DRAFT ENVIRONMENTAL IMPACT REPORT

SDSU Evolve Student Housing Project

SCH# 2024080979
January 2025

SDSU | San Diego State University

PREPARED FOR:

THE BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY
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Acronyms and Abbreviations

Acronym/ Abbreviation	Definition
AB	Assembly Bill
ACC	Advanced Clean Cars
ACM	asbestos-containing materials
ADT	average daily trips
AERMOD	American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model
AFY	acre-feet per year
amsl	above mean sea level
APE	Project area of potential effect
APSA	California Aboveground Petroleum Storage Act
BMP	best management practice
BUG	Backlight Uplight Glare
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalOSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERT	Community Emergency Response Team
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
City	City of San Diego
CMP	corrugated metal pipe
CMU	concrete masonry unit
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSS	Coastal Sage Scrub

Acronym/ Abbreviation	Definition
CSU	The California State University
CTR	California Toxics Rule
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel
DEHQ	Department of Environmental Health and Quality
DPM	diesel particulate matter
DWR	California Department of Water Resources
EIR	environmental impact report
EISA	Energy Independence and Security Act
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
ESA	Phase I Environmental Site Assessment
ESL	Environmental Screening Levels
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FMZ	fuel modification zone
FPP	Fire Protection Plan
FRAP	Fire and Resource Assessment Program
FTA	Federal Transit Administration
FTES	full-time equivalent student
GHG	greenhouse gas
GPD	gallons per day
GWP	global warming potential
HABS	Historic American Building Survey
HCD	Housing and Community Development
HCFC	hydrochlorofluorocarbon
HCP	habitat conservation plan
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HP	high-pressure
HRA	health risk assessment
HUC	hydrologic unit code
HVAC	heating, ventilation, and air conditioning
I	Interstate
IESNA	Illuminating Engineering Society of North America
IFC	International Fire Code
ips	inches per second
kWh	kilowatt-hour

Acronym/ Abbreviation	Definition
L_{90}	sound level exceeded 90% of the time
LBP	lead-based paint
LCD	liquid-crystal display
LDC	Land Development Code
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent continuous sound level
$L_{eq\text{-}h}$	hourly equivalent sound level
LID	low-impact development
LLG	Linscott, Law & Greenspan
LOS	level of service
LRA	Local Responsibility Areas
LUAG	Land Use Adjacency Guidelines
LZ	Lighting Zone
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MHPA	Multi-Habitat Planning Area
MM	Mitigation Measure
MMT	million metric tons
MS4	municipal separate storm sewer system
MSCP	San Diego Multiple Species Conservation Program
MT	metric tons
MTS	San Diego Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCAA	National Collegiate Athletic Association
NCCP	natural community conservation plan
NFPA	National Fire Protection Association
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Association
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NWS	National Weather Service
O_3	ozone
OA	Operational Area
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSFM	Office of the State Fire Marshal
PCB	polychlorinated biphenyls
PFC	perfluorocarbon
PPV	peak particle velocity
PRC	California Public Resources Code

Acronym/ Abbreviation	Definition
PV	photovoltaic
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCP	reinforced concrete pipe
REC	recognized environmental condition
RFS	Renewable Fuel Standard
RFW	Red Flag Warning
RHNA	Regional Housing Needs Assessment
RSL	regional screening level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE-1	Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCIC	Southern California Information Center
SCS	sustainable communities strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDC	Seismic Design Category
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric Company
SDPD	City of San Diego Police Department
SDSU	San Diego State University
SDUSD	San Diego Unified School District
SEP	State Emergency Plan
SF_6	sulfur hexafluoride
SIP	state implementation plan
SLCP	short-lived climate pollutant
SLF	Sacred Lands File
SO_2	sulfur dioxide
SO_x	sulfur oxides
SPCC	Spill Prevention, Control, and Countermeasures
SRA	State Responsibility Areas
SSC	Species of Special Concern
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TAZ	traffic analysis zone
TCA	Traditionally and Culturally Affiliated
TIS	Transportation Impact Study
TMDL	total maximum daily load
TPA	Transit Priority Area
UPD	San Diego State University Police Department
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture

Acronym/ Abbreviation	Definition
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VC	vitrified clay
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	Waste Discharge Requirement
WES	Wildfire Evacuation Study
WUI	wildland urban interface
WWTP	Wastewater Treatment Plant
ZAPP	Zoning and Parcel Information Portal
ZEV	zero-emission vehicle

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ES Executive Summary

This chapter provides a summary of the draft environmental impact report (Draft EIR) for the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project). This summary (a) addresses the purpose of the Draft EIR; (b) summarizes the Proposed Project's location, setting, and existing uses, Project description, and objectives; (c) identifies required permits and/or discretionary approvals; (d) summarizes in tabular form the environmental topics analyzed, resulting impacts, mitigation measures where applicable, and the level of significance before and after mitigation; (e) describes areas of controversy and issues to be resolved; and (f) summarizes reasonable alternatives to the Proposed Project.

ES.1 Document Purpose

This Draft EIR was prepared by the Board of Trustees of the California State University (CSU), acting as lead agency, to inform decision-makers and the public of the potential environmental effects associated with the Proposed Project. This Draft EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code [PRC] Section 21000 et seq.) and CEQA's implementing State Guidelines (CEQA Guidelines; Cal. Code Regs., tit. 14, §15000 et seq.) published by the Resources Agency of the State of California. CEQA Guidelines Section 15123 requires that the EIR summary identify each significant impact, recommended mitigation measures, and alternatives that would reduce or avoid the Project's significant impacts on the environment. The summary is also required to identify "areas of controversy," including issues raised by public agencies and the public, and "issues to be resolved," including the choice among alternatives and whether or how to mitigate the significant impacts of the Proposed Project. This Executive Summary was prepared consistent with the requirements of CEQA Guidelines Section 15123.

ES.2 Project Location

The site of the Proposed Project is the main SDSU campus, located approximately 10 miles east of downtown San Diego (See Figure 3-1, Regional Map and Figure 2-2, Vicinity Map). The Proposed Project is a student housing project consisting of two components -- the Peninsula Component and the University Towers East Component. The Peninsula component site is approximately 10.57-acres located at the northern terminus of 55th Steet, in northwest portion of the San Diego State University (SDSU) campus just south of Interstate-8 and west of Canyon Crest Drive (see Figure 2-3a, Project Site – Peninsula Component). The University Towers East component is approximately 1.1-acres located on Montezuma Road, on a site that is currently used as a parking lot (see Figure 2-3b, Project Site -- University Towers East Component).

The existing SDSU Campus Master Plan of record is depicted on Figure 2-4a, Existing Campus Master Plan and Figure 2-4b, Existing Campus Master Plan Legend. As part of the Proposed Project, the Campus Master Plan would be amended to include the new housing and related facilities (see Figure 2-5a, Proposed Campus Master Plan and Figure 2-5b Proposed Campus Master Plan Legend).

ES.3 Project Description

ES.3.1 Background and Proposed Project

Though historically known as a commuter campus, SDSU has, over the recent several years, constructed a number of student housing units both on and immediately near campus in an effort to provide increased housing availability for students attending the university. The Proposed Project represents SDSU's continuing efforts in this regard.

One of the primary objectives of the Proposed Project is to provide additional on-campus housing opportunities for all students. While demolition of the existing buildings within the Peninsula Component would remove 702 existing student beds, the construction of approximately 4,450 new student beds would result in a net increase of approximately 3,748 additional student beds on the Peninsula site. These additional beds would potentially be available to all student levels. The University Towers East Component would result in a new building with approximately 720 beds dedicated to primary first-year students. In total, development of the Proposed Project would result in approximately 5,170 new student beds, which is a net increase of approximately 4,468 student beds to the main campus inventory.

ES.3.2 Proposed Objectives

The overall goal of the Proposed Project is to enable an increased number of SDSU students the opportunity to live on the main SDSU campus. Specific Project objectives are as follows:

1. Expand the west campus student residential neighborhood in a manner similar to the student residential neighborhood on the east side of campus, to create housing that is inviting and safe, has a distinct identity, and provides students with supportive amenities such as a dining facility, community spaces, and study areas.
2. Provide food and support services in the immediate vicinity of the Proposed Project site for students to be housed in the new housing complexes.
3. Increase on-campus student housing options to the maximum degree possible for students currently housed off campus, thereby reducing the demand for student housing in the adjacent off-campus neighborhoods.
4. Replace outdated, low-density, inefficient student housing with more modern, attractive, and energy-efficient facilities.
5. Provide additional student housing on campus in an area that has the capacity to accommodate a large number of student housing beds and associated amenities, unencumbered by other uses that are not easily demolished or relocated.
6. Reduce vehicle miles traveled and related greenhouse gas emissions and increase the walkability of the SDSU campus by providing on-campus housing that includes a variety of student-friendly amenities situated within walking distance of the academic, athletic, and social centers of campus.
7. Take advantage of the limited available buildable area on an urban, built-out campus by maximizing density and number of student beds within the Project site.

ES.3.3 Required Permits and/or Approval

Implementation of the Proposed Project would require discretionary approvals by state and local agencies, as shown in Table ES-1, Project Approvals. Discretionary approvals would include certification of the adequacy of the Final Program EIR under CEQA, and approval and adoption of the Proposed Project by the CSU Board of Trustees.

Table ES-1. Project Approvals

Authorizing Jurisdiction or Agency	Action
California State University Board of Trustees	
Certification of the Final EIR under CEQA	Certification
Approval of the revised Campus Master Plan	Approval
Approval of Schematic Plans	Approval
Regional Water Quality Control Board – San Diego Region	
National Pollutant Discharge Elimination System Permit	Approval
San Diego Air Pollution Control District	
Authority to construct and/or permits to operate	Approval
City of San Diego	
Encroachment permits for construction within city rights-of-way, if necessary	Approval
Authority to connect to existing City-owned infrastructure, if necessary	Approval
Vacation of city rights-of-way, if necessary	Approval

ES.4 Summary of Environmental Impacts and Mitigation Measures

Table ES-2, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the potential significant environmental impacts expected to result with implementation of the Proposed Project, pursuant to the CEQA Guidelines Section 15123(b)(1). For a more detailed discussion of potential Project impacts, please see Chapter 4 of this EIR. Table ES-2 also lists the applicable mitigation measures recommended to reduce significant impacts, as well as the level of significance before and after mitigation is identified. As stated in Chapter 1 of this Draft EIR, the Initial Study prepared and circulated with the Notice of Preparation (NOP) for public review (see Appendix A) concluded that the Proposed Project would not result in significant impacts to agriculture and forestry resources or mineral resources; as a result, these topics are not addressed in the Draft EIR and not summarized in Table ES-2.

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Aesthetics			
Would the project have a substantial adverse effect on a scenic vista?	Less than Significant	N/A	N/A
Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	N/A	N/A
In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	N/A	N/A
Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on aesthetic resources?	Less than Significant	N/A	N/A
Air Quality			
Would the project conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	N/A	N/A
Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less than Significant	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	N/A	N/A
Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on air quality resources?	Less than Significant	N/A	N/A
Biological Resources			
Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant	**MM-BIO-1: Habitat Mitigation.** If California gnatcatcher is determined to be present within the Peninsula Study Area and/or the Peninsula Component site, impacts to disturbed Diegan coastal sage scrub beyond those impacts presently occurring due to existing brush management practices on the site shall be mitigated according to the requirements of MM-BIO-2. If California gnatcatcher is determined to be absent, and the Project would result in impacts to coastal sage scrube beyond those impacts presently occurring due to existing brush management practices, California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to Diegan coastal sage scrub, including brush management zones, by the conservation of non-occupied coastal sage scrub habitat at a 1:1 ratio. Conservation of habitat shall be by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County. The mitigation habitat shall include appropriate habitat for special-status reptiles with potential to occur on site. The mitigation habitat shall also	Significant and Unavoidable

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		support special-status plants, if found to occur on site, or be suitable for enhancement and planting of special-status plants. If surveys identify the presence of special-status plants that would be removed as part of the Project, CSU/SDSU, or its designee, shall implement a plant mitigation and monitoring plan to ensure the success of any enhancement, translocation, or restoration. **MM-BIO-2: Coastal California Gnatcatcher Surveys.** Coastal California Gnatcatcher: If the biological surveys presently being conducted determine the California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component site, and brush management is necessary beyond the scope of brush management presently being conducted on the site, California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to disturbed Diegan coastal sage scrub, including brush management zones, through conservation of California gnatcatcher-occupied Diegan coastal sage scrub. Mitigation shall be provided at a 2:1 ratio either by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County. If the surveys determine coastal California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component, CSU/SDSU shall consult with the U.S. Fish & Wildlife Service prior to the commencement of construction activities within suitable gnatcatcher habitat to determine if the Project needs to obtain a Section 7 or Section 10	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		permit. Additionally, if the surveys determine coastal California gnatcatcher is not present within the Peninsula Study Area and/or would not be affected by the Peninsula Component, no mitigation for the species is required, including this mitigation measure (MM-BIO-2) and related MM-BIO-7. **MM-BIO-3: Nesting Bird Survey(s).** If construction activity occurs during the breeding season (typically January 15 through September 15), California State University (CSU)/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to conduct a biological survey for nesting bird species protected by the federal Migratory Bird Treaty Act and California Fish and Game Code within 72 hours prior to construction. The survey shall be conducted within both the Peninsula Component site and the University Towers East Component site and a 300-foot buffer beyond each site. If any active nests are detected, the area shall be flagged and mapped on the construction plans along with a minimum of a 25-foot buffer and up to a maximum of 300 feet for raptors, as determined by the biologist, and such areas shall be avoided until the nesting cycle is complete as determined by the biologist. **MM-BIO-4: Construction Monitoring and Reporting.** To prevent inadvertent disturbance to areas outside the limits of grading, California State University (CSU)/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to monitor	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		all grading activities on both the Peninsula Component site and the University Towers East Component site. The biological monitor shall be contracted to perform biological monitoring during all grading, clearing, grubbing, and construction activities. The biological monitor shall perform the following duties: 1. Attend the preconstruction meeting with the contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds). 2. Conduct meetings with the contractor and other key construction personnel to describe the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife prior to clearing, grubbing, or grading. 3. Review and/or designate the construction area in the field with the contractor in accordance with the final grading plan prior to clearing, grubbing, or grading. 4. Supervise and monitor vegetation clearing, grubbing, and grading weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is intact. 5. Flush special-status species (i.e., avian or	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities. 6. Verify that the construction site is implementing the following stormwater pollution prevention plan best management practices: dust-control, silt fencing, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and weather-proof, prohibition of pets on the construction site, and a speed limit of 15 miles per hour during the daylight and 10 miles per hour during dark hours. 7. Periodically monitor the construction site after grading is completed and during the construction phase to see that artificial security light fixtures are directed away from open space and are shielded and to document that no unauthorized impacts have occurred. 8. Keep monitoring notes for the duration of the Project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources. 9. Prepare a monitoring report after the construction activities are completed, which describes the biological monitoring activities, including a monitoring log; photos of the site before, during, and after the grading and clearing activities; and a list of special-status species observed.	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-BIO-5: Invasive Species Prohibition. CSU/SDSU, or its designee, shall ensure that final landscape plans comply with the following provisions: (1) no invasive plant species as included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the Project region shall be included, and (2) the plant palette shall be composed of native species that do not require high irrigation rates. The Project biologist shall periodically check landscape products for compliance with this requirement. **MM-BIO-6: Construction Fencing.** To prevent inadvertent disturbance to sensitive vegetation and species within or adjacent to the sites, California State University (CSU)/San Diego State University (SDSU), or its designee, shall install fencing on both the Peninsula Component site and the University Towers East Component site prior to the commencement of construction activities. The fencing shall be placed to protect sensitive vegetation and species from inadvertent disturbance outside of the limits of grading, as well as in an effort to prevent unauthorized access into the canyon adjacent to the Peninsula site. **MM-BIO-7: Construction Noise Monitoring.** For any work proposed between February 1 and September 15, prior to start of construction activities, California State University (CSU)/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to conduct a pre-construction survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		location(s), and extent of occupied habitat on the Peninsula Component site. The pre-construction survey area for the coastal California gnatcatcher shall encompass all suitable habitats within the Peninsula Component site, as well as within a 300-foot buffer. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site feasible noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels $L_{eq\text{-}h}$ or preconstruction ambient noise levels, whichever is higher, during the breeding season, at any nest location(s. Noise monitoring and noise reduction techniques shall be implemented until the end of the nesting cycle for the detected nest as determined by the qualified biologist. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter equipment, adherence to equipment maintenance schedules, installation of temporary sound barriers, or shifting construction work away from occupied areas and/or further from the nest. **MM-BIO-8: Potential Mitigation for Operational Amplified Field Noise.** If amplified/elevated noise that would result in ambient noise level of above 60 A-weighted decibel average, or existing ambient noise level, whichever is higher, is anticipated from operational use (i.e. sporting/student/campus events) of the recreation fields, noise reduction techniques shall be implemented to ensure that amplified and/or elevated noise does not result in noise impacts to the	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		coastal California gnatcatcher. Prior to any such elevated and/or amplified field noise expected to occur between February 1 and September 15, California State University (CSU)/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to conduct survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat within a 300-foot buffer of the recreational field(s) within the Peninsula Component site. If no nest is detected, no further action is necessary. If a coastal California gnatcatcher nest is detected, SDSU or its designee shall implement feasible noise reduction techniques so that noise levels at the nest are not higher than 60 A-weighted decibels $L_{eq\text{-}h}$ or existing ambient noise levels, whichever is higher. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter sound equipment, focusing sound equipment eastward to avoid projection into the adjacent canyon, and/or installation of temporary sound barriers.	
Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant	**MM-BIO-1**, **MM-BIO-4**, **MM-BIO-5**, and **MM-BIO-6**	Less than Significant
Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct	No Impact	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
removal, filling, hydrological interruption, or other means?			
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant	**MM-BIO-1, MM-BIO-6**, **MM-BIO-7**, and **MM-BIO-8**	Less than Significant
Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	N/A	N/A
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	N/A	N/A
Would the project have a cumulative effect on biological resources?	Potentially Significant	**MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-4**, **MM-BIO-5**, **MM-BIO-6**, **MM-BIO-7**, and **MM-BIO-8**	Less than Significant
Cultural Resources and Tribal Cultural Resources			
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Potentially Significant	**MM-CUL-1: Prepare a Historic American Building Survey-Like Documentation.** The California State University (CSU)/San Diego State University (SDSU), or its designee, shall prepare of a Historic American Building Survey (HABS) Level III-like documentation for Mixquic Hall. All work shall be prepared by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or history. The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for a HABS Short Format. This mitigation measure is being	Significant and Unavoidable

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		proposed in compliance with CEQA and does not necessitate consultation or approval of the documentation by NPS or the State Historic Preservation Officer. The HABS-like short format document shall be limited to the following: • Digital photographs • Photograph index • Written Short Form for a HABS Level III using the NPS template Digital photographs shall be completed prior to issuance of any Project related permitting or construction. Photograph documentation shall be prepared according the 2024 NPS National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy. The photographer must be familiar with the NPS photograph policy. A minimum of 15 photographs must be taken. The photographer shall work with a qualified architectural historian to determine what shall be photographed, which shall include the overall parcel and all elevations of the building, existing setting, surrounding viewsheds, and character-defining details. No interior spaces (communal or private living spaces) are required. Photographs shall be indexed according to 2024 NPS National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy. The written documentation shall be printed on archival paper according to NPS standards for HABS documentation. Archival CD/DVD containing a PDF of the written documentation and photographs shall be produced according to NPS standards. Four digital	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		copies of the HABS documentation and photographs shall be prepared and distributed to the San Diego State University Special Collections & University Archives, City of San Diego's Digital Archives, Save Our Heritage Organisation, and the San Diego History Center.	
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant	**MM-CUL-2:** In the event that archaeological resources (sites, features, or artifacts) are exposed/uncovered during construction activities associated with the Project, the California State University/San Diego State University (CSU/SDSU), or its designee, shall immediately stop all construction work occurring within 50 feet of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas but shall be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. In such an event, a data recovery plan shall be developed by the qualified archaeologist in consultation with the CSU/SDSU and Native American representatives, if applicable. Ground disturbing work can continue in the area of the find only after impacts to the resources have been mitigated consistent with the data recovery plan.	Less than Significant Impact
Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	Potentially Significant	**MM-CUL-3**: In the event that any human remains are discovered during construction activities, the California State University/San Diego State University (CSU/SDSU), or its designee, shall contact the San Diego County Medical Examiner. Upon identification	Less than Significant Impact

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		of human remains, no further disturbance shall occur in the immediate area of the find until the County Medical Examiner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative to make recommendations regarding the proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until the opportunity to complete consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has occurred. All relevant provisions of California Public Resources Code Section 5097.98, CEQA Section 15064.5, and California Health and Safety Code Section 7050.5 shall be followed.	
Would the project have a cumulative effect on cultural resources?	Less than Significant	N/A	N/A
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	—	—	—

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Less than Significant	N/A	N/A
A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Potentially Significant	—	Less than Significant
Would the project have a cumulative effect on tribal cultural resources?	Potentially Significant	MM-CUL-4	Less than Significant
Energy			
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	N/A	N/A
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on energy resources?	Less than Significant	N/A	N/A
Geology and Soils			
Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-	No Impact	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?			
b. Strong seismic ground shaking?	No Impact	N/A	N/A
c. Seismic related ground failure including liquefaction?	No Impact	N/A	N/A
d. Landslides?	Less than Significant	N/A	N/A
Would the project result in substantial soil erosion or the loss of topsoil?	Less than Significant	N/A	N/A
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	N/A	N/A
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	N/A	N/A
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	N/A	N/A
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant	**MM-GEO-1:** Prior to commencement of any ground-disturbing activity on site, California State University (CSU)/San Diego State University (SDSU), or its designee shall retain a qualified paleontologist as defined by the 2010 Society of Vertebrate Paleontology guidelines, subject to the review and	Less than Significant Impact

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		approval of SDSU. The qualified paleontologist shall attend the preconstruction meeting and be on site during all rough grading and other significant ground-disturbing activities in previously undisturbed Eocene Mission Valley Formation and/or Stadium Conglomerate, late Pliocene to early Pleistocene San Diego Formation, or Pleistocene very old paralic deposits. In the event that paleontological resources (e.g., fossils) are unearthed during ground disturbing activities, the paleontological monitor will temporarily halt and/or divert grading activity in the impacted area to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow ground-disturbing activities to recommence in the impacted area. Upon completion of the paleontological monitoring program, the qualified paleontologist shall prepare a final monitoring report documenting the results of the mitigation program. This report is recommended to include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. Costs of laboratory processing and curation of any fossils recovered during the monitoring program are the responsibility of the Project applicant.	
Would the project have a cumulative effect on geology and soils resources?	Less than Significant	N/A	N/A
Greenhouse Gas Emissions			
Would the project generate greenhouse gas emissions, either directly or indirectly, that	Less than Significant	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
may have a significant impact on the environment?			
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on greenhouse gas emissions?	Less than Significant	N/A	N/A
Hazards and Hazardous Materials			
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant	**MM-HAZ-1: Pre-Demolition Hazardous Materials Abatement.** The California State University/San Diego State University, or its designee, shall ensure that demolition or renovation plans and contract specifications incorporate appropriate abatement procedures for the removal and where applicable delivery of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, petroleum and oil products, and universal waste items. Further, all abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), California Department of Public Health (which certifies lead paint workers), and the San Diego County Air Pollution Control District.	Less than Significant

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	**MM-HAZ-1**	Less than Significant
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant	**MM-HAZ-1**	Less than Significant
Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	N/A	N/A
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than Significant	N/A	N/A
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant	**MM-WLD-1**	Less than Significant
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Potentially Significant	**MM-WLD-3** through **MM-WLD-5**	Less than Significant

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project have a cumulative effect on hazards or hazardous materials?	Less than Significant	N/A	N/A
Hydrology and Water Quality			
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	N/A	N/A
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	N/A	N/A
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	—	—	—
e. result in substantial erosion or siltation on or off site;	Less than Significant Impact	N/A	N/A
f. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	Less than Significant	N/A	N/A
g. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant	N/A	N/A
h. impede or redirect flood flows?	No Impact	N/A	N/A
In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants	No Impact	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
due to project inundation?			
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on hydrology or water quality resources?	Less than Significant	N/A	N/A
Land Use and Planning			
Would the project physically divide an established community?	Less than Significant	N/A	N/A
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on land use resources?	Less than Significant	N/A	N/A
Noise			
Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant	**MM-NOI-1: Temporary Construction Noise Reduction (University Towers East Component).** The California State University/San Diego State University, or its designee, shall implement one or more of the following noise reduction measures, as necessary, in order to achieve on-site noise control and sound abatement that, in the aggregate, would result construction noise levels below the applicable threshold of 75 decibels (dB) at the closest noise-sensitive receptor during each phase of the construction of Phase 1b: • ***Administrative controls*** (e.g., reduce	Less than Significant

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		operating time of equipment and/or prohibit usage of equipment type[s] within certain distances to a nearest receiving occupied off-site property). • **Engineering controls** (change equipment operating parameters [e.g., speed, capacity] or install features or elements that otherwise reduce equipment noise emission [e.g., upgrade engine exhaust mufflers]). • ***Install noise abatement*** on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary solid barriers of at least 9 feet tall to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern. ○ For example, suspended sound blankets, field-erected plywood sheeting, or comparable temporary solid (or flexible but sufficiently massive) barriers (of minimum sound transmission class rating of 25, which per California Department of Transportation guidance indicates would permit up to 8 dB of expected barrier insertion loss) would occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		receptor(s) of concern. ○ Temporary barriers shall adhere to a minimum height standard of 9 feet to serve as an effective deterrent against noise pollution and shielding for adjoining off-site receptors.	
Would the project result in generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	N/A	N/A
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on noise resources?	Less than Significant	N/A	N/A
Population and Housing			
Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	**MM-POP-1:** Following approval of the Proposed Project, California State University/San Diego State University (SDSU) will promptly submit the following information to SANDAG and the City of San Diego and request that the information be incorporated into SANDAG's regional housing inventory. • The Evolve Student Housing Project would add approximately 4,468 beds to the existing SDSU housing inventory (3,748 within Census Tract 28.01 and 720 within Census	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		Tract 28.04), thereby resulting in an increase in available housing units to the College Area Community. SANDAG and the City of San Diego can and should consider this information in preparing the next update to SANDAG's regional forecasts, local housing elements, policies, land use designations, incentive programs and regulatory processes intended to accommodate future housing demand.	
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on housing and/or population resources?	Less than Significant	N/A	N/A
Public Services and Recreation			
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
Fire protection?	Less than Significant	N/A	N/A
Police protection?	Less than Significant	N/A	N/A
Schools?	No Impact	N/A	N/A
Parks?	Less than Significant	N/A	N/A
Other public facilities?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on public services resources?	Less than Significant	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant	N/A	N/A
Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on recreation resources?	Less than Significant	N/A	N/A
Transportation			
Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than Significant	N/A	N/A
Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Less than Significant	N/A	N/A
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	N/A	N/A
Would the project result in inadequate emergency access?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on transportation resources?	Less than Significant	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Utilities and Service Systems			
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	N/A	N/A
Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less than Significant	N/A	N/A
Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	N/A	N/A
Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	N/A	N/A
Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on utilities and/or service systems resources?	Less than Significant	N/A	N/A

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
Wildfire			
Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Potentially Significant	**MM-WLD-1:** Prior to occupancy of the first housing unit to be constructed as part of the Proposed Project, California State University (CSU)/San Diego State University (SDSU) or its designee shall implement a Wildfire Education Program (WEP). The Program would provide targeted outreach to residents living in a fire risk area in order to foster a community that has fire adaptive capacity. The educational program would cover a wide range of information such as residential evacuation planning, activities in a fire risk area, and more, all provided in easy-to-understand, graphically based materials. The educational program would be based on a layered approach to wildfire awareness that includes both passive and active features. The program would be ongoing in order to maintain high wildfire awareness even as the community grows and evolves. The program would feature bi-annual email and/or mailers, a custom website, including accessibility on the University's Office of Emergency Services website, webinars, and a new resident packet. In addition, the University Office of Housing Administration would identify a Fire Safety Coordinator that is responsible for: i. Preparing and distributing the annual reminder notice that shall be provided to each occupant encouraging them to review the WEP and be familiar with community evacuation protocols. ii. Coordination with local fire agencies to hold an	Less than Significant

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		annual fire safety and evacuation preparedness informational meeting for occupants. The meeting should be attended by representatives of appropriate fire agencies and important fire and evacuation information should be reviewed. iii. Maintaining fire safety information on the development's website, including the WEP and materials from the "Ready, Set, Go!" Program.	
Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Potentially Significant	**MM-WLD-2:** Concurrent with commencement of construction activities, prior to the start of import of combustible construction materials, and continuing throughout construction, California State University (CSU)/San Diego State University (SDSU) or its designee, shall implement vegetation management requirements pursuant to the Fire Protection Plan (FPP) and Office of the State Fire Marshal's (OSFM) These requirements include adequate fuel breaks around all grading, site work, and other construction activities in areas where there is flammable vegetation and combustible construction materials shall not be brought on-site without prior OSFM approval, or San Diego Fire Department approval should the OSFM decide to delegate the responsibility. **MM-WLD-3:** If biological constraints prevent implementation of full code-compliant Fuel Modification Zones (FMZs), prior to the commencement of construction activities, CSU/SDSU, or its designee, shall revise the Fire Protection Plan (FPP) to include alternative materials	Less than Significant

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		and methods of construction, alternative materials and methods (AM&Ms) of construction with justification of fire hardening that meets or exceeds the intent of a full 100 feet of fuel modification, such as a concrete masonry unit (CMU) fire wall, higher rated fire resistant siding, dual paned tempered glass windows, or other code exceeding measures. The updated FPP that describes the AM&Ms and justification shall be submitted to San Diego Fire and Rescue Department. MM-WLD-4: Following completion of Project construction, CSU/SDSU, or its designee shall To confirm that the Project's FMZs and landscape areas are being maintained according to the FPP and the OSFM's fuel modification guidelines, the Proposed Project's managing entity would obtain an FMZ inspection and report from a qualified inspector by May 31 of each year certifying that vegetation management activities throughout the Project Site have been performed. If the FMZ areas are not compliant, the Project's managing entity will have a specified period to correct any noted issues. MM-WLD-5: The widths of the irrigated Zone A are proposed to be extended beyond the 30-foot-wide requirement. The Zone A fuel modification zone for the Proposed Project would be at least 35 feet wide and would be up to over 100 feet in width. The Proposed Project's Zone A would consist of irrigated landscaping of fire-resistant, frequently maintained vegetation as well as non-combustible roads and walkways including the	

Table ES-2. Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact?	Mitigation Measure(s)	Level of Significance After Mitigation
		26-foot-wide looping fire road. Zone A conditions result in a greater reduction in fire behavior than Zone B conditions, which means that there would be greater reduction in fire behavior per foot of fuel modification compared to a traditional FMZ. **MM-WLD-6:** During construction of the Peninsula Component Building, 4, CSU/SDSU, or its designee shall utilize dual pane windows on the first 4 floors starting from ground level which is within 100 feet of natural fuels. Both panes shall be tempered glass to mitigate for a reduced fuel modification zone.	
Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Potentially Significant	**MM-WLD-2**	Less than Significant
Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than Significant	N/A	N/A
Would the project have a cumulative effect on wildfire?	Less than Significant	N/A	N/A

ES.5 Areas of Controversy/Issues to be Resolved

CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. Pursuant to CEQA Guidelines Section 15082, SDSU circulated an Initial Study (IS) and Notice of Preparation (NOP) dated August 23, 2024, to interested agencies, organizations, and individuals. The IS/NOP was also sent to the State Clearinghouse at the California Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research). The State Clearinghouse assigned a state identification, or clearinghouse number (SCH No. 2024080979) to this Draft EIR.

The IS/NOP is intended to encourage interagency communication regarding the proposed Project so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR to be prepared. Two public scoping meetings were held—one at the SDSU campus on September 4, 2024, and one via video conference on September 5, 2024—to gather additional public input. The NOP was published in a newspaper of general circulation (San Diego Union-Tribune), posted in the County Clerk's office, and mailed to all interested parties via registered mail. Interested agencies and persons had 30 days from receipt of the NOP to submit written comments.

Comments received during the NOP public scoping period were considered during preparation of this Draft EIR. The NOP and all comments received by SDSU, as well as a table summarizing the comments, are included in Appendix A to this Draft EIR.

Section 15123(b)(2) of the CEQA Guidelines requires that areas of controversy known to the lead agency be stated in the EIR summary. To determine the number, scope, and extent of the environmental topics to be addressed in this EIR, SDSU prepared an NOP and Initial Study and circulated them to interested public agencies, organizations, community groups, and individuals in order to receive input on the scope of the issues to analyze in the EIR as it relates to the Proposed Project. SDSU also held a scoping/public information meeting to obtain agency and public input on the Proposed Project. Based on the NOP and Initial Study scoping process and comments received, the areas of controversy and issues addressed in the Draft EIR include the following (the EIR section that addresses the issue is provided in parentheses):

1. Visual effects of 13 story buildings, light and glare (Section 4.1, Aesthetics)
2. Air quality impacts from demolition and construction (Section 4.2, Air Quality)
3. Biological resource impacts, including direct and indirect impacts to the adjacent Multi-Habitat Planning Area (MHPA) and consistency with the City's Land Use Adjacency Guidelines (LUAG)[1] (Section 4.3, Biological Resources)
4. Energy efficiency (Section 4.5, Energy)
5. Soil stability, runoff, and erosion impacts (Section 4.6, Geology and Soils and Section 4.9, Hydrology and Water Quality)
6. Increase in greenhouse gas emissions (GHG), heat island effect (Section 4.7, Greenhouse Gas Emissions)
7. Hazardous materials mixed with imported materials and demolition, hazardous waste, contaminated soils, emergency evacuation (Section 4.8, Hazards and Hazardous Materials)

8. Zoning consistency[1], campus boundaries, MSCP consistency (Section 4.10, Land Use and Planning)
9. Long-term construction noise, potential noise impacts to surrounding uses (Section 4.11, Noise)
10. Type of student housing, existing housing capacities, baseline student housing data, relationship of the Proposed Project to proposed housing planned at SDSU Mission Valley (Section 4.12, Population and Housing)
11. Impacts to public services and parks, including for a suggested need for a new fire station (Section 4.13, Public Services and Recreation)
12. Impacts associated with traffic and parking, bicycle infrastructure, evacuation, construction traffic (Section 4.14, Transportation)
13. Impacts from natural gas utilities, infrastructure upgrades (Section 4.15, Utilities and Service Systems)
14. Wildfire evacuation, fire hazards, wildfire prevention and safety (Section 4.16, Wildfire)
15. Alternatives (Section 6, Alternatives)

Based on the scope of the proposed action as described in the NOP and the comments received from the public, the following issues were determined to be potentially significant and, therefore, are addressed in Chapter 4, Environmental Analysis, of this EIR:

- Section 4.1, Aesthetics
- Section 4.2, Air Quality
- Section 4.3, Biological Resources
- Section 4.4, Cultural Resources and Tribal Cultural Resources
- Section 4.5, Energy
- Section 4.6, Geology and Soils
- Section 4.7, Greenhouse Gas Emissions
- Section 4.8, Hazards and Hazardous Materials
- Section 4.9, Hydrology and Water Quality
- Section 4.10, Land Use and Planning
- Section 4.11, Noise
- Section 4.12, Population and Housing
- Section 4.13, Public Services and Recreation
- Section 4.14, Transportation
- Section 4.15, Utilities and Service Systems
- Section 4.16, Wildfire

Of the environmental topics analyzed in Chapter 4, the following were determined to have potentially significant impacts requiring mitigation:

- Aesthetics
- Air Quality

1 SDSU is a state entity and not required to comply with a local agency's underlying zoning.

- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Transportation
- Wildfire

Of the environmental topics determined to have potentially significant impacts requiring mitigation, the following impact category was determined to have significant and unavoidable impacts:

- Biological Resources
- Cultural Resources and Tribal Cultural Resources

Impacts related to two CEQA-mandated environmental issue areas agricultural resources and mineral resources -- were determined no impact/less than significant as part of the NOP process. Accordingly, these environmental impact categories are not discussed in detail in this Draft EIR. See Chapter 5, Other CEQA Considerations.

ES.6 Summary of Project Alternatives

Section 15126.6 of the CEQA Guidelines identifies the parameters within which consideration and discussion of alternatives to a project should occur. Alternatives should be limited to those that would avoid or substantially lessen any of the significant effects of the project and could feasibly attain most of the basic objectives of the project. The rationale for selecting the alternatives to be evaluated and a discussion of the No Project Alternative are also required.

The EIR identifies four project alternatives in addition to the No Project Alternative developed during the planning phase of the Proposed Project.

1. "No Project Alternative." This alternative is required by CEQA, and it compares the present existing condition of the Project site against the potential impacts that would result from implementation of the Proposed Project. Under this alternative, the buildings at the Peninsula Components site and the existing parking lot at the University Towers East Component site would remain in their existing condition and no student housing would be built.
2. "Historic Preservation Alternative." This alternative would retain the historic Mixquic Hall within the Peninsula Component site and the remainder of the Peninsula Component site would be developed with the Amenity Building, the 9-story building and five towers. Under this alternative, the University Towers East Component would be developed as planned under the Proposed Project. Under this alternative, 3,752 student housing beds would be provided.
3. "Gnatcatcher Avoidance Alternative." This alternative would eliminate construction activities within 300 feet of the edge of coastal sagebrush habitat which would avoid impacts to the coastal California gnatcatcher. This would result in a buildable site of 1.09 acre on the Peninsula Site. Given the small size

of this area, only a single residential building could be constructed in the area proposed to support the Amenity Building. The University Towers East Component would be developed as envisioned in the Proposed Project under this alternative.

4. "Reduced Height Alternative." This alternative would reduce the height of the buildings on the Peninsula Component site. Instead of the proposed 13 stories, the six towers on the Peninsula Component site would be 7 stories tall. The 9-story building would be 5 stories, instead of the 9 stories under the Proposed Project. A corresponding fewer number of student housing units (i.e., beds) would be developed under this alternative.
5. "Alternative Site Locations Alternative." This alternative would place the buildings planned by the Proposed Project at multiple alternative locations throughout the campus. Under this alternative, buildings would be dispersed across multiple sites instead of all within the Peninsula and University Towers East Component sites.

Table ES-3, Alternatives Matrix – Impacts Comparison, provides a summary of the impacts of each alternative as it compares to the Proposed Project. As explained in the table notes, down arrows indicate impacts that would be less than the Proposed Project, up arrows indicate impacts that would be greater than the Proposed Project, and horizontal lines indicate impacts that would be similar to the Proposed Project. The analysis determined that the environmentally superior alternative is the Gnatcatcher Avoidance Alternative.

Table ES-3. Alternatives Matrix - Impacts Comparison

	No Project Alternative	Historic Preservation Alternative	Gnatcatcher Avoidance Alternative	Reduced Height Alternative	Alternative Site Locations Alternative
Aesthetics	↓	=	↓	=	↓
Air Quality	↑	↓	↑	↓	=
Biological Resources	↓	=	↓	=	↓
Cultural Resources and Tribal Cultural Resources	↓	↓	↓	=	↓
Energy	↓	=	↓	↓	=
Geology and Soils	↓	=	↓	=	↓
Greenhouse Gas Emissions	↑	↑	↑	↑	=
Hazards and Hazardous Materials	↓	=	=	=	=
Hydrology and Water Quality	↑	=	=	=	↑
Land Use and Planning	=	=	=	=	=
Noise	↓	=	=	↓	=
Population and Housing	↑	↑	↑	↑	=
Public Services and Recreation	↓	=	↓	↓	=
Transportation	↑	↑	↑	↑	=

Table ES-3. Alternatives Matrix - Impacts Comparison

	No Project Alternative	Historic Preservation Alternative	Gnatcatcher Avoidance Alternative	Reduced Height Alternative	Alternative Site Locations Alternative
Utilities and Service Systems	↓	↓	↓	↓	=
Wildfire	↑	↑	↑	=	↓

Notes:
↓= Less impacts than the Proposed Project
↑ = Greater impacts than the Proposed Project
= = Similar impacts to the Proposed Project

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1 Introduction and Existing Environmental Setting

This chapter provides an overview of the organization and content of this Draft Environmental Impact Report (EIR) prepared for the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the California State University (CSU) policies and procedures. In addition, this chapter summarizes the existing Project site and location; briefly describes the Proposed Project; provides an overview of the existing environmental setting, background, history, and planning context; and discusses the Proposed Project's environmental review procedures.

1.1 Draft Environmental Impact Report Organization and Content

This Draft EIR provides an analysis of the potentially significant environmental impacts, feasible mitigation measures, and reasonable alternatives associated with the Proposed Project. All elements of the Proposed Project are analyzed at a "project" level of review for CEQA purposes; as such, no further environmental review pursuant to CEQA is, or would be, required prior to construction, development, and implementation of the full Project.

To describe the significant direct, indirect, and cumulative impacts, and mitigation measures where applicable, as well as alternatives to the Proposed Project, this Draft EIR is organized as follows:

- **Executive Summary** summarizes the conclusions of the environmental impact analysis presented in this Draft EIR, including a summary of the Proposed Project's impacts as compared to the alternatives analyzed in this Draft EIR. The Executive Summary also includes a table summarizing all significant environmental impacts identified in this Draft EIR, along with the associated mitigation measures proposed to reduce or avoid each impact.
- **Chapter 1, Introduction and Existing Environmental Setting**, provides an overview of the Draft EIR, introducing the Proposed Project, applicable environmental review procedures, and format of the Draft EIR.
- **Chapter 2, Project Description**, provides the Project location, Project background and objectives, existing uses, need for the Project, detailed description of the Proposed Project components and phasing, and required discretionary approvals.
- **Chapter 3, Cumulative Methods and Projects**, provides a summary of the methodology and past, present, and reasonably foreseeable potential cumulative projects that are analyzed in conjunction with the Proposed Project in each of the environmental topical sections in Chapter 4 to evaluate cumulative impacts.
- **Chapter 4, Environmental Analysis**, in separate topical sections, provides an analysis of the potentially significant environmental impacts identified for the Project, as well as proposed mitigation measures, where applicable, to reduce or avoid potentially significant impacts where feasible.

- **Chapter 5, Other CEQA Considerations**, discusses the growth-inducing impacts of the Proposed Project, the environmental impact categories determined to result in no impacts and not addressed further in this Draft EIR, environmental areas where significant environmental effects cannot be avoided (i.e., significant unavoidable impacts), any significant irreversible environmental changes resulting from Project implementation, and Mandatory Findings of Significance pursuant to Section 15065(a)(1) of the CEQA Guidelines.
- **Chapter 6, Project Alternatives**, discusses four alternatives to the Proposed Project, including the No Project Alternative, Historic Preservation Alternative, Reduced Height Alternatives, and an Alternative On-Campus Locations Alternative.
- **Chapter 7, List of Preparers**, lists all individuals and related affiliations who participated in preparation of this Draft EIR.

The Draft EIR appendices include technical studies and related support materials prepared for the Project, as listed in the Draft EIR Table of Contents.

1.2 Description of Existing Site and Proposed Project

1.2.1 Site Location

The Proposed Project consists of two separate development components: the Peninsula Component and the University Towers East Component (see Figure 2-2, Vicinity Map, in Chapter 2).

The Peninsula Component site is located at the northern terminus of 55th Street. The existing site consists of eight, two-story apartment-style student housing buildings; a three-story apartment-style student housing building; the SDSU International Center complex; the SDSU Passport Office; the SDSU Global Education Office; and associated amenities (e.g., parking spaces, sidewalks, landscaped areas).

The University Towers East Component site is east and immediately adjacent to the existing University Tower building on Montezuma Road. The site presently consists of a parking lot for University Towers, which is immediately east of the Project site.

1.2.2 Proposed Project Summary

The Proposed Project would involve the construction and development of new student housing and related support facilities on SDSU's main campus. A detailed description of the Proposed Project is provided in Chapter 2 of this Draft EIR. The following is a brief summary of the Project.

The proposed Peninsula Component would be located on an approximately 10.57-acre site in the northwest portion of campus, just south of Interstate 8 and west of Canyon Crest Drive. Development of the Peninsula Component would include demolition of all 13 existing buildings, which presently provide housing for 702 students, and the subsequent phased development of one 9-story student housing building and five student housing buildings up to 13 stories in height that would contain a total of approximately 4,450 student beds. The proposed University Towers East Component would be developed on an approximately 1.1-acre site located immediately east of the existing University Towers building, south of Montezuma Road. The existing parking lot adjacent to University Towers would be demolished to allow for redevelopment of the site to include a new nine-story student housing building that would accommodate approximately 720 student beds. Development of the Proposed Project would result in approximately 5,170 new student beds, a net increase of approximately 4,468 student beds to the main campus inventory.

Phase 1A of the Proposed Project development would involve removal of five existing buildings on the Peninsula Component site and construction of the proposed 9-story apartment building and the Amenity Building. Phase 1B would consist of construction of the University Towers East Building. All Project elements in Phase 1 would begin construction in 2025. Phases 2 through 6 would involve construction of the apartment-style buildings proposed at the Peninsula Component site. Removal of existing buildings would occur phase by phase as space is needed to accommodate the proposed new buildings. See Table 2-3, Construction Phasing Plan, and Figures 2-10a through 2-10g, Construction Phasing Plan, in Chapter 2. Upon completion, the Proposed Project would consist of eight new buildings. One building would serve as an amenity building (two stories), and the remainder of the buildings would consist of student housing.

For further information and details regarding the Proposed Project, please refer to Chapter 2.

1.3 Environmental Procedures

1.3.1 California Environmental Quality Act Compliance

CEQA (California Public Resources Code, Section 21000 et seq.) requires the preparation and certification of an EIR for any project that a lead agency determines may have a significant effect on the environment. The Board of Trustees for the CSU is the lead agency in this case, responsible for approving and carrying out the Proposed Project in conjunction with SDSU. This Draft EIR was prepared in compliance with all criteria, standards, and procedures of CEQA and the State CEQA Guidelines (14 CCR 15000 et seq.) and was prepared as a project EIR (pursuant to CEQA Guidelines Section 15161).

1.3.2 Overview of the Environmental Impact Report Process

This Draft EIR is being made available to members of the public, agencies, and interested parties for a 45-day public review period in accordance with CEQA Guidelines Section 15105. Public review of the Draft EIR is intended to "focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (14 CCR 15204).

A Notice of Completion of the Draft EIR has been filed with the State Office of Land Use and Climate Innovation as required by CEQA Guidelines Section 15085. In addition, the Notice of Availability of the Draft EIR has been distributed pursuant to CEQA Guidelines Section 15087. This Draft EIR is available for public review and comment during the 45-day public review period and may be accessed at the following locations:

- SDSU website: https://bfa.sdsu.edu/campus/facilities/planning/eir
- SDSU Love Library, 5500 Campanile Drive, San Diego, California, 92182
- College-Rolando Public Library, 6600 Montezuma Road, San Diego, California, 92115

Once the 45-day public review period has concluded, the CSU Board of Trustees will review all public comments on the Draft EIR, provide written responses to all comments, and authorize revisions to the Draft EIR text, if necessary. A Mitigation Monitoring and Reporting Program will be incorporated into the Final EIR, and it will include monitoring team qualifications, specific monitoring activities, a reporting system, and criteria for evaluating the success of the mitigation measures. Mitigation measures contained in this Draft EIR were developed in consideration of future monitoring requirements and written in sufficient detail to address impacts of the Proposed Project, referencing the appropriate implementing permits and plans. The Final EIR will include all comment letters received on the Draft EIR; responses to comments; a Final EIR preface; and, if applicable, edits made to this Draft EIR as a result of public review.

1.3.3 Scope of the Environmental Impact Report

This Draft EIR evaluates the potential short-term (during construction), long-term (post-construction), direct, indirect, and cumulative environmental impacts associated with construction and operation of the Proposed Project. As previously described, the Proposed Project would consist of development of two new housing complexes on the main SDSU campus, which would provide additional student housing, dining, and auxiliary uses.

2 Project Description

2.1 Introduction

2.1.1 Purpose

The purpose of this section is to describe the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) for the public, reviewing agencies, and decision makers. Pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code Section 21000 et seq., CEQA Guidelines Section 15124, an adequate Project description is to contain the following information:

1. the precise location and boundaries of the Proposed Project, shown on a detailed map, along with a regional map of the Project location;
2. a statement of the objectives of the Proposed Project, which should include the underlying purpose of the Project;
3. a general description of the Project's technical, economic, and environmental characteristics; and
4. a statement briefly describing the intended uses of the environmental impact report (EIR).

An adequate project description should not supply extensive detail beyond the information necessary to evaluate and review the proposed project's environmental effects (CEQA Guidelines Section 15124). This section describes the Proposed Project, including its location, objectives, and characteristics, and the intended uses of this environmental document. The Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, is the lead agency responsible for certifying the adequacy and completeness of this Draft EIR, including Project Description, and considering approval of the Proposed Project.

2.1.2 Overview of Project Description

The Proposed Project is the construction and development of new student housing, dining, and ancillary uses on SDSU's main campus. The Proposed Project is comprised of two components: the Peninsula Component, which would be located at the northern terminus of 55th Street, and the University Towers East Component, which would be located immediately east of the existing University Towers on Montezuma Road (see Figure 2-1, Regional Map, and Figure 2-2, Vicinity Map).

The proposed Peninsula Component would be located on an approximately 10.57-acre site, just south of Interstate (I) 8 and west of Canyon Crest Drive. Development of the Peninsula Component would include demolition of 13 existing buildings that currently provide 702 student beds, and the phased redevelopment of the site with one 9-story student residential building and five student residential buildings up to 13 stories in height, collectively providing a total of approximately 4,450 student beds.

The proposed University Towers East Component would be developed on an approximately 1.1-acre site immediately east of the existing University Towers Building, south of Montezuma Road. An existing surface parking lot would be demolished to allow for redevelopment of the site with a new 9-story student residential building that would accommodate approximately 720 student beds.

Overall, development of the Proposed Project would result in approximately 5,170 new student beds, a net increase of approximately 4,468 student beds on the campus.

By providing additional on-campus housing, the Proposed Project is largely oriented around the environmental co-benefits of co-locating student housing on campus where the student's educational needs are served. By increasing student housing opportunities on the SDSU main campus through the development of residence halls, the Proposed Project simultaneously would reduce vehicle miles traveled (VMT) and related GHG emissions attributable to student commute patterns while providing students with a living environment enhancing student life on campus.

2.1.3 Project Location and Setting

The SDSU campus is located along the I-8 corridor, approximately 8 miles from downtown San Diego (see Figure 2-1 and Figure 2-2). The campus is located within the College Area Community of the City of San Diego. The College Area Community is characterized by SDSU as a major hub of activity, single and multi-family residential uses and neighborhood commercial developments that serve the surrounding community, including SDSU.

The proposed Peninsula Component would be located within the approximately 10.57-acre site at the northern terminus of 55th Steet, in the northwest portion of campus just south of Interstate-8 and west of Canyon Crest Drive (see Figure 2-3a, Project Site – Peninsula Component). The proposed University Towers East Component would be located on an approximately 1.1-acre site on Montezuma Road that is currently utilized as a parking lot (see Figure 2-3b, Project Site -- University Towers East Component).

The SDSU campus can be accessed from the north by College Avenue, which also provides local access to I-8. The campus can be accessed from the east or west by Montezuma Road, an east–west roadway near the southern boundary of the campus, and accessed from the south via College Avenue.

2.1.4 Project Information

Information pertinent to the Proposed Project, including the Project title, lead agency for the Project, Project sponsor, Project contact person, and level of environmental analysis to be conducted for the Proposed Project, is provided below.

Project Title

SDSU Evolve Student Housing Project

Lead Agency

The Board of Trustees of the California State University
401 Golden Shore, 6th Floor
Long Beach, California 90802
562.951.4020

Project Sponsor

San Diego State University
Business and Financial Affairs

Facilities Planning, Design, and Construction
5500 Campanile Drive
San Diego, California 92182–1624
619.594.6619

Contact Person

Kara Peterson, Director of Planning
Planning, Design, and Construction
San Diego State University
5500 Campanile Drive
San Diego, California 92182–1624
619.594.6619

Level of Environmental Review

The Draft EIR analyzes the Proposed Project at the "project" level of review. The Draft EIR examines all phases of development and operation of the Proposed Project; no further CEQA review will be required prior to Project implementation.

2.2 Project Area History and Existing Conditions

2.2.1 SDSU Campus

Founded as a state college in 1897, SDSU initially occupied a single building in downtown San Diego. In February 1930, the SDSU campus was moved to its present location atop Montezuma Mesa and was operated from seven buildings surrounding what is still referred to as the "Main Quad." Expansion of the campus initially occurred to the north and southeast. Gradually, the canyon areas were filled with ancillary uses, including sporting and entertainment venues, as well as parking lots.

By the early 1960s, primarily due to parking concerns and a lack of established functional campus areas, a comprehensive planning effort was deemed necessary for the future expansion of SDSU. The first SDSU campus master plan was prepared by Frank L. Hope and Associates and was approved by the Board of Trustees of the CSU in 1963. The 1963 master plan contained a planned land use map, outlined directives for facility placement, and provided target square footage for academic, support, and athletic spaces. An update to the 1963 campus master plan was completed in 1967, and a number of primarily minor revisions were made to the plan throughout the 1970s.

The SDSU Campus Master Plan has undergone several major revisions over the last 30 years. Beginning in 1997, SDSU embarked on a comprehensive two-phase master planning effort, which resulted in a significant update to the prior master plan efforts. Phase I of the process involved the preparation of a physical master plan, which documents SDSU's existing conditions and outlined proposed policies and guidelines to maintain and enhance the character, form, and function of the campus. Phase II of this process evolved into two distinct planning programs: the SDSU Aztec Walk Master Plan (approved in 1999) and the SDSU Campus Master Plan 2000 (approved in 2001).

Components of the Aztec Walk Master Plan included the consolidation and redevelopment of SDSU's athletic, recreational, and student housing resources. Replacement locations for parking facilities were also included. The Campus Master Plan 2000 consisted of a comprehensive, campus-wide buildout strategy. This master plan proposed the redevelopment of several classrooms, offices, research, and student buildings and facilities, and the development of several new buildings: a physical plant and yard, parking structure, and central campus park area.

The 2007 Campus Master Plan Revision provided the framework for implementing SDSU's long-term goals and programs for the campus by identifying needed buildings, facilities, improvements, and services to support campus growth and development from 25,000 full-time equivalent students to a new enrollment of 35,000 full-time equivalent students. To accommodate the projected student increase, the 2007 Campus Master Plan Revision included the near-term and long-term development of classroom, student housing, faculty/staff housing, and research and student support facilities on land located throughout the SDSU central campus, Alvarado, and Adobe Falls areas (SDSU 2007).[1]

In May 2011, the Board of Trustees approved the Plaza Linda Verde (now South Campus Plaza) mixed-use development project along with related revisions to the Campus Master Plan. Likewise, in September 2017, the Board of Trustees approved the New Student Housing Project. The New Student Housing Project also included revisions to the Campus Master Plan. Since that time, there have been several minor revisions to the Campus Master Plan, most recently in June 2018.

The current Campus Master Plan is depicted on Figure 2-4a, Existing Campus Master Plan, and Figure 2-4b, Existing Campus Master Plan Legend. As part of the Proposed Project, the Campus Master Plan would be further revised to accommodate the new housing and related facilities (see Figure 2-5a, Proposed Campus Master Plan, and Figure 2-5b, Proposed Campus Master Plan Legend).

2.2.2 Existing On-Site Uses

Peninsula Component

The Peninsula Component site currently contains eight two-story apartment-style student residential buildings that are known as Metepec, Zapotec, Toltec, Mixquic, Zacatapec (made up of three buildings), and Huaxtepec, and. a three-story apartment-style student residential building known as Tarastec; the SDSU International Affairs complex, which includes the International Student Center, the SDSU Passport Office, the SDSU Global Education Office, and the SDSU Faculty International Engagement Office, along with associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). Table 2-1 provides a summary of the existing buildings, square footages, and number of floors, student beds, and parking stalls on the proposed Peninsula Component site. As shown on Table 2-1, the existing student residential buildings at the Peninsula Component site provide 702 student beds.

Surrounding uses include open space and residential housing to the west; open space, I-8, and residential neighborhoods to the north; and university uses including parking, recreational fields, academic buildings, and student residential buildings to the east, south, and southwest of the Peninsula Component site.

1 Following litigation, the CSU Board of Trustees reapproved the 2007 Campus Master Plan and related student enrollment increase in May 2018.

University Towers East Component

The University Towers East Component site is currently utilized as a surface parking lot for University Towers, which is located immediately east of the Project site. The existing parking lot provides 125 parking stalls (see Table 2-1). Surrounding uses include residential neighborhoods of predominantly single-family homes to the east, south and west. The site is bordered on the south by Mary Lane Drive, which separates the site from the adjacent single-family residences. Montezuma Road and other university uses, including student housing and recreational fields north of the Project site.

Table 2-1. Existing Uses Summary

	Number of Individual Buildings	Approximate Building Area (Square Feet)	Floors	Student Beds	Parking Stalls
Peninsula Component					
Zacatepec	3	63,004	2	206	278*
Mixquic	1	16,280	2	62	N/A
Toltec	1	36,116	2	94	N/A
Zapotec	1	31,274	2	120	N/A
Metepec	1	11,360	2	52	N/A
Huaxtepec	1	31,607	2	84	N/A
Tarastec	1	26,216	3	84	N/A
SDSU Global Education Office	1	1,533	1	0	N/A
International Student Center	1	4,294	1	0	N/A
SDSU Passport Office	1	1,003	1	0	N/A
Faculty International Engagement Office	1	1,527	1	0	N/A
Subtotal	*13*	*224,214*	*14*	*702*	278
University Towers East Component					
Parking Lot	N/A	N/A	N/A	0	146
Combined Total	**13**	**224,214**	**14**	**702**	**424**

Note: *Parking stalls are located throughout the existing Peninsula Component site. For the purposes of this table, all existing parking stalls were assigned to the Zacatepec Building.

2.3 Project Background

Though historically known as a commuter campus, in recent years SDSU has constructed a number of student residential buildings both on and immediately adjacent to the campus in an effort to increase housing availability for students attending the university. The Proposed Project represents SDSU's continuing efforts in this regard.

One of the primary objectives of the Proposed Project is to provide additional on-campus housing opportunities for all classes of students (i.e., first-years through seniors). While demolition of the existing buildings within the Peninsula Component would remove 702 existing student beds, the construction of approximately 4,450 new student beds would result in a net increase of approximately 3,748 additional student beds on the Peninsula

Component site. These additional beds would potentially be available to students of all classes. The University Towers East Component would result in a new building with approximately 720 beds dedicated to first-year students. In total, development of the Proposed Project would result in approximately 5,170 new student beds, which is a net increase of approximately 4,468 student beds to the main campus inventory.

2.4 Project Goals and Objectives

The underlying purpose of the Proposed Project is to enable an increased number of SDSU students the opportunity to live on the main SDSU campus, thereby enhancing student life on campus and reducing vehicle miles traveled and attendant GHG emissions. Specific Project objectives are as follows:

1. Expand the west campus student residential neighborhood in a manner similar to the student residential neighborhood on the east side of campus, to create housing that is inviting and safe, has a distinct identity, and provides students with supportive amenities such as a dining facility, community spaces, and study areas.
2. Provide food and support services in the immediate vicinity of the Proposed Project site for students to be housed in the new housing complexes.
3. Increase on-campus student housing options to the maximum degree possible for students currently housed off campus, thereby reducing the demand for student housing in the adjacent off-campus neighborhoods.
4. Replace outdated, low-density, inefficient student housing with more modern, attractive, and energy-efficient facilities.
5. Provide additional student housing on campus in an area that has the capacity to accommodate a large number of student housing beds and associated amenities, unencumbered by other uses that are not easily demolished or relocated.
6. Reduce vehicle miles traveled and related greenhouse gas emissions and increase the walkability of the SDSU campus by providing on-campus housing that includes a variety of student-friendly amenities situated within walking distance of the academic, athletic, and social centers of campus.
7. Take advantage of the limited available buildable area on an urban, built-out campus by maximizing density and number of student beds within the Project site.

2.5 Project Overview

2.5.1 Project Development Components

Peninsula Component

The Peninsula Component would involve the development of six student residential buildings, including one 9-story building and five buildings up to 13 stories in height, that would contain a total of approximately 4,450 student beds (see Figure 2-6a, Peninsula Component Site Plan Layout).

The 9-story building, which would be comprised of double rooms with ensuite bathrooms, would accommodate approximately 650 student beds available to first-year through senior students. The 9-story building would be approximately 144,000 square feet in size, with each of the nine floors encompassing approximately 16,000 square feet. Every floor (excluding the ground-level floor) would include approximately 38 300 square foot units, and up to 3 student beds per unit. Each unit in the 9-story building would include a private restroom shared by the unit residents. In total, the 9-story building would include 323 units and approximately 650 student beds. Building services, such as mechanical and electrical rooms, would be located on the ground level floor along the proposed service road. The ground level floor would also include laundry facilities. Social spaces would be distributed throughout the residential floors.

The five buildings to be built up to 13 stories in height (Apartment Buildings 1 through 5) would each have approximately 174,240 square feet, based on an estimated approximately 13,403 square feet per floor. The Apartment Buildings would include 4-bedroom, 2-bathroom apartment-style units. Each Apartment Building would accommodate approximately 760 student beds, totaling approximately 3,800 student beds across all five buildings. Each building would include 95 4-bedroom units. The 4-bedroom, 2-bathroom units would be approximately 1,600 square feet in size and would accommodate up to 8 student beds per unit. Every Apartment Building unit would include a kitchen equipped with a sink, stovetop, oven, and refrigerator. Laundry facilities and buildings services in Apartment Buildings 1 through 5 would be located in each building.

The proposed Peninsula Component would also include a new two-story amenity building, approximately 15,000 square feet in size, that would be utilized for dining and other student support uses. Table 2-2 provides a summary of the proposed elements of the Peninsula Component.

Development of the Peninsula Component would result in a total of approximately 4,450 student beds. Demolition of the existing buildings would result in the removal of 702 existing onsite beds; thus, the Peninsula Component of the Proposed Project would result in a net increase of approximately 3,748 additional student beds in this location (see Table 2-1 and Table 2-2).

Development of the Peninsula Component would include the development of an interim sports fields area within the southwestern portion of the site. This interim sports fields area would be constructed at the same time as Apartment Building 3, before construction of Apartment Building 4 and 5. The interim sports fields area is intended as a temporary facility to be used until the construction of Apartment Buildings 4 and 5 begins. This time period could last approximately one year, or more or less, depending on the future conditions (e.g., market conditions, university housing needs) at that time.

University Towers East Component

The existing parking lot at the University Towers East Component site would be removed to allow for redevelopment of the site to include one 9-story student-housing building that would include approximately 720 student beds reserved for first-year students (Figure 2-6b, University Towers East Component Site Plan Layout). The proposed University Towers East building would be planned as a horseshoe layout, with a courtyard plaza located in the middle of the building. The building would be approximately 133,200 square feet, with each floor encompassing approximately 14,800 square feet. Each floor (aside from the ground floor) would include approximately 42 165 square-foot units and up to 3 student beds per unit. The ground level floor would include a lobby, resident lounge, mail room, and other maintenance rooms (e.g., mechanical, plumbing, trash). Table 2-2 provides a summary of the proposed elements of the University Towers East Component.

Table 2-2. Proposed Evolve Student Housing Summary

	Number of Individual Buildings	Building Area (Square Feet)	Floors	Student Beds	Parking Stalls
Peninsula Component					
9-Story Building					
9-Story Building	1	144,000	9	650	0
Apartment Buildings					
Building 1	1	174,240	13	760	0
Building 2	1	174,240	13	760	0
Building 3	1	174,240	13	760	0
Building 4	1	174,240	13	760	0
Building 5	1	174,240	13	760	0
Amenity Building	1	15,000	2	N/A	15
Subtotal	*7*	*1,030,200*	*67*	*4,450*	*15*
University Towers East Component					
University Towers East Building	1	133,200	9	720	0
Combined Total	**8**	**1,163,400**	**702**	**5,170**	**15**

2.5.2 Campus Master Plan and Student Enrollment

As shown in Table 2-2, the Proposed Project would provide additional housing opportunities for approximately 4,468 students who wish to live onto the main SDSU campus. These students would either be newly enrolled students or students already enrolled at SDSU that would transition to the housing provided by the Proposed Project. The number of students occupying the proposed housing would fall within the enrollment numbers anticipated under the current approved Campus Master Plan[2] (see Figure 2-4a and Figure 2-4b).

2.5.3 Circulation, Parking, and Access

Peninsula Component

Access to the proposed Peninsula Component housing would be provided via 55th Street, which is connected to the larger street system via Canyon Crest Drive, Remington Road, and Montezuma Road. Public vehicular access would terminate at the main entry to the Project site, which would feature a turnaround for pick-ups, drop-offs, and ridesharing. Parking would be provided for staff, and short-term parking would be designated for deliveries and brief visits. Parking for student residents with vehicles would be available in existing SDSU parking lots and structures.

A perimeter road would circle the proposed development. This road would be designated for pedestrians, student micro-mobility devices, and utility/service and emergency vehicle access. On event days (such as move-in or move-

[2] A full-time equivalent (FTE) student is a student with a 15 credit courseload, or 3 students taking 5 credits each, or any combination thereof totaling 15 course credits.

out), the perimeter road would be open to limited vehicular use. This roadway would link outdoor amenity spaces and offer panoramic views of the central campus and surrounding canyons. The proposed perimeter road would also serve as a 26-foot-wide fire access roadway. The fire lane is expected to consist of a pedestrian-friendly hardscape surface bordered by turf blocks, porous pavers, or other suitable materials to blur the edges of the fire lane while still meeting the required vehicular loading standards for fire apparatus

Additionally, pedestrian-only pathways connecting all residential buildings are proposed.

The Peninsula Component site would be enclosed by a security fence encircling the Peninsula Component area, effectively preventing non-resident pedestrian and vehicular access. This barrier would also secure the area against unauthorized entry from the surrounding community and canyon area. Pedestrian access will be secured with card readers at the primary pedestrian entry gate adjacent to the drop-off. Vehicular gates at the main entry and loop road's end would further ensure fire access throughout the development. All building lobbies would be situated to maintain visibility from the main circulation paths.

As part of the Proposed Project, 3 accessible, 260 standard, and 15 van parking stalls (totaling 278 parking stalls) would be removed from the Peninsula Component site. Approximately five staff parking spaces, five short-term parking spaces, five Americans with Disabilities Act accessible stalls, several parking spaces for ZipCars (short-term rental cars), and two 16-foot truck spaces would be constructed and provided at the planned drop off area along the southwestern portion of the Project Site at the Peninsula Component entrance.

University Towers East Component

The proposed University Towers East Component would be accessed by Montezuma Road to the immediate north and Mary Lane Alley to the immediate south. A security fence would be installed to provide security connecting to the existing University Towers Building. Access gates for residents would be provided at three locations. As with the Peninsula Component, parking for student residents of the University Towers East Component would be available in existing SDSU parking lots and structures.

As part of the Proposed Project, a total of 5 accessible , 140 standard, and 1 van parking stalls (totaling 146 parking stalls) would be removed from the Project site. The proposed development would include 5 staff parking spaces, one ADA accessible space, and several ZipCar spaces to be provided at the southwest corner of the Project site, south of the existing University Towers Building and along Mary Lane Alley that runs along the southern boundary of the Project site.

There is an existing fire access lane between the existing University Towers building and the proposed building. This fire access lane provides the fire department access to a standpipe along the eastern portion of the existing University Towers building. Further coordination is required with the City of San Diego Fire-Rescue Department to determine whether this existing fire access lane can be removed during the next Project phase The Proposed Project would also include a 26-foot minimum fire lane located along the alley south of the proposed building and an additional fire lane located along Montezuma Road, which would be within 15 to 30 feet of the proposed building.

2.5.4 Amenities, Landscaping, and Hardscaping

Landscaping at the Peninsula Component would be designed to complement the architecture and accentuate the assets of the site by incorporating a natural aesthetic into the open space character. Additionally, the proposed landscape and hardscape plan would facilitate a pedestrian-oriented environment and would include avenues for multimodal circulation. Similar to the Peninsula Component, the proposed landscaping and overall site character of the University Towers East Component would be pedestrian oriented.

Peninsula Component

Within the proposed interior pedestrian pathways of the Peninsula Component, outdoor amenities and landscape features would include an entry plaza and flexible use turf areas, study and work areas, outdoor gaming, student gathering, lounge seating areas, plazas, outdoor dining, bike & scooter hubs, and event space. A shade structure and large plaza area, located in the central northern portion of the site, would serve as the terminus to the pathways. Gathering areas would be located throughout the site.

In addition to the gathering spaces and other outdoor amenities, the Proposed Project would involve the construction of temporary recreational sports fields. These temporary recreational fields would be sited on the western portion of the Peninsula Component, generally at the planned locations of Apartment Buildings 4 and 5. The recreational fields are anticipated to include one soccer field, and other playing fields to be used by SDSU students. The recreational fields would be constructed in Phase 4 of the construction phasing and would be operational until the start of Phase 5 construction (see Table 2-3).

The existing Peninsula Component site contains approximately 9.18 acres of impervious surfaces and approximately 190 trees. To accommodate the Project, approximately 190 existing trees would be removed and replaced with other trees as part of the development. Specifically, the Project proposes to install approximately 6.54 acres of landscaping, including 195 trees, and 170,000 square feet of hardscaping. The landscape plan would include a combination of accent trees, shade trees, and drought tolerant plant material. The proposed irrigation system would include water-saving components such as a weather-based controller, rain shutoff device, master valve, flow sensor and efficient spray and drip irrigation.

University Towers East Component

The University Towers East Component would include open space and exterior amenity areas. Additionally, the Project would entail a pedestrian corridor and connection between the existing University Towers Building amenity areas, such as the pool recreation area, and the proposed amenity area for the University Towers East Component. The University Towers East Component would include a courtyard with outdoor amenities such as study areas, outdoor gaming, student gathering, lounge seating areas, plazas, outdoor dining, and event space.

The University Towers East Component site contains approximately 1.15 acres of existing impervious surfaces. Additionally, the site contains approximately 46 palm trees. To accommodate the Project, approximately 29 existing palm trees would be removed and later replaced. Specifically, as part of the Project, approximately 0.32 acres of landscaping, including 30 trees, and 0.55 acres of hardscaping would be installed. The Project would include streetscaping along Montezuma Road to include lighting and canopy trees to be aesthetically consistent with the existing character along the frontage of the site. Similar to the Peninsula Component, the landscape plan for the University Towers East Component would include a combination of accent trees, shade trees, and drought tolerant plant material. The proposed irrigation system would include water-saving components such as a weather-based controller, rain shutoff device, master valve, flow sensor and efficient spray and drip irrigation.

2.5.5 Utilities

It is anticipated that the Proposed Project would require new points of connection for the residence halls for domestic water, fire water, and sewer from the existing utility mains within 55th Street and Montezuma Road and alley south of the University Towers East Component. The southernmost residence hall and amenity building (Phase I) could use utility lines located within 55th Street. The existing main in 55th Street would allow for service of the proposed building. Most of the sewer load of the northernmost residence halls (future phases) would connect into the sewer main via gravity. The sewer main may need to be re-routed and re-constructed to avoid conflicts to the proposed buildings and amenity spaces while also providing appropriate maintenance access. Domestic water, fire water, and sewer facilities would be expanded to support the Proposed Project buildings and auxiliary structures. Development of new chilled-water cooling systems would be incorporated into the Proposed Project. Existing stormwater systems would be augmented to support any anticipated change in stormwater discharge quantities.

Construction and operation of the Proposed Project would entail improvements to all wet and dry utilities within the immediate areas. Improvements and modifications associated with each type of utility are described below.

Water

Peninsula Component

Based on estimated capacity and accessory uses, water use projected for the Peninsula Component of the Proposed Project would be approximately 550,000 gallons per day for domestic use. For landscaping purposes, the Peninsula Component would be using approximately 12,000 gallons per day for irrigation use (Lakin, pers. comm.,2024).

There are three fire hydrants located within the Project site, and two additional fire hydrants along Remington Road. The water main along 55th Street was recently increased to a 12-inch PVC pipeline and will remain or be re-routed if conflicts exist. This existing water line functions as a combined public fire water and domestic water main. An existing private 8-inch water main is located at the southern end of the Peninsula Component site. To support the Proposed Project, the water main would be adjusted to allow for the improvements and looped to provide a redundant supply to the high-rise buildings. The size of the main will be verified based on available water pressure and will be determined as part of the design process. Additional hydrants would be placed throughout the Peninsula Component site.

Water service laterals for the proposed buildings would be based on the new, looped, water main system around the Peninsula Component site. To install the looped water line around the site, easements would be obtained from the City of San Diego to access the public infrastructure. Additionally, fire water and domestic water laterals to each proposed building would require backflow prevention device and isolation valves for maintenance purposes.

Figure 2-7a, Concept Water Plan – Peninsula Component, shows the locations of proposed water facility infrastructure.

<u>University Towers East Component</u>

Based on estimated capacity and accessory uses, water use projected for the University Towers East Component of the Project would be approximately 50,000 gallons per day for domestic use. For landscaping purposes, the University Towers East Component would be using approximately 6,000 gallons per day for irrigation use.

A 12-inch polyvinyl chloride (PVC) water main is located along the site frontage, on Montezuma Road. Infrastructure along Montezuma Road is regional and a public system assumed to have capacity for the planned development based on current zoning regulations. This water line is a combined domestic water and fire water main. Additionally, there are three fire hydrants in front of the site, along Montezuma Road. Fire water and domestic water laterals to the proposed building would require backflow prevention device and isolation valves for each lateral for maintenance purposes.

Figure 2-7b, Concept Water Plan – University Towers East Component, shows locations of proposed water facility infrastructure.

Wastewater

Peninsula Component

Based on estimated equivalent dwelling units, the wastewater generation projected for the Proposed Project at the Peninsula Component would be 310,000 gallons per day.

A 12-inch VC pipe runs along 55th Street and drains from south to north. The 12-inch pipe then transitions into an 8-inch vitrified clay (VC) pipe within the cul-de-sac at the north end of the Project site. The pipe slopes from south to north down the canyon. The portion of the pipe that runs through private property has a 7-foot-wide easement owned by the City of San Diego.

The Proposed Project would include a proposed re-route of a portion of the existing 12-inch sewer main, as well as a proposed extension at the northwestern portion, and sewer laterals to connect the proposed apartment buildings within the Peninsula Component. There would be 15 proposed new manholes throughout the Peninsula Component site. Figure 2-8a, Concept Sewer Plan — Peninsula Component, shows the locations of proposed sewer facility infrastructure.

University Towers East Component

An existing 8-inch sanitary sewer main and three existing manholes are located within the alley directly south of the University Towers East Component site. This existing infrastructure carries flow from the existing University Towers Building directly east of the site. The Proposed Project is expected to tie into this existing infrastructure. Infrastructure along Montezuma Road is regional and a public system assumed to have capacity for the planned development based on current zoning regulations. Projected demand values for the proposed new building would be 30,000 gallons per day. Figure 2-8b, Concept Sewer Plan — University Towers East Component, shows the locations of proposed sewer facility infrastructure.

Stormwater

Peninsula Component

An existing 18-inch reinforced concrete pipe (RCP) storm drain is located on the northwest portion of the site. This storm drain is routed through private property, and then exits into the canyon west of the Project site. Additionally, the storm drain is located within a 4-foot easement that extends through the 55th Street cul-de-sac, and past the western edge of the Project site. A 24-inch corrugated metal pipe (CMP) storm drain is located on the northern portion of the Project site. An additional 12-inch CMP storm drain is located on the eastern portion of the Project site.

Two additional storm drains are located on the western portion of the Project site, exact size unknown at this time. These two storm drains are servicing existing parking lots and residence buildings: Toltec, Zapotec and Metepec. These outfall pipes are anticipated to be reused as the outfalls for future phase 5 and 6 projects and would remain in place once the proposed buildings are constructed and occupied.

All storm drain pipes exit the site via the canyon and empty into existing City of San Diego owned and maintained stormwater conveyance infrastructure.

The proposed concept drainage plan includes a proposed stormwater storage pond in the center of the Peninsula Component site, two underground storage tanks on the eastern portion of the site, and three proposed bioretention basins, one in the northwestern corner, and two in the southern portion of the site. Proposed storm drain pipe would connect the stormwater retention facilities to the existing storm drain pipes that convey stormwater off the Project site. Figure 2-9a, Concept Drainage Plan – Peninsula Component, shows the locations of proposed stormwater facility infrastructure.

University Towers East Component

A 12-inch RCP storm drain is located approximately 1,440 feet west of the Project site, within Montezuma Road. Existing storm water runoff from a portion of the site sheet flows to the existing curb-and-gutter along the Project site frontage, where it then flows west towards the intersection of 55th Street and Montezuma Road. Water then crosses 55th Street through a v-ditch and continues down Montezuma Road to the nearest curb inlet located approximately 1,200 feet west of the Project site. Additionally, the alley road directly south of the Project site (Mary Lane) sheet flows to the west into existing curb and gutter infrastructure and then flows north, near the intersection of 55th Street and Montezuma Road. Storm water then flows west across 55th Street utilizing the v-ditch located at the intersection and into the curb inlet in Montezuma Road. An additional 18-24-inch reinforced concrete pipe is located approximately 1,200 feet east of the site that collects storm water from the site frontage and eastward along Montezuma Road. Since the Project site is located at a relative high point on Montezuma Road, no concerns relating to street flow are expected.

Proposed improvements to the UTE Component site would include underground storage tanks in the center of the site from which stormwater would flow through a stormwater quality treatment unit and finally through a pump vault from where it would be discharged to the existing curb and gutter along the street frontage. Figure 2-9b, Concept Drainage Plan – University Towers East Component, shows the locations of proposed stormwater facility infrastructure.

Electrical and Natural Gas

Peninsula Component

Based on the estimated capacity and accessory uses, the proposed electrical energy needed to support the new buildings would be approximately 0.310 to 1.480 megawatts per year for each construction Phase (see Section 2.6, Project Construction and Phasing), totaling 2,440 Mw for the Proposed Project.

Existing electrical poles and high voltage equipment located along 55th Street would be undergrounded to better align with the proposed development. Updates to the on-site electrical infrastructure would be coordinated with SDG&E.

A 3-inch high-pressure (HP) gas line is located beneath Remington Road along with a 2-inch high-pressure line branching towards the end of 55th Street. These high-pressure gas lines are adequately sized to support the Proposed Project.

<u>University Towers East Component</u>

Existing overhead electrical lines are located along the roadway south of the Proposed Project site. It is anticipated that the site will tap into this infrastructure for service.

A 2-inch high-pressure gas line is located west of the Montezuma Road and 55th Street intersection. There is also a 2-inch high-pressure gas line approximately 700 feet east of the Project site.

Telecommunication Service

Peninsula Component

Telecommunication infrastructure is located within the Project site. This infrastructure includes both overhead and underground utility lines, as well as poles, pedestals, and risers. Some of this infrastructure will need to be rerouted and placed underground based on the location of the proposed buildings.

University Towers East Component

Overhead telecommunication infrastructure is located approximately 50 feet south of the Proposed Project site. Other infrastructure including overhead lines, poles, and risers are located west of the Project site, along 55th Street. Utility locating/survey will be required to verify all the existing telecommunication infrastructure within the Proposed Project limits

2.5.6 Design Standards and Energy Efficiency

In May 2014, the CSU Board of Trustees broadened sustainable practices to all areas of the CSU. The state also strengthened energy efficiency requirements in the California Green Building Standards Code (CALGreen; Title 24 of the California Code of Regulations). All CSU new construction, remodeling, renovation, and repair projects will be designed with consideration of optimum energy utilization, low lifecycle operating costs, and compliance with all applicable energy codes and regulations. Progress submittals during design are monitored for individual envelope and mechanical system performances. The CSU Mechanical Review Board was established in February 2004 and considers proposed building designs for conformance with code and energy efficiency practices (CSU 2018).

As part of the CSU's broadened commitment to sustainable practices, the CSU Board of Trustees adopted the first systemwide Sustainability Policy in May 2014. In May 2024, the CSU Sustainability Policy was updated to expand on existing sustainability goals (CSU 2024). The Sustainability Policy applies sustainable principles across all areas of university operations, expanding beyond facilities operations and utility management. This expansion was both a reaction to and a catalyst for a changing sustainability landscape within the CSU and higher education in general. The 2024 Sustainability Policy seeks to integrate sustainability into all facets of the CSU, including academics, facilities operations, the built environment, and student life (CSU 2024).

All CSU new construction, remodeling, renovation, and repair projects, including the Proposed Project, would be designed with consideration of optimum energy utilization, low life cycle operating costs, and compliance with all applicable state energy codes and regulations. Progress submittals during design are monitored for individual envelope, indoor lighting, and mechanical system performances. In compliance with these goals, the Proposed Project would be equipped with solar-ready design features that would facilitate and optimize the future installation of a solar photovoltaic (PV) system.

Fire Hardening Design Features

The proposed structures at the Peninsula Component and the University Towers sites would be built to comply with the California Building Code Chapter 7A Materials and Construction Methods for Exterior Wildfire Exposure. In addition to the building materials and features required in section of the California Building Code, the proposed Project would also include the following feature,

PDF-WLD-1 the Project would use Type I-B construction which would exceed the standards of Chapter 7A.

Nighttime Lighting Design Features

The Proposed Project would implement specific lighting performance standards and lighting site design standards to reduce excessive light spillover beyond the Project boundary during nighttime hours when outdoor lighting is illuminated. The following design features would be implemented:

PDF-AES-1 Project site (Peninsula Component) exterior lighting fixtures will be installed in such a manner to be aimed away from the Project site (Peninsula Component) perimeter, and shielded to prevent backlight toward the Project site (Peninsula Component) perimeter, to limit light trespass at the adjacent westerly undeveloped canyon.

PDF-AES-2 Project site (University Towers East Component) exterior lighting will be shielded, aimed away from the Project site (University Towers East Component) property line, and installed in such manner to limit light trespass to 0.74 fc maximum at adjacent residential use properties to the immediate east ("College Campanile Apartments") and immediate south (i.e., south of the shared alley and north of Mary Lane Drive) of the Project site.

PDF-AES-3 Sports Field Lighting will be installed in such manner to be shielded and or aimed to limit maximum surface luminance visible from any residential use to 100 cd/m2 to prevent glare.

PDF-AES-4 Site light fixtures at perimeter of the property (Peninsula Component and University Towers East Component) will comply with CALGreen Backlight Uplight Glare (BUG) requirements, including the use of backlight shields, and installed in such manner to limit maximum surface luminance visible from any residential use to 100 cd/m2 to prevent glare.

2.6 Project Construction and Phasing

Construction of the Proposed Project would occur in multiple phases (see Table 2-3 and Figure 2-10a through 2-10g, Project Construction Phasing Plans). As previously discussed, to accommodate the Peninsula Component all 13 existing on-site buildings would be demolished and removed. As a result of the demolition, 702 existing onsite beds and 315 existing parking spaces would be removed (see Table 2-1). Additionally, 146 parking spaces at the University Towers East Component site would be removed to accommodate the Project.

Phase 1A of Project development would include the removal of five existing buildings on the Peninsula Component site and the construction of the proposed 9-story apartment building (Building 1) and the Amenity Building. Phase 1B would consist of the construction of the University Towers East Building. All Project elements in Phase 1 would begin construction in 2025. Phases 2 through 6 involve the construction of the apartment-style buildings proposed at the Peninsula Component site. Removal of existing buildings would occur phase by phase as space is needed to accommodate the proposed buildings for the next two apartment-style buildings (Buildings 2 and 3). Phase 4 would include the removal of the remaining four existing buildings and the construction of Building 4 and temporary sports fields to be used in the interim prior to construction of Phases 5 and 6. Removal of the existing buildings according to the proposed schedule, as opposed to demolition of all buildings at once, would enable SDSU to provide the most student housing feasible to existing students throughout the eight-year construction schedule. The components of the Project that would be constructed during each phase are outlined in Figures 2-10a through 2-10g.

Table 2-3. Construction Phasing Plan

Building to be Constructed	Buildings Removed	Construction Start Date	Construction Finish Date	Occupancy Date	Student Beds Removed (-)	Student Beds Added (+)	Location
Phase 1							
Phase 1A							
9-Story Building	1 (Tarastec)	5/27/2025	7/31/2026	Fall 2026	-84	+646	Peninsula Component
Amenity Building	4	8/19/2025	7/31/2026	Fall 2026	0	0	Peninsula Component
Phase 1B							
University Towers East Building	0	11/18/2025	03/09/2027	Fall 2027	0	+714	University Towers East Component
Phase 2							
Apartment Building 1	1 (Huaxtepec)	8/31/2026	1/24/2028	Spring 2028	-84	+760	Peninsula Component
Phase 3							
Apartment Building 2	3 (Zacatepec)	2/24/2028	7/12/2029	Fall 2029	-206	+760	Peninsula Component
Phase 4							
Apartment Building 3 and Sports Fields	1 (Mixquic, Toltec, Zapotec, Metepec)	8/13/2029	12/23/2030	Spring 2031	-62	+760	Peninsula Component

Table 2-3. Construction Phasing Plan

Building to be Constructed	Buildings Removed	Construction Start Date	Construction Finish Date	Occupancy Date	Student Beds Removed (-)	Student Beds Added (+)	Location
Phase 5							
Apartment Building 4	0	1/22/2031	7/15/2032	Fall 2032	-214	+760	Peninsula Component
Phase 6							
Apartment Building 5	0	7/16/2032	1/12/2034	Spring 2034	-52	+760	Peninsula Component
Total	13				-702	+ 5,160	

Construction of the Proposed Project would be performed by qualified contractors. Plans and specifications would incorporate stipulations regarding standard CSU requirements and acceptable construction practices, including grading and demolition, safety measures, vehicle operation and maintenance, excavation stability, erosion control, drainage alteration, groundwater disposal, traffic circulation, public safety, dust control, and noise generation.

Construction of each of the Project components for the six phases would generally proceed as follows:

- **Step 1: Site Preparation.** Temporary barricades, fences, sound walls, and other protective devices would be erected to separate the Project site from surrounding neighborhoods and SDSU campus buildings. Stormwater Pollution Prevention Plan-directed controls would also be installed during this sequence.
- **Step 2: Demolition.** Demolition of the existing buildings at the Peninsula Component site would each take approximately 6 weeks and include the sorting, recycling, and/or disposal of debris from demolition activities. Equipment involved in demolition would include 3 excavators and 3 rubber-tired loaders. Hazardous materials encountered during demolition would be handled and disposed of in accordance with applicable federal, state, and local regulations and guidelines.
- **Step 3: Grading.** Site grading for Phases 1A and 1B would take approximately 6 weeks to complete. Likewise, site grading for Phases 2 through 6 would take approximately 6 weeks to complete. These grading activities would generally require 4 excavators, 2 crawler tractors, 2 graders, 2 rubber-tired loaders, 2 scrapers, and 2 rubber-tired dozers.
- **Step 4: Building Construction.** The construction of Project buildings would entail pouring the building foundation and ultimate construction of the building's structural framework. Construction of the temporary sports fields would entail installing landscaping and hardscaping. Exterior and interior features including walls, windows, doorways, and roofing materials would be installed. These building construction activities would generally require the use of 1 electric tower crane, forklifts, generator sets, 3 tractors/loaders/backhoes, 2 concrete pumps, welders, personnel lifts, boom hoists, and drill rigs. These activities would take approximately 12 months for each phase, with Phase 1A being completed first.
- **Step 5: Hardscape/Landscape**: Exterior hardscaping and landscaping would require pavers and rollers and would take approximately 6 months. Paving would occur only a few weeks of this time, while most of the site would have concrete or pavers for flatwork.
- **Step 6: Trenching.** Project trenching would include excavators and would take about one month to complete.

- **Step 7: Architectural Coating.** These activities include interior paint only; no volatile organic compound paints would be used, and no exterior paint is expected. Interior painting would take approximately 3 months.

Construction and Demolition Waste

The Proposed Project would generate demolition waste and construction debris during on-site clearing activities. In accordance with Section 5.408 of the California Green Building Standards Code, SDSU would implement a construction waste management plan for recycling and/or salvaging for reuse of at least 65% of nonhazardous construction/demolition debris. Additionally, the Project would be required to meet Leadership in Energy and Environmental Design v4 requirements for waste reduction during construction. Solid waste generated during demolition and construction activities would be hauled off site to the Miramar Landfill located in Kearny Mesa (approximately 10 miles from the Proposed Project).

2.6.1 Construction Staging and Storage Areas

Construction staging and storage areas would be located within the Peninsula and University Towers East Component sites. There would be two construction staging and storage areas within the Peninsula Component site during construction of Phases 1A and Phases 2 through 6. The two staging locations would be located at the southeastern corner and northwestern portion of the Peninsula Component site.

Construction staging areas for construction of Phase 1B, which would involve the construction of the University Towers East Building, would be located on the eastern and westernmost corner of the University Towers East Component's site boundary.

2.6.2 Construction Working Hours

In general, construction activities would be limited to between 7:00 a.m. and 7:00 p.m. Monday through Saturday. Limited Sunday work may be required. No construction would occur on public holidays.

2.6.3 Anticipated Road Closures and Traffic Control Measures

No road closures are anticipated to be necessary for the construction of the Proposed Project. The majority of construction activities would occur outside of existing roadways. To the extent off-site improvements associated with utility connections would require road closures, an appropriate construction traffic control plan would be implemented, which is a standard CSU requirement. The traffic control plan would illustrate the location of the proposed work area; identify the location of areas where the public right-of-way could be temporarily closed or obstructed and the placement of traffic control devices necessary to perform the work; show the proposed phases of traffic control; and identify the periods when the traffic control would be in effect and, although not expected, the periods when work would prohibit access to private property from a public right-of-way. The traffic control plan would also provide information on access for emergency vehicles to prevent interference with emergency response.

2.7 Campus Master Plan Revisions

As part of the Proposed Project and as previously noted, SDSU would revise its Campus Master Plan map to include the new buildings. Specifically, the campus boundaries would be revised to include the Peninsula Component site, as well as the buildings to be developed as part of the Project. As to the University Towers East Component, the Campus Master Plan would be revised to add the building that would be constructed as part of the University Towers East Component: the University Towers East Component site is already included within the Campus Master Plan boundaries. The proposed revised Campus Master Plan is depicted on Figure 2-5a and Figure 2-5b.

2.8 Intended Uses of the Draft EIR/Project Actions and Approvals

2.8.1 Intended Uses

This Draft EIR analyzes the Proposed Project at the detailed "project" level of review and examines all phases of Proposed Project construction and operation. This Draft EIR will be considered by the Board of Trustees of the CSU to evaluate the potential environmental impacts associated with implementation of the Proposed Project. Additionally, this Draft EIR could be relied upon by responsible agencies, including all appropriate regulatory agencies, with discretionary permitting or regulatory approval authority over elements of the Project.

SDSU is an entity of the CSU, which is the State of California acting in its higher education capacity. As a state entity, the CSU is not subject to local government planning and land use plans, policies, or regulations when its development, construction, facilities, and uses are in furtherance of its governmental purpose.

2.8.2 Requested Project Approvals

The following approvals by the CSU Board of Trustees are required prior to implementation of the Proposed Project:

- Certification of adequacy and completeness of the CEQA document;
- Adoption of the corresponding mitigation monitoring and reporting program;
- Approval of the Proposed Project, including revised Campus Master Plan; and
- Other approvals as necessary.

Development of the Proposed Project may require permits and/or approvals issued by public agencies other than the CSU Board of Trustees. The following is a non-exclusive list of other Project permits or approvals that may be required by other agencies:

1. San Diego Regional Water Quality Control Board (National Pollutant Discharge Elimination System permit)
2. San Diego County Air Pollution Control District (authority to construct and/or permits to operate)
3. City of San Diego water and wastewater approval (authority to connect to existing City-owned infrastructure)
4. City of San Diego (Potential vacation of 55th Street within the Peninsula Component boundaries)

2.8.3 Responsible and Trustee Agencies

Under CEQA, responsible agencies are public agencies other than the lead agency with discretionary approval authority over the Proposed Project. The above-listed agencies may determine they have some discretionary authority over one or more aspects of the Proposed Project; therefore, those agencies are identified at this time as potential responsible agencies. Such agencies typically rely on the Draft EIR prepared and certified by the lead agency (here, the CSU) when considering issuance of a Project permit or other approval related to the Proposed Project.

Trustee agencies are state agencies having jurisdiction by law over natural resources affected by the Proposed Project that are held in trust for the people of the State of California. In the event that any special-status species would be impacted by the Proposed Project, the following agencies would potentially be trustee agencies: the U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife.

2.9 References

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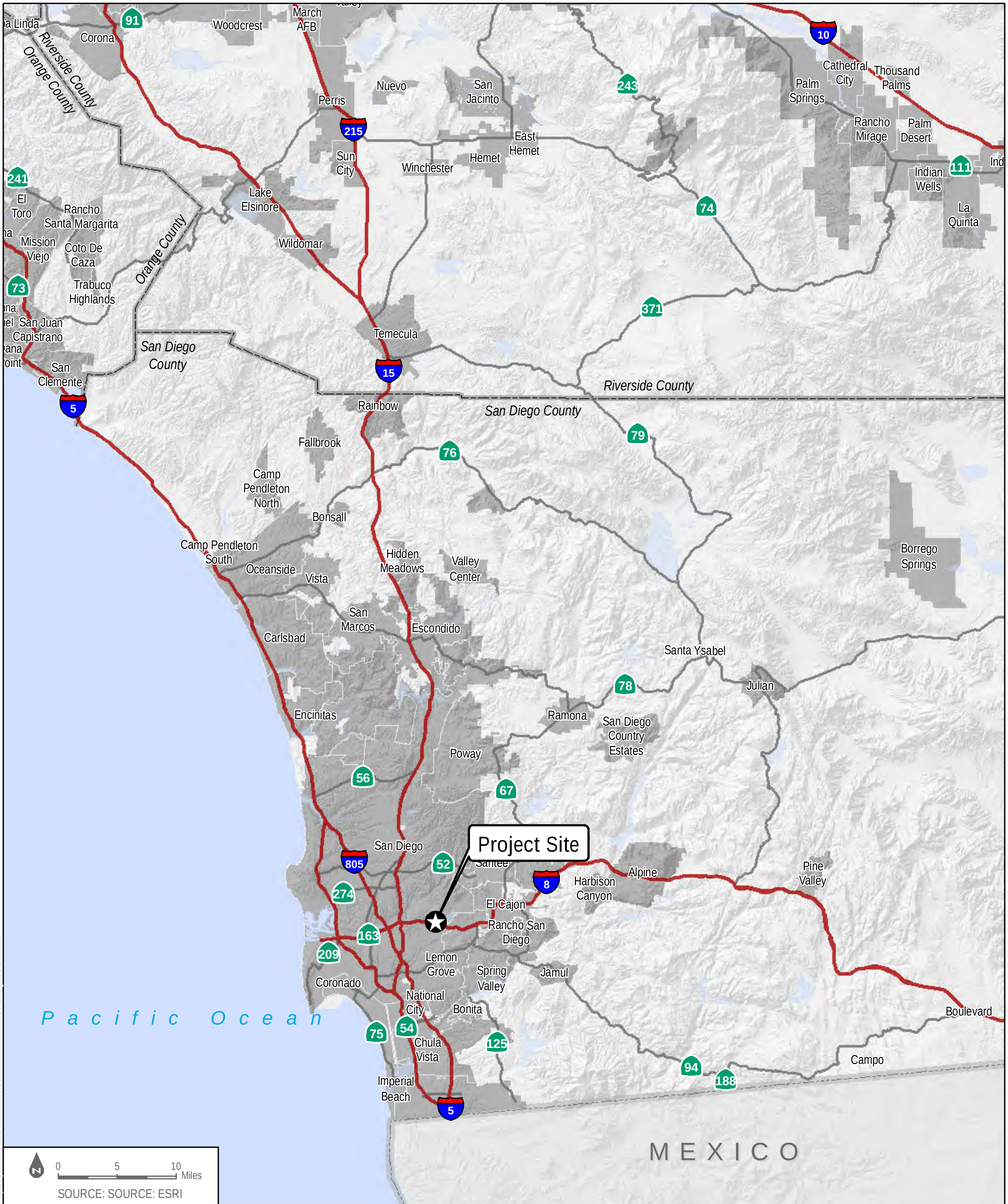

SDSU Evolve Student Housing

San Diego State University

Figure 2-1
Regional Map

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-2
Vicinity Map

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-3A

Project Site - Peninsula Component

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-3B
Project Site - University Towers East Component

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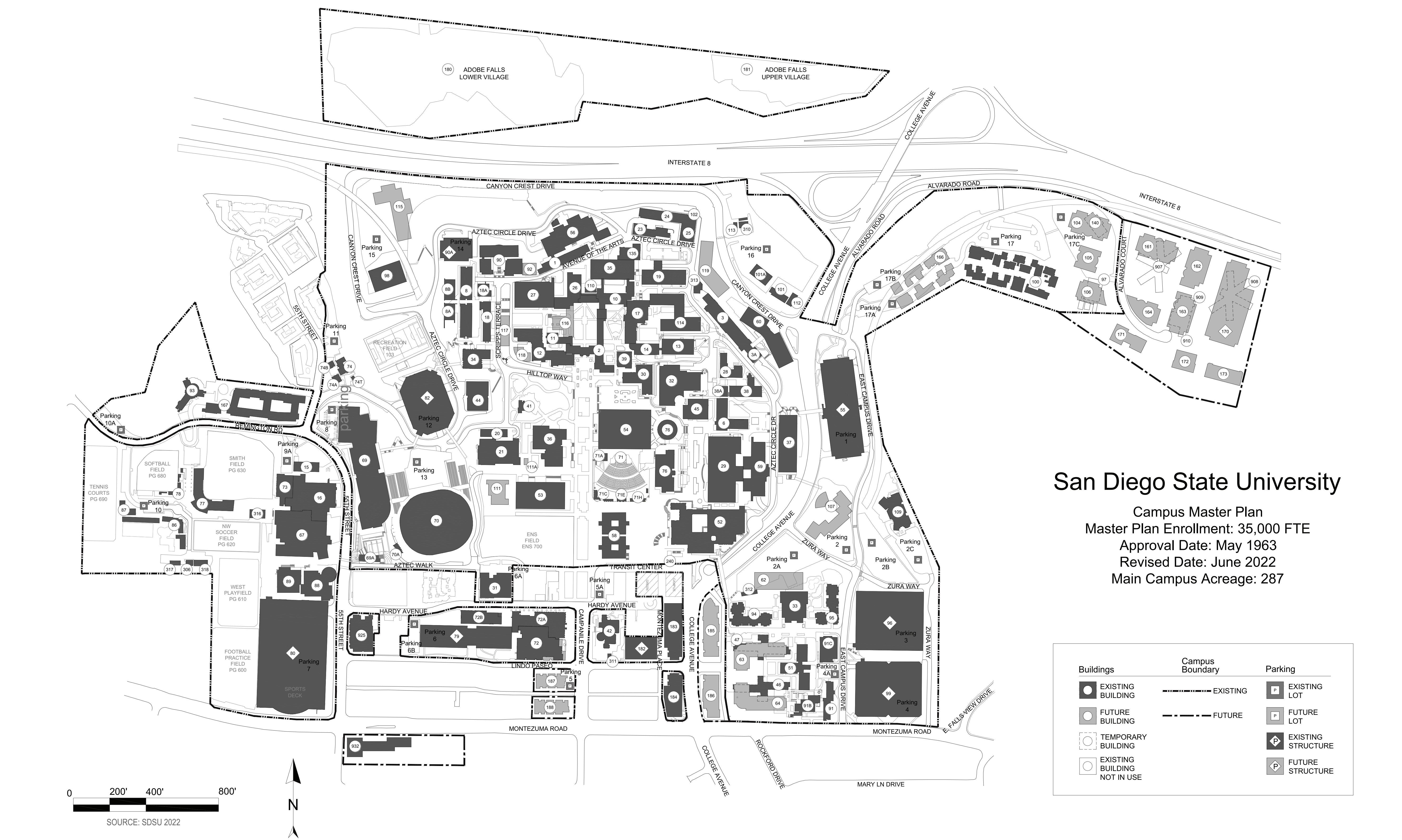

SAN DIEGO STATE UNIVERSITY

Figure 2-4A
Existing Campus Master Plan

SDSU Evolve Student Housing

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San Diego State University

Main Campus Master Plan Enrollment: 35,000 FTE

Main Campus Master Plan Approved by the Board of Trustees: May 1963

Main Campus Master Plan Revision approved by the Board of Trustees: June 1967, July 1971, November 1973, July 1975, May 1977, November 1977, September 1978, September 1981, May 1982, July 1983, May 1984, July 1985, January 1987, July 1988, July 1989, May 1990, July 1990, September 1998, May 1999, March 2001, May 2011, May 2017, May 2018, June 2022

1. Art - South
2. Hepner Hall
3. Geology - Mathematics - Computer Science
3a. Geology - Mathematics - Computer Science Addition
6. Education
8. Storm Hall
8a. Storm Hall West
8b. Charles Hostler Hall
10. Life Science - South
11. Little Theatre
12. Communication
13. Physics
14. Physics - Astronomy
15. University Police
16. Peterson Gymnasium
17. Physical Sciences
18. Nasatir Hall
18a. Aztec Shops Terrace
19. Engineering
20. Exercise and Nutritional Sciences Annex
21. Exercise and Nutritional Sciences
23. Facilities Services Boiler Shop
24. Facilities Services
25. Cogeneration Plant
26. Hardy Memorial Tower
27. Professional Studies and Fine Arts
28. Atkinson Hall
29. Student Services - West
30. Administration
31. Calpulli (Counseling, Disabled and Student Health Services)
32. Charles B. Bell Jr. Pavilion
33. Cuicacalli (Dining)
34. Ellen Ochoa Pavilion
35. Life Science - North
36. Dramatic Arts
37. Lamden Hall
38. North Education
38a. North Education 60
39. Faculty/Staff Club
41. Scripps Cottage
42. Speech, Language and Hearing Sciences
44. Facilities Services Chill Plant
45. Aztec Shops Bookstore
46. Maya Hall
47. Olmeca Hall (Coed. Residence)
51. Zura Hall (Coed. Residence)
52. Conrad Prebys Aztec Student Union
53. Music
54. Love Library
55. Parking 1
56. Art - North
58. Adams Humanities
59. Student Services - East
60. Chemical Sciences Laboratory
62. *Student Housing, Phase I (600 beds)*
63. *Student Housing, Phase II (700 beds)*
64. *Student Housing, Phase II (700 beds)*
67. Fowler Athletics Center/Hall of Fame
69. Aztec Recreation Center
69a. Arena Meeting Center
70. Viejas Arena at Aztec Bowl
70a. Arena Ticket Office
71. Open Air Theater
71a. Open Air Theater Hospitality House
71c. Open Air Theater Upper Restrooms
71e. Open Air Theater Concessions
71h. Open Air Theater Office
72. The KPBS Conrad Prebys Media Complex at Copley Center
72a. Gateway Center
72b. Extended Studies Center
73. Racquetball Courts
74. International Student Center
74a. Global Education Office
74b. Faculty International Engagement Office
74t. SDSU Passport Office
76. Love Library Addition/Manchester Hall
77. Tony Gwynn Stadium
78. Softball Stadium
79. Parking 6
80. Parking Structure 7/Sports Deck
82. Parking 12
86. Aztec Aquaplex
87. Aztec Tennis Center
88. Parma Payne Goodall Alumni Center
89. Jeff Jacobs JAM Center
90. Arts and Letters
90a. Parking 14
91. Tenochca Hall (Coed. Residence)
91b. Tenochca Community Space
91c. Tula Community Center
92. *Art Gallery*
93. Chapultepec Hall (Coed. Residence)
94. Tepeyac (Coed. Residence)
95. Tacuba (Coed. Residence)
96. Parking 3
97. Rehabilitation Center
98. Logistical Services
99. Parking 4
100. Villa Alvarado Hall (Coed. Residence)
101. Maintenance Garage
101a. Building A
102. Cogeneration/Chill Plant
103. Recreation Field
104. *Academic Building A*
105. *Academic Building B*
106. *Academic Building C - Education*
107. *College of Business*
109. University Children's Center
110. Growth Chamber
111. *Prebys Stage*
111a. *Amenities Building*
112. Resource Conservation
113. Waste Facility
114. Engineering and Interdisciplinary Sciences
115. *Physical Plant/Corporation Yard*
116. *School of Communication Addition A*
117. *School of Communication Addition B*
118. *School of Communication Addition C*
119. *Life Science North Replacement*
135. Donald P. Shiley BioScience Center
140. *Special Events Operations Center*
161. *Alvarado Park - Academic Building 1*
162. *Alvarado Park - Academic Building 2*
163. *Alvarado Park - Academic Building 3*
164. *Alvarado Park - Academic Building 4*
166. *Villa Alvarado Expansion*
167. Huaxyacac Residence Hall
170. *Alvarado Park - Parking Structure*
171. *Alvarado Park – Research Building 1*
172. *Alvarado Park – Research Building 2*
173. *Alvarado Park – Research Building 3*
180. *Adobe Falls Lower Village*
181. *Adobe Falls Upper Village*
182. South Campus Plaza Parking Building 3
183. South Campus Plaza Building 1
184. South Campus Plaza Building 2
185. *South Campus Plaza Building 5*
186. *South Campus Plaza Building 4*
187. *South Campus Plaza Building 6*
188. *South Campus Plaza Building 7*
240. Transit Center
306. Facilities Services Grounds Storage
310. EHS Storage Shed
311. Substation D
312. Substation B
313. Substation A
316. Stadium Annex (Facilities Services Storage #5)
317. Landscape Services
318. Landscape Services Equipment
907. 6475 Alvarado Road
908. 6505 Alvarado Road
909. 6495 Alvarado Road
910. 6330 Alvarado Road
925. Granada Apartments
932. University Towers

LEGEND: Existing Facility / *Proposed Facility*

NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Data Base (SFDB)

IMPERIAL VALLEY Off-Campus Center,
Imperial Valley Campus - Brawley
Master Plan Enrollment: 850 FTE
Master Plan approved by the Board of Trustees: September 2003

101. Initial Building (*Brandt Building*)
102. *Academic Building II*
103. *Academic Building III*
104. *Library*
105. *Computer Building*
106. *Auditorium*
107. *Administration*
108. *Academic Building IV*
109. *Student Center*
110. *Energy Museum*
111. *Faculty Office*
112. *Agricultural Research*

IMPERIAL VALLEY Off-Campus Center,
Imperial Valley Campus - Calexico
Master Plan Enrollment: 850 FTE
Master Plan approved by the Board of Trustees: February 1980
Master Plan Revision approved by the Board of Trustees: September 2003

1. North Classroom Building
2. Administration Building
2a. Art Gallery
3. Auditorium / Classrooms
4. Classroom Building
5. Library
5a. Library Addition
6. Physical Plant
7. Computer Building
9. Faculty Offices Building East
10. Faculty Offices Building West
20. Student Center
21. *Classroom Building/Classroom Building East*
22. *Classroom Building South*
201. Classroom Buildings (3 temporaries)

MISSION VALLEY Site
Master Plan Enrollment: 15,000 FTE
Master Plan approved by the Board of Trustees: January 2020

500. *Snapdragon Stadium*
501. *Campus Office/Research and Innovation*
502. *Campus Office/Research and Innovation*
503. *Campus Office/Research and Innovation*
504. *Campus Office/Research and Innovation*
505. *Campus Office/Research and Innovation*
506. *Campus Office/Research and Innovation*
507. *Campus Office/Research and Innovation*
508. *Campus Office/Research and Innovation*
509. *Campus Office/Research and Innovation/Retail*
510. *Campus Office/Research and Innovation*
511. *Campus Office/Research and Innovation*
512. *Campus Office/Research and Innovation/Retail*
513. *Campus Office/Research and Innovation*
514. *Campus Office/Research and Innovation/Retail*
515. *Campus Office/Research and Innovation/Retail*
516. *Campus Hospitality*
517. *Campus Residential*
518. *Campus Residential*
519. *Campus Residential*
520. *Campus Residential*
521. *Campus Residential*
522. *Campus Residential/Retail*
523. *Campus Residential*
524. *Campus Residential*
525. *Campus Residential*
526. *Campus Residential*
527. *Campus Residential/Retail*
528. *Campus Residential*
529. *Campus Residential*
530. *Campus Residential*
531. *Campus Residential/Retail*
532. *Campus Residential*
533. *Campus Residential*
534. *Campus Residential*
(Garage parking structures integral to Campus Residential buildings)

SOURCE: SDSU 2022

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-4B
Existing Campus Master Plan Legend

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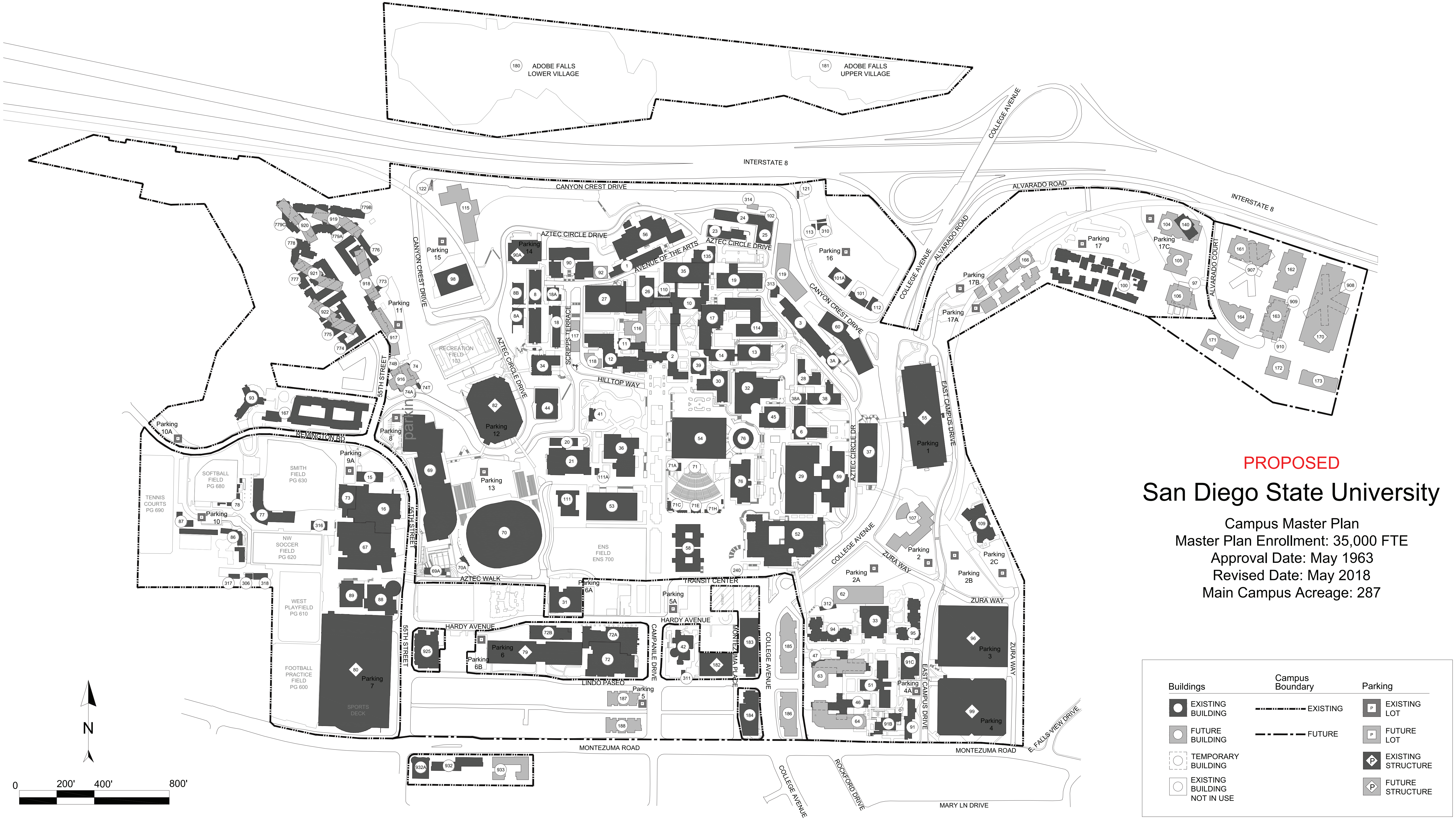

SOURCE: SDSU 2024

Figure 2-5A
Proposed Campus Master Plan

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San Diego State University

Main Campus Master Plan Enrollment: 35,000 FTE

Main Campus Master Plan Approved by the Board of Trustees: May 1963

Main Campus Master Plan Revision approved by the Board of Trustees: June 1967, July 1971, November 1973, July 1975, May 1977, November 1977, September 1978, September 1981, May 1982, July 1983, May 1984, July 1985, January 1987, July 1988, July 1989, May 1990, July 1990, September 1998, May 1999, March 2001, May 2011, May 2017, May 2018

1. Art - South
2. Hepner Hall
3. Geology - Mathematics - Computer Science
3a. Geology - Mathematics - Computer Science Addition
6. Education
8. Storm Hall
8a. Storm Hall West
8b. Charles Hostler Hall
10. Life Science - South
11. Little Theatre
12. Communication
13. Physics
14. Physics - Astronomy
15. University Police
16. Peterson Gymnasium
17. Physical Sciences
18. Nasatir Hall
18a. Aztec Shops Terrace
19. Engineering
20. Exercise and Nutritional Sciences Annex
21. Exercise and Nutritional Sciences
23. Facilities Services Boiler Shop
24. Facilities Services
25. Cogeneration Plant
26. Hardy Memorial Tower
27. Professional Studies and Fine Arts
28. Atkinson Hall
29. Student Services - West
30. Administration
31. Calpulli (Counseling, Disabled and Student Health Services)
32. Charles B. Bell Jr. Pavilion
33. Cuicacalli (Dining)
34. Ellen Ochoa Pavilion
35. Life Science - North
36. Dramatic Arts
37. Lamden Hall
38. North Education
38a. North Education 60
39. Faculty/Staff Club
41. Scripps Cottage
42. Speech, Language and Hearing Sciences
44. Facilities Services Chill Plant
45. Aztec Shops Bookstore
46. Maya Hall
47. Olmeca Hall (Coed. Residence)
51. Zura Hall (Coed. Residence)
52. Conrad Prebys Aztec Student Union
53. Music
54. Love Library
55. Parking 1
56. Art - North
58. Adams Humanities
59. Student Services - East
60. Chemical Sciences Laboratory
62. *Student Housing, Phase I (600 beds)*
63. *Student Housing, Phase II (700 beds)*
64. *Student Housing, Phase II (700 beds)*
67. Fowler Athletics Center/Hall of Fame
69. Aztec Recreation Center
69a. Arena Meeting Center
70. Viejas Arena at Aztec Bowl
70a. Arena Ticket Office
71. Open Air Theater
71a. Open Air Theater Hospitality House
71c. Open Air Theater Upper Restrooms
71e. Open Air Theater Concessions
71h. Open Air Theater Office
72. The KPBS Conrad Prebys Media Complex at Copley Center
72a. Gateway Center
72b. Extended Studies Center
73. Racquetball Courts
74. International Student Center
74a. Global Education Office
74b. Faculty International Engagement Office
74t. SDSU Passport Office
76. Love Library Addition/Manchester Hall
77. Tony Gwynn Stadium
78. Softball Stadium
79. Parking 6
80. Parking Structure 7/Sports Deck
82. Parking 12
86. Aztec Aquaplex
87. Aztec Tennis Center
88. Parma Payne Goodall Alumni Center
89. Jeff Jacobs JAM Center
90. Arts and Letters
90a. Parking 14
91. Tenochca Hall (Coed. Residence)
91b. Tenochca Community Space
91c. Tula Community Center
92. *Art Gallery*
93. Chapultepec Hall (Coed. Residence)
94. Tepeyac (Coed. Residence)
95. Tacuba (Coed. Residence)
96. Parking 3
97. Rehabilitation Center
98. Logistical Services
99. Parking 4
100. Villa Alvarado Hall (Coed. Residence)
101. Maintenance Garage
101a. Building A
102. Cogeneration/Chill Plant
103. Recreation Field
104. *Academic Building A*
105. *Academic Building B*
106. *Academic Building C - Education*
107. *College of Business*
109. University Children's Center
110. Growth Chamber
111. *Prebys Stage*
111a. *Amenities Building*
112. Resource Conservation
113. Waste Facility
114. Engineering and Interdisciplinary Sciences
115. *Physical Plant/Corporation Yard*
116. *School of Communication Addition A*
117. *School of Communication Addition B*
118. *School of Communication Addition C*
119. *Translational Sciences*
121. East Freeway Sign
122. *West Freeway Sign*
135. Donald P. Shiley BioScience Center
140. Special Events Operations Center
161. *Alvarado Park - Academic Building 1*
162. *Alvarado Park - Academic Building 2*
163. *Alvarado Park - Academic Building 3*
164. *Alvarado Park - Academic Building 4*
166. *Villa Alvarado Expansion*
167. Huaxyacac Residence Hall
170. *Alvarado Park - Parking Structure*
171. *Alvarado Park – Research Building 1*
172. *Alvarado Park – Research Building 2*
173. *Alvarado Park – Research Building 3*
180. *Adobe Falls Lower Village*
181. *Adobe Falls Upper Village*
182. South Campus Plaza Parking Building 3
183. South Campus Plaza Building 1
184. South Campus Plaza Building 2
185. *South Campus Plaza Building 5*
186. *South Campus Plaza Building 4*
187. *South Campus Plaza Building 6*
188. *South Campus Plaza Building 7*
240. Transit Center
306. Facilities Services Grounds Storage
310. EHS Storage Shed
311. Substation D
312. Substation B
313. Substation A
314. *(New) Substation A*
316. Stadium Annex (Facilities Services Storage #5)
317. Landscape Services
318. Landscape Services Equipment
773. Tarastec
774. Metepec
775. Zapotec
776. Huaxtepec
777. Toltec
778. Mixquic
779a. Zacatepec Building 1
779b. Zacatepec Building 2
779c. Zacatepec Building 3
907. 6475 Alvarado Road
908. 6505 Alvarado Road
909. 6495 Alvarado Road
910. 6330 Alvarado Road
916. *Student Housing Amenities Building*
917. *Student Housing Building 1*
918. *Student Housing Building 2*
919. *Student Housing Building 3*
920. *Student Housing Building 4*
921. *Student Housing Building 5*
922. *Student Housing Building 6*
925. Granada Apartments
932. University Towers
932A. University Towers Kitchen (Dining)
933. *University Towers East*

LEGEND: Existing Facility / *Proposed Facility*

NOTE: Existing building numbers correspond with building numbers in the Space and Facilities Data Base (SFDB)

IMPERIAL VALLEY Off-Campus Center,
SDSU Imperial Valley - Brawley
Master Plan Enrollment: 850 FTE
Master Plan approved by the Board of Trustees: September 2003

101. Initial Building (Brandt Building)
102. *Brawley Sciences Building*
103. *Academic Building III*
104. *Library*
105. *Computer Building*
106. *Auditorium*
107. *Administration*
108. *Academic Building IV*
109. *Student Center*
110. *Energy Museum*
111. *Faculty Office*
112. *Agricultural Research*

IMPERIAL VALLEY Off-Campus Center,
SDSU Imperial Valley - Calexico
Master Plan Enrollment: 850 FTE
Master Plan approved by the Board of Trustees: February 1980
Master Plan Revision approved by the Board of Trustees: September 2003

1. North Classroom Building
2. Administration Building
2a. Art Gallery
3. Auditorium / Classrooms
4. Classroom Building
5. Library
5a. Library Addition
6. Physical Plant
7. Computer Building
9. Faculty Offices Building East
10. Faculty Offices Building West
20. Student Center
21a. *Student Housing West*
21b. *Student Housing East*
21c. *Student Housing Office*
21d. *Student Housing Community Center*
22. *Classroom Building South*

MISSION VALLEY Site
Master Plan Enrollment: 15,000 FTE
Master Plan approved by the Board of Trustees: January 2020

500. Snapdragon Stadium
502. *Hospitality*
506. *Office/Research and Innovation/Retail*
508. *Office/Research and Innovation/Retail*
509. *Residential*
510. *Residential*
511. *Residential*
512. *Residential & Retail Project #1*
513a. *Affordable Housing Project #1*
513b. *Affordable Housing Project*
514. *Residential*
515. *Residential*
516. *Residential/Retail*
517. *Residential*
518. *Residential*
519. *Residential/Retail*
520. *Residential*
521. *Residential*
522. *Residential*
524. *Office/Research and Innovation*
525. *Office/Research and Innovation*
526. *Office/Research and Innovation*
527. *Office/Research and Innovation*
528. *Office/Research and Innovation/Retail*
529. *Office/Research and Innovation*
530. *Office/Research and Innovation*
531. *Office/Research and Innovation*
532. *Office/Research and Innovation*
534. *Office/Research and Innovation*
535. *Office/Research and Innovation*
537. *Office/Research and Innovation*
538. *Office/Research and Innovation/Retail*

(Garage parking structures integral to Residential buildings)

SOURCE: SDSU 2024

SDSU Evolve Student Housing

Figure 2-5B
Proposed Campus Master Plan Legend

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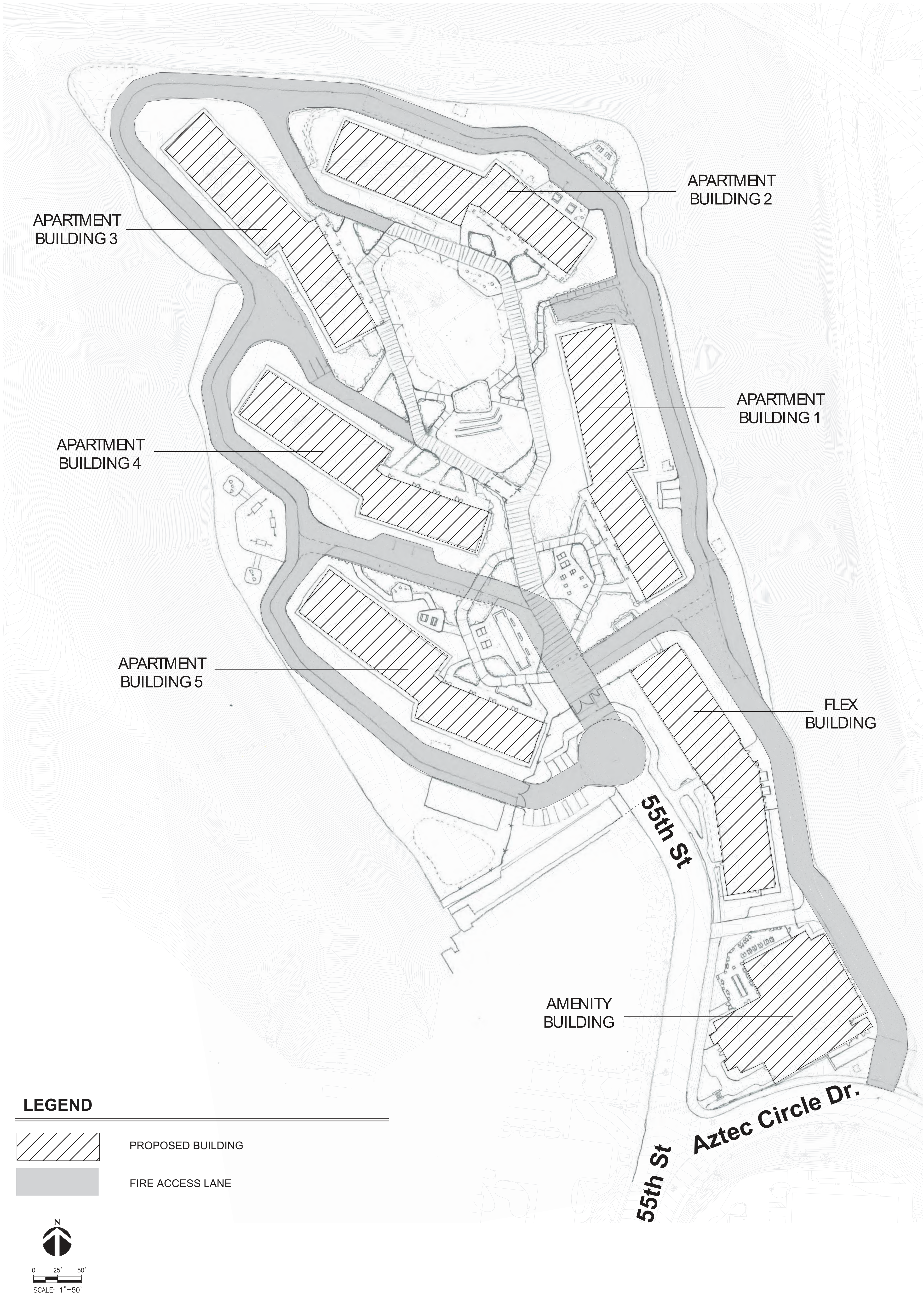

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-6a
Proposed Peninsula Component Site Plan

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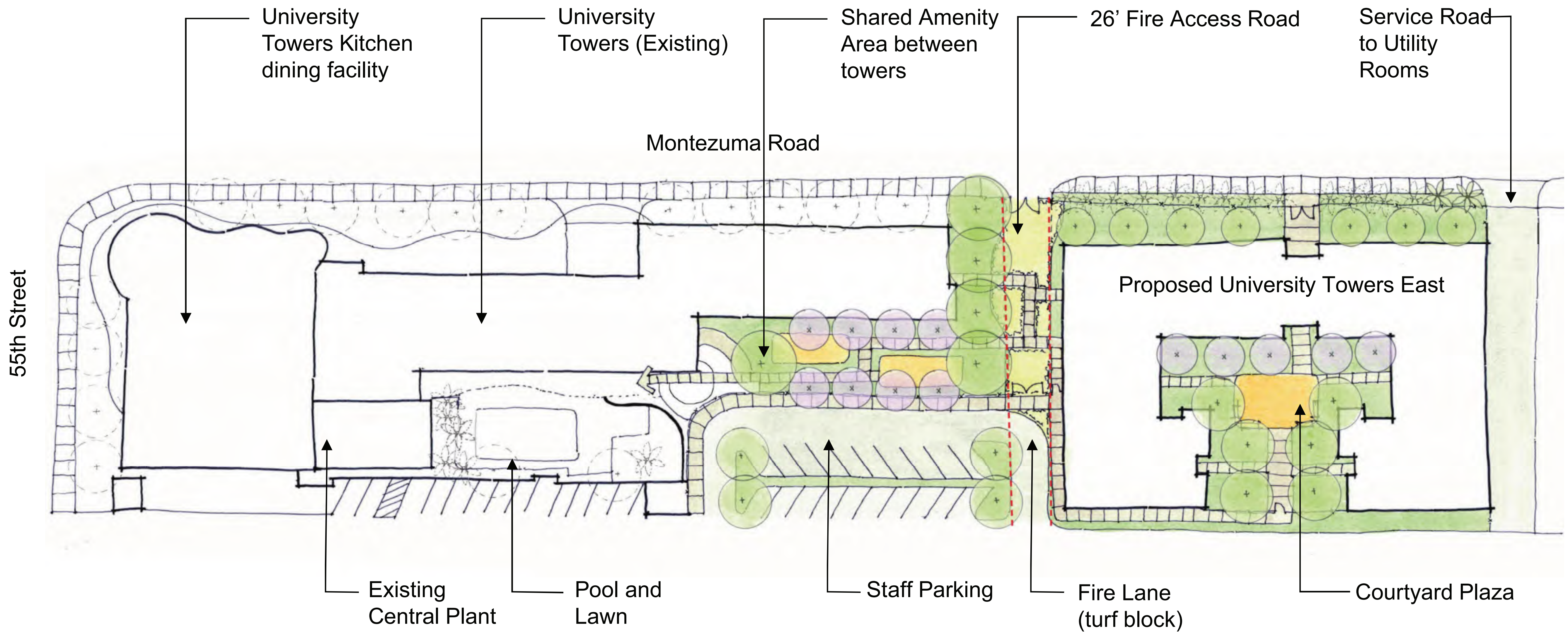

SOURCE: SDSU 2024

Figure 2-6B

Proposed University Towers East Component Site Plan

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LEGEND

EXISTING BUILDING

PROPOSED BUILDING

FIRE ACCESS LANE

EX. 12" W — EXISTING 12" AC PUBLIC WATER MAIN

EX. PRIVATE 8" W — EXISTING 8" AC PUBLIC WATER MAIN

12" W — PROPOSED 12" PUBLIC WATER MAIN

PROPOSED PUBLIC WATER MAIN REALIGNMENT

W — PROPOSED DOMESTIC WATER LATERAL

FW — PROPOSED FIRE WATER LATERAL

WATER LATERAL TO BE KILLED

EXISTING FIRE HYDRANT

PROPOSED FIRE HYDRANT

NOTES

1. PROPOSED WATER APPURTENANCES NOT SHOWN.
2. CONCEPT DESIGN IS PENDING REVIEW AND DESIGN ANALYSIS TO BE COMPLETED AS PART OF FUTURE DESIGN PROCESS. (DESIGN IS INTENDED TO ILLUSTRATE DEVELOPMENT INTENT AND SUBJECT TO CHANGE)

N

0 25' 50'
SCALE: 1"=50'

SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-7A
Concept Water Plan–Peninsula Component

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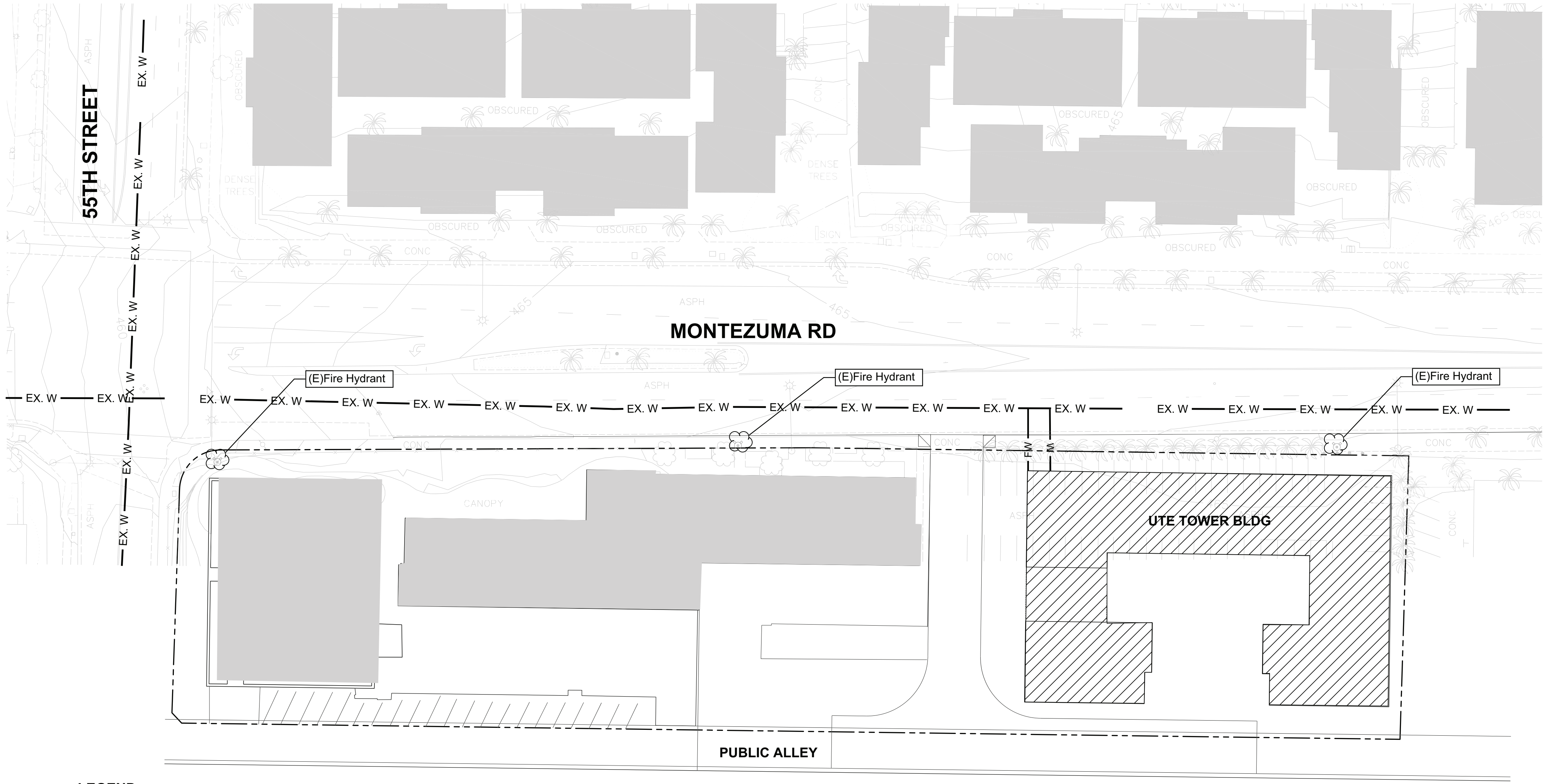

LEGEND

	EXISTING BUILDING
	PROPOSED BUILDING
— EX. W —	EXISTING 12" PVC WATER MAIN
— W —	PROPOSED DOMESTIC WATER LATERAL
— FW —	PROPOSED FIRE WATER LATERAL
	EXISTING FIRE HYDRANT

NOTES

1. PROPOSED WATER APPURTENANCES NOT SHOWN.
2. CONCEPT DESIGN IS PENDING REVIEW AND DESIGN ANALYSIS TO BE COMPLETED AS PART OF FUTURE DESIGN PROCESS. (DESIGN IS INTENDED TO ILLUSTRATE DEVELOPMENT INTENT AND SUBJECT TO CHANGE)

SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

San Diego State University

Figure 2-7B

Concept Water Plan–University Towers East Component

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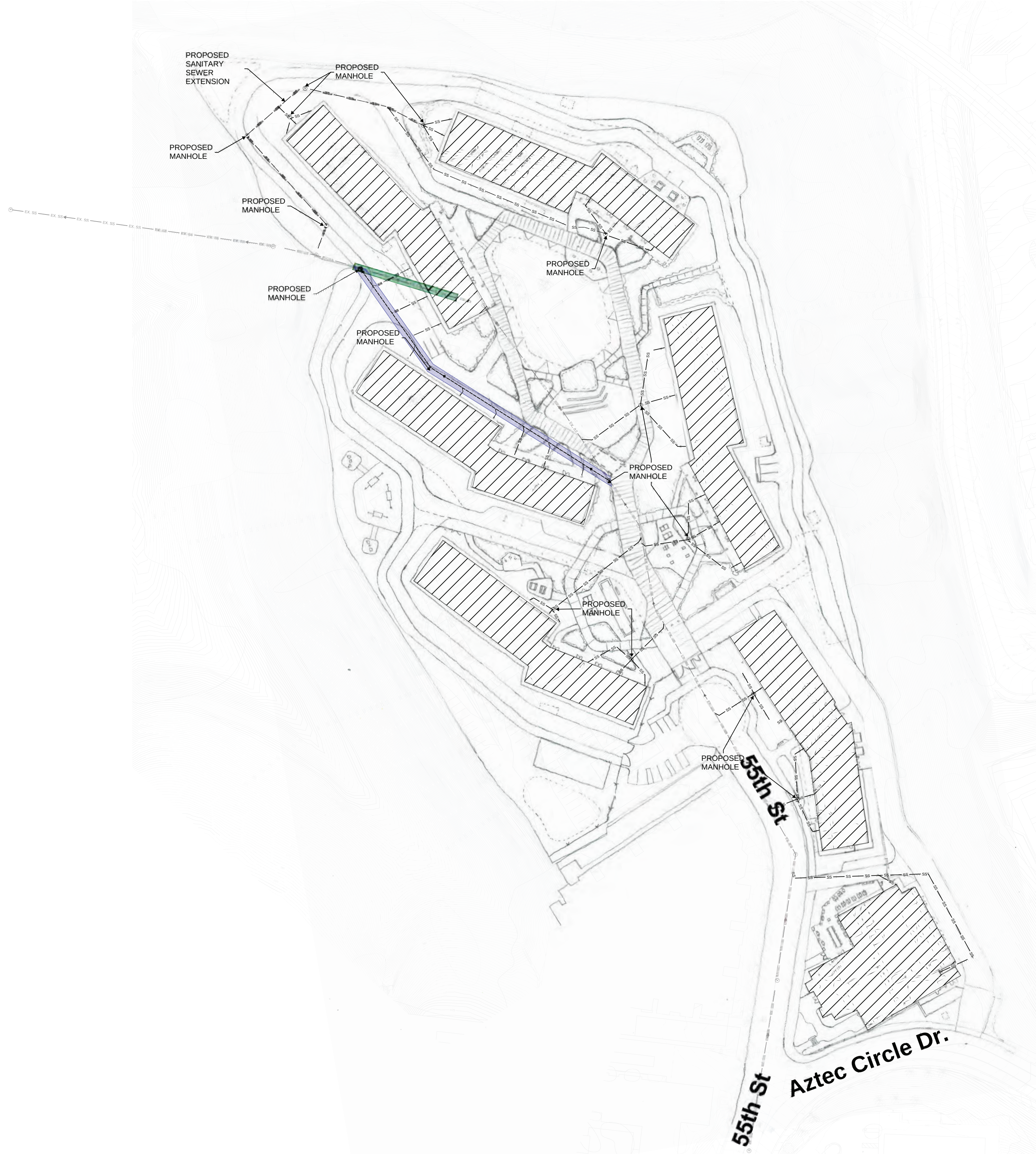

LEGEND

EXISTING BUILDING

PROPOSED BUILDING

FIRE ACCESS LANE

EXISTING 12" VC SANITARY SEWER MAIN

PROPOSED SANITARY SEWER LATERAL

PROPOSED SANITARY SEWER EXTENSION

PROPOSED SEWER MAIN RE-ROUTE

EXISTING 7' EASEMENT

PROPOSED EASEMENT

EXISTING MANHOLE

PROPOSED MANHOLE

PROPOSED CLEANOUT

NOTES

1. CONCEPT DESIGN IS PENDING REVIEW AND DESIGN ANALYSIS TO BE COMPLETED AS PART OF FUTURE DESIGN PROCESS. (DESIGN IS INTENDED TO ILLUSTRATE DEVELOPMENT INTENT AND SUBJECT TO CHANGE)

SCALE: 1"=50'

SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-8A
Concept Sewer Plan–Peninsula Component

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SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

San Diego State University

Figure 2-8B

Concept Sewer Plan–University Towers East Component

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SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-9A
Concept Drainage Plan–Peninsula Component

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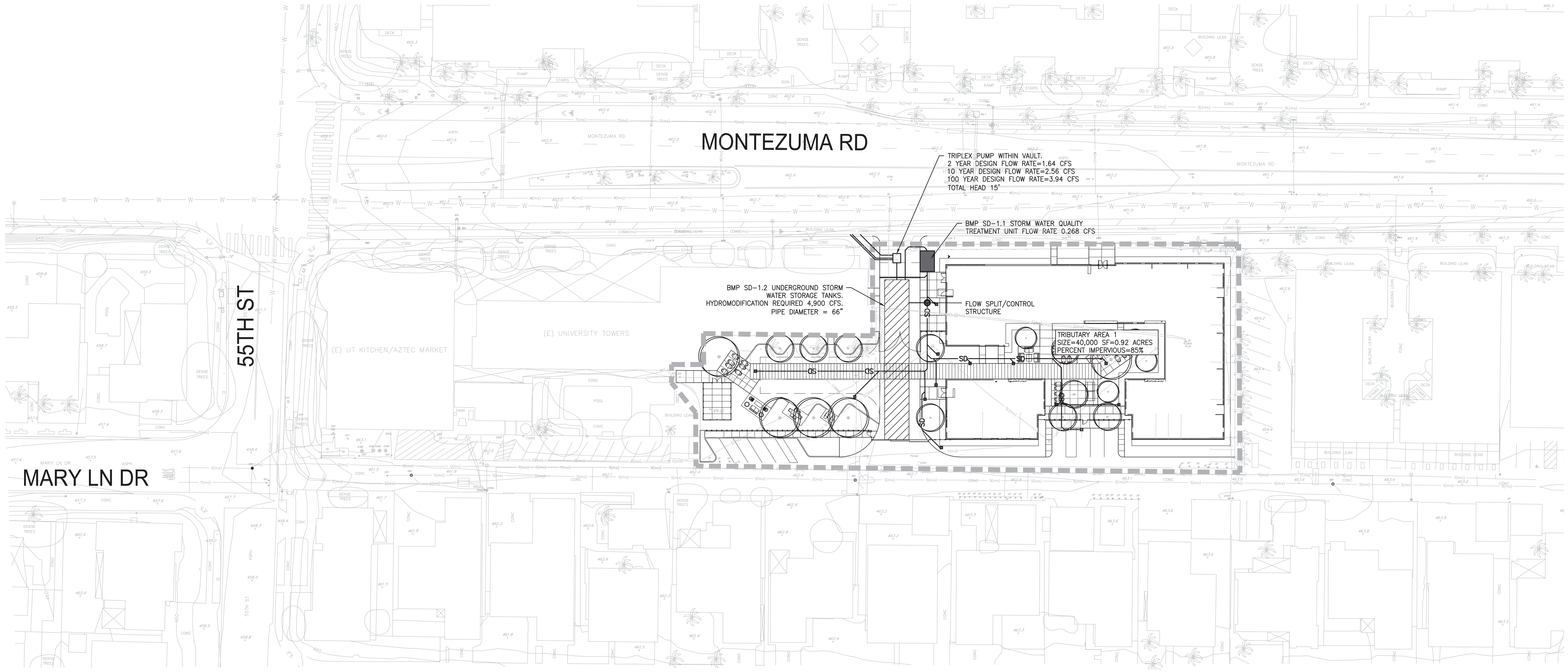

LEGEND

- LIMIT OF WORK
- PROPERTY LINE
- LID BOUNDARY
- FLOW LINE
- UNDERGROUND STORAGE TANKS
- STORM WATER QUALITY TREATMENT UNIT
- PROPOSED BUILDING (REFER TO ARCHITECTURAL PLANS FOR DETAILS)
- PUMP VAULT

NOTE:
IRRIGATION WATER METER, LINES AND APPURTENANCES BY OTHERS.

NOTE:
ALL BMP'S PROPOSED AS A PART OF THIS PROJECT ARE TO BE INSPECTED BY THE ENGINEER OF RECORD AFTER INSTALLATION AND PRIOR TO OBTAINING A CERTIFICATE OF OCCUPANCY.

NOTE:
PRIOR TO THE INSTALLATION OF ALL STORM DRAIN AND SEWER MAIN LINE CONNECTIONS, THE CONTRACTOR SHALL POTHOLE AND VERIFY THE HORIZONTAL AND VERTICAL LOCATION OF THE MAIN LINE. IF CONDITIONS DIFFER FROM THOSE ON THE PLAN, THE CONTRACTOR SHALL NOTIFY THE ENGINEER AND SHALL NOT BEGIN CONSTRUCTION UNTIL THE CHANGED CONDITION HAS BEEN EVALUATED.

N

0 15' 30'
SCALE: 1"=30'

SOURCE: SDSU & KPFF 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 2-9B
Concept Drainage Plan–University Towers East Component

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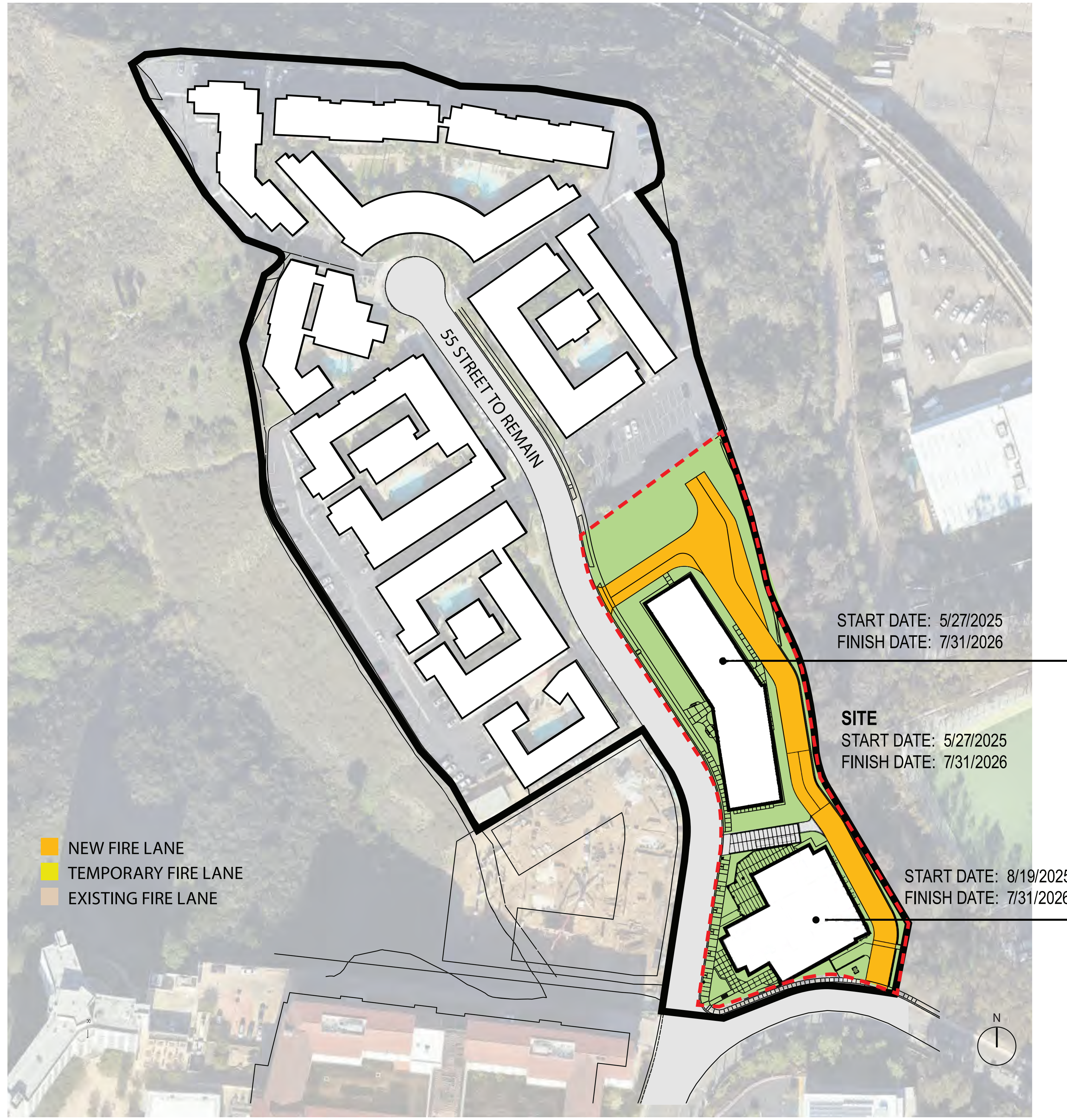
SDSU EVOLVE
PROJECT 1A

- TYPE 1B CONSTRUCTION (NON-COMBUSTIBLE) CAST IN PLACE CONCRETE COLUMN AND SHEAR WALLS AND POST TENSION CONCRETE FLOOR SLABS
- METAL-STUD FRAMED EXTERIOR CEMENT PLASTER WALL ASSEMBLIES MEET CRITERIA 6 (5/8” TYPE X GYPSUM SHEATHING ON THE EXTERIOR SIDE OF THE FRAMING)
- EXTERIOR WINDOWS AND EXTERIOR GLAZED DOOR ASSEMBLIES SHALL MEET CRITERIA 1 (BE COMPOSED OF MULTI-PANE GLAZING WITH A MINIMUM OF ONE TEMPERED PANE
- HIGH-RISE ELEMENTS (FOR THE APARTMENTS: PROJECTS 2 - 4)
- BUILDINGS DESIGNED TO CBC CHAPTER 7A REQUIREMENTS FOR VHFSZ
- LIMITED VEHICULAR ACCESS/TRAFFIC
- STATE HAS MORE RESTRICTIVE REQUIREMENTS FOR FIRE ACCESS THAN LOCAL JURISDICTION THAT IS RESPONDING TO INCIDENTS.



PROJECT 1A: FLEX UNITS

140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83’-6” TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES

CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

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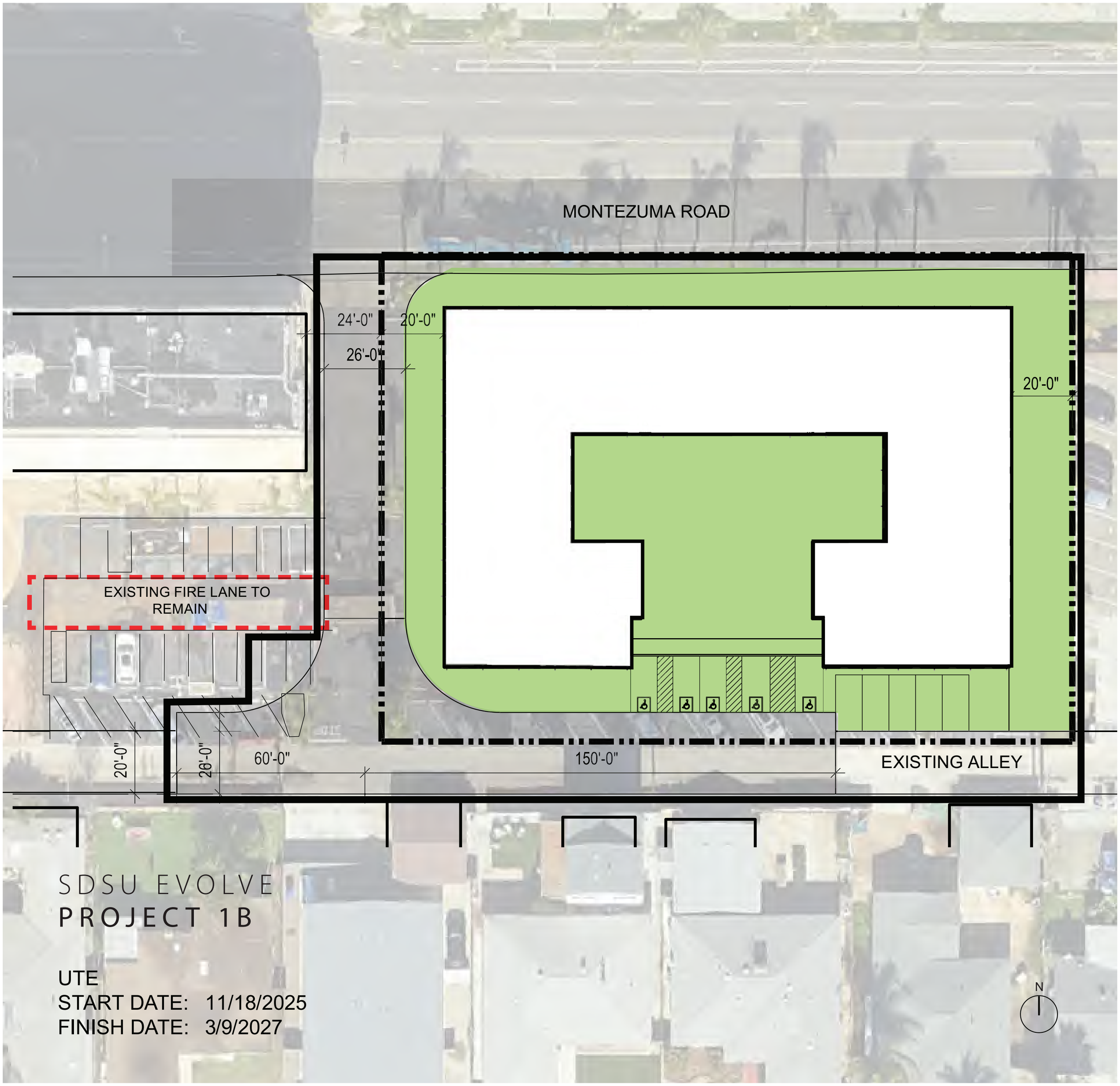

SOURCE: SDSU 2024

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SDSU Evolve Student Housing

San Diego State University

Figure 2-10B
Project Construction Phasing Plan
Phase 1B

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SDSU EVOLVE
PROJECT 2

- TYPE 1 CONSTRUCTION
- HIGH-RISE ELEMENTS (FOR THE APARTMENTS: PROJECTS 2 - 4)
- BUILDINGS DESIGNED TO CBC CHAPTER 7A REQUIREMENTS FOR VHFSZ
- LIMITED VEHICULAR ACCESS/TRAFFIC
- STATE HAS MORE RESTRICTIVE REQUIREMENTS FOR FIRE ACCESS THAN LOCAL JURISDICTION THAT IS RESPONDING TO INCIDENTS.

PROJECT 2: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: FLEX UNITS
140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83'-6" TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES
CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

Figure 2-10C
Project Construction Phasing Plan
Phase 2

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SDSU EVOLVE
PROJECT 3

- TYPE 1 CONSTRUCTION
- HIGH-RISE ELEMENTS (FOR THE APARTMENTS: PROJECTS 2 - 4)
- BUILDINGS DESIGNED TO CBC CHAPTER 7A REQUIREMENTS FOR VHFSZ
- LIMITED VEHICULAR ACCESS/TRAFFIC
- STATE HAS MORE RESTRICTIVE REQUIREMENTS FOR FIRE ACCESS THAN LOCAL JURISDICTION THAT IS RESPONDING TO INCIDENTS.

PROJECT 3: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS

PROJECT 2: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: FLEX UNITS
140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83'-6" TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES
CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

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SDSU EVOLVE
PROJECT 4

- TYPE 1 CONSTRUCTION
- HIGH-RISE ELEMENTS (FOR THE APARTMENTS: PROJECTS 2 - 4)
- BUILDINGS DESIGNED TO CBC CHAPTER 7A REQUIREMENTS FOR VHFSZ
- LIMITED VEHICULAR ACCESS/TRAFFIC
- STATE HAS MORE RESTRICTIVE REQUIREMENTS FOR FIRE ACCESS THAN LOCAL JURISDICTION THAT IS RESPONDING TO INCIDENTS.

START DATE: 8/13/2029
FINISH DATE: 12/23/2030

PROJECT 4: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 3: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS

PROJECT 2: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: FLEX UNITS
140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83'-6" TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES
CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

Figure 2-10E
Project Construction Phasing Plan
Phase 4

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SDSU EVOLVE
PROJECT 5

PROJECT 4: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 5: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 3: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS

PROJECT 2: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: FLEX UNITS
140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83'-6" TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES
CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

Figure 2-10F
Project Construction Phasing Plan
Phase 5

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SDSU EVOLVE
PROJECT 6

PROJECT 4: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 5: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 6: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 3: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS

PROJECT 2: APARTMENT STYLE UNITS
173,800 SF
TYPE 1-B CONCRETE
11-STORY HIGH RISE
R-2 OCCUPANCY
101'-6" TALL
FIRE SPRINKLERS, FIRE ALARM, SMOKE CONTROL
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: FLEX UNITS
140,378 SF
TYPE 1-B CONCRETE
9-STORY NON-HIGH RISE
R-2 OCCUPANCY
83'-6" TALL
FIRE SPRINKLERS, FIRE ALARM
VERY HIGH FIRE SEVERITY ZONE
NO SEISMIC JOINTS
RISK CATEGORY: II (<5,000 OCCUPANTS)

PROJECT 1A: AMENITIES
CONSTRUCTION TYPE: TBD
1-2 STORIES
10K SF DINING, 3K SF C-STORE, 3.5K MAILROOM, 5K SF CONFERENCE, 1.4K SF COFFEE SHOP

SOURCE: SDSU 2024

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3 Cumulative Methods and Projects

3.1 Introduction

This chapter is an introduction to the cumulative impacts analysis contained within each respective environmental topic section included in Chapter 4, Environmental Analysis. This chapter explains the purpose of analyzing cumulative impacts, discusses the cumulative forecasting methodology, and presents a list of past, present, and probable future projects producing related or cumulative impacts that were considered in assessing whether the incremental effect of the proposed San Diego State University Evolve Student Housing Project (Project or Proposed Project) would be cumulatively considerable, thereby resulting in a significant cumulative impact.

3.2 Purpose

The California Environmental Quality Act Guidelines define “cumulative impacts” as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (14 CCR Section 15355).

Cumulative impacts generally may result from the combined effect of past, present, and future projects located in proximity to a project under review. Therefore, a cumulative impacts analysis is to be viewed over time. The impacts of the Proposed Project were viewed in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the Project under review.

3.3 Cumulative Forecasting Methodology

To analyze the cumulative impacts of the Proposed Project with other past, present, or foreseeable future projects in the Project's vicinity, it is necessary to determine the type and specifics of the other projects in the area. One method to accomplish this is to compile a “list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency” (14 CCR Section 15130[b]).

Thus, to analyze the potential cumulative impacts of the Proposed Project, a list of past, present, and probable future projects in the area was compiled and is provided in Table 3-1. The list was compiled based on personal communications with San Diego State University staff and database and internet research. Analysis of the Proposed Project’s cumulative impacts is contained within the analysis of each separate environmental topical section presented in Chapter 4.

3.4 List of Cumulative Projects

Table 3-1 provides a list of approved and proposed development projects in the vicinity of the Proposed Project. Future projects were determined based on the date of the Notice of Preparation issuance (August 23, 2024) and are discussed to the extent that there is sufficient information available to determine the project’s general scope and size. Every effort has been made to provide the most current and accurate information possible. The status of the projects in the list may change over time as additional projects are proposed or as projects on the list are approved, withdrawn, or denied by the applicable jurisdiction.

Table 3-1 identifies the name, location, description, status, and projected buildout year (if available) of those cumulative projects within the vicinity of the Proposed Project. Figure 3-1, Cumulative Projects, depicts the location of each project listed in Table 3-1.

Table 3-1. Cumulative Projects

Number on Figure 3-1	Project Name	Project Location	Project Description	Status	Buildout Date
San Diego State University					
1	SDSU Performing Arts – Main Stage Theatre Renovation	SDSU Campus[1]	Renovate seating area of performing arts theater to improve accessibility.	Completed	Spring 2024
2	SDSU Performing Arts – Second Stage Theatre and Amenities	SDSU Campus	Construct a 15,600-gross-square-foot flexible use performance arts theater (the Second Stage Theater) and an adjacent 2,100-gross-square-foot structure (the Amenities Building), which would contain a box office, concessions, offices, and restroom facilities.	Completed	Fall 2023
3	SDSU Mission Valley Campus Master Plan	Mission Valley Community	Demolish and redevelop existing stadium and parking lot on 172 acres with up to 1.565 million square feet of academic/office space in 15 buildings; a new 35,000-capacity stadium; up to 95,000 square feet of commercial/retail space; up to 400 hotel rooms/40,000 square feet of conference space; 83 acres of parks and open space; up to 4,600 multi-family residences in 18 buildings; new on-site roadways, trails, bike paths, transit improvements and infrastructure; and off-site roadway improvements.	Planning	2037
4	Aztec Recreation Center Expansion	SDSU Campus	Expand the Aztec Recreation Center facility by approximately 68,000 gross square feet.	Completed	Fall 2021
5	New Student Housing	SDSU Campus	Construct a new first-year student residence hall to provide on-campus housing for 850 students.	Completed	Fall 2019
6	New Life Sciences Building	SDSU Campus	Construct an approximately 79,000-gross-square-foot new educational building to house instructional and	Planning	Summer 2027

Table 3-1. Cumulative Projects

Number on Figure 3-1	Project Name	Project Location	Project Description	Status	Buildout Date
	Project		research space on the campus, providing approximately 38,000 assignable square feet for instructional and research laboratories, related support spaces, and faculty offices.		
7	Huaxyacac Residence Hall	SDSU Campus	Construct a new residence hall to support the Sophomore Success program; includes new food service and community space to be shared with existing Chapultepec.	Completed	August 2019
8	Maya/ Olmeca Renovation	SDSU Campus	Phased renovation of two 1959 residence halls to replace HVAC systems, piping, fixtures, and finishes in restrooms, common areas, and resident rooms.	Completed	August 2019
City of San Diego					
1	63rd and Montezuma PDP	6253, 6263, and 6273 Montezuma Road	Demolish three buildings totaling approximately 18,751 square feet to allow construction of a five-story, 52,350-square-foot, 38-unit multifamily residential building.	Notice of Determination released March 2022	TBD
2	College View Apartments	5420 55th Street	Construct a six-story, 90-unit, 175,667-square-foot apartment building with subterranean parking garage on a 2.39-acre site.	Completed	Fall 2024
3	Stateside	6139–6147 Montezuma Road	Construct 102 student housing beds.	Under construction	TBD
4	Montezuma Hotel	6650 Montezuma Road	Construct a four-story, 67,990-square-foot, 58-foot-high, 125-room hotel.	Negative Declaration released 2019	TBD
5	College Area Sewer and Water SDP	Along Campanile Way, Campanile Drive, Baja Drive, 54th Street, and south of Baja Drive and east of Collwood Boulevard	Replace and abandon vitrified clay sewer mains and asbestos cement water mains and construct new mains and associated appurtenances.	Mitigated Negative Declaration released 2021	TBD

Sources: SDSU 2024a, 2024b, 2024c; The Barone Group 2024; City of San Diego 2024.
Notes: SDSU = San Diego State University; TBD = to be determined.
1 5500 Campanile Drive, San Diego, California.

3.5 References

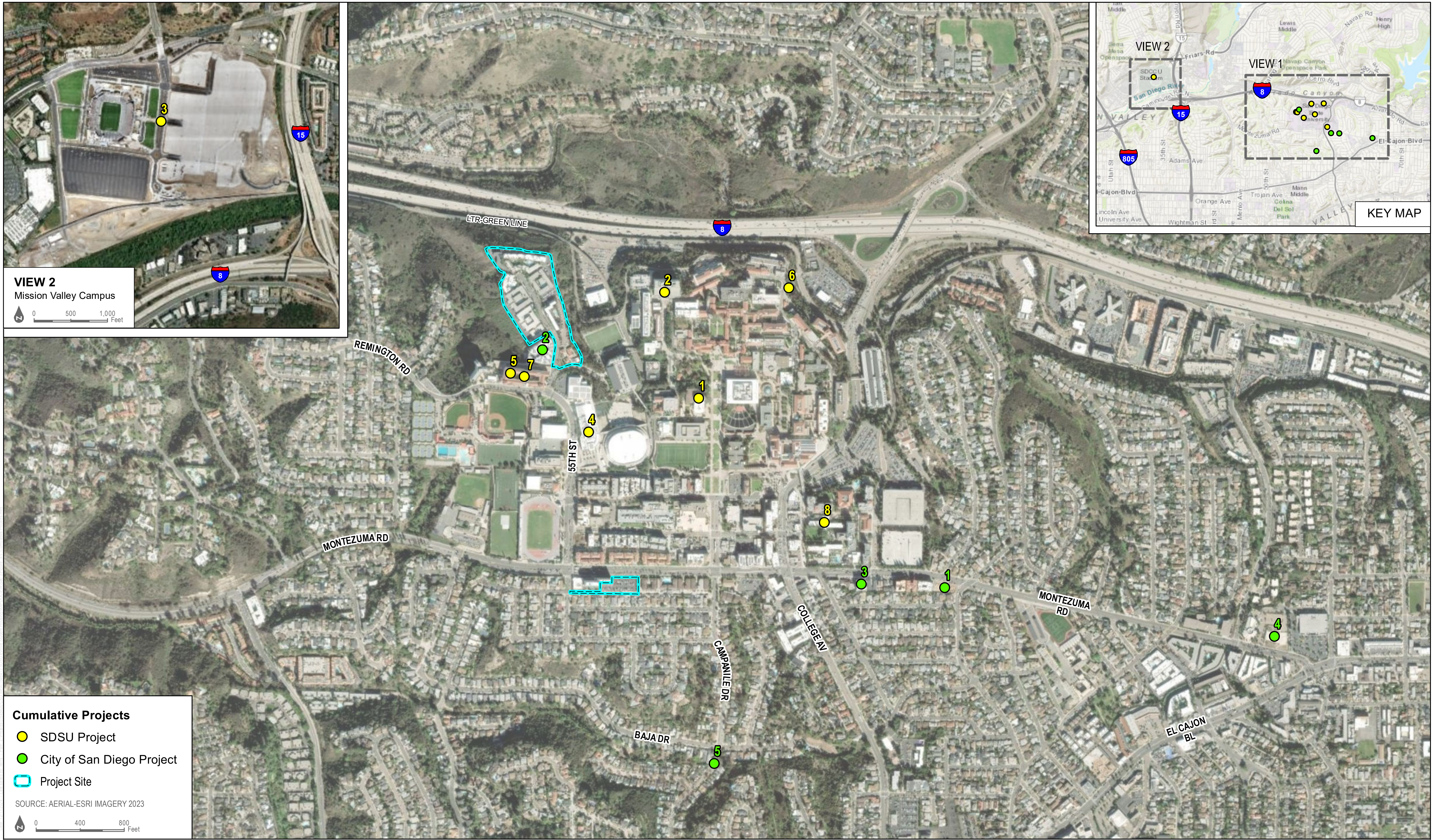
City of San Diego. 2024. "Final Environmental Documents." Accessed October 25, 2024. https://www.sandiego.gov/ceqa/final?search=college.

SDSU (San Diego State University). 2024a. "Capital Projects 2014–2021." September 12, 2024. https://bfa.sdsu.edu/campus/facilities/planning/conprojsum.

SDSU. 2024b. "Environmental Impact Reports (EIRs) & Other CEQA Documents." Updated September 6, 2024. Accessed September 12, 2024. https://bfa.sdsu.edu/campus/facilities/planning/eir.

SDSU. 2024c. "Construction, Renovation and Improvement Projects." Accessed October 25, 2024. https://housing.sdsu.edu/about/construction#:~:text=College%20View%20Apartments%20is%20currently%20under%20construction%20near,is%20scheduled%20to%20reach%20completion%20in%20Fall%202024.

The Barone Group. 2024. "New Residential Construction Project Underway Near SDSU." Accessed October 25, 2024. https://thebaronegroup.com/news/new-residential-construction-project-underway-near-sdsu/.



SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

FIGURE 3-1

Cumulative Projects

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4 Environmental Analysis

The purpose of this Draft Environmental Impact Report (EIR) is to evaluate the potential environmental effects of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project). SDSU issued a Notice of Preparation (NOP) and Initial Study on August 23, 2024. The NOP was transmitted to the Governor's Office of Land Use and Climate Innovation (formerly the State Clearinghouse), published in the San Diego Union-Tribune, posted in the office of the San Diego County Clerk, and distributed by registered mail to interested agencies, organizations, and individuals to solicit comments regarding the scope of issues and concerns related to the Project. In addition, two public scoping meetings were held—one at the SDSU campus on September 4, 2024, and one via webinar on September 5, 2024—at which time additional written and oral comments were provided by participants. All comments received in response to the NOP were submitted to SDSU and are contained in Appendix A of this Draft EIR. Sections 4.1 through 4.16 of this Draft EIR contain the analysis of potential environmental impacts associated with implementation of the proposed Project, and address the following impact categories:

- Aesthetics
- Air quality
- Biological resources
- Cultural resources and tribal cultural resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology and water quality
- Land use and planning
- Noise
- Population and housing
- Public services and recreation
- Transportation
- Utilities and service systems
- Wildfire

The Initial Study determined that the Proposed Project would not result in potential significant impacts related to agricultural resources or mineral resources. Therefore, these impact categories are not addressed in Chapter 4 and, instead, are addressed in Chapter 5, Other CEQA Considerations.

Analysis Format

This Draft EIR assesses whether the Proposed Project would impact each of the relevant environmental impact categories; whether such impacts would be significant or less than significant; and, if significant, whether mitigation would reduce the impacts to less than significant. The analysis of each environmental topic addressed in this Draft EIR is presented in the following format:

- **Existing Conditions**: Provides information describing the existing setting on or surrounding the Proposed Project site that may be subject to change as a result of implementation of the Project. This setting describes the conditions that existed when the NOP was issued, unless otherwise specified.
- **Regulatory Framework:** Provides a discussion of relevant federal, state, regional, and local regulations, plans, and policies applicable to the Proposed Project.
- **Significance Criteria**: Provides criteria for determining the significance of Project impacts for each environmental impact category.
- **Impacts Analysis**: Provides a discussion of the characteristics of the Project that may have an effect on the environment, analyzes the nature and extent to which the Project is expected to change the existing environment, and identifies whether Project impacts would be below or would exceed the level of significance criteria.
- **Cumulative Impacts:** Analyzes the Project's potential to contribute to an existing cumulative impact resulting in a significant cumulative contribution.
- **Summary of Impacts Prior to Mitigation**: Identifies the significance of the impact prior to imposition of mitigation measures.
- **Mitigation Measures:** Identifies mitigation measures to reduce potentially significant adverse impacts to the extent feasible, if applicable.
- **Level of Significance After Mitigation**: Determines whether the mitigation measures would reduce potentially significant impacts to less than significant, and identifies significant adverse environmental impacts that cannot be feasibly mitigated or avoided, if applicable. This section is only included for topics where potentially significant impacts are identified.
- **References**: Lists references sourced and reviewed to prepare the analysis.

4.1 Aesthetics

This section describes the existing visual conditions of the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criterion provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Aesthetics.

The analysis presented here is presented within the context of recent amendments to CEQA regarding the analysis of potential aesthetics-related impacts, which provide that for projects such as the Proposed Project, which would provide housing on an infill site in an area designated as a transit priority area, any impacts related to aesthetics shall not be considered significant impacts on the environment (California Public Resources Code, Section 21099[d]). Thus, this section does not consider aesthetics, including the aesthetic impacts of light and glare in determining the significance of Project impacts under CEQA. Nevertheless, CSU/SDSU recognizes that the public and decision makers may be interested in information about the aesthetic effects of the Proposed Project; therefore, the information contained in this section related to aesthetics, light and glare is provided solely for informational purposes and is not used to determine the significance of environmental impacts pursuant to CEQA.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received public comments expressing concern over proposed building height, effects to existing views, and potential glare generated by reflective building windows. The analysis presented below addresses each of these comments. See Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.1.1 Existing Conditions

4.1.1.1 Project Site and Surrounding Area

The Proposed Project is located on the campus of SDSU, within the City of San Diego, and consists of two component parts – the Peninsula Component, which is located at the northern end of 55th Street, and the University Towers East Component, located on the southside of Montezuma Road.

The Peninsula Component site currently contains eight, two-story apartment-style student residential buildings, a three-story apartment-style student residential building, the SDSU International Center complex, the SDSU Passport Office, the SDSU Global Education Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). Existing buildings on the Peninsula Component site are arranged in a semi-circle with asphalt parking lots on the outer edge of each parcel. Existing buildings are generally boxy in form, rectangular, U- or L-shaped in plan, feature stucco clad exteriors with limited application of stone veneer sections and include flat roofs. Landscaping is typically comprised of turf lawns, and mature trees and shrubs. Photographs of select existing development/buildings on the Peninsula Component site are included on Figure 4.1-1, Existing Conditions – Peninsula Component Site.

Surrounding uses on the Peninsula Component site include open space and residential housing to the west, open space, I-8, and residential housing to the north, university uses including parking, recreational fields, academic buildings, and student residential buildings are located to the east, south, and southwest of the Peninsula Component site. Densely vegetated canyon terrain is located to the west and a series of narrow mesas supporting single-family residential development in the College View Estates neighborhood extend north from Remington Road and are accessed via Hewlett Drive, Redding Road, Bixel Drive, and Dorman Drive. Approximately 18 residences are located off Hewlett Drive (and a narrow mesa landform) and the nearest residence is approximately 450 feet to the west of the Peninsula Component site. Hewlett Drive homes are constructed on terrain that abruptly descends from south to north (elevations are approximately 430 feet above mean sea level [amsl] near Remington Road and approximately 380 feet amsl near the northern terminus/cul-de-sac). Approximately 30 residences are located off Redding Road (and a narrow mesa landform) and the nearest residence is approximately 1,100 feet to the west of the Peninsula Component site. Similar to Hewlett Drive, elevations along Redding Road descend from south to north (elevations are approximately 435 feet amsl near Remington Road and approximately 370 feet amsl near the northern terminus/cul-de-sac).

The University Towers East Component site is currently utilized as a parking lot for University Towers, which is a nine-story student residential building clad in rough textured stucco concrete masonry units (CMU) blocks and featuring a flat roof. University Towers also includes a single-story, western addition that operates as a student dining option. Two-story, multi-family residential buildings (student housing) are located to the east of the University Towers East Component and stretch to Campanile Drive. The nine-story University Towers building is located to the immediate west of the site. The site is bordered on the south by Mary Lane Drive, which separates the site from the nearby single-family residences. Montezuma Road and university uses, including three-to four-story, stucco clad student-housing and recreation fields, including the SDSU Sports Deck, are located to the north and northwest of the University Towers East Component site. Photographs of select existing conditions at the University Towers East Component and University Towers sites are included on Figure 4.1-2, Existing Conditions – University Towers East Component Site.

4.1.1.2 Scenic Vistas and Scenic Resources

Publicly accessible and designated scenic vistas where views of the Project site are available are limited and consist primarily of prominent terrain located in Mission Trails Regional Park, of which the nearest trailhead is located approximately 2.9 miles to the northeast of the Peninsula Component. Cowles Mountain (elevation of 1,594 feet), Pyles Peak (elevation of 1,379 feet) and South Fortuna Summit (elevation of 1,094 feet) (Mission Trails Regional Park 2023) are located approximately 3.5, 3.85 and 4.1 miles northeast of the Project site, respectively. The summits of these mountains/peaks are accessible by the Cowles Mountain Trail, Pyles Peak Trail, and the North Fortuna Trail that provide recreationists broad panoramic views of Mission Valley, downtown San Diego, southern San Diego County and Tijuana. Long views to the north, east and west are also available from these elevated vantage points.

While the broad and long views available from the trails identified above are relatively similar, existing use and the visual character of the trails varies. The most popular of the three trails, Cowles Mountain Trail, is accessible via a developed staging area and parking lot located at the intersection of Golf Crest Drive and Navajo Road. From the staging area, hikers and trail runners climb the terrain in a general south to north alignment and a series of switchbacks provide ample viewing opportunities to the landscape to the south, including the SDSU campus. Wood post and rail fencing, and occasional mile markers mark the trail which experiences heavy traffic on weekends (generally from 30 minutes before sunrise to 30 minutes after sunset). Despite its relatively mild elevation profile and proximity to Cowles Mountain, the Pyles Peak Trail experiences light use, is narrow in width and is minimally marked. The trail traverses the western slopes of Cowles Mountain, Pyles Peak and intervening terrain and is continuously bordered by tall chaparral and coastal sage scrub vegetation. Views from the summit of Pyles Peak are similar to the wide, long views available from Cowles Mountain, however, due to a slightly lower elevation, the hills of northeastern Del Cerro block the majority of the SDSU campus from view. Lastly, the North Fortuna Trail is located in the northern portion of the regional park and consists of wide fire roads traversing moderate to steep terrain and a narrow, rock-strewn path that climbs the ridgeline of North Fortuna Mountain. Views from the summit are panoramic and are limited only by the presence of background mountainous terrain to the north, east, and south. The summits of both Cowles Mountain and Pyles Peak are located over 3.5 miles from the Project site and, while the site is visible from the peaks, the SDSU campus is viewed within the broader visual context of the development within the Allied Gardens and San Carlos neighborhoods, development along I-8 corridor, and more broadly, development within various City of San Diego neighborhoods including Downtown.

There are no designated scenic vistas identified in the College Area Community Plan (City of San Diego 1989) or the Navajo Community Plan (City of San Diego 2015) or in the 2024 City of San Diego General Plan (City of San Diego 2024).

4.1.1.2 Scenic Roads and Highways

State Scenic Highways

An eligible state scenic highway from Sunset Cliffs Boulevard to the San Diego/Imperial County boundary (Caltrans 2024), I-8 is located approximately 285 feet north of the Peninsula Component and 0.6 miles north of the University Towers East Component. Motorists on I-8 experience inferior angled views (i.e., views from a lower elevation to a particular object/structure located at a higher elevation in the landscape) to the Peninsula Component site. From eastbound I-8, the existing Peninsula Component site may be occasionally visible over an approximate 1,800-foot-long continuous segment of the interstate approach towards the site. From westbound I-8, the Peninsula Component site may be visible over an approximate 0.7-mile-long continuous segment of the interstate approach towards the site starting from approximately the College Avenue overpass. The posted speed limit on I-8 is 65 miles per hour and, therefore, the duration of any view is brief. Due to intervening topography, the University Towers East Component site is not visible from I-8.

Additional scenic highways in the general area include SR-52 (officially designated scenic highway paralleling the boundary of Mission Trails Regional Park i.e., east of Santo Road to near Mast Boulevard), SR-125 (officially designated scenic highway from SR-94 to I-8 near La Mesa) and SR-163 (officially designated scenic highway from the south to the north boundary of Balboa Park (Caltrans 2024). SR-52 is also an eligible state scenic highway from Interstate 5 to east of Santo Road and Mast Boulevard to SR-67 near Santee (Caltrans 2024). Neither the Peninsula Component nor the University East Towers Component sites are visible from any of the segments of eligible or officially designated state scenic highways listed above.

4.1.1.3 Visual Character and Quality

Key Observation Points

In addition to the discussion above under Project Site and Surrounding Area, existing visual character and quality of the site and views is described through the discussion of key observation points below.

Four locations from which representative views of the Peninsula Component site and two locations from which representative views of the University Towers East Component site are available to viewer groups in the surrounding area were selected to evaluate the anticipated visual change associated with implementation and operation of the Proposed Project. These locations/key observation points (i.e., KOPs) form the basis of the impact analysis as it relates to visual character and quality of the site and surrounding area. The views at identified locations are also characteristic of the range of viewing angles, distances, and general visibility to the Project site available to local viewer groups in the surrounding area. The quality of the existing view and character of the landscape at the KOPs was captured in photographs taken during the September 2024 photographic inventory. The location of the KOPs and their relationship to the Project site is depicted on Figure 4.1-3, Key Observation Points. The existing photographs taken at each KOP are included on Figures 4.1-4 and 4.1-5.

Table 4.1-1 below lists the identified KOPs and provides the location, approximate distance, viewing angle/observer position, and general visibility conditions to the Project site. A brief description of the view and visual character of the landscape also is provided below by key view location.

Table 4.1-1. Key Observation Points and General Visibility

KOPs	View Direction and Location	Distance to Project Site/Boundary (Approximate)	General Viewing Conditions to Project Site
Peninsula Component			
1	Southeast view from Adobe Falls Road	0.25 miles	Partially obstructed and obscured. Foreground landscaping/trees block the west portion of the Peninsula Component site from view; site visibility is limited to the north facades of three existing apartment buildings (three-stories each) lining the top of the visible mesa terrain. The existing on-campus Chapultepec Residence Hall is visible from this KOP.
2	Southwest view from Del Cerro Boulevard	0.45 miles	Mostly clear. Existing apartment buildings on the site are visible above single-family residences in the foreground. In addition to the Peninsula Component site, portions of the on-campus Chapultepec Residence Hall (11 stories), Huaxyacac East Residence Hall (5 stories), Fowler Athletic Center, and the Arts and Letters Building are visible from this location.
3	Northeast from Remington Road at Hewlett Drive	0.20 miles	Partially obstructed by intervening off-campus single-family residential development and Hewlett Drive street trees. Portions of select buildings on the Peninsula Component site are visible.
4	South from SDSU Lot 10 at Remington Road	0.20 miles northwest	Mostly obscured due to the higher elevation location of the viewpoint compared to Peninsula Component site (and by canyon vegetation lining the black metallic fence). Portions of two buildings on the Peninsula Component site are visible through gaps in existing vegetation in the foreground.
University Towers East Component			
5	Southwest from Montezuma Road	460 feet	Mostly clear. While some blockage of the site occurs due to nearby apartment development and landscaping (a tall hedge), some vehicles in the existing parking lot on the University Towers East Component site are visible (the 9-story University Towers Residence Hall is to the west).

Table 4.1-1. Key Observation Points and General Visibility

KOPs	View Direction and Location	Distance to Project Site/Boundary (Approximate)	General Viewing Conditions to Project Site
6	Northeast from Mary Lane Drive at 55th Street	390 feet	Obstructed by foreground single-family residences off Mary Lane Drive and by the existing 9-story University Towers Residence Hall.

4.1.1.4 Light, Glare, and Shading

Lighting and Glare

In addition to existing two- and three-story student housing development on the Peninsula Component site, there are numerous sources of existing light and glare. These sources include streetlights on 55th street, parking lot lighting at the University Towers East Component site, adjacent development/apartment lighting and lighting along Montezuma Road, primary exterior entrance and security lighting sources in the areas of Chapultepec Hall, Tony Gwynn Stadium. the Aztec Softball Field, Tennis Center, and Recreation Center. Fluorescent and LED lights from residential units at Chapultepec Hall are visible in the nighttime environment, and baseball, softball and tennis facilities located south of Remington Road support tall field lighting elements to facilitate evening events. In addition, streetlights, high sodium fixtures in parking lots, lights from motorists, and residential porch/window lights are visible in evening, nighttime, and early morning environment.

Sources of glare in the Project area primarily consist of glass windows in campus and off-campus facilities and structures. The prevalent Mission Architectural style displayed by campus facilities typically incorporates cool-colored stucco façades and modern residential developments along the Montezuma Road corridor generally consist of non-reflective exterior surfaces and finishes.

As a component of the Lighting Studies prepared for the Project by Francis Krahe & Associates Inc. (see Appendices B-2 and B-4), existing illuminance (i.e., the level of lighting falling on a given area expressed in foot candles or lumens per square foot) was measured and documented at nine monitoring locations. The locations of the monitoring sites are depicted on Figures 4.1-6a, Monitoring Sites for Measured Illuminance (Peninsula Component Site) and 4.1-6b, Monitoring Sites for Measured Illuminance (University Towers East Component Site). Horizontal and vertical plane lighting levels (and a qualitative evaluation of lighting levels) are listed in Table 4.1-2 for both components/sites. For context, measured illuminance greater than 0.74 footcandles (fc) is considered "high," from 0.09 to 0.74 fc is "medium," and levels less than 0.09 fc are considered "low" (see Appendices B-2 and B-4).

As shown on Table 4.1-2, monitoring sites M-N1 (north of the Peninsula Component, along Adobe Falls Road) and M-W2 (west of the Peninsula Component, along Hewlett Drive) are exposed to low (0 - 0.09 fc) horizontal illuminance. Sites M-W1 (located to the west of the Peninsula Component Site on Redding Road), M-W3 (located to the west on Hewlett Drive), M-W4 (SDSU Parking Lot 10A), M-W5 (located along the site's western boundary), M-E1 (located on the eastern boundary of the University Towers East Component), M-S2 (located directly south of the University Towers East Component along a public alleyway), and M-S3 (located at the southeastern corner of the University Towers East Component along a public alleyway) are all/each exposed to medium (0.09 to 0.74 fc) horizontal illuminance. Monitoring site M-S1 is exposed to high (higher than 0.74 fc) horizontal illuminance.

Monitoring sites M-N1, M-W1, M-W2, M-W3, and M-W4 experience low vertical luminance, M-W5 experiences medium, and M-E1, M-S1, M-S2, and M-S3 experience high vertical luminance under existing conditions. The measured illuminance at the 10 monitoring sites is listed in Table 4.1-2, below, along with an evaluation (high, medium, low).

Table 4.1-2. Measured Illuminance and Evaluation at Monitoring Sites (Existing Conditions)

Monitoring Site	Illuminance (footcandles)		Evaluation (High, Medium, or Low)	
	Horizontal	*Vertical*	*Horizontal*	*Vertical*
Peninsula Component Site				
M-N1	0.01	0.01	Low	Low
M-W1	0.15	0.06	Medium	Low
M-W2	0.01	0.01	Low	Low
M-W3	0.35	0.02	Medium	Low
M-W4	0.41	0.04	Medium	Low
M-W5	0.60	0.28	Medium	Medium
University Towers East Component Site				
M-E1	0.67	2.72	Medium	High
M-S1	1.00	1.58	High	High
M-S2	0.64	1.40	Medium	High
M-S3	0.13	0.77	Medium	High

Sources: Appendices B-2 and B-4.

In addition to existing illuminance levels, the Lighting Studies evaluate measured luminance at the same 10 monitoring sites. Whereas illuminance indicates the amount of lumens falling on a given surface, *luminance* describes the perceived brightness of an illuminated or luminous surface which is referred to as "contrast" and is determined by the variation of luminance. "High," "medium," and "low" contrast are terms used to describe the effect of the contrast ratios of greater than 30:1, between 10:1 and 30:1, and below 10:1, respectively.

Table 4.1-3 summarizes the measured luminance at each monitoring site along with qualitative evaluation of the existing luminance. As shown in the table, no luminance contrast ratios above 30:1 that would indicate a potential glare condition were measured at any of the 10 monitoring sites. The highest existing contrast ratio was 24.5:1 at monitoring site M-W4, which is located southwest of the Peninsula Component site at SDSU Parking Lot 10A. The lowest existing contrast ratio was 8.5:1 at monitoring site M-S1, which is located west of the University Towers East Component and on Mary Lane Drive.

Table 4.1-3. Measured Luminance at Monitoring Sites (Existing Conditions)

Monitoring Site	Luminance (cd/m^2)		Contrast Ratio (Max/Average)	Evaluation
	Maximum	*Average*		
Peninsula Component Site				
M-N1	14.5	174.0	12.0 : 1	Medium Average luminance, High Maximum luminance, Medium Contrast
M-W1	70.5	1,200.0	17.0 : 1	Medium Average luminance, High Maximum luminance, Medium Contrast

Table 4.1-3. Measured Luminance at Monitoring Sites (Existing Conditions)

Monitoring Site	Luminance (cd/m^2)		Contrast Ratio (Max/Average)	Evaluation
	Maximum	*Average*		
M-W2	3.6	40.3	11.2 : 1	Low Average luminance, Medium Maximum luminance, Medium Contrast
M-W3	478.6	8,999.0	17.1 : 1	High Average luminance, High Maximum luminance, Medium Contrast
M-W4	153.8	3,776.0	24.5 : 1	High Average luminance, High Maximum luminance, Medium Contrast
M-W5	534.0	8,438.0	15.8 : 1	High Average luminance, High Maximum luminance, Medium Contrast
University Towers East Component Site				
M-E1	387.8	4286.0	11.1 : 1	High Average luminance, High Maximum luminance, Medium Contrast
M-S1	354.2	3026.0	8.5 : 1	High Average luminance, High Maximum luminance, Low Contrast
M-S2	589.2	6508.0	11.0 : 1	High Average luminance, High Maximum luminance, Medium Contrast
M-S3	260.0	2485.0	9.6 : 1	High Average luminance, High Maximum luminance, Low Contrast

Sources: Appendices B-2 and B-4.
Notes: cd/m^2 = candelas per square meter.

Light trespass illuminance at the nearest sensitive use properties associated with the Project is calculated within a vertical plane at the sensitive use property line. The vertical plane extends from grade to a maximum viewing elevation above grade. Figures 4.1-7a, Vertical Plane Calculation Locations – Peninsula Component Site, and 4.1-7b, Vertical Plane Calculation Locations – University Towers East Component Site, identifies the vertical plane calculation locations near the component sites.

The distance varies from a minimum of 565 feet at Monitoring Site M-W2 directly west of the Peninsula Component site to a maximum of 1,360 feet at Monitoring Site M-N1 to the north. All Monitoring Sites have varying degrees of visibility toward the Project, and although several have partial views, the Lighting Studies assume a full direct view from all Monitoring Sites with no existing structures creating shading at the sensitive use properties. The distance from the University Towers East Component site to adjacent sensitive use properties is 0 feet at M-E1 and 20 feet at Monitoring Sites M-S1, M-S2, and M-S3 directly south of the site, with all Monitoring Sites having complete direct visibility toward the Project with no intervening topography, building structures, or landscape.

Shading

Daylight shading occurs when a landform or building mass prevents direct sunlight from falling onto a nearby property. The extent of daylight shading is dependent on several factors including daylight intensity, duration of shading, and time of year. Daylight shading may be caused by one landform or building mass or cumulatively from multiple sources.

As detailed in the Shading Studies for the Project prepared by Francis Krahe & Associates (Appendices B-3 and B-5), existing development on the Peninsula Component site is not casting measurable shadow/shading on any of the six monitoring sites (M-N1 and M-W1 through M-W5) throughout the year. Lastly, as no buildings are constructed on the University Towers East Component site, the site is not casting measurable shadow/shading on any of the four monitoring sites (M-E1 and M-S1 through M-S3).

4.1.2 Regulatory Framework

Federal

While there are no federal agency aesthetics or visual resource policies that would be applicable to the Proposed Project, illumination standards from the Illuminating Engineering Society of North America are included below for guidance concerning light trespass.

Illuminating Engineering Society of North America (IESNA)

The Illuminating Engineering Society of North America (IESNA) recommends illumination standards for a wide range of building and development types. These recommendations are widely recognized and accepted as best practices and are therefore a consistent predictor of the type and direction of illumination for any given building type. For all areas not governed by the regulatory building code, municipal code, or specifically defined requirements, the IESNA standards are used as the basis for establishing the amount and direction of light recommended for the Project.

The IESNA Standards define Outdoor Lighting Zones relative to a range of human activity versus natural habitat. LP-11-20, Environmental Considerations for Outdoor Lighting pages 11 & 12, establishes the Zone designation for a range of existing lighting conditions, from low or no existing lighting to high light levels in urban areas. These lighting zone definitions are referenced by the California Administrative Code as noted above in relation to allowable energy use for outdoor lighting. In addition, the IESNA standards define recommended Light Trespass limits (Appendix F to Appendix B-2, Light and Glare Analysis – Peninsula Project Component, of this Draft EIR) relative to the Outdoor Lighting Zones. The recommended Light Trespass illuminance limits define the maximum Light Trespass values in Lux and footcandles at the location where Light Trespass is under review.

The existing conditions surrounding the Project site are best described as Lighting Zone 3. IESNA Table 26.5 (see Appendix F to Appendix B-2 of this Draft EIR) lists a Pre-curfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for Zone 3.

The IESNA recommendations listed above are not a regulatory requirement and are superseded by the applicable California State University requirements for Light Trespass at sensitive properties.

State

California State Scenic Highway Program

Established in 1963 by the State Legislature and managed by the California Department of Transportation (Caltrans), the goal of the State Scenic Highway Program is to "preserve and enhance the natural beauty of

California" by identifying those portions of the State highway system and nearby scenic corridor that require special conservation treatment (Caltrans 2008). Highways included in the State Scenic Highway Program should "traverse an area of outstanding scenic quality, contain striking views, flora, geology, or other natural attributes" (Caltrans 2008). Eligible state scenic highways consist of state routes nominated for official designation by the local governing body with jurisdiction over the lands adjacent to the proposed scenic highway. In order to be identified as an "eligible" state scenic highway, a visual assessment of the proposed corridor and a Scenic Highway Proposal must be completed by the local jurisdiction and Caltrans must determine that the route meets scenic highway criteria. Official State Scenic Highway designation requires preparation of a Corridor Protection Plan by the local governing body that contains measures, ordinances, zoning, and/or planning policies applicable to the area of land within the scenic corridor and the Plan must be deemed acceptable by Caltrans.

From its western terminus to State Route (SR) 98 near Coyote Wells in western Imperial County, I-8 is an eligible state scenic highway (Caltrans 2024). In addition, SR-52 (eligible and official designated state scenic highway segments) and SR-125 from SR-94 to I-8 near La Mesa, and SR-163 from the south to the north boundary of Balboa Park (officially designated state scenic highways) are located within 6 miles of the Project site (Caltrans 2024).

Senate Bill 743 and Public Resources Code 21099

Senate Bill 743 (SB 743), which became effective on January 1, 2014, adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The Project site is located within 0.5 mile of the MTS SDSU Trolley Station, as well as the bus transit station at 55th Street and, therefore, the Project site is located within a transit priority area. Also, the Project site is currently developed and located in an urban area and, therefore, the Project is proposed on an infill site. In accordance with PRC Section 21099, the potential aesthetic impacts of the Proposed Project shall not be considered significant impacts on the environment.

California Code of Regulations, Title 24 (California Building Standards Code)

Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code, consists of regulations to control building standards throughout the State. The following components of Title 24 include standards related to exterior building and site lighting:

2022 Building Energy Efficiency Standards

The 2022 Building Energy Efficiency Standards, also referred to the California Energy Code (CEC), stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment.

Title 24 Part 6 includes the following requirements which apply to Glare in Section 130.2 Outdoor Lighting Controls and Equipment:

Section 130.2 OUTDOOR LIGHTING CONTROLS AND EQUIPMENT

"(b) Luminaire cutoff requirements. All outdoor luminaire of 6,200 initial luminaire lumens or greater, shall comply with backlight, uplight, and glare (collectively referred to as "BUG" in accordance with IES TM-15-11, Addendum A) requirements as follows:

Maximum zonal lumens for backlight, uplight, and glare shall be in accordance with Title 24, Part 11, Section 5.106.8.

Project light fixtures with less than 6,200 lumens are exempt from the requirements of Section 130.2.

2022 California Green Building Standards Code

The 2022 California Green Building Standards Code, which is Part 11 of Title 24, is commonly referred to as the CALGreen Code. Paragraph 5.106.8, Light Pollution Reduction, requires that all non-residential outdoor lighting must comply with the following requirements:

"The minimum requirements in the CEC for Lighting Zones 1 – 4 as defined in Chapter 10 of the California Administrative Code ….; Further requirements and exceptions are defined in 2022 Building Energy Efficiency Standards, Title 24 Part 6, Section 140.7 PRESCRIPTIVE REQUIREMENTS FOR OUTDOOR LIGHTING. Section 140.7 includes the following exceptions which apply to the Project exterior lighting:

"Exceptions to Section 140.7(a): When more than 50 percent of the light from a luminaire falls within one or more of the following applications for the lighting power for that luminaire shall be exempt from Section 140.7:

"4. Lighting for sports and athletic fields, and children's playgrounds." ….

"9. Landscape lighting."

California Energy Code Lighting Zone

The Project site and surrounding properties are within a suburban, institutional, and residential zone with extensive nighttime use, including the existing student residential apartment buildings, nearby residences to the west and north, and nearby SDSU facilities. Current best practices for lighting standards recognize the unique issues related to nighttime use adjacent to light sensitive locations. The California Administrative Code Table 10-114-A includes designations for Lighting Zones (LZ) 1 through 4, which correspond to the Light Trespass Illuminance recommendations published by IESNA. The IESNA recommendations for Light Trespass Illuminance vary based upon the extent of nighttime human activity and the extent of natural habitat.

All urban areas within California are designated Lighting Zone 3 as default under the CEC, which stipulates a maximum Light Trespass illuminance of 8 lux (0.74 footcandles). Per the California Administrative Code, Table 10-114-A, the designations for outdoor lighting zones in urban areas are as designated by the 2010 U.S. Census.

The Project site is within the geographic area corresponding to the definition of Lighting Zone 3. In addition, the IESNA defines Lighting Zone 3 as: "areas with moderately high lighting levels. These typically include commercial corridors, high intensity suburban commercial areas, town centers, mixed use areas, industrial uses and shipping and rail yards with high nighttime activity, high use recreational and playing fields, regional shopping malls, car dealerships, gas stations, and other nighttime active exterior retail areas."

IESNA Table 26.5 (see Appendix F to Appendix B-2 of this Draft EIR) lists a Pre-curfew 8 Lux (0.74 footcandles) maximum at the location where trespass is under review for Lighting Zone 3. The California standard is well defined and supported by the IESNA and ASHRAE, and other independent lighting organizations such as the International Dark Sky Organization and U.S. Green Building Council.

Local

SDSU Physical Master Plan

In 1997, several major planning efforts were undertaken at the university, one of which was the preparation and adoption of the SDSU Physical Master Plan Phase 1 Existing Conditions (SDSU Physical Master Plan). The Physical Master Plan provides a comprehensive, campus-wide build-out strategy, including campus background & history, land uses & facilities, planning & design elements, and draft design guidelines.

The draft design guidelines, included as Chapter 5 of the SDSU Physical Master Plan, provide criteria and standards for the continuing development of the campus. The guidelines consist of spatial environmental elements, architectural elements, landscape architectural elements, and circulation elements. Spatial environmental elements (campus entries, campus edges, campus landmarks, campus nodes, and campus views) are most responsible for creating the spatial environment of the SDSU campus. Architectural elements (site form and layout; campus neighborhoods; and building character, function & materials) are responsible for setting the design character of the campus and determining the circulation system. Landscape architecture elements (informal open space area; formal urban space area; landscape materials, furnishings & lighting; wayfinding systems; and memorial and public art) are responsible for creating a high visual and aesthetic quality to integrate architecture, landscape architecture, and other site components. Circulation elements (vehicular circulation & parking; pedestrian and bicycle circulation; transit facilities; and utility elements) are responsible for establishing access points and traffic patterns to minimize impacts with streets and facilities.

Lighting Policy

SDSU's lighting policy strives to achieve safety and security on all walkways and parking areas while also accentuating unique architectural qualities of campus facilities (SDSU 2007). SDSU's lighting policy also voluntarily follows the adopted ordinances of the City of San Diego for any outdoor lighting upgrades in attempts to reduce potential lighting impacts on astronomical research occurring at the Palomar and Mount Laguna observatories.

The design concept for on-campus exterior lighting is to achieve consistency in the selection of light sources, light fixture, poles, and material to improve the visual quality of an installation and reduce occurrences of cluttered and chaotic landscapes. General criteria applicable to all on-campus lighting includes use of high pressure or metal halide fixtures where public safety or aesthetic issues are important, achieving the minimum light distribution requirements necessary to provide a safe night-time environment and use of lighting (and varying intensity levels of lighting) to help direct motorists and pedestrians to major entrances and parking lots (SDSU 2007).

4.1.3 Significance Criteria

The significance criteria used to evaluate the project impacts to aesthetics are based on Appendix G of the CEQA Guidelines, Aesthetics. According to Appendix G, a significant impact related to aesthetics would occur if the Project would:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Regarding Significance Threshold 3 and pursuant to Public Resources Code 21071, an “urbanized area” is understood to mean either of the following:

1. An incorporated city that meets either of the following criteria:
   - Has a population of at least 100,000 persons.
   - Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.
2. An unincorporated area that satisfies the criteria in both paragraph (1) and (2) of the following criteria:
   - Is either of the following:
     - (A) Completely surrounded by one or more incorporated cities, and both of the following criteria are met:
       - (i) The population of the unincorporated area and the population of the surrounding incorporated city or cities equals not less than 100,000 persons.
       - (ii) The population density of the unincorporated area at least equals the population density of the surrounding city or cities.

SDSU is located within the geographical city limits of San Diego that, according to the California Department of Finance, had a population of 1,383,623 persons as of January 1, 2024 (California Department of Finance 2024). The SDSU campus is completely surrounded by urbanized communities and as such, the site of the Proposed Project is located within an urbanized area for purposes of this environmental analysis.

In the context of Significance Threshold 4 identified above related to lighting and glare, the determination of significance as presented in the Lighting Study for light and glare considers the following factors:

- The change in ambient nighttime levels as a result of Project light sources; and

- The extent to which Project lighting would spill off the Property and affect adjacent residential or other sensitive use properties.

Specifically, Project construction or building lighting would create a significant impact with regard to artificial light or glare if:

1. Light Trespass illuminance from the Proposed Project exceeds 0.74 fc at a residential property line, and therefore adversely changes the ambient light level at adjacent residential properties
   - Project exterior lighting is unshielded and aimed toward the adjacent undeveloped canyon.
   - Project exterior lighting luminance visible from residential properties must be less than high contrast conditions, i.e., less than 30 to 1 contrast ratio

For shading, the determination of significance relative to Project-generated shading considers the following factors:

The change in daylight shading as a result of the Project; and

The extent to which shade from the Project would affect adjacent light-sensitive use properties.

Based on the absence of state regulations that establish a specific significance threshold for shading, the following parameters are utilized as the basis of the Project's shading evaluations. Specifically, the Proposed Project would have a significant shade impact on nearby residential properties if:

1. The Proposed Project would create shadow conditions for more than 3 hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time from October 21st to February 21st.
2. The Proposed Project would create shadow conditions for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time between March 19th and September 22nd.

4.1.3.1 Project Design Features

Relative to light and glare, SDSU commits to the following project design features (PDFs) to substantially lessen impacts to the extent feasible during operation. As such, the following PDFs are considered part of the Project Description and the impact analysis presented below in Section 4.1.4 incorporates implementation of these PDFs.

PDF-AES-1 Peninsula Component exterior lighting will be installed in such a manner to be aimed away from Peninsula Component perimeter, and shielded to prevent backlight toward the Peninsula Component perimeter, to limit light trespass at the adjacent westerly undeveloped canyon.

PDF-AES-2 University Towers East Component exterior lighting will be shielded, aimed away from the University Towers East Component property line, and installed in such manner to limit light trespass to 0.74 fc maximum at adjacent residential use properties to the immediate east ("College Campanile Apartments") and immediate south (i.e., south of the shared alley and north of Mary Lane Drive) of the Project site.

PDF-AES-3 Sports Field Lighting will be installed in such manner to be shielded and or aimed to limit maximum surface luminance visible from any residential use to 100 cd/m2 to prevent glare.

PDF-AES-4 Site light fixtures at the perimeter of the Peninsula Component and University Towers East Component sites will comply with CALGreen Backlight Uplight Glare (BUG) requirements, including the use of backlight shields, and installed in such manner to limit maximum surface luminance visible from any residential use to 100 cd/m2 to prevent glare.

4.1.4 Impacts Analysis

1. Would the Project have a substantial adverse effect on a scenic vista?

Construction/Temporary Impacts

As detailed in Section 1.3, Project Description, construction of the Proposed Project would occur over six phases. During this timeframe, views from recreational trails and mountain summits in Mission Trails Regional Park to the Project site would be dynamic as mobilization, demolition, and site preparation activities would transition to establishment of building foundations that would eventually shift to erection of steel framing and construction of exterior shells. Temporary visual impacts associated with construction activities are primarily associated with the influx of construction workers, equipment and vehicles to the Project site and the noticeable changes to the existing form, line, color, and texture of the site resulting from demolition of existing structures, and grading activities.

While the visual effects of demolition, grading, and building construction may be noticeable to users of the Cowles Mountain, Pyles Peak and North Fortuna Trails and associated summits, these effects would occur over 3.5 miles away and at a considerably lower elevation compared to the elevation of regional park trails and summits. As such, Project construction would not entail the introduction of elements that could block, screen, or impede existing views from regional park trails or summits. Also, due to the distance between scenic vistas and the Project site, visual contrasts resulting from demolition, grading, and building construction (and associated infrastructure installation) would not be prominent in the visible landscape and would not attract substantial attention in available long and expansive views. As construction progresses and building frames and envelopes become more distinct, the distance between trails, summits and features on the Project site including buildings, landscaping, roads, and interim park uses (on the Peninsula Component site only) would reduce the prominence of these features in the visible landscape. Further, the verticality and massing of building frames and envelopes would not be strong attractants from scenic vistas as these elements would be backscreened (i.e., viewed in front of) by terrain, vegetation, and existing development (including multi-story residences halls on the SDSU campus). The backscreening effect would reduce the visual prominence of new building frames and envelopes on the Project site by altering perceptions of scale and mass through juxtaposition of Project components and existing built features. Backscreening would also help new building frames and envelopes to recede into the surrounding landscape/urban environment.

Because demolition, grading, and building construction (and associated infrastructure installation) would not entail the introduction of elements capable of blocking or screening available broad, panoramic views from scenic vistas and because new building frames and envelopes on the Project site would be backscreened by terrain, vegetation, and existing development that would reduce the visual prominence of new building frames and envelopes forms and lines, the Proposed Project would result in a **less-than-significant impact** to scenic vistas during construction.

Operational/Permanent Impacts

Once constructed, new development on the Peninsula Component site (one nine-story and five, up-to thirteen-story residence halls on the 10.3-acre site at the northwestern corner of the main SDSU campus) and University Towers East Component site (one nine-story residence hall) would have an altogether minor impact on the quality of existing views available from trails and peaks within Mission Trails Regional Park. Due to the distance between trails/peaks and the Project site, and the elevated vantage points offered along trails (and at peaks), new multi-story development on the Project site would not result in significant view blockage. The verticality of nine- and thirteen story buildings may result in limited interruption of views by screening land uses of smaller scale in the immediate area; however, screening of existing nearby development in views from elevated vantage points located more than 3.5 miles away would not result in a significant scenic vista impact. New development on the Project site would not result in significant degradation of existing views as new multi-story residence halls on the SDSU would be experienced/viewed alongside existing on- and off-campus multistory development, and the broad, expansive nature of views from elevated vantage points in Mission Trails Regional Park would not be adversely affected. In the morning and evening hours, side lighting may enhance the visibility of proposed residence halls by highlighting the lightly colored off-white color exteriors of structures against the backdrop of a collection of slightly darker and hazy colors in the landscape. However, these effects would not compromise the expansive, panoramic nature of views available from scenic vistas.

Because the proposed buildings and amenities/infrastructure on the Project site would not block, screen or impede the availability of expansive, panoramic views from popular trails and summits in Mission Trails Regional Park and because views to public resources, including the Pacific Ocean, San Diego Bay, and undeveloped canyon terrain would be unaffected by new development on the Project site, Project operations would result in **less-than-significant** impacts to scenic vistas.

As to the residentially developed mesa to the west of the proposed Peninsula Component site, including publicly accessible Remington Road, development of the Proposed Project would not have a substantial adverse effect on a scenic vista. As shown on Figure 4.1-12, Key Observation Point 3: Remington Road (Existing and Proposed Conditions), the scale of proposed development on the Peninsula Component site would have limited effects on the quality of existing views across the site. Under existing conditions, views to the east are available but limited to relatively non-descript developed hillsides with the existing 11-story Chapultepec Hall prominently located within the viewshed. While Project operations would entail the presence of tall, multistory development on the Peninsula Component site (and would result in some blockage of the background in available views), no visible alterations to the existing canyon terrain would occur and development would not result in a loss of a scenic vista. While the Project comprises buildings of greater scale compared to existing on-site conditions, the Peninsula Component site is currently developed with residential uses and landscaping and lacks particularly scenic resources. Further, the development of denser and taller development on the project site would generally be consistent with nearby residence development on the SDSU campus, including Chapultepec Hall (11-stories) and Huaxyacac Hall (5-stories). For these reasons, while views from publicly accessible vantage points in the residential areas to the west of the Peninsula Component site would be altered, development of the Proposed Project would not have a substantial adverse effect on a scenic vista and impacts would be **less than significant.**

Under California Public Resources Code section 21099(d)(1), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered [to have a] significant impact on the environment." Because the Proposed Project consists of residential/student housing to be developed within a mapped Transit Priority Area, any impacts related to aesthetics, including impacts to existing scenic views or scenic vistas, are not considered significant impacts on the environment.

2. Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Occasionally clear yet brief views to development on the Peninsula Component site (mostly apartments in the northern portion of the site) are available from the nearby segment of westbound I-8. The University Towers East Component site is not visible from I-8 and therefore, development on the University Towers East Component site would not impact views from the interstate. From the eastbound I-8 travel lanes (particularly the “fast” lane and nearest lanes), partial views to some development on the Peninsula Component site (and nearby development including 11-story Chapultepec Hall, 5-story Huaxyacac Hall, and College View Apartments) are occasionally available along an approximate 1,800-foot long continuous segment of the interstate approach towards the site. From westbound I-8, the Peninsula Component site may be visible over an approximate 0.7-mile long continuous segment of the interstate approach towards the site starting from approximately the College Avenue overpass. Due to intervening terrain, vegetation and existing development, views to the Project site are not available to motorists on additional scenic highways in the region including SR-52, SR-125, and SR-163.

Construction/Temporary Impacts

While the Peninsula Component site would be obscured by intervening canyon terrain and the elevated, horizontal concrete deck of the San Diego Trolley Green Line, construction activities along the edge of the mesa underlying the site would be briefly visible (albeit partially screened) to passing eastbound interstate motorists. Views from I-8 travel lanes to on-campus construction activities at the Peninsula Component site would be made in passing and would be experienced at relatively high travel speeds. Assuming a travel speed of 65 miles per hour and an available viewing window of 1,800 feet, partially screened views to construction activities along the edge of the Peninsula Component site would be available to eastbound motorists for less than 20 seconds. Existing views to the south along eastbound I-8 near the Project site are limited in extent by abruptly ascending canyon terrain that is retained and obscured by the continuous, relatively tall form of a sparsely vegetated concrete and rock accent retaining wall. The presence of this wall is concurrent with the segment of the San Diego Trolley Green Line that parallels but is vertically separated from the eastbound I-8 travel lanes between the Grantville and SDSU stations. Views to construction on the Peninsula Component site from westbound I-8 travel lanes would be available starting at/near the College Avenue overpass and would remain in the field of vision until motorists pass the site (a distance of approximately 0.7-mile or roughly 3,700 feet). Assuming a travel speed of 65 miles per hour and an available viewing window of 3,700 feet, partially screened views to construction activities along the edge of the Peninsula Component site would be available to eastbound motorists for less than 40 seconds. The duration of available views to activities on the Peninsula Component site would gradually increase as multi-story buildings increase in height and the associated building viewshed expands.

Noticeable changes to existing views and visual quality would result from demolition of existing structures, removal of landscaping, grading activities, and the progressive re-introduction of rectangular building frames and forms to the Peninsula Component site. As viewed from I-8, view effects would primarily be associated with the presence of taller construction equipment (i.e., cranes) and the construction of a series of tall residence halls. As the earlier stages of construction progress, building envelopes would begin to materialize and the proposed verticality of development would begin to become apparent. These construction activities and changes in site scale would be visible from a relatively short segment of I-8 that cuts through a landscape comprised of developed hillsides and mesas including multi-story development on the SDSU campus.

Construction associated with the Proposed Project would not substantially damage scenic resources within the I-8 view corridor as no particularly unique trees or rock outcroppings are located on the Peninsula Component site. In addition, no historic buildings on the site are located within the I-8 view corridor. Because views of construction activities on the Peninsula Component site from the nearby segment of I-8 would be temporary and dynamic, and because the site does not support particularly scenic resources, gradual visual alteration of the Peninsula Component site resulting from existing structure and development demolition, site preparation and grading, and building construction (and infrastructure and landscaping installation) would not result in substantial damage to trees, rock outcroppings, or other scenic resources (that are not currently supported on site). As such, potential impacts related to construction activities would be **less than significant.**

Operational/Permanent Impacts

Views to new residence halls on the Peninsula Component site would be available from east- and westbound I-8 near the SDSU Campus. Due to the scale of proposed residence halls (i.e., up to thirteen stories), views that include the upper floors of new buildings alongside nearby multistory campus development could be available from the westbound lanes of I-8 from as far away as four to five miles (views would not be continuous/available along a continuous stretch of the interstate over this distance). Following construction, views to proposed residence halls from eastbound travel lanes would be partially blocked by intervening terrain and nearby development, including the MTS Trolley (Project visibility during operations would be slightly greater than during construction and available for a distance of approximately 0.5 mile starting near Waring Road).

The scale of proposed development on the Peninsula Component site would have limited effects on the quality of existing views across the site. Under existing conditions, views to the Peninsula Component site are available but limited to existing apartment buildings along the site perimeter. As westbound motorists pass the existing Arts and Letters Building, more of the Peninsula Component site is revealed but due to the low viewing angle available from the interstate, visible components are limited to the apartments lining the edge of the canyon. While Project operations would entail the presence of tall, multistory development on the Peninsula Component site (and would result in some blockage of the background sky), no visible alterations to the existing canyon terrain would occur and development would not result in a loss of visible scenic resources. While the Project comprises buildings of greater scale compared to existing on-site conditions, the Peninsula Component site is currently developed with residential uses and landscaping and lacks particularly scenic resources. Further, the development of denser and taller development on the project site would generally be consistent with nearby residence development on the SDSU campus including Chapultepec Hall and Huaxyacac Hall that, in addition to the Arts and Letters Building, have previously altered the I-8 viewshed near the Peninsula Component site. Lastly, and due to the mobile nature of interstate views to the Peninsula Component site, the increased scale and density of residential development on the Peninsula Component site would not substantially damage scenic resources within the I-8 viewshed. Due to the fact that the Proposed Project would not substantially damage scenic resources within the I-8 corridor, the lack of scenic resources present on the currently developed site and the brief, intermittent, and mobile nature of interstate views to proposed multistory development on the Peninsula Component site, impacts to scenic resources within a state scenic highway would be **less than significant.**

Also, as previously noted, under California Public Resources Code section 21099(d)(1), "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered [to have a] significant impact on the environment." As such, any impacts related to aesthetics, including impacts related to a state scenic highway, are not considered significant impacts on the environment.

3. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Development of the Proposed Project would result in a change in the existing visual appearance/character of the Project site. As proposed, existing two- to three-story apartment building and parking lot development on the Project site would be demolished and redeveloped with multi-story (i.e., 9 to 13-story) residence halls, landscaping, parking, and various other site amenities. An illustrative site plan showing buildout of the Peninsula Component site is presented on Figure 2-6a in Chapter 2. Anticipated visual change at each of the six identified viewpoints is presented on Figures 4.1-10 through 4.1-15.

As a state entity, the applicable regulations relative to scenic quality are those adopted by the California State University (CSU)/SDSU. In this regard and as discussed below, the Proposed Project would be consistent with all applicable guidelines. As detailed below in Table 4.1-4, the Project would be consistent with applicable design guidelines of the SDSU Master Plan and as such, potential conflicts with regulations governing scenic quality would be **less than significant.**

Also, as previously noted, because the Proposed Project consists of residential/student housing to be developed within a mapped Transit Priority Area, any impacts related to aesthetics, including impacts related to applicable regulations governing scenic quality, are not considered significant impacts on the environment.

Table 4.1-4. SDSU Master Plan Design Guidelines Consistency Analysis

Guideline	Consistency Analysis
5.1 Campus Entries. Campus entries should be examined at two levels-entries for vehicles into the campus area and its associated parking areas, and the pedestrian entries into the central core of the campus. Entries are an integral part of the campus wayfinding system.	**Consistent.** The Peninsula Component would be located at the northern terminus of 55th Street, adjacent to the northwest portion of campus just south of I-8 and west of Canyon Crest Drive. I-8 is a major entry gateway into the campus as the northern entry to SDSU. The SDSU campus can be accessed from the north by College Avenue and can be accessed from the east or west by Montezuma Road, and east-west roadway near the southern boundary of the campus and accessed from the south via College Avenue. A perimeter road would circle the proposed development and this road would be designated for pedestrians, student micro-mobility devices, and utility/service and emergency vehicle access. In addition to providing site circulation, the perimeter road would double as a wellness and fitness path, accommodating a two-way bicycle/micro-mobility path, and a separate pedestrian path. The University Towers East Component entry would be accessible from Montezuma Road to the immediate north and Mary Lane Alley to the immediate south.
5.2 Campus Edges. The campus edge is the first visual element that all visitors, staff, faculty, and students experience. A vast majority of the general public may never enter the campus and therefore their perception of the campus will be limited to these edges. Edges are also very important in	**Consistent.** As described above, the northern terminus of 55th Street, adjacent to the northwest portion of campus just south of I-8 and west of Canyon Crest Drive includes a campus edge. Additionally, the campus edge along Montezuma Road serves as another crucial visual element for visitors, staff, faculty, and students. The Project would be designed consistent with the existing SDSU residential buildings to ensure harmony with the campus edges/boundaries.

Table 4.1-4. SDSU Master Plan Design Guidelines Consistency Analysis

Guideline	Consistency Analysis
identifying a sense of arrival and they form the first visual clues to warn the traveler that turning and entry decisions will need to be made.	
5.4 Campus Nodes. Nodes are important centers of activity that should encourage social interaction and provide places of rest and observation. Although a variety of nodes exist that include minor pedestrian activities, seating areas and plazas, these guidelines primarily address the larger nodes identified in Chapter 4.	**Consistent.** The Peninsula Component would include a courtyard with outdoor amenities such as study areas, outdoor gaming, student gathering, lounge seating areas, a large plaza area, outdoor dining, and event space. The University Towers East Component would include open space and exterior amenity areas.
5.5 Campus Views. Both internal and external views exist on campus. Internal views are covered under the guidelines for site layout and form. This section will discuss off-campus views that originate from on-campus viewpoints.	**Consistent.** The Peninsula Component would have major views of distant landmarks including Lower Mission Valley and Mount Soledad. The Project would not obstruct these views because the proposed structures would not display spatial or scale dominance in the broad, horizontal landscape visible from these views, specifically those from the proposed residence halls on the Peninsula Component site. In contrast, the University Towers component, located along Montezuma Road, does not encompass major views or viewpoints, thus maintaining consistency with the Campus Views guidelines.
5.6 Site Form and Layout. Implementation of basic site planning principles and spatial design guidelines will help to provide an understandable layout of the campus. Buildings should be arranged in a manner that promotes a coherent physical appearance, image, and Identity for SDSU. A consistent and unified architectural approach to site planning fosters a 'sense of order' and a 'sense of place.' Buildings which are properly sited provide a positive sense of order that will enhance the campus image.	**Consistent:** Site layout would be designed in accordance with SDSU's basic site planning principles and spatial design guidelines. The Peninsula Component would entail development of residence halls where lower scale, two- to three-story apartment buildings are currently located. The University Towers East Component consists of the development of a nine-story residence hall on an existing parking lot for the existing nine-story University Towers residence hall. The construction of residence halls on the proposed University Towers East Component site would aid in achieving an understandable layout of the campus. The layout of buildings on the two sites is deliberate and is intended to achieve the desired density and also create unique neighborhoods, amenities, and spaces for future on-campus residents. For both sites, multi-story development is proposed near existing multi-story development/residence halls to help promote a coherent appearance with the existing built environment.
5.8 Building Character, Function & Materials. These architectural guidelines focus primarily on those elements that relate to the context and character of the campus and upon appropriate architectural design.	**Consistent:** The proposed buildings at both the Peninsula Component and the University Towers Component would be designed to reflect the architectural character and context of the SDSU campus. Compliance with the California Building Code Chapter 7A, which governs materials and construction methods for exterior wildfire exposure, ensures that the buildings would utilize appropriate, durable materials. Furthermore, the architectural design would incorporate features that harmonize with the existing campus aesthetic, enhancing the overall visual coherence of the area while meeting functional requirements.

Table 4.1-4. SDSU Master Plan Design Guidelines Consistency Analysis

Guideline	Consistency Analysis
5.11 Landscape Materials, Furnishings & Lighting. A major component of landscape architectural guidelines is that of plant materials. Although this is just one of many components under landscape architecture, it is often thought by many as the definition of landscape. Site furnishings provide for functional use of exterior spaces and help to set the character of the space and relate it to adjacent architectural elements. Site furnishings are those items which make the outdoor environment safer, easier, and more pleasant to use and enjoy. Site furnishings include amenities such as benches and other objects used for sitting, tables, drinking fountains, trash containers, flag poles, bicycle racks and other man-made items located within the landscape. Arbors, overheads, pergolas and trellises are other elements that can extend architectural treatments into the open landscape. Exterior lighting performs a number of functional uses, primarily related to night-time safety, security, and wayfinding. The lighting system should define and reinforce the vehicular and pedestrian circulation systems. Even during daylight hours, lighting standards can help to define primary and secondary streets. Lighting is also necessary to highlight design treatments and spaces. Lights can be used artistically while still providing functional requirements of illumination and wayfinding	**Consistent:** Project landscaping would be designed to complement the architecture and accentuate the assets of the site by extending a natural aesthetic into the open space character (see Guideline 5.9 and 5.10). Additionally, the proposed landscape and hardscape plan would facilitate a pedestrian-oriented environment and would include avenues for multimodal circulation. Similar to the Peninsula Component, the proposed landscaping and overall site character of the University Towers East Component would be pedestrian oriented.

4. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Lighting

Operational/Permanent Impacts

The Lighting Studies prepared for the Proposed Project evaluate the light trespass illuminance from Project operations with respect to the regulations defined by CALGreen at the nearest residential property lines. The Lighting Study prepared for the Peninsula Component site analyzes the Proposed Project exterior lighting as described in the Conceptual Project Exterior Lighting Plan (included as Appendix A to the Lighting Study for the Peninsula Component site [Draft EIR Appendix B-2]) for both Phase 1 through 4 development plan, and Phase 5 and 6 development plan, which defines the lighting fixtures, locations, dimensions, and orientation. For the University Towers East Component site, the lighting study analyzes the Proposed Project exterior lighting as described in the Conceptual Project Exterior Lighting Plan (Appendix A to the Lighting Study for the University Towers East Component site [Draft EIR Appendix B-4]) which defines the lighting fixtures, locations, dimensions, and orientation.

The respective analyses for the Peninsula Component and University Towers East Component follow below. Also, as previously noted, under California Public Resources Code section 21099(d)(1), aesthetic impacts of a project such as the Proposed Project are not to be considered significant impacts to the environment. As such, any potential impacts related to light and glare that might be identified as potentially significant as part of the analysis are not considered significant impacts on the environment within the meaning of CEQA.

Peninsula Component Site – Phases 1-4

Table 4.1-5 illustrates the results of the analysis for the subject Phases based on the CALGreen threshold. As shown on the table, illuminance levels under this scenario would be below the applicable threshold.

Table 4.1-5. Calculated Light Trespass Illuminance (Peninsula Component Site Phases 1-4)

Vertical Plane	Illuminance (fc)			CALGreen Analysis (0.74 fc threshold)
	Maximum	*Minimum*	*Average*	
VP-N1	0.30	0.00	0.05	Below threshold
VP-W1	0.60	0.00	0.13	Below threshold

Source: Appendix B-2.

The maximum calculated light trespass illuminance resulting from operation of site lighting as presented in Table 4.1-5 varies from a minimum of 0.30 fc at vertical plane VP-N1 to a maximum of 0.60 fc at vertical plane VP-W1. The calculated Light Trespass illuminance from the Project exterior lighting (Phases 1-4) is below the maximum of 0.74 fc threshold established by CALGreen to the north and west of the Project site. Therefore, the Project exterior lighting (Phases 1-4) would not create a light trespass impact at nearby residential properties and impacts would be **less than significant.**

Peninsula Component Site – Phases 5 and 6

Table 4.1-6 illustrates the results of the analysis for the subject Phases based on the CALGreen threshold. As shown on the table, illuminance levels under this scenario would be below the applicable threshold.

Table 4.1-6. Calculated Light Trespass Illuminance (Peninsula Component Site Phases 5 and 6)

Vertical Plane	Illuminance (fc)			CALGreen Analysis (0.74 fc threshold)
	Maximum	*Minimum*	*Average*	
VP-N1	0.30	0.00	0.06	Below threshold
VP-W1	0.60	0.00	0.08	Below threshold

Source: Appendix B-2.

The maximum calculated light trespass illuminance resulting from operation of site lighting following completion of Phases 5 and 6 of development on the Peninsula Component site as presented in Table 4.1-6 varies from a minimum of 0.30 fc at vertical plane VP-N1 to a maximum of 0.60 fc at vertical plane VP-W1. The calculated light trespass illuminance from the Project exterior lighting (Phases 5 and 6) is below the maximum of 0.74 fc threshold established by CALGreen to the north and west of the Project site. Therefore, the Project exterior lighting (Phases 5 and 6) would not create a light trespass impact at nearby residential properties and impacts would be **less than significant.**

The undeveloped canyon areas to the west and north of the Project site are considered sensitive natural habitat areas for purposes of this analysis. Based on review of conceptual lighting plans developed by the Project Architect in Fall 2024 and with implementation of PDF-AES-1, the Project exterior lighting locates light poles near the perimeter of the Project site (i.e., along the perimeter road/path) but directs light toward proposed buildings/uses on the Project site and away the undeveloped canyon areas. Further and in accordance with PDF-AES-1, exterior lighting would be shielded to prevent backlight towards the undeveloped canyon area. As Project exterior lighting locates, orients, and shields fixtures to prevent light trespass from entering the undeveloped canyon area, lighting impacts at the border of the undeveloped canyon areas to the west and north of the Peninsula Component site would be **less than significant.**

University Towers East Component Site

Calculated Light Trespass data for the vertical planes located at the adjacent residential properties (see Figure 4.1-7b) is presented in Table 4.1-7.

Table 4.1-7. Calculated Light Trespass Illuminance (University Towers East Component Site)

Vertical Plane	Illuminance (fc)			CALGreen Analysis (0.74 fc threshold)
	Maximum	*Minimum*	*Average*	
VP-E1	0.70	0.00	0.13	Below threshold
VP-S1	0.30	0.00	0.05	Below threshold

Source: Appendix B-4.

Table 4.1-7 illustrates the results of the analysis based on the CALGreen threshold that assumes implementation of PDF-AES-2 at the University Towers East Component site. As shown on the table, illuminance levels under this scenario would be below the applicable threshold.

The maximum calculated light trespass illuminance in Table 4.1-7 varies from a maximum of 0.70fc at vertical plane VP-E1 to a minimum of 0.00 fc at vertical planes VP-S1 and VP-E1. The calculated light trespass illuminance from the Proposed Project (University Towers East Component) exterior lighting would be below the maximum of 0.74 fc threshold established by CALGreen to the east and south of the Project site at residential property lines. Therefore, with implementation of PDF-AES-2, the Project's exterior lighting at the University Towers East Component site would result in **less-than-significant** lighting impacts at residential properties to the immediately to the east and to the south.

Glare

Peninsula Component Site

Potential glare from Project exterior lighting at the Peninsula Component site is evaluated by calculating the Contrast Ratio, which is the ratio of the maximum Project exterior lighting luminance to the existing measured average luminance. Development of the Peninsula Component site (Phase 1 through Phase 4) includes exterior site lighting fixtures, which are specified with more than 6,200 lumens each, and are therefore subject to the requirements of CALGreen Section 5.106.8, which stipulates limits for off-site glare by compliance with IES TM-15-11. The Project lighting must comply with the requirements of CALGreen, and therefore the site lighting fixtures must have luminaire luminance of no more than 100 cd/m^2. Phase 1 through Phase 4 site lighting would be visible from the sensitive residential properties to the west and north, and are evaluated with a maximum luminance of 100 cd/m^2, which results in Low to medium Contrast conditions. Although these lights would be visible, they would not create a source of substantial glare, and would not create a significant glare impact. Impacts would be **less than significant.**

Phase 1 through Phase 4 exterior lighting also includes temporary sports field lighting fixtures. With implementation of PDF-AES-3 that entails the installation of sports field lighting in such manner to be shielded and or aimed to limit maximum surface luminance visible from any residential use to 100 cd/m2 to prevent glare, and PDF-AES-4 that would further limit surface luminance visibility, the resulting visible maximum surface luminance would be 100 cd/m^{2}or less. As proposed, the interim sports field lighting on the Peninsula Component site would have an exterior lighting luminance of 100 cd/m^2 that would result in Low to Medium Contrast Ratios for Monitoring Sites to the west of the Project site at M-W1, M-W2, and M-W4 (see Table 4.1-8 below). Therefore, the Project Phase 1 through Phase 4 exterior sports field lighting would not create a new source of substantial glare that would be visible to residential properties to the west of the Project site. Impacts would be **less than significant.**

Regarding Phases 5 through 6, perimeter roadway light poles within the Project site would be visible from the residential sensitive properties to the west and north, and are evaluated with a maximum luminance of 100 cd/m^2, which results in low contrast conditions. As the interim sports field lighting assessed above in the Phase 1 through Phase 4 scenario would not be in operation in Phases 5 and 6 (buildings would be constructed on the sports field sites in Phases 5 and 6), luminance from sports field lighting is not included in the Phase 5 and Phase 6 luminance results in Table 4.1-8 below. Although perimeter roadway light poles would be visible from off-campus monitoring sites, they would not create a source of substantial glare, and would not create a significant glare impact. Impacts would be **less than significant.**

Table 4.1-8. Exterior Lighting Contrast Ratio – Peninsula Component Site (Phases 1 through 4)

Monitoring Site	Existing Measured Luminance (cd/m^2)		Project Luminance		Evaluation
	Average	*Maximum*	*Maximum*	*Contrast Ratio*	
Phase 1 through 4					
M-N1	14.5	174.0	100.0	6.9 : 1	Low Contrast, no Glare
M-W1	70.5	1,200.0	100.0	1.4 : 1	Low Contrast, no Glare
M-W2	3.6	40.3	100.0	27.9 : 1	Medium Contrast, no Glare
M-W3	478.6	8,999.0	100.0	0.2 : 1	Low Contrast, no Glare
M-W4	153.8	3,776.0	100.0	0.7 : 1	Low Contrast, no Glare
M-W5	534.0	8,438.0	100.0	0.2 : 1	Low Contrast, no Glare
Phase 5 and 6					
M-N1	14.5	174.0	100.0	6.9 : 1	Low Contrast, no Glare
M-W1	70.5	1,200.0	100.0	1.4 : 1	Low Contrast, no Glare
M-W2	3.6	40.3	100.0	27.9 : 1	Medium Contrast, No Glare
M-W3	478.6	8,199.0	100.0	0.2 : 1	Low Contrast, no Glare
M-W4	153.8	3,776.0	100.0	0.7 : 1	Low Contrast, no Glare
M-W5	534.0	8,435.0	100.0	0.2 : 1	Low Contrast, no Glare

Source: Appendix B-2.

University Towers East Component

Similar to the Peninsula Component site, potential glare from the proposed exterior lighting at the University Towers East Component site is evaluated by calculating the Contrast Ratio. As proposed, exterior lighting at the University Towers East Component would include site lighting that is shielded and directed away from the adjacent properties. Table 4.1-9 summarizes the measured average luminance at each monitoring site along with a calculation of the comparison of the Proposed Project exterior lighting maximum luminance to the existing measured average luminance to determine the Contrast Ratio. As shown in Table 4.1-9, at all four monitoring sites the lighting would result in low contrast and no glare.

Table 4.1-9. Exterior Lighting Contrast Ratio – University Towers East Component Site

Monitoring Site	Existing Measured Luminance (cd/m^2)		Project Luminance		Evaluation
	Average	*Maximum*	*Maximum*	*Contrast Ratio*	
M-E1	387.8	4286.0	100.0	0.3 : 1	Low Contrast, No Glare
M-S1	354.2	3026.0	100.0	0.3 : 1	Low Contrast, No Glare
M-S2	589.2	6508.0	100.0	0.2 : 1	Low Contrast, No Glare
M-S3	260.0	2485.0	100.0	0.4 : 1	Low Contrast, No Glare

Source: Appendix B-4.

The calculated Contrast Ratio from proposed lighting at the University Towers Component Site at all monitoring sites viewing toward the Project site varies from a maximum of 0.4 to 1 at M-S3 to a minimum of 0.2 to 1 at M-S2; all Contrast Ratios would be considered Low Contrast. The proposed University Towers East Component site building and associated site improvements, and the visibility of the Project lighting fixtures from the adjacent residential properties to the east and south of the University Towers East Component site were analyzed assuming implementation of PDF-AES-4 and while exterior site lighting would be visible, it would not present a high contrast condition with greater than 30:1 Contrast Ratio. Regarding properties more distant from the University Towers East Component site than the monitoring sites, light degrades rapidly with distance and therefore, properties more distant than the monitoring sites from the Project site would receive substantially less light than the monitoring sites (i.e., contrast ratios would be comparatively less). Therefore, the Proposed Project exterior lighting would have a **less-than-significant** glare impact.

Shading

As previously noted, under California Public Resources Code section 21099(d)(1), aesthetic impacts of a project such as the Proposed Project are not to be considered significant impacts to the environment. As such, any potential impacts related to shading that might be identified as potentially significant impacts in the analyses presented below are not considered significant impacts on the environment within the meaning of CEQA.

As described above, the Proposed Project would have a significant shade impact on nearby residential properties if:

- The Project creates shadow conditions for more than 3 hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time from October 21st to February 21st.
- The Project creates shadow conditions for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time between March 19th and September 22nd.

The Project's potential to create Daylight Shading is calculated by comparing the amount of existing Daylight Shading that occurs from the Project site to the amount of Daylight Shading which would occur from the Proposed Project's new building mass at adjacent sensitive use properties.

As detailed in the Shading Study prepared for the Peninsula Component site (Appendix B-3), proposed development on the Peninsula Component site would introduce 1 hour of daylight shading at monitoring site M-W5 from 9:00 a.m. to 10:00 a.m. during the winter solstice, 2 hours of daylight shading at monitoring site M-W5 from 9:00 a.m. to 11:00 a.m. during the equinoxes, and 2 hours of daylight shading during the summer solstice at the Project's west site boundary (monitoring site M-W5) from 9:00 a.m. to 11:00 a.m. This location is immediately adjacent to the undeveloped canyon to the north and west of the Peninsula Component site, which is not considered a sensitive use with respect to daylight shading. No shading of other monitoring sites is anticipated during Project operations. Existing residential properties further to the west and north of the monitoring sites would not receive daylight shading from development on the Peninsula Component site at any of examined timeframes. Therefore, Project impacts relating to daylight shading associated with development of the Peninsula Component site would be **less than significant.**

Proposed development of the University Towers East Component site would introduce 2 hours of daylight shading at monitoring site M-E1 (i.e., the residential property to the immediate east of the University Towers East Component site) from 1:00 p.m. to 3:00 p.m. during the winter solstice, less than 4 hours of daylight shading at monitoring site M-E1 during the equinoxes, and less than 4 hours of daylight shading during the summer solstice at the existing residential property line immediately to the east of the University Towers East Component site (monitoring site M-E1). Existing residential properties to the south of the University Towers East Component site would not receive daylight shading from the Project at any of the times studied. Based on the evaluation of Project shading presented in the Shading Study prepared for the University Towers East Component site (Appendix B-5), Project impacts relating to daylight shading associated with development of the University Towers East Component site would be **less than significant.**

4.1.5 Cumulative Analysis

The geographic scope for the cumulative analysis for Aesthetics is the Proposed Project viewshed (3-mile) as presented on Figures 4.1-8 and 4.1-9.

As with the Proposed Project, none of the cumulative projects considered in this analysis would substantially obstruct or noticeably interrupt the available long and broad westward views from prominent peaks in Mission Trails Regional Park. Further and as there are no designated scenic vistas in the planning documents/community plans prepared for neighborhoods near the main SDSU campus, cumulative development considered in this analysis would not result in substantial adverse impacts to a scenic vista.

The nearest state scenic highways to the project site are I-8, SR-163, SR-52, and I-5. However, as described in the scenic highways discussion in Section 4.1.4 above, the Proposed Project would not be clearly visible from the designated scenic segments of above listed highways. As such, the analysis included herein pertains solely to potential cumulative scenic highway impacts from I-8. Similar to the Proposed Project, development of cumulative projects in the cumulative geographic scope for aesthetics (which primarily encompasses a built, urbanized landscape) would not likely require the removal of or damage to rock outcroppings or the removal of native and natural (i.e., non-landscaping related) trees. Cumulative development could potentially result in physical impacts to historic buildings (Project-specific technical studies and/or CEQA documents would evaluate this potential); however, as development of the Project would not result in physical impacts to historic buildings, the Proposed Project would not contribute to a potential cumulative impact concerning damage to scenic resources visible from a state scenic highway.

Regarding conflicts with policies and regulations governing scenic quality, the Proposed Project is designed to integrate with the existing design of the SDSU campus, and it does not introduce any significant conflicts with applicable design guidelines of the SDSU Master Plan. As a state entity, the applicable regulations relative to scenic quality for the Project are those adopted by the CSU/SDSU. In this regard, private or other non-CSU initiated cumulative development located off the main campus of SDSU and in the cumulative geographic scope for aesthetics would not combine with the Project to create a cumulative considerable impact concerning conflicts with applicable scenic quality regulations. Similarly, the Project is consistent with all identified design guidelines of the SDSU Master Plan and thus, would not contribute to a potential cumulative impact.

Cumulative development in the geographic scope area would generally occur on currently developed sites in an urbanized landscape that currently contains multiple nighttime lighting sources and building materials capable of producing glare and/or shading on nearby properties. Similar to the Proposed Project, the development and redevelopment of sites in the cumulative geographic scope area could entail the introduction of new lighting that may result in light trespass in excess of established standards, high luminance/high contrast ratios, and/or new shading or a duration in excess of established standards. Regarding lighting, all cumulative residential development under the jurisdiction of the City would be required to conform to Section 1410.0401, Light Pollution Reduction of Residential Buildings, which includes standards regarding light pollution reduction. Similarly, the San Diego Municipal Code contains light pollution reduction standards for residential development (see Section 1410.0401) that includes the use of shields and flat lenses in lighting that reduce opportunities for glare. Through compliance with existing regulations and environmental review, glare effects associated with non-CSU initiated cumulative development considered is not anticipated to substantially affect the quality of existing day and nighttime views. Regarding shading, development of the Project site was determined to result in less-than-significant shading impacts to nearby properties. This determination, in combination with the highly localized nature of shading effects, leads to the conclusion that new shading generated by Project development would not be cumulatively considerable and the Project would not contribute to a potentially significant cumulative shading impact.

Therefore, cumulative impacts related to aesthetics would be **less than significan**t.

4.1.6 Summary of Impacts Prior to Mitigation

As discussed throughout this section, under California Public Resources Code section 21099(d)(1), aesthetic impacts of a project such as the Proposed Project are not to be considered significant impacts to the environment. As such, any potentially significant impacts related to aesthetics identified under the analyses presented in this section are not considered significant impacts on the environment for CEQA purposes.

Potential impacts to scenic vistas, scenic resources within a state scenic highway, and conflicts with applicable scenic quality regulations were determined to be **less than significant.**

Regarding non-sports field lighting at the Peninsula Component site, the Project would place light poles near the perimeter of the site and lighting sources would be shielded and directed away undeveloped canyon areas through implementation of PDF-AES-1. Therefore, the Project exterior lighting would create a **less-than-significant** lighting impact at the border of the undeveloped canyon areas to the west and north of the Peninsula Component site.

Regarding lighting at the University Towers East Component site, the Project would implement PDF-AES-2 and the calculated light trespass illuminance from proposed exterior lighting sources would not exceed the maximum of 0.74 fc threshold established by CALGreen to the immediate east and south of the Project site at residential property lines. Therefore, the Project's exterior lighting at the University Towers East Component site would result in **less-than-significant** lighting impacts at residential properties to the immediately to the east and to the south.

Regarding temporary sports field lighting that would be installed at the Peninsula Component site following development of Phases 1 through 4, the interim sports field lighting would have a maximum exterior lighting luminance of 100 cd/m^2 and through implementation of PDF-AES-3 and PDF-4, field lighting would result in Low to Medium Contrast Ratios for Monitoring Sites to the west of the Project site. Therefore, the exterior sports field lighting at the Peninsula Component site would not create a new source of substantial glare that would be visible to residential properties to the west of the Project site and impacts would be **less than significant.**

Operation of proposed lighting at the University Towers East Component site would result in a **less-than-significant** glare impact.

Lastly, shading impacts associated with development of new structures on the Project site would be **less than significant.**

4.1.7 Mitigation Measures

No mitigation measures are required or proposed.

4.1.9 References

California Department of Finance. 2024. Estimates -E1: Population and Housing Estimates for Cities, Counties, and the State – January 1, 2023 and 2024. Released May 1, 2024.

Caltrans (California Department of Transportation). 2008. Scenic Highway Guidelines.

Caltrans. 2024. "California State Scenic Highways". https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Access October 23, 2024.

City of San Diego. 1989. College Area Community Plan.

City of San Diego. 2015. Navajo Community Plan.

City of San Diego. 2024. General Plan. July.

Mission Trails Regional Park. 2023. Mission Trails Regional Park Trail Map. Updated May 2023.

SDSU (San Diego State University). 2007. SDSU Physical Master Plan Phase I. May.

SOURCE: DUDEK 2024

Figure 4.1-1
Existing Conditions – Peninsula Component Site

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SOURCE: DUDEK 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-2
Existing Conditions–
University Towers East Component Site

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-3
Key Observation Points

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KOP 1

KOP 2

KOP 3

KOP 4

SOURCE: DUDEK 2024

SDSU Evolve Student Housing

San Diego State University

Figure 4.1-4

Existing Conditions - KOP 1, KOP 2, KOP 3, and KOP 4 (Peninsula Component Site)

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KOP 5

SOURCE: DUDEK 2024

KOP 6

SDSU Evolve Student Housing

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Figure 4.1-5
Existing Conditions - KOP 5 and KOP 6 (University Towers East Component Site)

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SOURCE: FRANCIS KRAHE 2024

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-6A
Monitoring Sites for Measured Illuminance
Peninsula Component Site

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SOURCE: FRANCIS KRAHE 2024

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-6B

Monitoring Sites for Measured Illuminance
University Towers East Component Site

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SOURCE: FRANCIS KRAHE 2024

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SDSU Evolve Student Housing

San Diego State University

Figure 4.1-7A

Vertical Plan Calculation Locations
Peninsula Component Site

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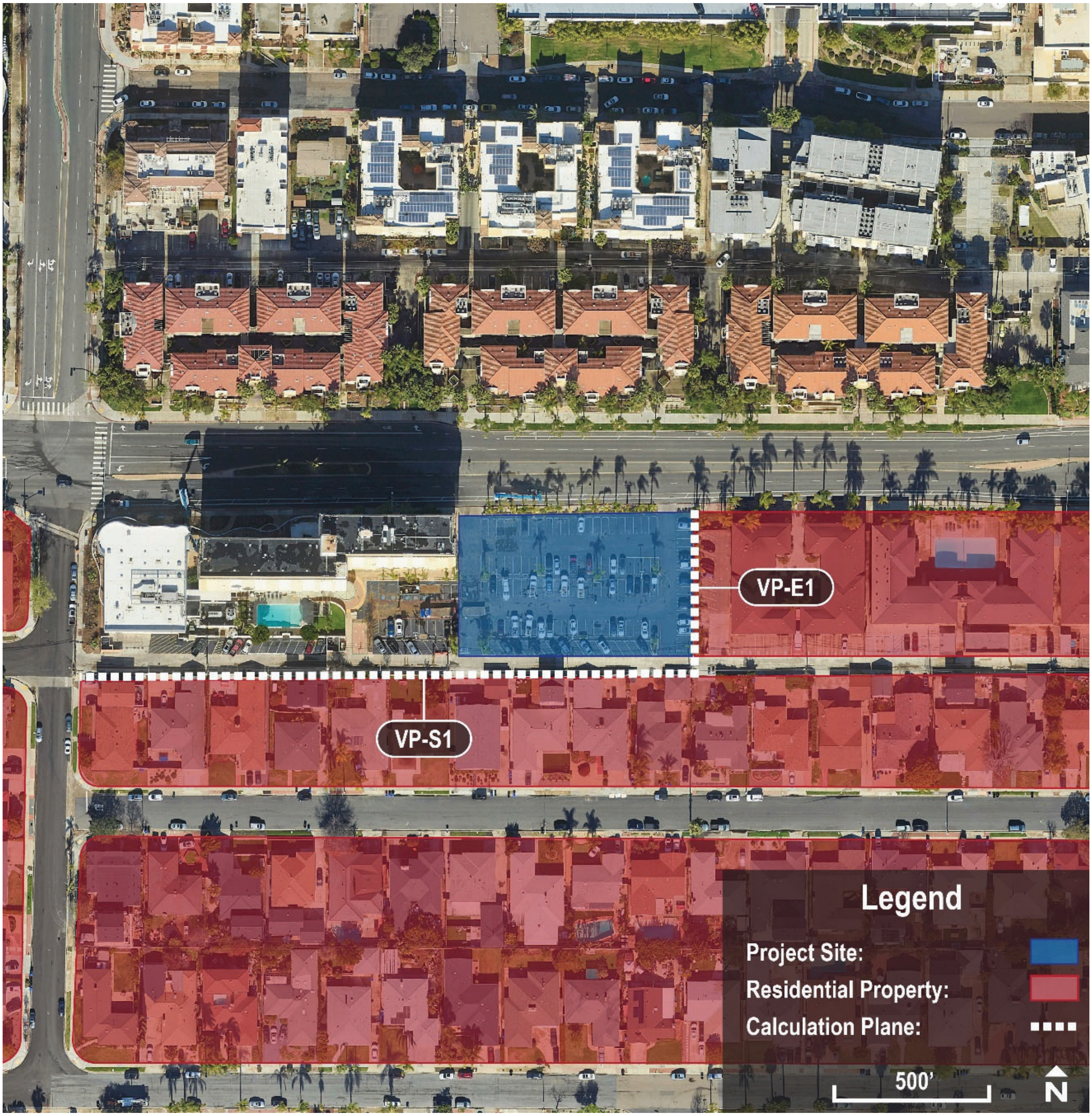

SOURCE: FRANCIS KRAHE 2024

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-7B
Vertical Plan Calculation Locations
University Towers East Component Site

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-8

Viewshed (3 mile) - Peninsula Component Site

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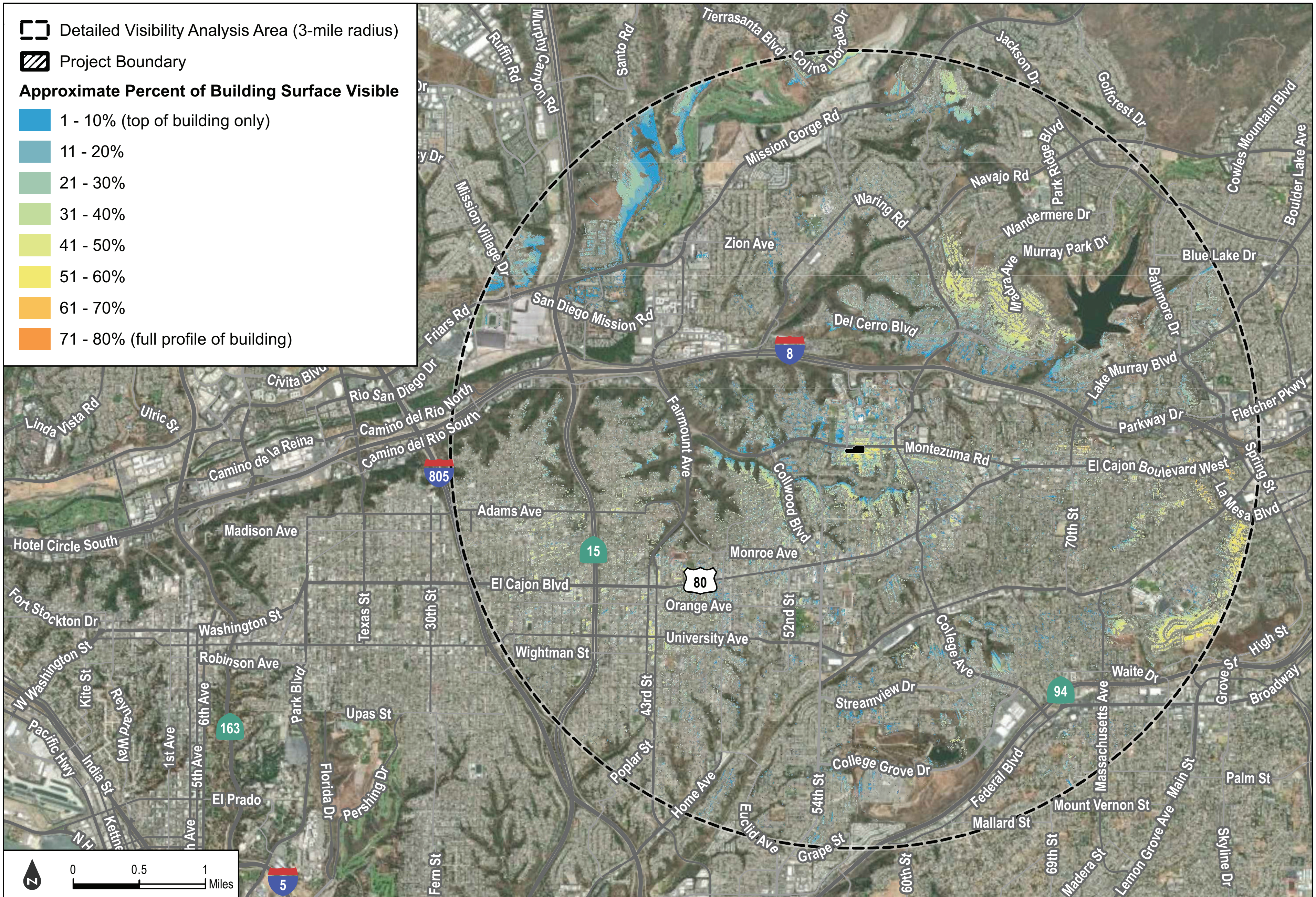

SDSU Evolve Student Housing

San Diego State University

Figure 4.1-9
Viewshed (3 mile) - University Towers East Component Site

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-10
Key Observation Point 1: Adobe Falls Road
(Existing and Proposed Conditions)

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-11
Key Observation Point 2:
Del Cerro Boulevard
(Existing and Proposed Conditions)

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

Figure 4.1-12
Key Observation Point 3: Remington Road
(Existing and Proposed Conditions)

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-13
Key Observation Point 4: SDSU Lot 10
(Existing and Proposed Conditions)

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

SDSU Evolve Student Housing

San Diego State University

Figure 4.1-14
Key Observation Point 5: Montezuma Road
(Existing and Proposed Conditions)

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EXISTING

PROPOSED

SOURCE: DUDEK 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.1-15
Key Observation Point 6: Mary Lane Drive
(Existing and Proposed Conditions)

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4.2 Air Quality

This section describes the existing air quality conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Air Quality, and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant. The information and analysis presented in this section is supported by Appendix C.

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to air quality issues concerning impacts from demolition and impacts from fugitive dust and other toxics. These public comments/concerns are addressed in the analysis within this section. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a compilation of comments received in response to the Notice of Preparation.

4.2.1 Existing Conditions

The Project site is located within the San Diego Air Basin (SDAB) and is subject to applicable regulations of the San Diego Air Pollution Control District (SDAPCD). The SDAB is 1 of 15 air basins that geographically divide the State of California. The SDAB lies in the southwest corner of California, comprises the entire San Diego region (covering approximately 4,260 square miles), and is an area of high air pollution potential.

Meteorological and Topographical Conditions

The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems. The SDAB experiences warm summers, mild winters, infrequent rainfall, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The local climate is characterized as semi-arid with consistently mild, warmer temperatures throughout the year. The annual average high temperature in the region is approximately 69.9°F. The annual average low temperature is approximately 56.5°F. Average precipitation in the local area is approximately 10.13 inches per year, with the bulk of precipitation falling between November and March (WRCC 2024).

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east. Along with local meteorology, the topography influences the dispersal and movement of pollutants in the SDAB. The mountains to the east limit dispersal of pollutants in that direction and periodically trap them in inversion layers as described below.

The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High-Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. Another type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses can also trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce ozone (O_3), commonly known as smog.

Light daytime winds, predominantly from the west, further influence the ambient air quality conditions by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to emissions of carbon monoxide (CO) and oxides of nitrogen (NO_x). CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the SDAB are associated with areas experiencing heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days when O_3 concentrations are lower.

Sensitive Receptors

Some land users are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. The SDAPCD identifies sensitive receptors as those who are especially susceptible to adverse health effects from exposure to toxic air contaminants (TACs), such as children, the elderly, and the ill. Sensitive receptors include schools (grades kindergarten through 12), day care centers, nursing homes, retirement homes, health clinics, and hospitals within 2 kilometers of the facility (CARB 2005; SDACPD 2019).

The closest sensitive receptors to the Proposed Project are existing dormitories on site and off-site residences.

Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards (criteria) for outdoor concentrations of those pollutants to protect public health. The federal and state standards are set, with an adequate margin of safety, to identify the pollutant levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. These pollutants, as well as TACs, are discussed in the following paragraphs.[1]

Ozone

O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the

1 The descriptions of each of the criteria air pollutants and their associated health effects are based on the U.S. Environmental Protection Agency's Criteria Air Pollutants (EPA 2016b) and the California Air Resources Board Glossary of Air Pollutant Terms (CARB 2016a).

source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies.

O_3 exists in the upper atmosphere O_3 layer (stratospheric ozone) and at the Earth's surface in the troposphere (ozone).[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is, thus, considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; more specifically, short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors, such as the sick, the elderly, and young children.

Nitrogen Dioxide

NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2016a).

NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources of NO_x are transportation and stationary fuel combustion sources, such as electric utility and industrial boilers.

Carbon Monoxide

CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

2 The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

Sulfur Dioxide

Sulfur dioxide (SO_2) is a colorless, pungent gas formed primarily from the incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Fine particulate matter, or particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs. Coarse particulate matter, or particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater human health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. As a result, $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the bloodstream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM_{10} and $PM_{2.5}$ (EPA 2009).

Lead

Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, however, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Volatile Organic Compounds

Hydrocarbons are organic gases that are formed from hydrogen and carbon, and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the primary sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs, which are discussed below. There are no separate health standards for VOCs as a group.

Sulfates

Sulfates are the fully oxidized form of sulfur, and typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere. Sulfates can result in respiratory impairment and reduced visibility.

Vinyl Chloride

Vinyl chloride is a colorless gas with a mild, sweet odor that has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in the air can cause nervous system effects such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide

Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles

Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$, described above.

Non-Criteria Air Pollutants

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure or acute and/or chronic non-cancer health effects. A toxic substance released into the air is considered a TAC. Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter

Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM) (17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines, including on-road diesel engines from trucks, buses, and cars and off-road diesel engines from locomotives, marine vessels, and heavy-duty construction equipment, among others.

Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2016b). Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Odorous Compounds

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and, overall, is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Valley Fever

Coccidioidomycosis, more commonly known as "valley fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. The fungus is very prevalent in the soils of California's San Joaquin Valley. The ecological factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, and sandy soils.

San Diego County (County) is not currently considered a highly endemic region for valley fever, as the latest report from the California Department of Public Health found the County had 13.6 reported cases per 100,000 people in 2023 (California Department of Public Health 2023). (In California, counties are considered to be highly endemic for valley fever if there are more than 20 cases reported per 100,000 people per year.) Among the total reported incidents of valley fever in 2021, less than 5 cases were in in SDSU's zip code (92182) (County of San Diego 2023).

San Diego Air Basin Attainment Designation

Pursuant to the 1990 federal Clean Air Act (CAA) amendments, EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, calls for the designation of areas as "attainment" or "nonattainment," but based on California Ambient Air Quality Standards (CAAQS) rather than the NAAQS. Table 4.2-1 depicts the current attainment status of the SDAB with respect to the NAAQS and CAAQS.

Table 4.2-1. San Diego Air Basin Attainment Classification

Pollutant	Designation/Classification	
	Federal Standards	*State Standards*
Ozone (O_3) – 1 hour	No national standard	**Nonattainment**
O_3 – (8 hour)	**Nonattainment (moderate)**	**Nonattainment**
Nitrogen Dioxide (NO_2)	Unclassifiable/attainment	Attainment
Carbon Monoxide (CO)	Attainment (maintenance)	Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/attainment	Attainment
Coarse Particulate Matter (PM_{10})	Unclassifiable/attainment	**Nonattainment**
Fine Particulate Matter ($PM_{2.5}$)	Unclassifiable/attainment	**Nonattainment**
Lead	Unclassifiable/attainment	Attainment
Hydrogen Sulfide	No federal standard	Attainment
Sulfates	No federal standard	Unclassified
Visibility-Reducing Particles	No federal standard	Unclassified
Vinyl Chloride	No federal standard	No designation

Sources: SDAPCD 2024.
Notes: Attainment = meets the standards; Attainment/maintenance = achieves the standards after a nonattainment designation; Nonattainment = does not meet the standards; Unclassified or Unclassifiable = insufficient data to classify; Unclassifiable/attainment = meets the standard or is expected to be meet the standard despite a lack of monitoring data.
If nonattainment for federal standards, a clarifying classification is provided indicating the severity of the nonattainment status.

In summary, the SDAB is designated as a nonattainment area for the federal and state 8-hour O_3 standards. The SDAB is also designated as a nonattainment area for the state 1-hour O_3, PM_{10}, and $PM_{2.5}$ standards. The portion of the SDAB where the Proposed Project would be located is designated as attainment or unclassifiable/unclassified for all other criteria pollutants under the NAAQS and CAAQS.

Local Ambient Air Quality

CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Local ambient air quality is monitored by the SDAPCD. The SDAPCD operates a network of ambient air monitoring stations throughout the County that measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS.

The SDAPCD-operated monitoring station closest to the Project site is the Sherman Elementary School monitoring station, which is located approximately 6 miles southwest of the Project site. This monitoring station's data are used to represent the background ambient air quality concentrations for O_3, NO_2, and $PM_{2.5}$ in the vicinity of the Project site. The monitoring station located on Rancho Carmel Drive is the closest to the Project site that monitors CO (14 miles north of the Project site). The First Street monitoring station in El Cajon (7 miles east of the Project site) is the closest for SO_2. And the Chula Vista monitoring station (10 miles south of the Project site) is the closest for PM_{10}. Table 4.2-2 presents the most recent background ambient air quality data and number of days exceeding the ambient air quality standards in 2021 to 2023 at these monitoring stations.

Table 4.2-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	*2022*	*2023*	*2021*	*2022*	*2023*
Ozone (O_3) – Sherman Elementary School									
Maximum 1-hour Concentration	ppm	State	0.09	0.076	0.087	0.081	0	0	0
Maximum 8-hour Concentration	ppm	State	0.070	0.064	0.063	0.071	0	0	1
		Federal	0.070	0.063	0.063	0.070	0	0	0
Nitrogen Dioxide (NO_2) – Sherman Elementary School									
Maximum 1-hour Concentration	ppm	State	0.18	0.054	0.054	0.054	0	0	0
		Federal	0.100	0.054	0.054	0.054	0	0	0
Annual Concentration	ppm	State	0.030	0.009	0.010	0.009	0	0	0
		Federal	0.053	0.009	0.010	0.009	0	0	0
Carbon Monoxide (CO) – 11403 Rancho Carmel Drive									
Maximum 1-hour Concentration	ppm	State	20	3.0	2.2	1.6	0	0	0
		Federal	35	3.0	2.2	1.6	0	0	0
Maximum 8-hour Concentration	ppm	State	9.0	1.8	1.2	1.1	0	0	0
		Federal	9	1.8	1.2	1.1	0	0	0
Sulfur Dioxide (SO_2) – First Street									
Maximum 1-hour Concentration	ppm	Federal	0.075	0.002	0.001	0.001	0	0	0
Maximum 24-hour Concentration	ppm	State	0.04	0.0003	0.0003	0.0003	0	0	0
	ppm	Federal	0.140	0.0003	0.0003	0.0003	0	0	0

Table 4.2-2. Local Ambient Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2021	*2022*	*2023*	*2021*	*2022*	*2023*
Annual Concentration	ppm	Federal	0.030	0.0001	0.0001	0.0001	0	0	0
Coarse Particulate Matter (PM_{10})[a] – Chula Vista									
Maximum 24-hour Concentration	μg/m³	State	50	46	38	51	0	0	0
		Federal	150	46	38	51	0	0	0
Annual Concentration	μg/m³	State	20	N/A	N/A	N/A	N/A	N/A	N/A
Fine Particulate Matter ($PM_{2.5}$)[a] – Sherman Elementary School									
Maximum 24-hour Concentration	μg/m³	Federal	35	25.6	18.9	27.8	0	0	0
Annual Concentration	μg/m³	State	12	9.4	N/A	N/A	0	N/A	N/A
		Federal	12.0	9.7	8.8	8.9	0	0	0

Sources: CARB 2024a; EPA 2024a.

Notes: ppm = parts per million; μg/m³ = micrograms per cubic meter; N/A = not available.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and Environmental Protection Agency AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored.

4.2.2 Regulatory Framework

Federal

Criteria Air Pollutants

The federal CAA, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. EPA is responsible for implementing most aspects of the CAA, including the setting of the NAAQS for major air pollutants, hazardous air pollutant standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

Under the CAA, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The CAA identifies two categories of NAAQS. Primary standards provide the levels of air quality necessary to protect public health; secondary standards provide the levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant (EPA 2024b). The NAAQS describes acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare state implementation plans (SIPs) that demonstrate how those areas will attain the standards within mandated time frames. Table 4.2-3 below contains the NAAQS.

Hazardous Air Pollutants

The 1977 federal CAA amendments required EPA to identify national emission standards for hazardous air pollutants to protect public health and welfare. Hazardous air pollutants include certain VOCs, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 CAA amendments, which expanded the control program for hazardous air pollutants, 189 substances and chemical families were identified as hazardous air pollutants.

State

Criteria Air Pollutants

The federal CAA delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the CAA and regulating emissions from motor vehicles and consumer products.

CARB's CAAQS are generally more restrictive than the NAAQS. The CAAQS describes adverse conditions; therefore, monitored ambient air quality concentrations must be below these standards before a basin can demonstrate attainment. The NAAQS and CAAQS are presented in Table 4.2-3.

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
O_3	1 hour	0.09 ppm (180 μg/m^3)	N/A	Same as Primary Standard[f]
	8 hours	0.070 ppm (137 μg/m^3)	0.070 ppm (137 μg/m^3)[f]	
NO_2[g]	1 hour	0.18 ppm (339 μg/m^3)	0.100 ppm (188 μg/m^3)	Same as Primary Standard
	Annual Arithmetic Mean	0.030 ppm (57 μg/m^3)	0.053 ppm (100 μg/m^3)	
CO	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8 hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m^3)	0.075 ppm (196 μg/m^3)	N/A
	3 hours	N/A	N/A	0.5 ppm (1,300 μg/m^3)
	24 hours	0.04 ppm (105 μg/m^3)	0.14 ppm (for certain areas)[g]	N/A
	Annual	N/A	0.030 ppm (for certain areas)[g]	N/A
PM_{10}[i]	24 hours	50 μg/m^3	150 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	20 μg/m^3	N/A	

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
$PM_{2.5}$[i]	24 hours	N/A	35 μg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 μg/m^3	12.0 μg/m^3	15.0 μg/m^3
Lead[j,k]	30-day Average	1.5 μg/m^3	N/A	N/A
	Calendar Quarter	N/A	1.5 μg/m^3 (for certain areas)[k]	Same as Primary Standard
	Rolling 3-Month Average	N/A	0.15 μg/m^3	
Hydrogen sulfide	1 hour	0.03 ppm (42 μg/m^3)	N/A	N/A
Vinyl chloride[j]	24 hours	0.01 ppm (26 μg/m^3)	N/A	N/A
Sulfates	24 hours	25 μg/m^3	N/A	N/A
Visibility reducing particles	8 hours (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	N/A	N/A

Source: CARB 2024b; EPA 2024b.

Notes: O_3 = ozone; ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m^3= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; N/A = not applicable.

a California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

f On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.

g To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

h On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the one-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/m³ to 12 μg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[j] California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[K] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 μg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

A TAC is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Federal laws use the term “hazardous air pollutants” to refer to the same types of compounds that are referred to as TACs under state law. California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588).

AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. Pursuant to AB 2588, existing facilities that emit air pollutants above specified levels were required to (1) prepare a TAC emission inventory plan and report, (2) prepare a risk assessment if TAC emissions were significant, (3) notify the public of significant risk levels, and (4) if health impacts were above specified levels, prepare and implement risk reduction measures.

California Health and Safety Code Section 41700

Section 41700 of the California Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Local

San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The Project site is located within the SDAB and is subject to the guidelines and regulations of the SDAPCD.

In San Diego County, O_3 and particulate matter are the pollutants of main concern, as exceedances of ambient air quality standards for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a nonattainment area for the federal 8-hour O_3 standard and the state 1-hour and 8-hour O_3, PM_{10}, and $PM_{2.5}$ standards.

Federal Attainment Plans

The SDAPCD prepared the 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (2020 Attainment Plan) that demonstrates how the region will further reduce air pollutant emissions in order to attain the current NAAQS for O_3. The 2020 Attainment Plan was approved by the SDAPCD on October 14, 2020. On November 19, 2020, CARB adopted the 2020 Attainment Plan for attaining the federal 8-hour 75 parts per billion and 70 parts per billion O_3 standards. CARB projects attainment for the standards by 2026 and 2032, respectively (SDAPCD 2020). The 2020 Attainment Plan was submitted to EPA as a revision to the California SIP for attaining the O_3 NAAQS and was approved in March 2024.

State Attainment Plans

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated every 3 years. The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2021).

On March 9, 2023, the SDAPCD adopted the 2022 RAQS. The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O_3. The 2022 RAQS guides the SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O_3, including NO_x and VOCs. The 2022 RAQS emphasizes O_3 control measures, but also identifies complementary measures and strategies that can reduce emissions of greenhouse gases and particulate matter. It also includes new analyses exploring O_3 and its relationship to public health, mobile sources, under-resourced communities, and greenhouse gases and climate change. Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies (SDAPCD 2023).

In regard to particulate matter emissions reduction efforts, in December 2005, the SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill 656 in San Diego County (Senate Bill 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, the SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carryout and trackout removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

As stated earlier, the SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD.

SDAPCD Rules and Regulations

As stated above, the SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD and would apply to the proposed project.

SDAPCD Regulation II: Permits; Rule 20.2: New Source Review Non-Major Stationary Sources

This rule requires new or modified stationary source units (that are not major stationary sources) with the potential to emit 10 pounds per day or more of VOC, NO_x, SO_x, or PM_{10} to be equipped with best available control technology. A stationary source is an emission unit or aggregation of emission units which are located on the same or contiguous properties and which units are under common ownership or entitlement to use. For those units with a potential to emit above Air Quality Impact Assessments Trigger Levels, the units must demonstrate that such emissions would not violate or interfere with the attainment of any national air quality standard (SDAPCD 2016b).

The Proposed Project includes backup diesel emergency generators, which are subject to Rule 20.2 and require appropriate operating permits from the SDAPCD.

Additionally, because the SDAPCD has not adopted specific criteria air pollutant thresholds for CEQA analyses, the thresholds identified in Rule 20.2 are utilized in this analysis as screening-level thresholds to evaluate project-level impacts, as discussed in Section 4.2.3, Significance Criteria.

SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions

This rule prohibits discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any period of 60 consecutive minutes, which is darker in shade than that designated as Number 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as Number 1 on the Ringelmann Chart (SDAPCD 1997).

Construction of the Proposed Project may result in visible emissions, primarily during earth-disturbing activities, which would be subject to SDAPCD Rule 50. Although visible emissions are less likely to occur during operation of the Proposed Project, compliance with SDAPCD Rule 50 would be required during both construction and operational phases.

SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance

This rule prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or tend to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1969).

Any criteria air pollutant emissions, TAC emissions, or odors generated during construction or operation of the Proposed Project would be subject to SDAPCD Rule 51. Violations can be reported to the SDAPCD as an air quality complaint by telephone, email, and online form. Complaints are investigated by the SDAPCD as soon as possible.

SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust

This rule regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project area (SDAPCD 2009).

Construction of the Proposed Project, primarily during earth-disturbing activities, may result in fugitive dust emissions that would be subject to SDAPCD Rule 55. Fugitive dust emissions are not anticipated during operation of the Proposed Project.

SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings

This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021).

Rule 67.0.1-compliant architectural coatings would be used by the Proposed Project as a matter of regulatory compliance.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants - New Source Review

This rule requires new or modified stationary source units with the potential to emit TACs above rule threshold levels to either demonstrate that they will not increase the maximum incremental cancer risk above 1 in 1 million at every receptor location, demonstrate that toxics best available control technology will be employed if maximum incremental cancer risk is equal to or less than 10 in 1 million, or demonstrate compliance with the SDAPCD's protocol for those sources with an increase in maximum incremental cancer risk at any receptor location of greater than 10 in 1 million but less than 100 in 1 million (SDAPCD 2017a).

The Proposed Project does not currently include specific stationary sources that would generate TACs not commonly associated with residential development projects. If stationary sources with the potential to emit TACs were to be included as part of the Proposed Project—or if they were added at a later date—those sources would be subject to SDAPCD Rule 1200 and would be subject to new source review requirements.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1210: Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction

This rule requires each stationary source required to prepare a public risk assessment to provide written public notice of risks at or above the following levels: maximum incremental cancer risks equal to or greater than 10 in 1 million, cancer burden equal to or greater than 1.0, total acute non-cancer health hazard index equal to or greater than 1.0, or total chronic non-cancer health hazard index equal to or greater than 1.0 (SDAPCD 2017b).

The Proposed Project does not currently include specific stationary sources that would generate TACs. If stationary sources with the potential to emit TACs were to be included as part of the Proposed Project—or if they were added at a later date—those sources would be subject to SDAPCD Rule 1210 and would be subject to public notification and risk reduction requirements.

San Diego Association of Governments

SANDAG is a regional planning agency for the incorporated and unincorporated areas of the County on regional issues relating to transportation, the economy, community development, and the environment. SANDAG relatedly serves as the federally designated metropolitan planning organization for the County.

With respect to air quality planning and other regional issues, SANDAG has prepared the 2021 Regional Plan for the San Diego region (SANDAG 2021). The Regional Plan combines the big-picture vision for how the region will grow over the next 35 years with an implementation program to help make that vision a reality. The Regional Plan, including its Sustainable Communities Strategy, is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so that it meets the diverse needs of the San Diego region through 2050.

In regard to air quality, the Regional Plan sets the policy context in which SANDAG participates and responds to the SDAPCD's air quality plans and builds off the air district's air quality plan processes that are designed to meet health-based criteria pollutant standards in several ways (SANDAG 2021). First, it complements air quality plans by providing guidance and incentives for public agencies to consider best practices that support technology-based control measures in air quality plans. Second, the Regional Plan emphasizes the need for better coordination of land use and transportation planning, which heavily influences the emissions inventory from the transportation sectors of the economy. This also minimizes land use conflicts, such as residential development near freeways, industrial areas, or other sources of air pollution.

4.2.3 Significance Criteria

Thresholds of Significance

The criteria used to evaluate the Proposed Project's potential impacts to air quality are based on Appendix G of the CEQA Guidelines, Section III, Air Quality. Based on these criteria, the Proposed Project would result in a significant impact related to air quality if the Project would:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

With respect to the second criterion, as part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 requiring the preparation of air quality impact assessments for permitted stationary sources (SDAPCD 2019). The SDAPCD thresholds identify levels below which a stationary source would not have a significant impact on ambient air quality. These thresholds are listed in Table 4.2-4 below and represent screening-level thresholds that can be used to evaluate whether Project-related emissions would cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 4.2-4, the Proposed Project could have the potential to result in a cumulatively considerable net increase in these pollutants and, thus, a significant impact on the ambient air quality.

Table 4.2-4. San Diego Air Pollution Control District Air Quality Significance Thresholds

Construction Emissions			
Pollutant	*Total Emissions (Pounds per Day)*		
Respirable Particulate Matter (PM_{10})	100		
Fine Particulate Matter ($PM_{2.5}$)	67		
Oxides of Nitrogen (NO_x)	250		
Oxides of Sulfur (SO_x)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	250		
Operational Emissions			
Pollutant	*Total Emissions*		
	Pounds per Hour	*Pounds per Day*	*Tons per Year*
PM_{10}	N/A	100	15
$PM_{2.5}$[b]	N/A	55	10
NO_x	25	250	40
SO_x	25	250	40
CO	100	550	100
Operational Emissions			
Pollutant	*Total Emissions*		
	Pounds per Hour	*Pounds per Day*	*Tons per Year*
Lead and Lead Compounds	N/A	3.2	0.6
VOCs	N/A	250	15

Sources: SDAPCD 2019.
Notes: N/A = not available.

With respect to the third criterion, the SDAPCD specifically recommends consideration of sensitive receptors in locations such as day care centers, schools, retirement homes, and hospitals or medical patients in residential homes close to major roadways or stationary sources, which could be impacted by air pollutants. The SDAPCD document, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments provides guidance with which to perform health risk assessments (HRAs) within the SDAB. The current SDAPCD thresholds of significance for TAC emissions from both permitted and non-permitted sources are (i) less than 10 in 1 million for cancer and (ii) less than 1.0 for the chronic hazard index (SDAPCD 2022).

Finally, with respect to the fourth criterion (odors), SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

Approach and Methodology

Construction

Emissions from the construction phase of the Proposed Project were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.28 (CAPCOA 2024).

As described in Chapter 2, Project Description, of this EIR, the Project is proposed to be built out over six phases. The estimated schedule per phase, as provided by SDSU, is shown below. For modeling purposes, it was assumed that construction of the Proposed Project would commence in May 2025 and would last approximately 105 months, ending in January 2034. The Project was assumed to be constructed in six phases and based on the assumptions shown below (durations are approximate):

- Phase 1: May 2025–March 2027
- Phase 2: August 2026–January 2028
- Phase 3: February 2028–July 2029
- Phase 4: August 2029–December 2030
- Phase 5: January 2031–July 2032
- Phase 6: July 2032–January 2034

Detailed construction equipment modeling assumptions are provided in Appendix C. As discussed therein, the Project would utilize equipment up to 8 hours per day; however, on an average annual basis, the number of hours would be much less than that. Within each phase, there are subphases of construction that may include demolition, site preparation, grading, building construction, architectural coating, paving, and trenching. The following earthwork is anticipated to occur over the course of Project construction: Phase 1, cut/export of 28,200 cubic yards, fill/import of 17,820 cubic yards; Phase 2, cut/export of 3,500 cubic yards, fill/import of 5,800 cubic yards; Phase 3, cut/export of 4,400 cubic yards, fill/import of 18,400 cubic yards; Phase 4, cut/export of 20,900 cubic yards, fill/import of 12,201 cubic yards; Phase 5 cut/export of 5,491 cubic yards, fill/import of 1,500 cubic yards; and Phase 6 cut/export of 5,491 cubic yards and fill/import of 1,500 cubic yards. The following amount of material also is anticipated to be hauled off site during the demolition phases: Phase 1, 3,780 tons; Phase 2, 3,093 tons; Phase 3, 5,204 tons; and Phase 4, 11,043 tons.

The construction equipment mix used for estimating the construction emissions of the Proposed Project is based on SDSU-provided information per construction phase. Equipment not labeled as electric is assumed to be diesel. As a proposed condition of approval, SDSU has committed to using Tier 4 Final construction equipment for all proposed diesel equipment.

The construction scenario assumptions used in CalEEMod for Phases 1 through 6 are shown in Tables 4.2-5 through 4.2-10 below.

Table 4.5-5. Phase 1 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	5/27/2025	6/24/2025	16	4	48	Excavators	3	8
						Tractors/Loaders/Backhoes	1	8
Site Preparation	6/25/2025	7/9/2025	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	7/10/2025	8/28/2025	30	4	166	Graders	1	7
						Excavators	1	8
						Rubber Tired Dozers	1	8
Trenching	8/29/2025	10/29/2025	4	4	0	Excavators	2	8
Building Construction	8/29/2025	1/29/2027	350	148	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	4
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
						Bore/Drill Rigs	1	2
Paving	1/30/2027	2/27/2027	16	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	1	6
Architectural Coating	12/7/2026	3/9/2027	198	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

Table 4.5-6. Phase 2 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	8/31/2026	9/28/2026	16	4	40	Excavators	3	8
						Tractors/Loaders/Backhoes	1	8
Site Preparation	9/29/2026	10/13/2026	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	10/14/2026	11/25/2026	30	4	38	Graders	1	8
						Excavators	2	8
						Rubber Tired Dozers	1	8
Trenching	11/26/2026	1/26/2027	4	4	0	Excavators	2	8
Building Construction	11/26/2026	11/30/2027	350	82	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	7
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
Paving	12/1/2027	12/28/2027	10	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	2	6
Architectural Coating	10/22/2027	1/24/2028	110	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

Table 4.5-7. Phase 3 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	2/24/2028	3/23/2028	16	4	66	Excavators	3	8
						Tractors/Loaders/Backhoes	1	8
Site Preparation	3/24/2028	4/7/2028	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	4/8/2028	5/20/2028	30	4	96	Graders	1	7
						Excavators	2	7
						Rubber Tired Dozers	1	8
Trenching	5/21/2028	7/20/2028	4	4	0	Excavators	2	8
Building Construction	5/21/2028	5/15/2029	350	82	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	7
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
Paving	5/16/2029	6/12/2029	10	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	2	6
Architectural Coating	4/11/2029	7/12/2029	110	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

Table 4.5-8. Phase 4 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Demolition	8/13/2029	9/10/2029	16	4	140	Excavators	3	8
						Tractors/Loaders/Backhoes	1	8
Site Preparation	9/11/2029	9/25/2029	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	9/26/2029	11/7/2029	30	4	138	Graders	1	7
						Excavators	2	7
						Tractors/Loaders/Backhoes	2	8
						Rubber Tired Dozers	2	8
Trenching	11/8/2029	1/8/2030	4	4	0	Excavators	2	8
Building Construction	11/8/2029	11/2/2030	350	82	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	7
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
Paving	11/3/2030	11/30/2030	10	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	2	6
Architectural Coating	9/20/2030	12/23/2030	110	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

Table 4.5-9. Phase 5 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Site Preparation	1/22/2031	2/4/2031	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	2/5/2031	3/18/2031	30	4	30	Graders	1	8
						Excavators	4	8
						Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Trenching	3/19/2031	5/19/2031	4	4	0	Excavators	2	8
Building Construction	3/19/2031	5/11/2032	350	82	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	7
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
Paving	5/12/2032	6/14/2032	10	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	2	6
Architectural Coating	4/14/2032	7/15/2032	110	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

Table 4.5-10. Phase 6 Construction Scenario Assumptions

Construction Phase	Start Date	End Date	One-Way Vehicle Trips			Equipment		
			Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Average Daily Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Site Preparation	7/16/2032	7/29/2032	18	4	0	Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Grading	7/30/2032	9/9/2032	30	4	30	Graders	1	8
						Excavators	4	8
						Rubber Tired Dozers	1	8
						Tractors/Loaders/Backhoes	2	8
Trenching	9/10/2032	11/10/2032	4	4	0	Excavators	2	8
Building Construction	9/10/2032	11/17/2033	350	82	0	Forklifts	1	8
						Generator Sets (Electric)	1	8
						Cranes (Electric)	1	7
						Welders (Electric)	1	8
						Tractors/Loaders/Backhoes	1	7
						Pumps	1	8
						Aerial Lifts	2	8
						Bore/Drill Rigs	1	8
Paving	11/18/2033	12/15/2033	10	4	0	Pavers	1	6
						Paving Equipment	1	6
						Rollers	2	6
Architectural Coating	10/12/2033	1/12/2034	110	4	0	Air Compressors (Electric)	1	6

Note: See Appendix C for details.

For the analysis, it was assumed that heavy-duty construction equipment would be operating 5 days per week (22 days per month) during Proposed Project construction. Construction worker and vendor trips were based on CalEEMod default assumptions and rounded up to the nearest whole number to account for whole round trips.

A detailed depiction of the construction schedule—including information regarding phases and equipment used during each phase—is included in Appendix C of this EIR. The information contained in Appendix C was used as CalEEMod inputs.

In accordance with SDAPCD Rule 55 to restrict emissions of fugitive dust, SDSU shall water during dust-generating activities at least twice per day. And, in accordance with SDAPCD Rule 67.0.1, the contractor shall use architectural coatings that do not exceed 50 grams per liter for interior and exterior applications and 100 grams per liter for paving applications. CalEEMod's modeling input parameters reflect these regulatory compliance requirements.

Operation

Emissions from the operational phase of the Proposed Project were estimated using CalEEMod. The following operational years were utilized as the first full year following completion of each proposed construction phase: 2027 for Phase 1, 2028 for Phase 2, 2029 for Phase 3, 2030 for Phase 4, 2032 for Phase 5, and 2034 for Phase 6.

As previously described, the Proposed Project would demolish and replace existing residential units on the Peninsula Component site. The operational area and energy source emissions from the existing residential units on the Peninsula Component site were not quantified herein. As a result, this analysis conservatively reports all operational area and energy source emissions from the Proposed Project as new emissions measured from a zero emissions baseline, even though the actual change from the existing, on-site conditions would represent an incremental change that is smaller than reported below. Conversely, the methodology used to estimate the Proposed Project's mobile source-related emissions does account for the beneficial reduction in emissions attributable to the Project's provision of additional on-campus student housing opportunities, as described further below.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text. The Project would not have fireplaces or hearths.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2024). Consumer product VOC emissions for the buildings are estimated in CalEEMod based on the floor area of buildings and on the default factor of pounds of VOC per building square foot per day. Consumer products associated with the parking lot and other asphalt surfaces include degreasers, which were estimated based on the square footage of the parking lot and the default factor of pounds of VOC per square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings, such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from the application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emissions factor is based on the VOC content of the surface coatings, and SDAPCD's Rule 67.0.1 (Architectural Coatings) governs the VOC content for interior and exterior coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021). The Proposed Project would use architectural coatings that would not exceed 50 grams per liter for interior applications and 100 grams per liter for exterior applications consistent with SDAPCD Rule 67.0.1. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2024).

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. The Amenity Building is the only building within the Project that would include natural gas (for cooking); all other buildings would be all-electric.

Mobile Sources

Following the completion of construction activities, the Proposed Project's student residents would generate criteria pollutant emissions from mobile sources (vehicular traffic). The Project, however, would result in a beneficial net reduction in student trips and corresponding emissions, because the Project would create additional on-campus student housing opportunities for students who otherwise would need to live in off-campus housing and commute to the campus.

As estimated by the Proposed Project's transportation engineer (Linscott, Law & Greenspan, Engineers), when living off campus, existing students would result in an estimated 5,808 average daily trips (Appendix I). If living on campus in the Proposed Project, however, the students would result in an estimated 2,860 average daily trips, resulting in a net reduction of 2,948 average daily trips. Similarly, there would be a reduction in average trip length per trip when comparing off-campus and on-campus student housing. The existing off-campus trip length is estimated to be 14.17 miles per trip per student. The Proposed Project's on-campus student resident trip length is estimated to be 7.6 miles per trip per student, resulting in a net reduction of 6.57 miles per trip per student. Annually, therefore, the Project would result in a net reduction of an estimated 1,076,020 trips and 22,105,626 vehicle miles traveled.

CalEEMod default data, including vehicle mix, trip characteristics, and emissions factors, were used for the model inputs. Emissions factors representing the vehicle mix and emissions for 2027 for Phase 1, 2028 for Phase 2, 2029 for Phase 3, 2030 for Phase 4, 2032 and Phase 5, and 2034 for Phase 6 were used to estimate emissions associated with vehicular sources.

Stationary Sources

Following the completion of construction activities, the Proposed Project would generate criteria pollutant emissions from stationary sources (emergency generator maintenance and testing). The Project would include a total of seven emergency generators at the following locations: one each at Phase 1 Peninsula Component and University Towers East Component and one each at Phase 2, Phase 3, Phase 4, Phase 5, and Phase 6 for the Peninsula Component. The Phase 1 Peninsula Component emergency generator would be rated at 200 kilowatts. The University Towers East Component emergency generator would be rated at 250 kilowatts. The emergency generators for Phases 2 through 6 for the Peninsula Component would be rated at 350 kilowatts each. All proposed emergency generators would be rated per EPA Tier 4 Final emission standard. In accordance with SDAPCD Rule 69.4.1, the generators were assumed to run up to 30 minutes per day and 52 hours per year for maintenance and testing.

Health Risk Assessment

An HRA was performed to assess the Proposed Project's construction and operation impact on sensitive receptors (on site and off site) close to the Project site (provided in Appendix C). The HRA was informed by the methodologies prescribed in the Office of Environmental Health Hazard Assessment (OEHHA) document Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidelines) (OEHHA 2015). To facilitate implementation of the OEHHA Guidelines, the SDAPCD has developed a three-tiered approach where each successive tier is progressively more refined, with fewer conservative assumptions. The SDAPCD document Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022) provides guidance with which to perform HRAs within the SDAB and also was utilized in the preparation of the Proposed Project's HRA.

Health effects from TACs are usually described in terms of cancer risk. The SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in 1 million (an increase in 0.001% chance). Additionally, some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The SDAPCD recommends a Chronic Hazard Index significance threshold of 1 (project increment).

The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in this assessment.

The HRA for the Proposed Project evaluated the risk to existing residents (on site and off site) from diesel exhaust emissions from on-site construction equipment and diesel haul and vendor trucks. Once Phase 1 is operational, there will be DPM emissions from the emergency generator during maintenance and testing. Therefore, emissions from emergency generators in the Project's subsequent phases are included in the HRA once each phase is operational. After construction is fully completed, the emergency generator testing would be the only source of TAC emissions from the Project.

The dispersion modeling of DPM was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the model SDAPCD requires for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain (EPA 2023). For the Proposed Project, AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the "X/Q" values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations determined for the 1-hour and period-averaging periods. Principal parameters of this modeling are presented in Table 4.2-11.

Table 4.2-11. AERMOD Principal Parameters

Parameter	Details
Meteorological Data	The latest 3-year meteorological data (2020–2022) for the Kearny Villa Road Station from SDAPCD were downloaded and then input to AERMOD.
Urban versus Rural Option	Urban areas typically have more surface roughness, as well as structures and low-albedo surfaces that absorb more sunlight—and thus more heat—relative to rural areas. However, based on the SDAPCD guidelines, the rural dispersion option was selected due to the Proposed Project's proximity to the ocean.
Terrain Characteristics	The terrain in the vicinity of the modeled Project site is generally hilly. The elevation of the modeled site is about 400 feet above sea level. Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate.
Elevation Data	Digital elevation data were imported into AERMOD, and elevations were assigned to the emission sources and receptors. Digital elevation data were obtained through AERMOD View in the U.S. Geological Survey's National Elevation Dataset format with a 30-meter resolution.
Emission Sources and Release Parameters	Air dispersion modeling of DPM from construction equipment and emergency generator testing was conducted using emissions estimated using the CalEEMod. The construction emissions were modeled as a series of adjacent line-volume sources. The emergency generators were modeled as point sources.
Source Release Characterizations	The source release height was assumed to be 6.8 meters with plume height and width of 8.6 meters and release height of 3.4 meters per volume source (EPA 2023). As the exact make and model is not known yet, the emergency generator release parameters were based on survey data by engine size (SBCAPCD 2023). The following source parameters were assumed: Phase 1 Peninsula Component, release height 8.2 feet, exit temperature 931°F, stack diameter of 5.3 inches, and gas exit flow rate of 1,829 cubic feet per minute (CFM); University Towers East Component, release height 8.2 feet, exit temperature 931°F, stack diameter of 5.3 inches, and gas exit flow rate of 1,829 CFM; Phases 2 through 6 Peninsula Component, release height 7.6 feet, exit temperature 799°F, stack diameter of 8 inches, and gas exit flow rate of 2,930 CFM.
Receptors	Discrete receptors were placed over residences (on site and off site) proximate to the Project site.

Notes: AERMOD = American Meteorological Society/EPA Regulatory Model; SDAPCD = San Diego Air Pollution Control District; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model.
See Appendix C for additional information.

Dispersion model plot files from AERMOD were then imported into CARB's Hotspots Analysis and Reporting Program Version 2 to determine health risk, which requires peak 1-hour emission rates and annual emission rates for all pollutants for each modeling source. The average construction DPM emissions were assumed for each phase of construction. For the off-site residential health risk, the HRA assumes exposure would start in the third trimester of pregnancy for a duration of 30 years. For the on-site residential health risk, the exposure would start at age 16. The results of the HRA are provided in Section 4.2.4, Impacts Analysis, and detailed results and methodology are provided in Appendix C.

4.2.4 Impacts Analysis

1. Would the project conflict with or obstruct implementation of the applicable air quality plan?

As stated in Section 4.2.2, Regulatory Framework, the SDAPCD is responsible for developing and implementing the clean air plans for attainment and maintenance of the NAAQS and CAAQS in the SDAB; specifically, the SIP and RAQS.[3] The federal O_3 attainment plan, which is part of the SIP, was adopted in 2020. The SIP includes a demonstration that current strategies and tactics will attain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1992 and is updated every 3 years (most recently in 2022). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

As mentioned above, the SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County as part of development of their general plans. As such, projects involving development consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS. However, if a project involves development that is greater than that anticipated in the local plan and/or SANDAG's growth projections, that project might conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

The Proposed Project would add up to 4,468 net new beds to the campus. The Project is not growth-inducing as it would not generate an increase in student enrollment. The final buildout of all 4,468 beds is not expected until 2034. According to SANDAG's Series 15 Regional Forecast, housing is anticipated to increase from 605,371 units in 2029 to 645,899 units in 2040, or 3,377 units per year (SANDAG 2024). As this is a phased project, the maximum number of beds within 1 year would be Phase 1 at 1,370 beds. All other phases would add up to 760 beds per year. Therefore, the buildout of the Project would be within the regional housing annual projections. The Project would be within the regional growth projections and would not conflict with the RAQS and SIP. Therefore, a **less-than-significant** impact would result.

2. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SDAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants

3 For the purpose of this discussion, the relevant federal air quality plan is the O_3 attainment plan (SDAPCD 2020). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

are relevant in the determination of whether a project's individual emissions violate any air quality standard or contribute substantially to an existing or projected air quality violation or have a cumulatively significant impact on air quality.

Construction Emissions

Construction of the Proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with construction activities were quantified using CalEEMod. Default values provided by the program were used where detailed Proposed Project information was not available. A detailed depiction of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included in the air quality technical report (Appendix C of this EIR). The information contained Appendix C was used as CalEEMod inputs.

Construction of the Proposed Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Exhaust from internal combustion engines used by construction equipment and vehicles would result in emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. The application of asphalt pavement and architectural coatings would also produce VOC emissions.

Table 4.2-12 shows the estimated maximum daily construction emissions associated with construction of the Proposed Project. Complete details of the emissions calculations are provided in Appendix C.

Table 4.2-12. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Summer						
2025	1.75	17.45	27.64	0.10	6.38	2.50
2026	1.76	14.11	35.88	0.06	7.08	2.42
2027	1.42	5.83	21.76	0.02	3.53	0.88
2028	1.44	10.33	23.13	0.06	4.98	2.01
2029	69.97	5.83	24.21	0.02	4.49	1.09
2030	69.91	5.72	23.15	0.02	4.47	1.09
2031	1.30	6.62	20.68	0.03	3.58	0.89
2032	69.55	5.39	21.21	0.02	4.47	1.09
2033	1.10	5.10	20.04	0.03	3.52	0.88
2034	N/A	N/A	N/A	N/A	N/A	N/A
Winter						
2025	1.72	10.31	25.68	0.04	4.04	1.04
2026	127.78	16.99	53.15	0.07	9.52	3.10
2027	126.21	8.99	28.86	0.04	5.68	1.42

Table 4.2-12. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2028	68.65	0.43	3.79	0.00	0.96	0.23
2029	1.37	14.78	28.34	0.10	8.35	3.62
2030	69.90	7.02	21.22	0.03	4.47	1.09
2031	1.17	6.82	20.55	0.04	3.69	1.64
2032	1.16	6.82	21.41	0.03	3.59	0.90
2033	69.53	5.60	21.68	0.03	4.48	1.10
2034	68.42	0.27	2.68	0.00	0.96	0.23
Maximum	**127.78**	**17.45**	**53.15**	**0.10**	**9.52**	**3.62**
Threshold	*250*	*250*	*550*	*250*	*100*	*67*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; N/A = not applicable; CalEEMod = California Emissions Estimator Model.
See Appendix C for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. Although not considered mitigation, these emissions reflect the CalEEMod "mitigated" output, which accounts for the required compliance with SDAPCD Rule 55 (Fugitive Dust) and Rule 67.0.1 (Architectural Coatings).

As shown in Table 4.2-12, daily construction emissions from the Proposed Project would not exceed the significance thresholds for any criteria air pollutant. Therefore, impacts during construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be **less than significant.**

Operational Emissions

Operation of the Proposed Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (vehicle trips), area sources (consumer products, landscape maintenance equipment), and energy sources. As discussed in Section 4.2.3, all pollutant emissions associated with long-term operations were quantified using CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on Project-specific trip rates. CalEEMod default values were used to estimate emissions from the Proposed Project area and energy sources.

Table 4.2-13 presents the maximum daily area, energy, and mobile source emissions associated with full operation (all phases) of the Proposed Project without mitigation. The existing mobile emissions avoided due to the Proposed Project's provision of additional on-campus student housing opportunities are presented along with the net emissions (project minus existing). The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix C.

Table 4.2-13. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per day					
Summer Project						
Area	141.72	2.76	294.75	0.01	0.14	0.10
Energy	0.18	3.17	1.54	0.02	0.25	0.25
Mobile	9.66	5.92	65.85	0.17	15.46	4.00
Stationary	0.38	0.81	7.00	0.01	0.03	0.03
Summer Total	**151.95**	**12.71**	**369.14**	**0.22**	**15.92**	**4.39**
Winter Project						
Area	116.11	0.00	0.00	0.00	0.00	0.00
Energy	0.18	3.17	1.54	0.02	0.25	0.25
Mobile	9.49	6.51	62.52	0.16	15.46	4.00
Stationary	0.38	0.81	7.00	0.01	0.03	0.03
Winter Total	**126.17**	**10.53**	**71.06**	**0.20**	**15.78**	**4.29**
Summer Existing						
Mobile	29.75	28.25	287.49	0.69	58.68	15.26
Winter Existing						
Mobile	*29.13*	*31.03*	*263.36*	*0.66*	*58.68*	*15.26*
Summer Net Emissions (Project – Existing)	122.20	(15.54)	81.65	(0.47)	(43.31)	(10.87)
Winter Net Emissions (Project – Existing)	97.04	(20.50)	(192.30)	(0.46)	(42.90)	(10.97)
Threshold	*250*	*250*	*550*	*250*	*100*	*67*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; CalEEMod = California Emissions Estimator Model; <0.01 = reported value is less than 0.01.
See Appendix C for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect the CalEEMod "mitigated" output, which accounts for compliance with SDAPCD Rule 67.0.1 (Architectural Coatings). Emissions shown in parentheses represent net negative values.

As shown in Table 4.2-13, the Proposed Project's net daily area, energy, and mobile source emissions would not exceed the operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Impacts during operation would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be **less than significant.**

Cumulative Analysis

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The poor air quality in the SDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., VOCs and NO_x for O_3) potentially contribute to poor air quality.

In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the CAAQS and NAAQS. If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Regarding short-term construction impacts, the SDAPCD thresholds of significance are used to determine whether the project may have a short-term cumulative impact. As shown in Table 4.2-12, the Proposed Project would not exceed any criteria air pollutant threshold during construction. Therefore, the Project would have a less-than-significant cumulative impact during construction.

Additionally, for the SDAB, the SIP and RAQS serve as the long-term regional air quality planning documents for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS- and CAAQS-attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the SIP and RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the SIP and RAQS are based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

As stated previously, the Proposed Project would not result in significant regional growth not accounted for within the SIP and RAQS. Additionally, as shown in Table 4.2-13, the Proposed Project would not exceed any criteria air pollutant threshold during operation. Rather, except for VOCs, the Proposed Project would reduce criteria air pollutant emissions below existing levels by increasing the availability of on-campus student housing and, thereby, minimizing student-related vehicle travel.

In light of the above, the Proposed Project would not result in a cumulatively considerable contribution to pollutant emissions. Cumulative impacts would be **less than significant** during construction and operation.

3. Would the project expose sensitive receptors to substantial pollutant concentrations?

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed "sensitive receptors" are the most serious hazards of existing air quality conditions in the County. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the SDAPCD (SDAPCD 2022), include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. As such, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. The closest sensitive receptors to the Proposed Project are residences adjacent to the property boundary and existing dormitories on site.

Health Impacts of Toxic Air Contaminants

"Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard OEHHA risk-assessment methodology (OEHHA 2015). In addition, some TACs have noncarcinogenic effects.

TACs that would potentially be emitted by the Proposed Project during construction activities would be DPM emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB airborne toxic control measures to reduce DPM emissions. According to the OEHHA, HRAs should be based on a 30-year exposure duration based on typical residency period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). The duration of the Project's proposed construction activities would be approximately 105 months. After proposed construction is completed, there would be emissions of DPM from maintenance and testing of the emergency generators.

An HRA was performed to evaluate the risk from diesel exhaust emissions on existing sensitive receptors from construction and operational activities. The HRA methodology was described in Section 4.2.3, and the detailed assessment is provided in Appendix C. Table 4.2-14 summarizes the results of the HRA for Proposed Project construction and operation.

Table 4.2-14. Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Cancer Risk – On Site	Per Million	0.4	10.0	Less than Significant
Chronic Non-Cancer Risk – On Site	Not Applicable	0.01	1.0	Less than Significant
Cancer Risk – Off Site	Per Million	7.4	10.0	Less than Significant
Chronic Non-Cancer Risk – Off Site	Not Applicable	0.01	1.0	Less than Significant

Source: Appendix C.
Notes: CEQA = California Environmental Quality Act.

The results of the HRA demonstrate that the TAC exposure from construction and operational diesel exhaust emissions would result in a cancer risk (on site and off site) below the 10 in 1 million threshold, as well as a chronic non-cancer hazard index risk of less than 1.0. Therefore, TAC emissions from construction and operation of the Proposed Project would not potentially expose sensitive receptors to substantial pollutant concentrations and would result in an impact that is **less than significant.**

Health Impacts of Carbon Monoxide

Mobile-source (vehicular) CO impacts occur regionally and locally. According to the Project's transportation impact report (Appendix I), the average daily trips and vehicle miles traveled for the Proposed Project would be reduced compared to the existing scenario. Therefore, project-related travel would not exacerbate regional traffic impacts within the local airshed and the SDAB. Locally, project-related traffic would be nominal and can be reasonably considered to be a negligible change to the City's roadway system. With this said, if traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the Proposed Project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. As discussed earlier in this section, the Proposed Project would result in a net reduction in daily trips associated with the students. Therefore, there is not anticipated to be a decline in level of service in intersections around the Project site. As such, a CO hotspot analysis is not needed, and the Proposed Project would have a **less-than-significant impact.**

Valley Fever Exposure

As discussed in Section 4.2.1, Existing Conditions, valley fever is not highly endemic to the County, and the incidence rate in the Project area is below the County average and the statewide average. Construction of the Proposed Project would comply with SDAPCD Rule 55, which limits the amount of fugitive dust generated during construction. Strategies the Project would implement to comply with SDAPCD Rule 55 and control dust include watering two times per day and limiting speed on unpaved roads to 15 mph. Based on the low incidence rate of Coccidioidomycosis in the Project area and in greater San Diego County, as well as the Proposed Project’s implementation of dust control strategies, it is not anticipated that earth-moving activities during Project construction would result in exposure of nearby sensitive receptors to valley fever. During operation, there would be no ground disturbance or grading to generate fugitive dust. Therefore, the Proposed Project would have a **less-than-significant impact** with respect to valley fever exposure for sensitive receptors.

Health Impacts of Other Criteria Air Pollutants

As shown above, construction and operation of the Proposed Project would not result in emissions that exceed the SDAPCD’s emission thresholds for any criteria air pollutants. The SDAPCD emission thresholds were developed to show levels at which a project would not prevent or interfere with the attainment or maintenance of an ambient air quality standard. As the ambient air quality standards define the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health, by not exceeding the SDAPCD emission thresholds, the project would not be causing harm to public health.

Regarding VOCs, some VOCs are associated with motor vehicles and construction equipment, while others are associated with architectural coatings, the emissions of which would not result in the exceedances of the SDAPCD’s thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. Additionally, SDAPCD Rule 67.0.1 restricts the VOC content of coatings for both construction and operational applications.

Regarding VOCs and NO_x, these pollutants are precursors to O_3, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by EPA as a nonattainment area for the 8-hour O_3 NAAQS and CAAQs standards and the 1-hour CAAQS standard). The health effects associated with O_3, as discussed in Section 4.2.1, are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur, because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest.

Regarding NO_2, according to the construction emissions analysis, construction of the Proposed Project would not contribute to exceedances of the NAAQS and CAAQS for NO_2. As described in Section 4.2.1, health impacts from exposure to NO_2 and NO_x are associated with respiratory irritation, which may be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, these heaviest increments of use would be intermittent during the Project's construction period. Additionally, off-road construction equipment would operate at various portions of the site and would not be concentrated in one portion of the site at any one time. Construction of the Proposed Project also would not require any stationary emission sources that would create substantial, localized NO_x impacts. In summary, the Proposed Project's VOC and NO_x emissions, as described previously, would minimally contribute to regional O_3 concentrations and its associated health effects. In addition to O_3, NO_x emissions would not contribute to potential exceedances of the NAAQS and CAAQS for NO_2. As shown in Table 4.2-1, the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Thus, it is not expected that the Proposed Project's operational NO_x emissions would result in exceedances of the NO_2 standards or contribute to the associated health effects. CO tends to be a localized impact associated with congested intersections. The associated CO "hotspots" were discussed previously as a less-than-significant impact. Thus, the Proposed Project's CO emissions would not contribute to significant health effects associated with this pollutant. Likewise, PM_{10} and $PM_{2.5}$ would not contribute to potential exceedances of the NAAQS and CAAQS for particulate matter, would not obstruct the SDAB from coming into attainment for these pollutants, and would not contribute to significant health effects associated with particulates.

Based on the preceding considerations, health impacts associated with criteria air pollutants would be **less than significant.**

4. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Section 41700 of the California Health and Safety Code and SDAPCD Rule 51 (Public Nuisance) prohibit emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

SDAPCD Rule 51 (Public Nuisance) also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and since their measurements are difficult to quantify. As a result, this guideline is qualitative and analysis focuses on the existing and potential surrounding uses and location of sensitive receptors.

The occurrence and severity of potential odor impacts depends on numerous factors: the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

Construction

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the Proposed Project. Potential odors produced during Project construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project site 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.**

Operation

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Proposed Project includes a dining commons on the Peninsula Component site; otherwise, it is all residential. Therefore, Proposed Project operations would result in a **less-than-significant** odor impact.

4.2.5 Cumulative Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in in Chapter 3, Cumulative Methods and Projects, of this Draft EIR. For the purposes of air quality emissions, this cumulative analysis considers emissions within the air basin (i.e., SDAB).

As discussed in Section 4.2.4, buildout of the Project would not exceed the annual growth projections for the SANDAG housing estimates. Further, implementation of the Project would result in construction and operational emissions that would be below the SDAPCD's mass daily regional significance thresholds, and as such, would not conflict with the applicable SIP and RAQS. Therefore, the Project would not contribute to a cumulatively considerable impact related to conflicting with the SDAPCD SIP and RAQS.

As discussed previously, air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SDAPCD develops and implement plans for future attainment of ambient air quality standards. The potential for the Project to result in a cumulatively considerable impact, specifically, a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 4.2.4. Consistent with the finding for the Project, the cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment would be less than significant during construction and operation for cumulative impacts. The Project would not result in a cumulatively considerable impact.

As discussed in Section 4.2.4, regarding sensitive receptors, the Project would result in a less-than-significant impact during construction and operation. Emissions of TACs during construction and operation would not exceed applicable thresholds for off-site or on-site receptors. The Project would also not cause or create a CO hotspot. The Project would not emit substantial quantities of criteria pollutant emissions or TACs during operation. The impact of the Project, in addition to growth, including other cumulative projects, could further increase the exposure of air quality pollutants to sensitive receptors. However, cumulative projects, as listed in Chapter 3 of this EIR, would not result in substantial concentrations of TAC emissions during operation as they are predominantly residential and commercial projects with the majority of their emissions (mobile sources) occurring off site. Emissions during construction would disperse rapidly from the project sites and generally occur at magnitudes that would not affect substantial numbers of people. Consistent with the significance finding for the Project, during construction there would be a less-than-significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs. Consistent with the significance finding for the Project, during operation there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TACs.

As discussed in Section 4.2.4, regarding odors or other emissions, the Project would result in a less-than-significant impact during construction and operation. Odor impacts are generally limited to the immediate area surrounding the source. Potential odors from the Project site would be temporary and limited (due to the type of land uses—recreational and residential are not typically substantial odor-producing land uses), and cumulative projects listed in Chapter 3 of this EIR, among other developments in the SDAB, would be subject to SDAPCD Rule 51. Therefore, the Project would not contribute to a cumulatively considerable impact regarding other emissions, such as those leading to odors, which would adversely affect a substantial number of people. The cumulative impact would be **less than significant.**

4.2.6 Summary of Impacts Prior to Mitigation

The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County as part of development of their general plans. As such, projects involving development consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS. However, if a project involves development that is greater than that anticipated in the local plan and/or SANDAG's growth projections, that project might conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

The buildout of the Project would be within the SANDAG regional housing annual projections. The Project would be within the regional growth projections and would not conflict with the RAQS and SIP. Therefore, a **less-than-significant** impact would result.

The Project would not exceed the SDAPCD significance thresholds during construction or operation. The SDAPCD emissions thresholds were developed to show levels at which a project would not prevent or interfere with the attainment or maintenance of an ambient air quality standard. As the ambient air quality standards define the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harm to the public's health, by not exceeding the SDAPCD emission thresholds, the Project would not be causing harm to public health. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be **less than significant.**

Emissions of TACs during construction and operation would not exceed applicable thresholds for off-site or on-site receptors. The Project would also not cause or create a CO hotspot. The Project would not emit substantial quantities of criteria pollutant emissions or TACs during operation. Based on the low incidence rate of Coccidioidomycosis in the Project area and in greater San Diego County, as well as the Proposed Project's implementation of dust control strategies, it is not anticipated that earth-moving activities during Project construction would result in exposure of nearby sensitive receptors to valley fever. During operation, there would be no ground disturbance or grading to generate fugitive dust. Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and would have a **less-than-significant** impact.

The Project would result in a **less-than-significant** impact during construction and operation. Odor impacts are generally limited to the immediate area surrounding the source. Potential odors from the Project site would be temporary and limited (due to the type of land uses—recreational and residential are not typically substantial odor-producing land uses).

4.2.7 Mitigation Measures

All potential air quality impacts of the Proposed Project would be less than significant. Therefore, no mitigation measures are required.

4.2.8 References

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4.3 Biological Resources

This section describes the existing biological resources conditions of the Project site and its vicinity, identifies applicable planning requirements, evaluates potential biological resources impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Biological Resources, and, as necessary, identifies mitigation measures to reduce any identified potentially significant impacts to less than significant. This section is based on a Biological Resources Technical Report prepared by Dudek for the Project and included as Appendix D.

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to biological resources issues concerning indirect impacts to the adjacent Multi-Habitat Planning Area (MHPA) and consistency with the City of San Diego (City) Land Use Adjacency Guidelines. The analysis presented below addresses each of these topics. As to the MHPA and consistency with related guidelines, the California State University (CSU)/SDSU as a state entity is not subject to local land use regulations, nor is it a signatory to the San Diego Multiple Species Conservation Program (MSCP)/MHPA; therefore, the CSU/SDSU is not subject to its regulations, including the Land Use Adjacency Guidelines. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.3.1 Existing Conditions

The Study Area for the Proposed Project is composed of three areas: the Peninsula Component, the Peninsula Study Area, and the University Towers East Component. The Peninsula Study Area consists of the portion of the site presently developed, as well as the parcels immediately surrounding and abutting the Peninsula Component that are owned by SDSU and/or its auxiliaries acting through the State of California. The Peninsula Study Area fully encapsulates the Peninsula Component. The University Towers East Component site consists of the existing parking lot. The Study Area boundaries are shown on Figure 4.3-1, Peninsula Component Study Area Biological Resources, and Figure 4.3-2, University Towers East Component Study Area Biological Resources.

The Peninsula Component is broken up into three separate direct impact types: existing developed areas proposed for redevelopment, brush management zone 1, and brush management zone 2. Brush management zone 1 includes a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 includes a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space (see Figure 4.3-1).

Generally, land uses adjacent to the proposed Peninsula Component site consist of student residential buildings, Remington Road/55th Street, and SDSU sports fields to the south; San Diego Metropolitan Trolley System tracks, Interstate (I) 8, and residential development to the north; undeveloped canyon land and residential development to the west; and Canyon Crest Drive, SDSU surface parking and building, and Metropolitan Trolley System tracks to the east. The central portion of this site comprises urban/developed areas and ornamental plantings. There are steep slopes composed of native and non-native vegetation along the northern, western, and eastern sides of the urban/developed area. The slope on the western side of the urban/developed area ultimately extends down to the bottom of a canyon where a drainage channel conveys stormwater runoff. The elevation of this site ranges from approximately 210 feet above mean sea level (amsl) to 450 feet amsl. According to the U.S. Department of Agriculture, there are three soil types present, and descriptions based on the Web Soil Survey (USDA 2024) appear as follows: Olivenhain cobbly loam, 30% to 50% slopes; Olivenhain–Urban land complex, 2% to 9% slopes; and

Olivenhain–Urban land complex, 9% to 30% slopes. The Olivenhain series is a well-drained soil with slow or medium runoff and very slow permeability (USDA 2024). These soils are found on gently sloping to strongly sloping hillsides and on marine terraces. Olivenhain soils are generally very cobbly (USDA 2024). SDSU has conducted periodic brush management on these steep hillsides in past years.

Land uses adjacent to the University Towers East Component site consist of Montezuma Road and student housing to the north, 55th Street to the west, and single-family and multifamily residential developments to the south and east. The entire site comprises urban/developed areas. The elevation is approximately 466 feet amsl. According to the U.S. Department of Agriculture, there are two soil types present, and descriptions based on the Web Soil Survey (USDA 2024) are as follows: Olivenhain–Urban land complex, 2% to 9% slopes (description same as above), and Redding-Urban land complex. The Redding series is a well or moderately well drained soil with very low to high runoff and very slow to slow permeability (USDA 2024).

4.3.1.1 Vegetation Communities

Within the Peninsula Component site and Peninsula Study Area, the following vegetation communities were mapped: one native plant community, Diegan coastal sage scrub (predominantly disturbed); four non-native vegetation types including ornamental, eucalyptus woodland, non-native riparian, and disturbed land; and two land cover types, urban/developed and unvegetated channel.

Within the University Towers East Component site, only one land cover type, urban/developed, was mapped.

The acreages of the vegetation communities and land cover types within the Study Area are presented in Table 4.3-1, and their spatial distributions are presented on Figure 4.3-1 and Figure 4.3-2.

Table 4.3-1. Vegetation Communities/Land Cover Types within the Project Components and Study Area

Habitat Types/Vegetation Communities	Acreages within the Study Area
Non-Native Vegetation Communities/Land Cover Types	
Urban/Developed (DEV)	16.98[1]
Ornamental Plantings (ORN)	3.10
Non-Native Riparian (NNR)	0.90
Eucalyptus Woodland (EW)	2.30
Disturbed Habitat (DH)	0.75
Unvegetated Channel (UVC)	0.03
Subtotal	*24.07*[2]
Native Vegetation Communities	
Diegan Coastal Sage Scrub (CSS) (disturbed)	12.97
Subtotal	*12.97*
Total	**37.03**[2]

Source: Appendix D of this Draft EIR.
Notes:
1 Does not include Aztec Circle Drive.
2 Acreages may not sum due to rounding.

The following is a brief description of the various habitat types/vegetation communities listed in Table 4.3-1.

Urban/Developed

As used in Table 4.3-1, urban/developed refers to areas that have been previously developed or disturbed so severely that native vegetation is no longer supported. Urban/developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials (Oberbauer et al. 2008). This land cover is not considered a sensitive biological resource by the California Department of Fish and Wildlife (CDFW) under CEQA (CDFW 2023). Impacts to these areas do not require mitigation.

Developed land dominates the central portion of the Peninsula Component and encompasses the entire University Towers East Component, totaling 16.99 acres, and includes existing buildings, paved roads, common areas, and parking lots associated with the SDSU student residences.

Ornamental Plantings

Ornamental plantings are areas where non-native ornamental species and landscaping schemes have been installed and maintained. Ornamental plantings are not considered a sensitive biological resource by CDFW under CEQA (CDFW 2023). Impacts to these areas do not require mitigation.

A total of 3.10 acres of ornamental plantings associated with the landscaping around existing SDSU buildings is mapped in several locations throughout the Peninsula Component and the Peninsula Study Area, specifically around the perimeter of the urban/developed areas. This habitat type supports a myriad of ornamental species, including, but not limited to, bank catclaw (*Acacia redolens*), hottentot fig (*Carpobrotus edulis*), jade plant (*Crassula ovata*), Brazilian pepper tree (*Schinus terebinthifolius*), and ornamental pines (*Pinus* spp.).

Non-Native Riparian

Non-native riparian habitat consists of densely vegetated riparian thickets dominated by non-native, invasive species, where non-native, invasive species account for greater than 50% of the total vegetative cover within a mapping unit (Oberbauer et al. 2008). Characteristic species include giant reed (*Arundo donax*), tamarisk (*Tamarix ramosissima*), eucalyptus (*Eucalyptus* spp.), palms (*Phoenix* spp. and *Washingtonia* spp.), castor bean (*Ricinus communis*), and pampas grass (*Cortaderia* spp.). The non-native riparian habitat within the site was considered to be a semi-natural stand, and as such was denoted as GNA/SNA, meaning that on a global and state level, a conservation status rank is not applicable because the species or ecosystem is not a suitable target for conservation activities (CDFW 2023). Per CDFW, non-native riparian is not a sensitive vegetation community regulated by CDFW. In addition, it is located outside of the impact area.

A total of 0.90 acres of non-native riparian habitat is present at the bottom of the Peninsula Component canyon, in a small strip along the far western edge of the Peninsula Study Area, and is dominated by palms and pampas grass (*Cortaderia jubata*). Less than 15% of the riparian species observed were native.

Eucalyptus Woodland

Although not recognized by Holland (1986) as a native plant community, eucalyptus woodland is a distinct, non-native, naturalized vegetation type that is fairly widespread in Southern California and is considered a woodland habitat. It typically consists of monotypic stands of introduced Australian eucalyptus trees. The understory is either depauperate or absent owing to shade and the possible allelopathic (toxic) properties of the eucalyptus leaf litter. Although eucalyptus woodlands are of limited value to most native plants and animals, they frequently provide nesting and perching sites for several raptor species. Eucalyptus woodland is not considered a sensitive biological resource by CDFW under CEQA (CDFW 2023). Impacts to these areas do not require mitigation.

A total of 2.30 acres of eucalyptus woodland habitat is present within the southeastern corner of the Peninsula Component and Peninsula Study Area, adjacent to the urban/developed areas.

Disturbed Habitat

Disturbed habitat is characterized by a predominance of non-native species, often introduced and established through human action. Oberbauer et al. (2008) describes disturbed land as areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of non-native plant species such as ornamentals or ruderal exotic species (i.e., weeds). Disturbed habitat is not considered a sensitive biological resource by CDFW under CEQA (CDFW 2023). Impacts to these areas do not require mitigation.

A total of 0.75 acres of disturbed habitat is present along the perimeter of the existing urban/developed areas within the Peninsula Component and Peninsula Study Area. This habitat type supports a variety of ruderal and ornamental species, including, but not limited to, hottentot fig, jade plant, Maltese star-thistle (*Centaurea melitensis*), and castor bean.

Unvegetated Channel or Floodway

According to Oberbauer et al. (2008), unvegetated channel is the sandy, gravelly, or rocky fringe of waterways or flood channels that are unvegetated on a relatively permanent basis. Vegetation may be present but is usually less than 10% total cover and grows on the outer edge of the channel.

Within the western side of the Peninsula Study Area there is a 0.03-acre unvegetated channel along the canyon bottom and an erosional feature caused by the City's storm drain outlet that connects into the channel. This land cover is located outside of the impact area.

Disturbed Diegan Coastal Sage Scrub

According to Holland (1986), Diegan coastal sage scrub is composed of a variety of soft, low shrubs, characteristically dominated by drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.), with scattered evergreen shrubs, including lemonadeberry (*Rhus integrifolia*), and laurel sumac (*Malosma laurina*). It typically develops on xeric (dry) slopes.

Virtually all of the Diegan coastal sage scrub vegetation is disturbed and located within the Peninsula Study Area. There is also a small amount of disturbed Diegan coastal sage scrub within the Peninsula Component. The disturbed Diegan coastal sage scrub totals 12.97 acres and is dominated by California sagebrush, California buckwheat, Menzies's golden bush (*Isocoma menziesii*), coyote brush (*Baccharis pilularis*), lemonadeberry, and laurel sumac, with approximately 25% cover of non-native *Acacia* species, compact brome (*Bromus madritensis*), and Smilo grass (*Stipa miliacea*) growing throughout and along the edges.

Diegan coastal sage scrub has a global rank of G4 and state rank of S4, meaning it is not considered sensitive by the state (CDFW 2023). However, impacts to these areas would require mitigation since they provide habitat for the coastal California gnatcatcher (*Polioptila californica californica*), which is a protected species.

4.3.1.2 Floral Diversity

A total of 38 species of native or naturalized plants, 16 native (42%) and 22 non-native (58%), have been recorded within the Peninsula Study Area, Peninsula Component, and University Towers East Component (see Appendix A of Appendix D of this Draft Environmental Impact Report [EIR]). Focused rare plant surveys will be conducted during the spring and summer of 2025. Once complete, information contained in Appendix C will be updated if additional species are detected.

4.3.1.3 Wildlife Diversity

The Peninsula Study Area and Peninsula Component site support habitat for both common upland and some special-status species. A list of the wildlife species detected within the Project site thus far is provided in Appendix B of Appendix D of this Draft EIR. To date, there have been 29 species observed. Common bird species detected thus far include mourning dove (*Zenaida macroura*), California scrub-jay (*Aphelocoma californica*), bushtit (*Psaltriparus minimus*), and American crow (*Corvus brachyrhynchos*). Scrub and ornamental habitats within the Project site provide foraging and nesting habitat for migratory and resident bird species and other wildlife species.

Special-status wildlife species are addressed in Section 4.3.1.5, below.

4.3.1.4 Special-Status Plant Species

Endangered, rare, or threatened plant species, as defined in CEQA Guidelines Section 15380(b) (14 CCR 15000 et seq.), are referred to as “special-status plant species” and include (1) endangered or threatened plant species recognized in the context of the California Endangered Species Act (CESA) and the federal Endangered Species Act (FESA) (CNDDB 2024a), and (2) plant species with a California Rare Plant Rank (CRPR) 1 through 3 (CNPS 2024). CRPR 4 plant species are identified as special-status for the purposes of this analysis.

There are a number of special-status plant species that have a moderate potential to occur and are listed in Appendix C1 of Appendix D of this Draft EIR. San Diego goldenstar (*Bloomeria clevelandii;* CRPR 1B.1) has a high potential to occur due to the fact that it was documented during surveys conducted for the 2017 SDSU New Student Housing Project (Dudek 2017), which overlaps a portion of the Peninsula Study Area. Other special-status plant species with a high potential to occur due to recent documented occurrences in the immediate vicinity and the presence of suitable habitat include small-flowered morning-glory (*Convolvulus simulans;* CRPR 4.2), San Diego barrel cactus (*Ferocactus viridescens;* CRPR 2B.1), and ashy spike-moss (*Selaginella cinerascens;* CRPR 4.1).

Special-status plant species that are known to occur in the surrounding region but are not expected to occur or have low potential to occur on site are also listed in Appendix C2 of Appendix D of this Draft EIR. These appendices will be updated as necessary pending the results of the focused rare plant surveys.

Special-status plant surveys will be conducted in the spring (April) and summer (June) of 2025, which coincides with the blooming periods for the majority of the annual species; therefore, target species should be detected if they occur on site. These surveys will determine the presence or absence of plant species that are considered endangered, rare, or threatened under CEQA Guidelines Section 15380 (14 CCR 15000 et seq.).

Until surveys are completed, any species with a potential to occur on site will be assumed to be present within suitable habitat and potential impacts will be mitigated accordingly.

Critical Habitat

There is no U.S. Fish and Wildlife Service (USFWS) designated critical habitat mapped for plant species within the Project site or within a 1-mile vicinity. There is USFWS-designated critical habitat for two species located within 5 miles of the Project site: San Diego ambrosia (*Ambrosia pumila)* and spreading navarretia (*Navarretia fossalis*) (USFWS 2024). There is a moderate potential for San Diego ambrosia to occur within the suitable coastal sage scrub habitat within the Peninsula Study Area and Peninsula Component. However, spreading navarretia is not expected to occur as there is no suitable marsh or swamp habitat present.

4.3.1.5 Sensitive Wildlife Species

Endangered, rare, or threatened wildlife species, as defined in CEQA Guidelines Section 15380(b) (14 CCR 15000 et seq.), are referred to as "special-status wildlife species" and include (1) endangered or threatened wildlife species recognized in the context of CESA and FESA (CNDDB 2024b); (2) California Species of Special Concern (SSC) and Watch List species, as designated by the CDFW (CNDDB 2024c); (3) mammals and birds that are fully protected species, as described in the California Fish and Game Code, Sections 4700 and 3511; and (4) Birds of Conservation Concern, as designated by the USFWS (USFWS 2008).

Special-status wildlife species that have a high or moderate potential to occur are presented in Appendix D1 of Appendix D of this Draft EIR. Special-status wildlife species that are known to occur in the surrounding region or have low potential to occur on site are listed in Appendix D2 of Appendix D of this Draft EIR. For each species listed, Dudek determined whether the species has the potential to occur on site based on information gathered during the literature review, including the location of the Project site, vegetation communities or land covers present, current site conditions, and past and present land use.

Critical Habitat

There is no USFWS-designated critical habitat mapped within the Project site. However, there is USFWS-designated critical habitat for two species located within 5 miles of the Project site: coastal California gnatcatcher and least Bell's vireo (*Vireo bellii pusillus*) (USFWS 2024). There is a high potential for coastal California gnatcatcher to occur within the suitable coastal sage scrub habitat within the Peninsula Study Area and Peninsula Component. However, least Bell's vireo are not expected to occur as the non-native riparian is highly disturbed, fragmented from other riparian habitat, and relatively small in expanse.

Species with a Moderate or High Potential to Occur On Site

Special-Status Amphibians and Reptiles

*San Diego Tiger Whiptail Lizard (*Aspidoscelis tigris stejnegeri*)*

San Diego tiger whiptail lizard (*Aspidoscelis tigris stejnegeri*) is a CDFW SSC and has moderate potential to occur on site. It is found in coastal Southern California, mostly west of the Peninsular Ranges and south of the Transverse Ranges, north into Ventura County, and south into Baja California, Mexico (Stebbins 2003).

The San Diego tiger whiptail is found in a variety of habitats, primarily in areas where plants are sparse and there are open areas for running. According to Stebbins (2003), the species ranges from deserts to mountain pine forests where it prefers warmer and drier areas. The species is also found in woodland and streamside growth, and it avoids dense grassland and thick shrub growth. There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

*Northern Red-Diamond Rattlesnake (*Crotalus ruber ruber*)*

The northern red-diamond rattlesnake (*Crotalus ruber ruber*) is a CDFW SSC and has moderate potential to occur on site. It is found in a variety of habitats from the coast to the deserts, from San Bernardino County into Baja California, Mexico (below 5,000 feet in elevation). It commonly occurs in rocky areas within coastal sage scrub, chaparral, juniper woodlands, and desert habitats, but can also be found in areas devoid of rocks (Lemm 2006). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

*Blainville's Horned Lizard (*Phrynosoma blainvillii*)*

Blainville's horned lizard (*Phrynosoma blainvillii*) (previously coast horned lizard) is a CDFW SSC and has moderate potential to occur on site. It is found from the Sierra Nevada foothills and central California to coastal Southern California. It is often associated with coastal sage scrub, especially areas of level to gently sloping ground with well-drained loose or sandy soil, but it can also be found in annual grasslands, chaparral, oak woodland, riparian woodland, and coniferous forest between 30 feet and 7,030 feet amsl (Jennings and Hayes 1994). This reptile typically avoids dense vegetation, preferring 20% to 40% bare ground in its habitat. The Blainville's horned lizard can be locally abundant in areas where it occurs, with densities near 20 adults per acre. Adults are active from late March through late August, and young are active from August through November or December. Up to 90% of the diet of the Blainville's horned lizard consists of native harvester ants (*Pogonomyrmex* spp.). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Coast Patch-Nosed Snake (Salvadora hexalepis virgultea)

The coast patch-nosed snake (*Salvadora hexalepis virgultea*) is a CDFW SSC and has moderate potential to occur on site. It ranges from west-central Nevada south to the tip of Baja California and northwestern Sonora, and from coastal Southern California to southwestern Utah and central Arizona. The coast patch-nosed snake is found at elevations from below sea level to around 6,988 feet amsl (Goldberg 1995).

The coast patch-nosed snake is diurnal (Stebbins 2003) and can be found throughout the day during the milder months of spring. Activity is restricted to the mornings and late afternoons during the summer months. As an active, diurnal snake, it will occasionally take refuge in rock crevices, in small mammal burrows, and under vegetation. May and June are the typical months of peak activity; however, in the southern part of its range, activity may extend all year during mild to warm weather. The subspecies is a broad generalist in its diet and an opportunistic feeder that probably preys on anything it can overpower including small mammals (*Dipodomys*), lizards (*Aspidoscelis*, *Coleonyx*), and the eggs of lizards and snakes (Stebbins 2003). Jennings and Hayes (1994) also found that the patch-nosed snake may adjust its activities around that of one of its prey: the whiptail lizard (Aspidoscelis spp.). There is suitable arid coastal scrub habitat for this species within the Peninsula Study Area and Peninsula Component.

Special-Status Birds

Coastal California Gnatcatcher (Polioptila californica californica)

The coastal California gnatcatcher is a federally listed threatened species and a CDFW SSC and has a high potential to occur on site. It is closely associated with coastal sage scrub habitat and typically occurs below elevations of 950 feet amsl and on slopes less than 40%, but gnatcatchers have been observed at elevations greater than 2,000 feet amsl (Zeiner et al. 1990). The species is threatened primarily by loss, degradation, and fragmentation of coastal sage scrub habitat; it is also impacted by brown-headed cowbird (*Molothrus ater*) nest parasitism.

Focused surveys for this species are being conducted through year end 2024 into early 2025 within all potentially suitable gnatcatcher habitat (coastal sage scrub) in the Study Area.

While coastal California gnatcatcher were not detected in the 2017 surveys conducted in support of the adjacent SDSU New Student Housing Project (Dudek 2017), this species has potential to occur in the coastal sage scrub and the surveys that will be conducted in 2024 and 2025 will provide current information on the species' presence/absence. Potential impacts to coastal California gnatcatchers due to Project implementation are discussed in the impacts analysis.

Special-Status Mammals

No special-status mammals have a high or moderate potential to occur or have been observed in the Study Area.

Special-Status Amphibians

No special-status amphibians are anticipated to occur within the Study Area. There is a lack of suitable habitat such as pools for breeding and stream terraces for foraging and wintering. Additionally, the drainages in the Study Area are fed by urban runoff and predominantly covered in thick non-native vegetation. The Study Area is located within an urbanized setting and there is likely a strong presence of urban-adapted predators. No special-status amphibians have been observed in the Study Area.

Special-Status Invertebrates

Crotch's bumble bee (*Bombus crotchii*) is a candidate to become a state endangered species. This species is known to occur almost exclusively in California and has historically occupied grasslands and shrublands in Southern to central California (CDFW 2019). Suitable habitat for this species may include (1) areas of grasslands and upland scrub that contain requisite habitat elements, such as small mammal burrows and forage plants; (2) potential nest habitat (late February through late October) containing underground abandoned small mammal burrows, perennial bunch grasses, and/or thatched annual grasses, brush piles, old bird nests, dead trees, or hollow logs (Williams et al. 2014; Hatfield et al. 2015); and (3) overwintering sites (November through early February). The Peninsula Study Area and Peninsula Component have the potential to support foraging and nesting for this species.

Crotch's bumble bee has a moderate potential to occur within the coastal sage scrub communities on site where floral resources are present. There are several records of Crotch's bumble bee within 5 miles of the site, including one from 2019 located approximately 4 miles west of the site along the northern side of the San Diego River (CDFW 2024).

4.3.1.6 Jurisdictional Waters of the United States/Wetland Resources

Based on the jurisdictional delineation conducted in 2017 for the SDSU New Student Housing Project (Dudek 2017), one drainage within the Peninsula Study Area was identified as jurisdictional under the U.S. Army Corps of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB). Approximately 728 linear feet of non-wetland waters (ephemeral stream channels) under the jurisdiction of USACE and RWQCB are found within the far west side of the Peninsula Study Area. This drainage connects downstream with the San Diego River and, eventually, the Pacific Ocean.

4.3.1.7 Habitat Connectivity and Wildlife Corridors

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping-stones for wildlife dispersal. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of wildlife from high-density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife corridors are considered sensitive by resource and conservation agencies.

The Project site vicinity includes a variety of existing residential and urban developments, as well as buildings and facilities associated with SDSU. Two baseball diamonds, tennis courts, and other various sports fields are present to the south and west of the Peninsula Component site. To the north are the Metropolitan Trolley System tracks, I-8, and high density housing. Located to the east and south are large parking structures and Viejas Arena, a popular open air concert venue. Cumulatively, these developments and facilities contribute to the fragmentation and human disturbance of the surrounding area. Although much of the Peninsula Component site is located along a mesa adjacent to a north-trending canyon that feeds into Alvarado Canyon, the lower terraces of the canyon are constrained by existing development, principally I-8 and existing residential development north of I-8. However, there are other canyons located within the Alvarado Canyon system that are peripherally connected to the Peninsula Component. Due to the nearby residential areas, I-8, and SDSU campus, wildlife that move through the north-trending canyon is largely limited to urban-adapted wildlife species such as brush rabbit (*Sylvilagus bachmani*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), lizards and snakes, and a variety of bird species and invertebrates. Thus, the Peninsula Component site supports a linkage function within the canyon but is not considered a wildlife corridor because it is cut off from connection to southern portions of the county and would have more of a cul-de-sac function of habitat for species that are tolerant of the urban interface.

The University Towers East Component site is urban/developed and surrounded by land that is urban/developed and does not contain habitat connectivity and wildlife corridors.

Canyonlands in San Diego are largely the only habitat corridors within urbanized areas of San Diego. The largest open space areas within the vicinity of the Project site are Mission Trails Regional Park, located approximately 3.3 miles northeast; Marine Corps Air Station Miramar, located approximately 4.5 miles north; and Otay Mesa, located approximately 6.7 miles southeast.

4.3.2 Regulatory Framework

Federal

Federal Endangered Species Act

The FESA of 1973 (16 USC 1531 et seq.), as amended, is administered by USFWS, National Oceanic and Atmospheric Administration, and National Marine Fisheries Service. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing extinction of plants and wildlife. Under provisions of Section 9(a)(1)(B) of FESA, it is unlawful to "take" any listed species. "Take" is defined in Section 3(19) of FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

FESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans (HCPs) on private property without any other federal agency involvement. Upon development of an HCP, USFWS can issue incidental take permits for listed species.

FESA provides for designation of Critical Habitat, defined in Section 3(5)(A) as specific areas within the geographical range occupied by a species where physical or biological features "essential to the conservation of the species" are found and "which may require special management considerations or protection." Critical Habitat may also include areas outside the current geographical area occupied by the species that are nonetheless "essential for the conservation of the species."

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). The MBTA was updated in 2004 with the Migratory Bird Treaty Reform Act of 2004, which amended the MBTA to apply only to migratory bird species that are "native to the United States or U.S. territories, and that a native migratory bird species is one that is present as a result of natural biological or ecological processes." A list of non-native, human-introduced species that are not covered by the MBTA was published in 2020. On January 7, 2021, USFWS published a final rule, effective December 3, 2021, defining the scope of the MBTA to prohibit incidental take and applying enforcement discretion, consistent with judicial precedent and longstanding agency practice (USFWS 2021). Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). The Executive Order requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect these species.

Clean Water Act (Section 404)

The Clean Water Act (CWA) is the major federal legislation governing water quality, providing guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 of the CWA requires an applicant for a federal license or permit that may result in a discharge of pollutants into waters of the United States to obtain state certification, thereby ensuring that the discharge would comply with provisions of the CWA. The State Water Resources Control Board and RWQCBs administer the Section 401

Certification program in California. Section 402 of the CWA establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. USACE implementing regulations are found in 33 Code of Federal Regulations (CFR) Parts 320 to 332. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency (EPA) in conjunction with USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic ecosystem only if there is no practicable alternative that would have less-adverse impacts.

Wetlands and Other Waters of the United States

The definition of waters of the United States establishes the geographic scope of authority under Section 404 of the CWA; however, the CWA does not specifically define waters of the United States, leaving the definition open to statutory interpretation and agency rulemaking. The definition of what constitutes "waters of the United States" (provided in 33 CFR Section 328.3[a]) has changed multiple times over the past few decades, starting with the *United States v. Riverside Bayview Homes Inc*. court ruling in 1985. Subsequent court proceedings, rule makings, and congressional acts in 2001 (*Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers*), 2006 (*Rapanos v. United States*), 2015 (Clean Water Rule), 2018 (suspension of the Clean Water Rule), 2019 (formal repeal of the Clean Water Rule), 2020 (Navigable Waters Protection Rule), and 2021 (*Pasqua Tribe et al v. United States Environmental Protection Agency* resulting in remand and vacatur of the Navigable Waters Protection Rule and a return to "the pre-2015 regulatory regime") have attempted to provide greater clarity to the term and its regulatory implementation. On December 30, 2022, the agencies announced the final Revised Definition of "Waters of the United States" rule (Rule) (88 CFR 3004–3144). The Rule was published in the Federal Register on January 18, 2023, and became effective on March 20, 2023, restoring federal jurisdiction over waters that were protected prior to 2015 under the CWA for traditional navigable waters, the territorial seas, interstate waters, and upstream water resources that significantly affect those waters. The Rule represents a re-expansion of federal jurisdiction over certain water bodies and wetlands previously exempt pursuant to the 2020 Navigable Waters Protection Rule. The Rule also considers various subsequent court decisions, including two notable Supreme Court decisions.

There are two key changes that the Rule incorporates. First, the Rule reinstates the "Significant Nexus" test. The Significant Nexus test refers to waters that either alone, or in combination with similarly situated waters in the region, significantly affect the chemical, physical, or biological integrity of traditional navigable waters, interstate waters, or the territorial seas (86 FR 69372-69450). The Significant Nexus test attempts to establish a scientific connection between smaller water bodies, such as ephemeral or intermittent tributaries, and larger, more traditional navigable waters such as rivers. Significant Nexus evaluations take into consideration hydrologic and ecologic factors including, but not limited to, volume, duration, and frequency of surface water flow in the resource and its proximity to a traditional navigable water, and the functions performed by the resource on adjacent wetlands. Second, the Rule adopts the "Relatively Permanent Standard" test. To meet the Relatively Permanent Standard, water bodies must be relatively permanent, standing, or continuously flowing and have a continuous surface connection to such waters.

On May 25, 2023, the Supreme Court issued its long-anticipated decision in *Sackett v. United States Environmental Protection Agency*, in which it rejected the EPA's claim that waters of the United States, as defined in the CWA, includes wetlands with an ecologically Significant Nexus to traditional navigable waters. The Supreme Court held that only those wetlands with a continuous surface water connection to traditional navigable waterways would be afforded federal protection under the CWA. Specifically, to assert jurisdiction over an adjacent wetland under the

CWA, a party must establish that (1) the adjacent body of water constitutes water[s] of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters), and (2) the wetland has a continuous surface connection with that water, making it difficult to determine where the water ends and the wetland begins. On August 29, 2023, EPA and USACE announced the final rule amending the 2023 definition of waters of the United States, conforming with the *Sackett v. United States Environmental Protection Agency* decision. Some of the key changes include removing the Significant Nexus test from consideration when identifying tributaries and other waters as federally protected and revising the adjacency test when identifying federally jurisdictional wetlands. Under the EPA's new waters of the United States definition, a waters of the United States is a relatively permanent, standing, or continuously flowing body of water that has an apparent surface connection to a "traditionally navigable water" to fall within federal purview. The new rule applies to wetlands and streams throughout the United States. Although the Sackett opinion did not specifically reference streams, EPA's new rule extends the "continuous surface connection" standard to streams, thereby removing non-permanent, ephemeral streams that do not meet these standards from federal jurisdiction.

The term "wetlands" (a subset of waters of the United States) is defined in 33 CFR, Section 328.3(c)(16), as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark," which is defined in 33 CFR 328.3(c)(7) as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

State

California Endangered Species Act

CDFW administers CESA (California Fish and Game Code, Section 2050 et seq.), which prohibits the "take" of plant and animal species designated by the Fish and Game Commission as endangered or threatened in the State of California. Under CESA Section 86, take is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA Section 2053 provides that state agencies may not approve projects that would "jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy."

CESA Sections 2080 through 2085 address the taking of threatened, endangered, or candidate species by stating:

> No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided in this chapter, the Native Plant Protection Act (Fish and Game Code, Sections 1900–1913), or the California Desert Native Plants Act (Food and Agricultural Code, Section 80001).

California Fish and Game Code

According to Sections 3511 and 4700 of the California Fish and Game Code, which regulate birds and mammals, respectively, a "fully protected" species may not be taken or possessed without a permit from the Fish and Game Commission, and "incidental takes" of these species are not authorized.

According to Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Finally, Section 3513 states that is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

For the purposes of these state regulations, CDFW currently defines an active nest as one that is under construction or in use and includes existing nests that are being modified. For example, if a hawk is adding to or maintaining an existing stick nest in a transmission tower, then it would be considered to be active and covered under these California Fish and Game Code sections.

Pursuant to Section 1602 of the California Fish and Game Code, the CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. A Streambed Alteration Agreement is required for impacts to jurisdictional wetlands in accordance with Section 1602 of the California Fish and Game Code.

Porter–Cologne Water Quality Control Act

The intent of the Porter–Cologne Water Quality Control Act is to protect water quality and the beneficial uses of water, and it applies to both surface water and groundwater. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under the Porter–Cologne Water Quality Control Act include isolated waters that are no longer regulated by USACE. Developments with impact to jurisdictional waters must demonstrate compliance with the goals of the act by developing stormwater pollution prevention plans, standard urban stormwater mitigation plans, and other measures to obtain a CWA Section 401 certification or waste discharge requirements.

California Environmental Quality Act

CEQA requires identification of a project's potentially significant impacts on biological resources and feasible mitigation measures (MMs) and alternatives that could avoid or reduce significant impacts. CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors" (14 CCR 15000 et seq.). A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c). CEQA also requires identification of a project's potentially significant impacts on riparian habitats (such as wetlands, bays, estuaries, and marshes) and other sensitive natural communities, including habitats occupied by endangered, rare, and threatened species.

Regional

Natural Community Conservation Plan

Section 2835 of the California Fish and Game Code allows CDFW to authorize incidental take in a natural community conservation plan (NCCP). Take may be authorized for identified species whose conservation and management is provided for in the NCCP, whether or not the species is listed as threatened or endangered under FESA or CESA, provided that the NCCP complies with the conditions established in Section 2081 of the California Fish and Game Code. The NCCP provides the framework for the MSCP Plans (see the following discussion).

Multiple Species Conservation Program

The MSCP is a comprehensive regional long-term habitat conservation program. The MSCP addresses habitat and species conservation within approximately 900 square miles in the southwestern portion of San Diego County (County of San Diego 1998). It serves as an approved HCP pursuant to FESA and an approved NCCP in accordance with the state Natural Communities Conservation Planning Act (County of San Diego 1998).

The MSCP establishes a preserve system designed to conserve large blocks of interconnected habitat having high biological value, which are delineated as the MHPA. The City's MHPA is an area within which a "hard line" preserve would be established in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997).

The MSCP identifies 85 plants and animals to be "covered" under the plan ("Covered Species"). Many of these Covered Species are subject to one or more protective designations under state and/or federal law, and some are endemic to San Diego. The MSCP was designed to provide adequate habitat in the preserve to maintain ecosystem functions and persistence of extant populations of the 85 Covered Species, while also allowing participating landowners' "take" of Covered Species on lands located outside of the preserve. The purpose of the MSCP is to address species conservation on a regional level and thereby avoid project-by-project biological mitigation, which tends to fragment habitat.

Signatory agencies/districts administer their portions of the MSCP through subarea plans and implementing agreements. Within the City, the MSCP is implemented through the City of San Diego MSCP Subarea Plan (Subarea Plan) and Implementing Agreements (City of San Diego 1997), as well as referenced companion documents, including the Environmentally Sensitive Lands Regulations of the Land Development Code and San Diego Biology Guidelines of the Land Development Manual. The MSCP Subarea Plan establishes a preserve system designed to conserve large blocks of interconnected habitat having high biological value, which are delineated in the MHPA.

As the CSU/SDSU is a state entity, the CSU/SDSU is not subject to local land use regulations, nor is it a signatory to the MSCP; therefore, it is not subject to the implementing agreements or related regulations, including, but not limited to, Environmentally Sensitive Lands Regulations or San Diego Biology Guidelines.

4.3.3 Significance Criteria

The criteria used to evaluate the Proposed Project's potential impacts to biological resources are based on Appendix G of the CEQA Guidelines. Based on these criteria, the Proposed Project would result in a significant impact related to biological resources if the Project would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Methodology

The following analysis determines the potential impacts to biological resources based on the above criteria and the information gathered and reported in the Evolve Student Housing Project Biological Resources Technical Report, prepared by Dudek in December 2024 and included as Appendix D to this Draft EIR. Appendix D was prepared with a literature review of relevant data, field reconnaissance, and resource mapping.

4.3.4 Impacts Analysis

1. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Direct Impacts

The Peninsula Component is broken up into three separate direct impact types: existing developed areas proposed for redevelopment, brush management zone 1, and brush management zone 2.

Within the Peninsula Component, 0.55 acres of native Diegan coastal sage scrub (disturbed) are located within brush management zone 2 and would be directly impacted by Project development. Within brush management zone 1, three non-native vegetation communities (ornamental plantings, eucalyptus woodland, and disturbed habitat) would be directly impacted. Most of the existing urban/developed land cover within the Peninsula Component would be redeveloped and, therefore, directly impacted by Project development (Figure 4.3-3, Proposed

Impacts to Peninsula Component Study Area Biological Resources). Therefore, the Proposed Project would result in direct impacts to the Peninsula Component site.

The University Towers East Component direct impacts would only include the redevelopment of existing urban/developed land cover (Figure 4.3-4, Proposed Impacts to University Towers East Component Study Area Biological Resources). There are no brush management zones proposed within this site. Therefore, redevelopment of the University Towers East Component site would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. As such, **no impacts** would occur related to the University Towers East component.

Table 4.3-2 lists the impacts to each vegetation community or land cover type by impact type. As shown on the table, a total of 0.55 acres of Diegan coastal sage scrub, a native vegetation community, would be directly impacted by development of the Proposed Project.

Table 4.3-2. Impacts to Vegetation Communities/Land Cover Types

Vegetation Communities/Land Cover Types	Direct Impacts				
	Peninsula Component			University Towers East Component	Direct Impact Totals[1]
	Peninsula Redevelopment Area	*Peninsula Brush Management Zone 1*	*Peninsula Brush Management Zone 2*	*University Towers East Redevelopment Area*	
Native Vegetation Communities					
Diegan Coastal Sage Scrub (CSS) (disturbed)	0	0	0.555	0	***0. 55***
Subtotal	*0*	*0*	*0.555*	*0*	***0.555***
Non-Native Vegetation Communities/Land Cover Types					
Urban/Developed (DEV)	6.79	3.45	0.24	1.30	***11.77***
Ornamental Plantings (ORN)	0	0.06	0.53	0	***0.59***
Non-native Riparian (NNR)	0	0	0	0	***0***
Eucalyptus Woodland (EUC)	0.04	0.22	0.73		***0.99***
Disturbed Habitat (DH)	0	0.02	0.34	0	***0.36***
Unvegetated Channel	0	0	0	0	***0***
Subtotal	*6.83*	*3.75*	*1.84*	*1.30*	***13.71***
Total[1]	**6.83**	**3.75**	**2.39**	**1.30**	**14. 27**

Source: Appendix D of this Draft EIR.
Note:
1 May not sum due to rounding.

Impacts to the Peninsula Component redevelopment area and brush management zone 1, as well as impacts to the redevelopment area within the University Towers East Component, would impact existing urban/developed land, ornamental plantings, disturbed habitat, and eucalyptus woodland. These impacted non-native vegetation types are not protected, and special-status plants or special-status wildlife are not expected to occur within these areas. Therefore, no direct impacts from the Proposed Project would occur within the University Towers East Component, Peninsula Component existing developed area, or Peninsula Component brush management Zone 1. Direct impacts of note would be limited to 0.55 acres of Diegan coastal sage scrub located in Peninsula Component brush management zone 2, which serves as potential habitat for several special-status species.

The discussion below analyzes the effect (i.e., potential significance) of the Proposed Project's direct impacts within the Peninsula Component on any species identified as a candidate, sensitive, or special-status species.

Special-Status Plants

There are a number of special-status plants that have a moderate or high potential to occur within the Peninsula Component. These are listed in Appendix C1 of Appendix D of this Draft EIR. A spring survey and summer survey for special-status plants will be conducted in April and June 2025, respectively. Until surveys are completed, it will be assumed for purposes of this Draft EIR that these species are present within areas of suitable habitat, (i.e., coastal sage scrub).

Therefore, impacts to the 0.55 acres of disturbed Diegan coastal sage scrub as a result of the brush management within zone 2 of the Peninsula Component would result in significant impacts to special-status plants if they were determined to be present. Therefore, potential direct impacts to special-status plants would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Special-Status Birds

Coastal California gnatcatcher has high potential to occur in the disturbed Diegan coastal sage scrub present on the Peninsula Component site. Surveys for this species began in October 2024 and are slated to continue through 2025. Coastal California gnatcatcher is a federally listed threatened species and a CDFW SSC.

Impacts to the 0.55 acres of disturbed Diegan coastal sage scrub due to the brush management within zone 2 of the Peninsula Component would result in significant impacts to coastal California gnatcatcher if they were determined to be present. Therefore, potential direct impacts to coastal California gnatcatcher would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation) and **MM-BIO-2** (coastal California gnatcatcher surveys).

Special-Status Reptiles

San Diegan tiger whiptail, northern red-diamond rattlesnake, Blainville's horned lizard, and coast patch-nosed snake have moderate potential to occur in the coastal sage scrub on the Peninsula Component site. These species are not federally or state listed as threatened or endangered but are CDFW-designated Watch List species or SSCs and/or covered species under the City's Subarea Plan.

Impacts to the 0.55 acres of disturbed Diegan coastal sage scrub due to the brush management within zone 2 would result in impacts to special-status reptiles if they were determined to be present. Therefore, direct impacts to special-status reptiles would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Special-Status Mammals

Four species of bats including pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), western red bat (*Lasiurus frantzii*), and western yellow bat (*Lasiurus xanthinus*) have a low potential to forage (see Appendix D2 of Appendix D of this Draft EIR) within brush management zone 2 of the Peninsula Component. These species are not federally or state listed as threatened or endangered, but are CDFW SSCs. These species could forage within the coastal sage scrub habitat, although it is unlikely that they would roost due to the high disturbance in the area and the lack of suitable resources. Therefore, impacts to these areas would not have a substantially adverse effect on special-status mammals, and direct impacts to special-status mammals would be **less than significant.**

Special-Status Amphibians

No special-status amphibians have potential to occur (see Appendix D2 of Appendix D to this Draft EIR) as there is no suitable habitat (breeding pools, stream terraces, etc.) within or in the immediate vicinity of the Peninsula Component. **No impacts** would occur.

Special-Status Invertebrates

There is a moderate potential for Crotch's bumble bee to occur where floral resources are present, primarily in the coastal sage scrub as it is the most suitable habitat within the Peninsula Study Area (see Appendix D1 of Appendix D to this Draft EIR). This species is a candidate to become a state endangered species.

Impacts to the 0.55 acres of potentially occupied disturbed Diegan coastal sage scrub habitat due to the brush management within zone 2 of the Peninsula Component would result in impacts to special-status invertebrates if they were determined to be present. Therefore, direct impacts to special-status invertebrates would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Birds Protected Under the MBTA

If construction activities associated with the Proposed Project and associated brush management were to occur during the bird nesting season (typically January 15 through September 15), impacts to migratory birds or destruction of active migratory bird nests and/or eggs would be considered a significant impact because they are protected under the MBTA. Because it is reasonable to assume that construction activities would occur between January 15 and September 15, direct impacts to migratory birds would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-3** (nesting bid surveys).

Indirect Impacts

The University Towers East Component consists of urban/developed land and is surrounded by land that is urban/developed. There are no brush management zones proposed within this component. No potential indirect impacts on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS are anticipated at the University Towers East Component site. **No indirect impact** would occur.

The discussion below analyzes the indirect impacts within the Peninsula Component to any species identified as a candidate, sensitive, or special-status species.

Short-Term Indirect Impacts to Special-Status Plants

Potential short-term or temporary indirect impacts to special-status plants adjacent to the Project site would primarily result from construction activities and include impacts related to or resulting from the generation of fugitive dust; changes in hydrology resulting from construction, including sedimentation and erosion; and the introduction of chemical pollutants (including herbicides). Potential short-term indirect impacts associated with the Proposed Project could affect the special-status plants if they occur adjacent to the Peninsula Component as described in detail below.

Generation of Fugitive Dust. Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases.

Changes in Hydrology. Construction could result in hydrologic and water-quality-related impacts adjacent to and downstream of the limits of grading. Hydrologic alterations include changes in flow rates and patterns in drainages, which may affect adjacent and downstream (off-site) aquatic, wetland, and riparian vegetation communities. Water-quality impacts include chemical-compound pollution (brush, oil, lubricants, paints, release agents, and other construction materials), erosion, and excessive sedimentation. The removal of existing vegetation can increase runoff from roads and other paved surfaces, resulting in increased erosion and transport of surface matter into vegetation communities. Altered erosion, increased surface flows, and underground seepage can allow for the establishment of non-native plants. Changed hydrologic conditions can also alter seed bank characteristics and modify habitat for ground-dwelling fauna that may disperse seed.

Chemical Pollutants. Erosion and chemical pollution (releases of brush, oil, lubricants, paints, release agents, and other construction materials) may affect special-status plants. The use of chemical pollutants can decrease the number of plant pollinators, increase the existence of non-native plants, and cause damage to and destruction of native plants.

Short-term indirect impacts to special-status plants associated with generation of fugitive dust, changes in hydrology, and chemical pollutants within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting).

No potential short-term indirect impacts to special-status plants are anticipated within the University Towers East Component of the Proposed Project.

Short-term Indirect Impacts to Special-Status Wildlife

Short-term, construction-related, or temporary indirect impacts to special-status wildlife species that have a high or moderate potential to occur (see Appendix D1 of Appendix D to this Draft EIR) would primarily result from construction activities associated with the Peninsula Component and associated brush management. Potential temporary indirect impacts could occur as a result of generation of fugitive dust, chemical pollutants, increased human activity, non-native animal species, and noise, as further described below.

Generation of Fugitive Dust. Dust and applications for fugitive dust control can impact vegetation surrounding the limits of grading, resulting in changes in the community structure and function. These changes could result in significant impacts to suitable habitat for special-status wildlife species.

Chemical Pollutants. Accidental spills of hazardous chemicals could contaminate nearby surface waters and groundwater and indirectly impact wildlife species through poisoning or altering suitable habitat.

Non-native, Invasive Animal Species. Trash from construction-related activities could attract native and non-native, invasive predators, such as ravens (*Corvus corax*) and coyotes, which could impact the wildlife species present in the Peninsula Component site.

Increased Human Activity. Construction activities adjacent to the canyon can deter wildlife from using already constrained habitat areas near the Peninsula Component footprint.

Noise. Construction-related noise could occur from equipment used during brush management and construction of student residential facilities and associated infrastructure. Noise impacts can have a variety of indirect impacts on wildlife species, including increased stress, weakened immune systems, altered foraging behavior, displacement due to startle, degraded communication with conspecifics (e.g., masking), damaged hearing from extremely loud noises, and increased vulnerability to predators (Lovich and Ennen 2011; Brattstrom and Bondello 1983, as cited in Lovich and Ennen 2011).

If a coastal California gnatcatcher nest is present within a 300-foot buffer of the Peninsula Component site, construction-related noise may result in significant adverse impacts to special-status species. Construction noise would need to be reduced to 60 A-weighted decibel average, or existing ambient levels, whichever is higher, to reduce potential impacts. Short-term indirect impacts to special-status wildlife associated with construction noise within the Peninsula Component would be potentially significant absent mitigation. One method of avoiding potential construction noise-related impacts would be to suspend construction during nesting season (February 1 through September 15); however, this method would substantially lengthen the duration of construction such that completion of the Proposed Project would be delayed a minimum of 5-10 years at substantially increased cost and delay in providing the necessary housing and related benefits that would result from the Project in meeting the Project objectives.

Rather, the Proposed Project would implement **MM-BIO-7,** which would include pre-construction survey(s) for the coastal California gnatcatcher prior to construction work between February 1 and September 15. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques shall be implemented during the breeding season to ensure that construction noise levels do not exceed 60 A-weighted decibels hourly equivalent sound level ($L_{eq\text{-}h}$)_or pre-construction ambient noise levels, whichever is higher, during the breeding season, until the completion of the nesting cycle, as determined by the biologist. While this mitigation would likely reduce potential impacts related to construction noise, because it is not known at this time the location of any potential future nests, nor the feasibility of each noise reduction technique, it cannot be concluded with certainty the mitigation measure would reduce the impact to a less-than-significant level. As such, the impact would be **significant and unavoidable.**

In addition to short-term construction-related noise impacts, portions of the Peninsula Component to be ultimately developed as student housing (Buildings 5 and 6) would, in the interim, be developed as recreation fields. Consistent with the Project's construction phasing schedule, four student residential buildings, as well as the Amenity Building, would be constructed initially, which would leave a temporary open area (consisting of urban/developed land cover) in the southwestern corner of the Peninsula Component site. Recreation fields would be built in this area for recreational use by student residents of the Peninsula Component as an interim land use. Typical student use of the fields for daily activities would likely be below 60 A-weighted decibels L_{eq-h} by the time sound reaches the habitat (Dudek 2024; Caltrans 2013). During subsequent construction phases, the fields would be removed and replaced by the remaining proposed student residential buildings.

If the biological surveys determine that there is sensitive wildlife in the area, the recreational uses may result in noise impacts within the native habitat due to elevated noise from the users of the recreational fields, particularly if amplified sound is used. These elevated noise levels could result in a potentially significant impact absent mitigation as the noise levels could disturb sensitive wildlife if determined to be present and/or nesting.

SDSU has published a document entitled Regulations for Use Of University Buildings And Grounds. Section 8.0 and Appendix B address sound amplification, such as when, where, and what decibel levels are permissible throughout the campus (SDSU 2024). All Proposed Project activities that include amplified noise would (at a minimum) be subject to the guidelines, restrictions, and regulations set forth in this document. Section 8.0 of the Regulations for Use Of University Buildings And Grounds states that "use of amplified sound in outdoor space is restricted and must be approved in advance to designated outdoor campus locations in order to preserve the academic and research mission of the University."

Section 8.0 outlines permissible sound levels for amplified sound as 90 decibels when measured 50 feet from the sound source and 65 decibels when measured from inside the nearest classroom. Section 8.0 continues to outline permitted time for amplified sound to be from 10:00 a.m. to 2:00 p.m. Appendix B lists locations on campus approved for amplified sound. The Project site is not listed as a location of approved amplified sound. If amplified sound is proposed for use as part of the proposed interim recreational fields, approval by the Vice President for Business and Financial Affairs is required, and all amplified sound would comply with the regulations outlined in the Regulations for Use Of University Buildings And Grounds.

If amplified/elevated sound is approved, in addition to complying with the above regulations, noise reduction techniques are to be applied to ensure that amplified and/or elevated noise from operational use (i.e., sporting/student/campus events) of the recreational fields do not result in significant noise impacts to the coastal California gnatcatcher. Specifically, mitigation is recommended that provides prior to any elevated and/or amplified field noise expected to occur between February 1 and September 15, the CSU/SDSU, or its designee, shall retain a qualified biologist to conduct survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat within a 300-foot buffer of the recreational field(s) within the Peninsula Component site. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques (e.g., pausing work to create a 60 A-weighted decibel average, or existing ambient levels, whichever is higher directing speakers away from habitat) shall be implemented to ensure that operational noise levels do not exceed 60 A-weighted decibels L_{eq-h} or existing ambient levels, whichever is higher, at any nest location(s).

Short-term indirect impacts to special-status wildlife associated with potential amplified recreational field noise within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-8** (potential mitigation for operational amplified field noise).

Lighting. The sports fields and access road that would be constructed will be regularly illuminated. As discussed in the exterior lighting study by Francis Krahe & Associates (2024), included as Appendix B-2 to this Draft EIR, the

Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, the lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1, Aesthetics, of this Draft EIR. Further, all field lighting would only be illuminated from 6am to 11pm. Therefore, impacts would be less than significant.

Short-term indirect impacts to special-status wildlife species associated with generation of fugitive dust, chemical pollutants, non-native and/or invasive animal species, increased human activity, and noise within the Peninsula Component would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), **MM-BIO-6** (construction fencing), **MM-BIO-7** (construction noise monitoring), and **MM-BIO-8** (potential mitigation for operational amplified field noise).

Long-Term Indirect Impacts to Special-Status Plants

Long-term (operation-related) or permanent indirect impacts could result from the proximity of the Proposed Project to special-status plants adjacent to the Peninsula Component after construction. Permanent indirect impacts that could affect special-status plants include generation of fugitive dust, habitat fragmentation, chemical pollutants, altered hydrology, non-native invasive species, increased human activity, and alteration of the natural fire regime. Each of these potential indirect impacts is discussed as follows.

Generation of Fugitive Dust. See prior discussion above regarding the effects of fugitive dust on special-status plants.

Chemical Pollutants. The effects of chemical pollutants on special-status plant species are described above. Additionally, during landscaping activities, herbicides may be used to prevent certain types of vegetation from reoccurring around structures. However, weed control treatments shall include only legally permitted chemical, manual, and mechanical methods. Additionally, any herbicides used during landscaping activities would be contained within the Project impact footprint and, therefore, long-term indirect impacts would be less than significant.

Altered Hydrology. Water would be used for landscaping purposes that may alter the on-site hydrologic regime. These hydrologic alterations may affect special-status plant communities. Altered hydrology can allow for the establishment of non-native plants and invasion by Argentine ants (*Linepithema humile*), which can compete with native ant species that could be seed dispersers or plant pollinators. However, the water, and associated runoff, used during landscaping activities would be contained within the Peninsula Component impact footprint, and long-term indirect impacts associated with altered hydrology are not expected.

Non-native, Invasive Plant and Animal Species. Invasive plant species that thrive in edge habitats are a well-documented problem in Southern California and throughout the United States. Bossard et al. (2000) list several adverse effects of non-native species in natural open areas, including, but not limited to, exotic plant competition for light, water, and nutrients and the formation of thatches that block sunlight from reaching smaller native plants. The Peninsula Component already contains invasive species (e.g., pampas grass). Exotic plant species may establish adjacent to the Peninsula Component and alter habitats and displace native species over time, leading to extirpation of native plant species and unique vegetation communities. The introduction of non-native, invasive animal species could negatively affect native species that may be pollinators of or seed dispersal agents for plants within vegetation communities and special-status plant populations.

Increased Human Activity. Increased human activity could result in the potential for trampling of vegetation outside of the impact footprint, as well as soil compaction, and could affect the viability of plant communities. Trampling can alter the ecosystem, creating gaps in vegetation and allowing exotic, non-native plant species to become established, leading to soil erosion. Trampling may also affect the rate of rainfall interception and evapotranspiration, soil moisture, water penetration pathways, surface flows, and erosion. An increased human population increases the risk of damage to vegetation communities and special-status plants. To prevent inadvertent disturbance to special-status plants within or adjacent to the Peninsula Component, mitigation is proposed requiring that fencing be installed prior to construction activities to protect species from inadvertent disturbance outside of the limits of grading, as well as in an effort to prevent unauthorized access into the canyon.

Alteration of the Natural Fire Regime. The Proposed Project could potentially increase the risk of fire in the canyon, including, but not limited to, fire associated with electrical shorts or electrical equipment malfunction. Additional fire risks from an increase in human-induced ignition sources (i.e., cigarette butts or other fire ignition sources) would occur. In order to reduce the risk of fire, a brush management zone would be incorporated as part of the Peninsula Component. Brush management zone 1 would include a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 would include a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space. Additional details regarding the brush management zones and associated fire management analysis is provided in the Fire Protection Plan (Appendix J-2). Because brush management zones would comply with generally accepted fire buffers and conventional fire reduction design features, fire suppression actions that would modify fire intervals would not be necessary.

Long-term indirect impacts to special-status plants associated with generation of fugitive dust, chemical pollutants, altered hydrology, non-native, invasive plant and animal species, increased human activity, and alteration of the natural fire regime within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), and **MM-BIO-6** (construction fencing).

Long-Term Indirect Impacts to Special-Status Wildlife Species

Potential long-term or permanent indirect impacts associated with the Peninsula Component, including brush management, to sensitive wildlife species that have high or moderate potential to occur (see Appendix D1 of Appendix D of this Draft EIR) include generation of fugitive dust; non-native, invasive plant and animal species; habitat fragmentation; increased human activity; alteration of the natural fire regime; and altered hydrology.

Generation of Fugitive Dust. See prior discussion of the effects of fugitive dust on special-status wildlife.

Altered Hydrology. Water would be used for landscaping purposes that may alter the on-site hydrologic regime. These hydrologic alterations may affect special-status wildlife species. Altered hydrology can allow for the establishment of non-native plants and invasion by Argentine ants, which can compete with native ant species that could be seed dispersers or plant pollinators. Changes in plant composition could affect the native vegetation communities and wildlife habitat. However, the water, and associated runoff, used during landscaping activities would be contained within the Peninsula Component impact footprint, and long-term indirect impacts associated with altered hydrology are not expected.

Non-Native, Invasive Plant and Animal Species. Invasive plant species that thrive in edge habitats are a well-documented problem in Southern California and throughout the United States. Bossard et al. (2000) list several adverse effects of non-native species in natural open areas, including, but not limited to, the fact that exotic plants compete for light, water, and nutrients and can create a thatch that blocks sunlight from reaching smaller native plants. Exotic plant species may alter habitats and displace native species over time, leading to extirpation of native plant species and subsequently suitable habitat for special-status wildlife species. In addition, trash cans attract invasive predators, such as ravens and coyotes, which could impact the wildlife species in the Project site.

Increased Human Activity. The Proposed Project would provide more on-campus student residential facilities, leading to increased human activity that could result in the potential for trampling of vegetation outside of the Peninsula Component impact footprint, and soil compaction could affect the viability and function of suitable habitat for wildlife species. An increased human population increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity can deter wildlife from using habitat areas near the Peninsula Component footprint.

Alteration of the Natural Fire Regime. The Proposed Project could potentially increase the risk of fire in the canyon, including, but not limited to, fire associated with electrical shorts or electrical equipment malfunction. Additional fire risks from an increase in human-induced ignition sources (i.e., cigarette butts or other fire ignition sources) would also occur. In order to reduce the risk of fire, a brush management zone is incorporated as part of the Peninsula Component. Brush management zone 1 will include a 30-foot-wide lean clean zone (developed or landscaped with irrigation). Brush management zone 2 will include a 70-foot-wide area of 50% vegetation thinning. Both brush management zones combined would create a buffer of 100 feet of defensible space. Additional details regarding the brush management zones and associated fire management analysis are provided in the Fire Protection Plan (Dudek 2024). Because the brush management zones would comply with generally accepted fire buffers and conventional fire reduction design features, fire suppression actions that would modify fire intervals would not be necessary.

Lighting. The sports fields and access road that would be constructed would be regularly illuminated. As discussed in Appendix B-2 of this Draft EIR, the Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1 of this Draft EIR. Further, all field lighting would only be illuminated from 6:00 a.m. to 11:00 p.m. Therefore, long-term indirect impacts to wildlife are not expected.

Long-term indirect impacts to special-status wildlife species associated with generation of fugitive dust, altered hydrology, non-native invasive plant and animal species, increased human activity, and alteration of the natural fire regime within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), and **MM-BIO-6** (construction fencing).

2. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The University Towers East Component site does not contain any sensitive natural communities or jurisdictional waters. As such, **no impacts** would occur.

The discussion below analyzes development of the Peninsula Component site and potential impacts to riparian habitat or other sensitive natural communities.

Direct Impacts

Neither the redevelopment area within the Peninsula Component site nor brush management zones 1 or 2 within the Peninsula Component site support any riparian habitat. These areas are comprised entirely of upland habitat, ornamental vegetation, non-native vegetation, or urban/developed areas. Diegan coastal sage scrub is considered a sensitive natural community by CDFW under CEQA (CDFG 2010). Impacts are proposed to 0.55 acres of Diegan coastal sage scrub (disturbed), a sensitive natural community, within portions of the area designated as brush management zone 2 within the Peninsula Component. Direct impacts to this sensitive natural community would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1** (habitat mitigation).

Indirect Impacts

Sensitive Natural Communities

Potential short-term and long-term indirect impacts associated with development of the Peninsula Component site, including associated brush management, would be the same as those described for special-status plants in Threshold 1. These impacts would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), and **MM-BIO-6** (construction fencing).

Jurisdictional Waters

Development proposed as part of the Peninsula Component site, including associated brush management zones, would avoid the unvegetated channel within the Peninsula Study Area. Because of the distance of the channel from Project activities (redevelopment areas and brush management zones), there would be no substantial adverse effect on the unvegetated channel and impacts would be **less than significant.**

3. Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The non-native riparian area within the western side of the Peninsula Study Area would be considered a wetland if there were positive wetland indicators of all three parameters present: hydrology, soil, and vegetation. However, these indicators are not present and therefore this area is not considered a wetland. The Project site does not contain any state or federally protected wetlands. Therefore, the Proposed Project would not have a substantial adverse effect on state or federally protected wetlands and **no impact** would occur.

4. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The University Towers East Component site is urban/developed and surrounded by land that is urban/developed. Therefore, the University Towers East Component site would not support dispersal and movement between wildlife corridors or have the potential to directly or indirectly impact habitat connectivity, and **no impact** would occur.

The discussion below analyzes development within the Peninsula Component site and potential impacts to the movement of any native resident or migratory fish or wildlife species, to established native resident or migratory wildlife corridors, or to the use of native wildlife nursery sites.

Direct Impacts

The brush management that would be conducted adjacent to the proposed Peninsula Component development site includes a portion of the canyon situated between the existing SDSU buildings/parking lot and the homes to the west/northwest along Hewlett Drive. While the Peninsula Study Area supports a linkage function within the canyon, it is not considered a wildlife corridor because it is cut off from connection to southern portions of the county and has more of a cul-de-sac function of habitat for species that are tolerant of the urban interface. While coastal California gnatcatcher were not detected in the 2017 surveys conducted in support of the adjacent SDSU New Student Housing Project (Dudek 2017), this species has potential to occur in the coastal sage scrub. The surveys that are to be conducted into 2025 will provide current information on the species presence/absence.

The Proposed Project, including associated brush management, would primarily impact the existing urban/developed portion of the Peninsula Component site that consists of urban/developed land and ornamental plantings and as a result is unlikely to support dispersal and movement between connected canyons. Therefore, the Proposed Project would not have a substantially adverse effect on wildlife movement and impacts would be **less than significant**. However, the proposed impacts associated with brush management zone 2 within the Peninsula Component would impact 0.55 acres of Diegan coastal sage scrub. If the surveys currently underway reveal that coastal California gnatcatcher occupy the coastal sage scrub on site, impacts to the coastal sage scrub site could interfere with gnatcatcher's use of habitat in these canyons. Therefore, impacts to the movement of wildlife species at the Peninsula Component site would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-1**.

Indirect Impacts

Short-Term Indirect Impacts

Short-term indirect impacts to habitat connectivity and wildlife corridors could result from increased human activity, noise, and lighting associated with development proposed on the Peninsula Component site.

Increased Human Activity. Project construction would likely take place during the daytime, which would result in an increase in human activity during the majority of the daylight hours. Diurnal wildlife species would likely be most affected as a result of increased human activity. An increased human population increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity can deter wildlife from using habitat areas near the Peninsula Component footprint. Although the native habitat in the canyon is already constrained, some species use a variety of habitats and could continue using other areas within and adjacent to the Peninsula Component for wildlife movement; therefore, short-term indirect impacts associated with increased human activity could be potentially significant absent mitigation.

Noise. An increase in construction-related noise could occur from Project activities and equipment used during brush management and construction of student residential facilities and associated infrastructure. Noise impacts can have a variety of indirect impacts on wildlife species, including increased stress, weakened immune systems, altered foraging behavior, displacement due to startle, degraded communication with conspecifics (e.g., masking), damaged hearing from extremely loud noises, and increased vulnerability to predators (Lovich and Ennen 2011; Brattstrom and Bondello 1983, cited in Lovich and Ennen 2011). Therefore, an increase in noise could potentially affect how wildlife use and move through the adjacent canyon. Some species use a variety of habitats and could continue using other areas within and adjacent to the Peninsula Component for wildlife movement; however, the native habitat in the canyon is already constrained. Therefore, short-term indirect impacts associated with increased noise could be potentially significant absent mitigation.

SDSU has published a document entitled Regulations For Use Of University Buildings And Grounds, which addresses sound amplification, such as when, where, and what decibel levels are permissible throughout the campus (SDSU 2024). All Proposed Project activities that include amplified noise would (at a minimum) be subject to the guidelines, restrictions, and regulations set forth in this document.

In addition to short-term construction-related noise impacts, portions of the Peninsula Component site to be developed as student housing would, in the interim, be developed as recreation fields, which could also result in potential noise impacts. Consistent with the Project's construction phasing schedule, four student residential buildings, as well as the Amenity Building, would be constructed initially, which would leave a temporary open area (consisting of urban/developed land cover) in the southwestern corner of the Peninsula Component site. As part of the Project, recreation fields would be built in this area for recreational use. During subsequent construction phases, the fields would be removed and replaced by the remaining proposed student housing.

If sensitive wildlife does use the adjacent canyon as a corridor, the recreational uses may result in noise impacts within the native habitat in the area due to elevated noise from the users of the recreational fields. These elevated noise levels could result in a potentially significant impact absent mitigation such as noise attenuation measures, as the noise levels could disturb sensitive wildlife. Therefore, short-term indirect impacts associated with increased noise could be potentially significant absent mitigation.

Lighting. The sports fields and access road that would be constructed would be regularly illuminated. As discussed in Appendix B-2 of this Draft EIR, the Project includes Project design features that would avoid light spillover into the canyon and native habitat area by requiring that all lighting be directed towards the recreation fields and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife. Additionally, the lighting would be designed with light poles of sufficient height and enhanced shielding to allow the light to be directed toward the ground plane to reduce spillover to the sensitive habitat to the west of the Peninsula Component site, as described in Section 4.1 of this Draft EIR. Further, all field lighting would only be illuminated from 6:00 a.m. to 11:00 p.m. Therefore, impacts would be less than significant.

Potential short-term indirect impacts to wildlife movement associated with increased human activity and noise within the Peninsula Component of the Proposed Project would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-6** (construction fencing), **MM-BIO-7** (construction noise monitoring), and **MM-BIO-8** (potential mitigation for operational amplified field noise).

Long-Term Indirect Impacts

Long-term indirect impacts associated with the Proposed Project include increased human activity at the Peninsula Component site that could result in long-term indirect impacts.

Increased Human Activity. Increased human activity could potentially affect the adjacent canyon and suitable habitat for wildlife species as it increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity could deter wildlife from using habitat areas near the Peninsula Component footprint.

Lighting. Nighttime lighting (including security lighting) would be associated with the buildings, walkways, parking areas, and plazas. However, all lighting would be directed towards the interior of the proposed Peninsula Component site and away from the native vegetation, surrounding slopes, and canyon that may support sensitive wildlife.

Potential long-term indirect impacts to wildlife movement associated with increased human activity within the Peninsula Component site would be potentially significant absent mitigation. Impacts would be reduced to **less than significant through implementation of MM-BIO-6** (construction fencing).

5. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The lead agency, the CSU, is a state agency; therefore, it is not subject to the policies and ordinances set forth by local agencies such as the City or County of San Diego, which might maintain a local tree preservation policy or ordinance. The CSU and the SDSU Campus Master Plan do not provide any policies specific to protecting biological resources. Therefore, **no impact** would occur.

6. Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

SDSU is not a signatory to the San Diego MSCP and thus is not a "permittee" under the HCP that encompasses a portion of the undeveloped canyon to the west of the Peninsula Component site. As such, SDSU is not subject to the MSCP and need not comply with its provisions. Because SDSU is not subject to the policies and ordinances set forth by the MSCP, the Proposed Project would not conflict with the HCP, and **no impact** would occur.

4.3.5 Cumulative Analysis

The Proposed Project, when combined with existing and probable future projects within the SDSU campus and the surrounding area (see Chapter 3, Cumulative Methods and Projects, Table 3-1), could contribute to significant cumulative impacts on biological resources. The Proposed Project would have potentially significant direct and indirect impacts to special-status plants, coastal California gnatcatcher, special-status reptiles, special-status mammals, birds protected under the MBTA, and a sensitive natural community (coastal sage scrub). Absent mitigation, these impacts would make a cumulatively considerable contribution to a significant cumulative effect on the species in question. Of the projects described in Table 3-1, the City's ongoing or proposed projects would likely contribute to indirect impacts to biological resources from increased human activity, fugitive dust, pollutants, altered hydrology, and introduction of non-native species. Other present and probable projects within the region would be discussed further in the associated CEQA document.

The potentially significant impacts associated with the Proposed Project would be reduced to less than significant through implementation of the MMs recommended in Section 4.3.7. Specifically, direct impacts to sensitive natural communities, special-status species, or wildlife movement if coastal California gnatcatcher is present would be mitigated through **MM-BIO-1** (habitat mitigation), **MM-BIO-2** (coastal California gnatcatcher surveys), and **MM-BIO-3** (nesting bird surveys), and potential indirect impacts would be mitigated through **MM-BIO-4** (construction monitoring and reporting), **MM-BIO-5** (invasive species prohibition), **MM-BIO-6** (construction monitoring and reporting), and **MM-BIO-8** (potential mitigation for operational amplified field noise). Implementation of these measures would reduce cumulative impacts to **less than significant.** Because it cannot be concluded that **MM-BIO-7** (construction noise monitoring and noise reduction measures) would fully reduce the potential impact related to noise from construction, this impact would be **significant and unavoidable.** As this potential impact could result in indirect impacts to the coastal California gnatcatcher, and other cumulative projects listed in Table 3-1 may also result in indirect impacts to the coastal California gnatcatcher, this would result in a **significant and unavoidable** cumulative impact.

4.3.6 Summary of Impacts Prior to Mitigation

The Proposed Project has the potential to result in the following impacts prior to mitigation.

The Project would have the potential to directly impact special-status plants, birds, including the coastal California gnatcatcher, reptiles and invertebrates. These would be **potentially significant impacts.**

Because it is reasonable to assume that construction activities would occur between January 15 and September 15, impacts to migratory birds may occur. This would be a **potentially significant impact.**

Short-term indirect impacts to special-status plants associated with generation of fugitive dust, changes in hydrology, and chemical pollutants within the Peninsula Component may occur. This would be a **potentially significant impact.**

Short-term indirect impacts associated with noise to special-status birds, including the coastal California gnatcatcher, may occur due to construction activities and to periodic operational activities associated with events that may be held on the proposed recreation fields on the Peninsula Component. These short-term, indirect impacts would be **potentially significant impacts.**

Long-term indirect impacts to special-status wildlife species associated with generation of fugitive dust, altered hydrology, non-native invasive plant and animal species, increased human activity, and alteration of the natural fire regime within the Peninsula Component of the Proposed Project may occur. These long-term, indirect impacts would be **potentially significant impacts.**

Direct and indirect impacts to sensitive natural communities at the Peninsula Component site may occur. This would be a **potentially significant impact.**

Direct and indirect impacts to wildlife movement at the Peninsula Component site may occur. This would be a **potentially significant impact.**

4.3.7 Mitigation Measures

The following mitigation measures would reduce the potential for direct and indirect impacts to special-status plant and wildlife species, sensitive natural communities, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible. Implementation of the following mitigation measures would reduce most impacts to a less-than-significant level. Some impacts would remain significant and unavoidable.

MM-BIO-1 **Habitat Mitigation:** If coastal California gnatcatcher is determined to be present within the Peninsula Study Area and/or the Peninsula Component site, impacts to disturbed Diegan coastal sage scrub beyond those impacts presently occurring due to existing brush management practices on the site shall be mitigated according to the requirements of **MM-BIO-2**. If coastal California gnatcatcher is determined to be absent, and the Project would result in impacts to coastal sage scrub beyond those impacts presently occurring due to existing brush management practices, the California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to Diegan coastal sage scrub, including brush management zones, by the conservation of non-occupied coastal sage scrub habitat at a 1:1 ratio. Conservation of habitat shall be by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County.

The mitigation habitat shall include appropriate habitat for special-status reptiles with potential to occur on site. The mitigation habitat shall also support special-status plants, if found to occur on site, or be suitable for enhancement and planting of special-status plants. If surveys identify the presence of special-status plants that would be removed as part of the Project, the CSU/SDSU, or its designee, shall implement a plant mitigation and monitoring plan to ensure the success of any enhancement, translocation, or restoration.

MM-BIO-2 **Coastal California Gnatcatcher:** If the biological surveys presently being conducted determine the coastal California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component site, and brush management is necessary beyond the scope of brush management presently being conducted on the site, the California State University (CSU)/San Diego State University (SDSU), or its designee, shall mitigate impacts to disturbed Diegan coastal sage scrub, including brush management zones, through conservation of coastal California gnatcatcher-occupied Diegan coastal sage scrub. Mitigation shall be provided at a 2:1 ratio either by on-site preservation or by purchase of appropriate credits at an approved mitigation bank in San Diego County.

Additionally, if the surveys determine coastal California gnatcatcher is present within the Peninsula Study Area and/or the Peninsula Component, the CSU/SDSU shall consult with the U.S. Fish and Wildlife Service prior to the commencement of construction activities within suitable gnatcatcher habitat to determine if the Project needs to obtain a Section 7 or Section 10 permit.

If the biological surveys determine coastal California gnatcatcher is not present within the Peninsula Study Area and/or would not be affected by the Peninsula Component, no mitigation for the species is required, including this mitigation measure (**MM-BIO-2**) and related **MM-BIO-7.**

MM-BIO-3 **Nesting Bird Survey(s)**: If construction activity occurs during the breeding season (typically January 15 through September 15), the California State University/San Diego State University, or its designee, shall retain a qualified biologist to conduct a biological survey for nesting bird species protected by the federal Migratory Bird Treaty Act and California Fish and Game Code within 72 hours prior to construction. The survey shall be conducted within both the Peninsula Component site and the University Towers East Component site and a 300-foot buffer beyond each site. If any active nests are detected, the area shall be flagged and mapped on the construction plans along with a minimum of a 25-foot buffer and up to a maximum of 300 feet for raptors, as determined by the biologist, and such areas shall be avoided until the nesting cycle is complete as determined by the biologist.

MM-BIO-4 **Construction Monitoring and Reporting:** To prevent inadvertent disturbance to areas outside the limits of grading, the California State University/San Diego State University, or its designee, shall retain a qualified biologist to monitor all grading activities on the Project site. The biological monitor shall be contracted to perform biological monitoring during all grading, clearing, grubbing, and construction activities.

The biological monitor shall perform the following duties:

1. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing, grubbing, or grading to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).
2. Conduct meetings with the contractor and other key construction personnel to describe the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife prior to clearing, grubbing, or grading.
3. Review and/or designate the construction area in the field with the contractor in accordance with the final grading plan prior to clearing, grubbing, or grading.
4. Supervise and monitor vegetation clearing, grubbing, and grading weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is intact.
5. Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing and earth-moving activities.
6. Verify that the construction site is implementing the following stormwater pollution prevention plan best management practices: dust-control, silt fencing, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and weather-proof, prohibition of pets on the construction site, and a speed limit of 15 miles per hour during the daylight and 10 miles per hour during dark hours.
7. Periodically monitor the construction site after grading is completed and during the construction phase to see that artificial security light fixtures are directed away from open space and are shielded and to document that no unauthorized impacts have occurred.
8. Keep monitoring notes for the duration of the Project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources.
9. Prepare a monitoring report after the construction activities are completed, which describes the biological monitoring activities, including a monitoring log; photos of the site before, during, and after the grading and clearing activities; and a list of special-status species observed.

MM-BIO-5 **Invasive Species Prohibition:** The California State University/San Diego State University, or its designee, shall ensure that final landscape plans for the Project site comply with the following provisions: (1) no invasive plant species included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the Project region shall be included, and (2) the plant palette shall be composed of native species that do not require high irrigation rates. The biologist retained for monitoring shall periodically check landscape products for compliance with this requirement.

MM-BIO-6 **Construction Fencing:** To prevent inadvertent disturbance to sensitive vegetation and species within or adjacent to the sites, the California State University/San Diego State University, or its designee, shall install fencing on the Project site prior to the commencement of construction activities. The fencing shall be placed to protect sensitive vegetation and species from inadvertent disturbance outside of the limits of grading, as well as in an effort to prevent unauthorized access into the canyon adjacent to the Peninsula Component site.

MM-BIO-7 **Construction Noise Monitoring**: For any work proposed between February 1 and September 15, prior to start of construction activities, the California State University/San Diego State University, or its designee, shall retain a qualified biologist to conduct a pre-construction survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat on the Peninsula Component site. The pre-construction survey area for the coastal California gnatcatcher shall encompass all suitable habitats within the Peninsula Component site, as well as within a 300-foot buffer. If a coastal California gnatcatcher nest is detected, noise monitoring shall be conducted, and on-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels hourly equivalent sound level or pre-construction ambient noise levels, whichever is higher, during the breeding season, at any nest location(s). Noise monitoring and noise reduction techniques shall be implemented until the end of the nesting cycle for the detected nest as determined by the qualified biologist. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter equipment, adherence to equipment maintenance schedules, installation of temporary sound barriers, or shifting construction work away from occupied areas and/or further from the nest.

MM-BIO-8 **Potential Mitigation for Operational Amplified Field Noise**: If amplified/elevated noise that would result in ambient noise level of above 60 A-weighted decibel average, or existing ambient noise level, whichever is higher, is anticipated from operational use (i.e., sporting/student/campus events) of the recreation fields, noise reduction techniques shall be implemented to ensure that amplified and/or elevated noise does not result in noise impacts to the coastal California gnatcatcher. Prior to any such elevated and/or amplified field noise expected to occur between February 1 and September 15, the California State University/San Diego State University (SDSU), or its designee, shall retain a qualified biologist to conduct survey(s) for the coastal California gnatcatcher to document the presence/absence, potential nest location(s), and extent of occupied habitat within a 300-foot buffer of the recreational field(s) within the Peninsula Component site. If no nest is detected, no further action is necessary. If a coastal California gnatcatcher nest is detected, SDSU or its designee shall implement feasible noise reduction techniques to ensure that noise levels at the nest are not higher than 60 A-weighted decibels hourly equivalent sound level or existing ambient noise levels, whichever is higher. Noise reduction techniques shall be implemented if feasible. Noise reduction techniques may include but are not limited to constructing a sound barrier, utilization of quieter sound equipment, focusing sound equipment eastward to avoid projection into the adjacent canyon, installation of temporary sound barriers, or shifting construction work away from occupied areas and/or further from the nest.

4.3.8 Level of Significance After Mitigation

Implementation of the above mitigation measures would reduce most potential impacts to biological resources to **less-than-significant levels.**

As discussed above, direct and indirect impacts to special-status plants and wildlife at the Project site would be potentially significant prior to mitigation. Direct impacts to special-status plants and wildlife, including special-status plants, special-status birds, special-status reptiles, special-status invertebrates, and birds protected under the MBTA, would be reduced to **less than significant through implementation of MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3.** Indirect impacts to special-status plants and wildlife would be reduced to **less than significant through implementation of MM-BIO-4**, **MM-BIO-5**, **MM-BIO-6**, and **MM-BIO-8.**

Indirect impacts related to construction noise would not be reduced to less than significant, even with the implementation of **MM-BIO-7.** This impact would be **significant and unavoidable.**

Direct and indirect impacts to riparian habitat or sensitive natural communities at the Peninsula Component site would be potentially significant prior to mitigation. Direct impacts to sensitive natural communities would be reduced to **less than significant through implementation of MM-BIO-1.** Indirect impacts to sensitive natural communities would be reduced to **less than significant through implementation of MM-BIO-4**, **MM-BIO-5**, and **MM-BIO-6.**

Direct and indirect impacts to wildlife movement at the Peninsula Component site would be potentially significant prior to mitigation. Direct impacts would be reduced to **less than significant through implementation of MM-BIO-1.** Short-term and long-term indirect impacts would be reduced to **less than significant through implementation of MM-BIO-6**, **MM-BIO-7**, and **MM-BIO-8.**

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Peninsula Component

Study Area

Vegetation Communities/Land Covers

dDCSS, disturbed Diegan Coastal Sage Scrub

DEV, Developed Land

DH, Disturbed Habitat

EUC, Eucalyptus Woodland

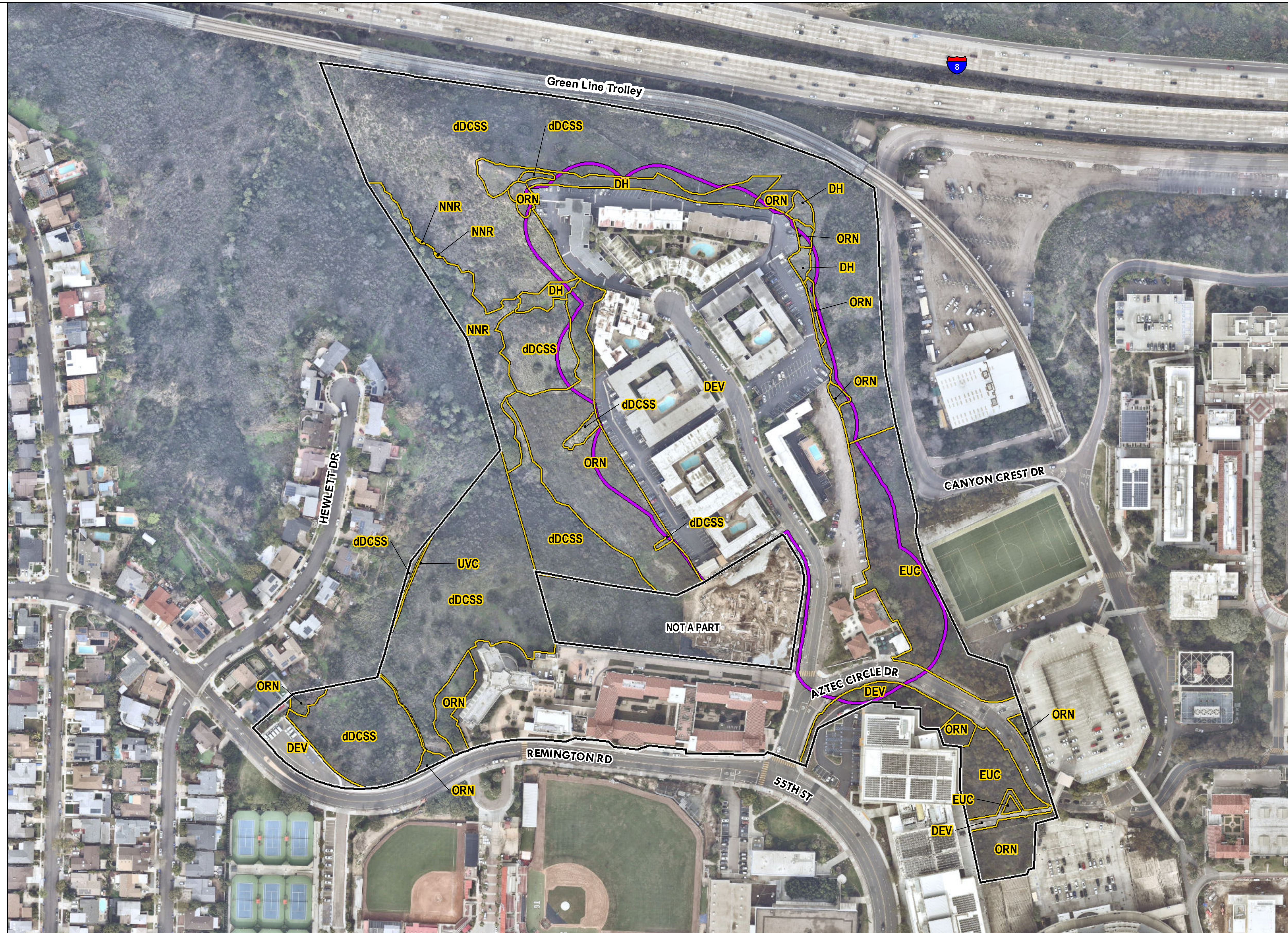
NNR, Non-Native Riparian

ORN, Ornamental

UVC, Unvegetated Channel

0 110 220 Feet

SOURCE: AERIAL-SANGIS IMAGERY 2023



SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.3-1

Peninsula Component Study Area Biological Resources

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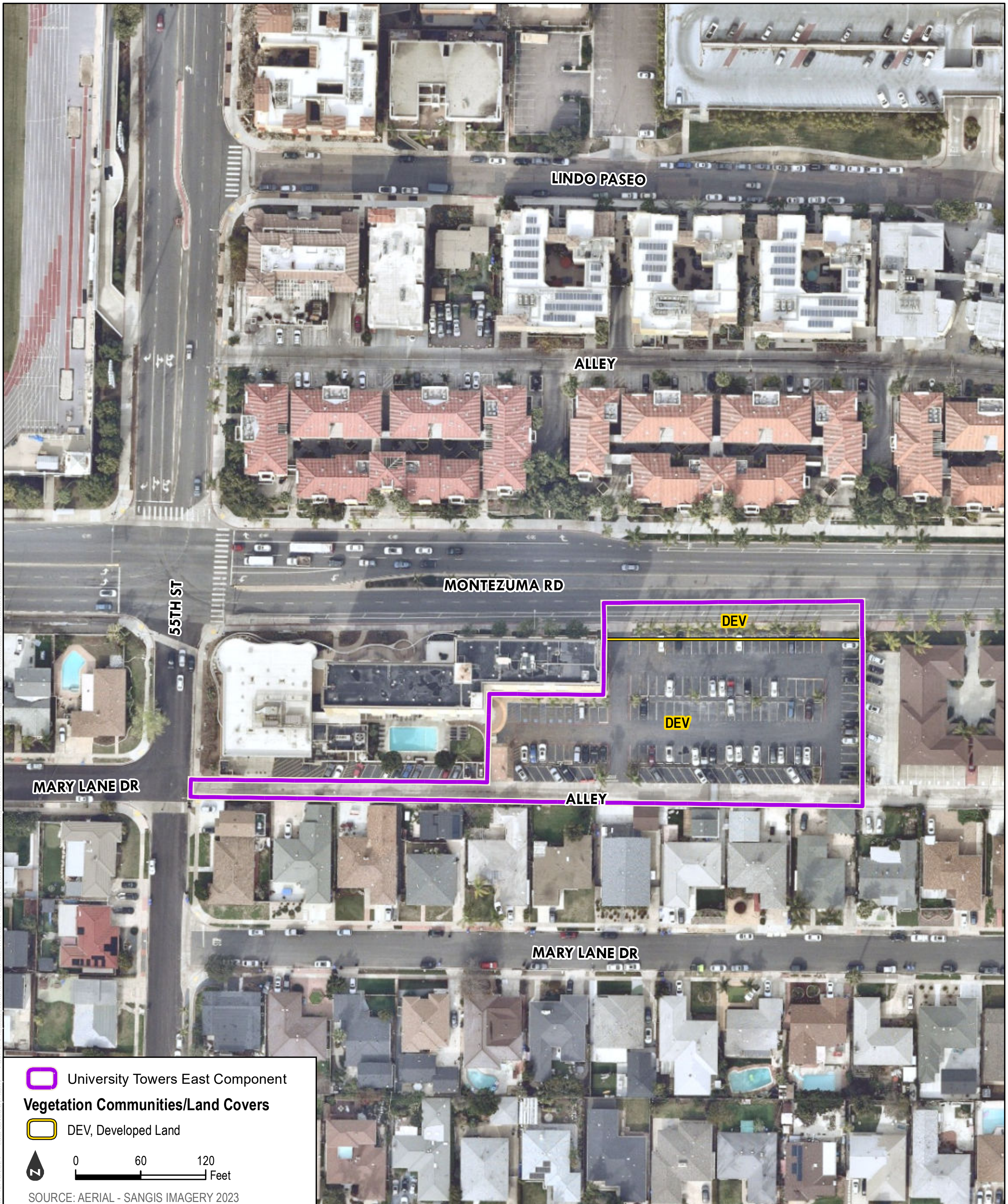

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Figure 4.3-2
University Towers East Component
Biological Resources

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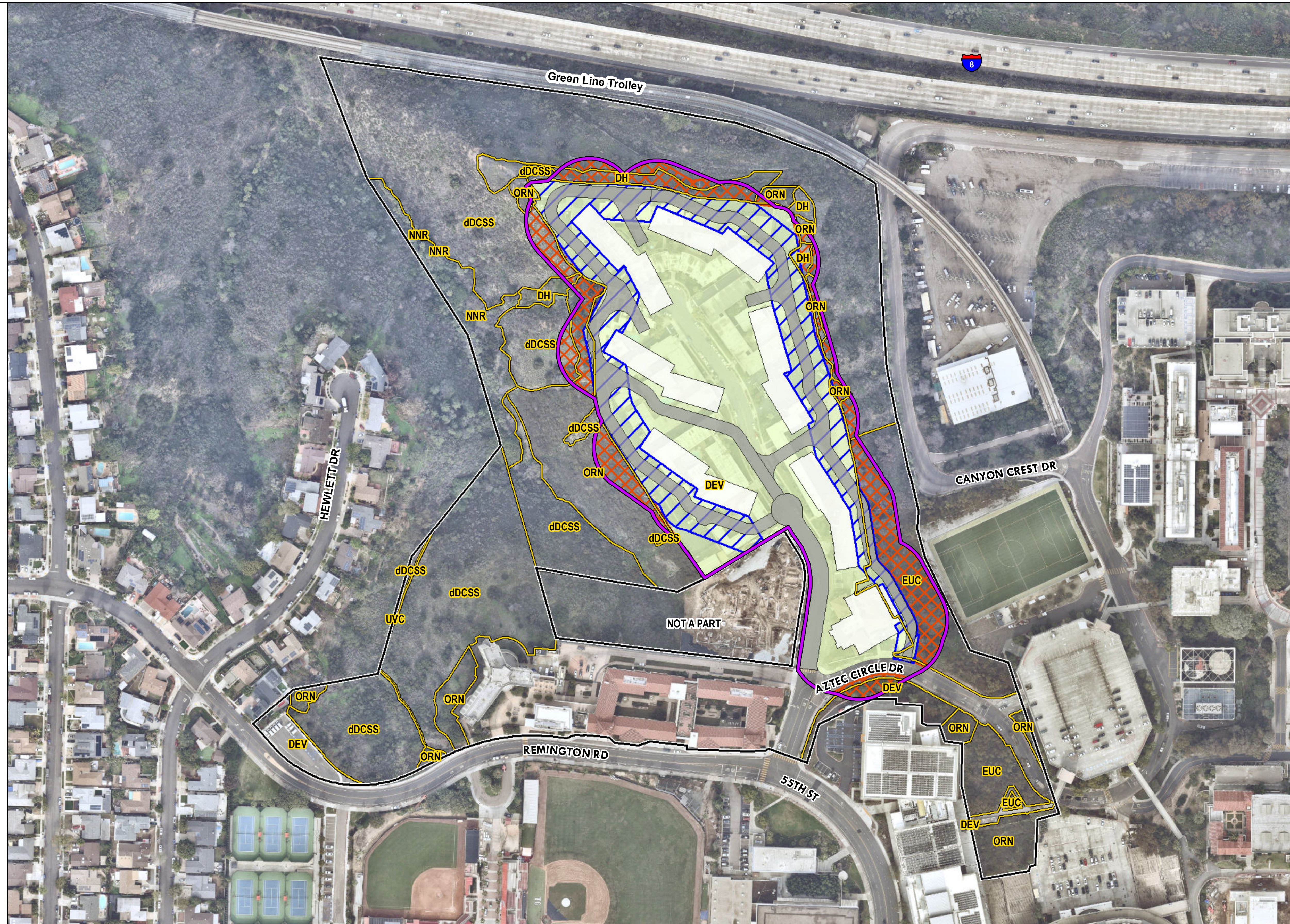
Peninsula Component
Study Area
Proposed Building
Proposed Access Roads

Vegetation Communities/Land Covers

dDCSS, disturbed Diegan Coastal Sage Scrub
DEV, Developed Land
DH, Disturbed Habitat
EUC, Eucalyptus Woodland
NNR, Non-Native Riparian
ORN, Ornamental
UVC, Unvegetated Channell

Impacts

Redevelopment Area
FMZ Zone A (≥ 27 feet)
FMZ Zone B (100 feet)



0 110 220 Feet

SOURCE: AERIAL-SANGIS IMAGERY 2023

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Figure 4.3-3

Proposed Impacts to Peninsula Component Study Area Biological Resources

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Figure 4.3-4
Proposed Impacts to University Towers East Component Biological Resources

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4.4 Cultural Resources and Tribal Cultural Resources

This section describes the existing cultural resources and tribal cultural resources conditions of the Project site and its vicinity; identifies associated regulatory requirements; evaluates potential archaeological, historical, and tribal cultural resources impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Cultural Resources and Tribal Cultural Resources; and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant. This section is based on a Cultural Resources Technical Report and a Historical Resources Technical Report, both prepared by Dudek for the Project and included as Appendices E-1 and E-2, respectively.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received a comment from the Native American Heritage Commission (NAHC) related to cultural resources concerning consultation with California Native American tribes in the area. The analysis presented below addresses this topic. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.4.1 Existing Conditions

This section describes the existing conditions generally within the SDSU campus, including its historical setting and the results of the California Historical Resources Information System (CHRIS) records search. This section also identifies and evaluates the existing built environment resources in consideration of historical significance and integrity.

Environmental Setting

The Project area of potential effect (APE) encompasses the footprint of the Peninsula Component and the University Towers East Component. The Peninsula Component is located in the northwestern portion of the SDSU campus, south of Interstate-8 and west of Canyon Crest Drive, and the University Towers East Component is located in the southern portion of the campus south of Montezuma Road (see Figure 2-2, Project Vicinity, in Chapter 2, Project Description).

Prehistoric Overview

Available evidence indicates that continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad timeframe have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750). Summaries of these prehistoric periods can be found in Appendix E-1.

As recognized by State Assembly Joint Resolution No. 60 (2001), the Kumeyaay Nation has occupied the southern California and Baja California region, including the City of San Diego's (City) jurisdictional boundaries and the Proposed Project's APE, far into antiquity. In the event any Native American human remains are found within the

City's jurisdictional boundaries, the Native American Heritage Commission (NAHC) is expected to designate a Most Likely Descendant from the Kumeyaay Nation; Kumeyaay aboriginal lifeways did not cease within San Diego County and Baja California at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

Historic Period Overview

Post-Contact history for California is generally divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1846), and American Period (1846–present). The Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican American War, signals the beginning of the American Period when California became a territory of the United States.

The built environment resources analyzed in this section date to the twentieth century; therefore, this overview concentrates on the development of: San Diego, SDSU, and Modernism architecture of the region. A complete historic context is included in the Historical Resources Technical Report provided in Appendix E-2.

City of San Diego

By the early 1900s, San Diego was an established city and development spread from downtown due to a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill, and Sherman Heights were developed. At the time downtown was being built, there began to be summer cottage/retreat development in what are now the beach communities and La Jolla area (Mills 1985: 1–20; McGrew 1922: 117–125).

Development also spread to the greater North Park and Mission Hills areas during the early 1900s. The neighborhoods were built as small lots, a single lot at a time. This provided affordable housing away from the downtown area, and development expanded as transportation improved. Barrio Logan began as a residential area, but because of proximity to rail freight and shipping freight docks, the area became more mixed, with conversion to industrial uses. This area was more suitable to industrial uses because land values were not as high. Topographically, the area is more level, and it does not have views like the areas north of downtown. Various ethnic groups settled in the area because of the affordability of land ownership (Mills 1985: 1–20; McGrew 1922: 129–135).

San Ysidro began to be developed around the turn of the twentieth century. The early settlers were followers of the Littlelanders colonies movement. There, the pattern of development was designed to accommodate small plots of land for each homeowner to farm as part of a farming/residential cooperative community. Nearby Otay Mesa-Nestor began to be developed by farmers of Germanic and Swiss backgrounds. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area. In addition, there were grape growers of Italian heritage who settled in the Otay River Valley and tributary canyons who produced wine for commercial purposes (Mills 1985: 1–20; McGrew 1922: 182–183).

There was farming and ranching in Mission Valley until the middle portion of the twentieth century when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San

Diego River where now there are motels, restaurants, office complexes, and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s, when the federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed-use and residential on moderate-sized lots (Mills 1985: 1–20; McGrew 1922: 272–277).

In the area near the SDSU campus, apartment buildings and single-family residences were constructed in the post-World War II decades, including those on the Project site. Tierrasanta, previously owned by the U.S. Navy, was developed in the 1970s. It was one of the first planned developments in the area with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Penasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated, with commercial uses located along the main thoroughfares and residential uses located beyond that. Industrial uses are located in planned industrial parks (Mills 1985: 1-20).

<u>Development of San Diego State University</u>

SDSU was founded in 1897 as the San Diego Normal School, a training facility for elementary school teachers by a board of trustees appointed by the governor. An approximately 17-acre site on Park and El Cajon Boulevards was chosen as the original location of the school. The board selected Samuel Black, the state superintendent of public instruction, as the first president of the San Diego Normal School in 1898, and by 1899, the school reached an enrollment of 100 students (SDSU 2024; SDS 1899: 1). The school was expanded in 1905 with roads, landscaping, two new tennis courts, and a basketball court, and a new building was constructed in 1909 (SDS 1905: 4; SDS 1909: 6).

In 1921, the school was reestablished as the San Diego State Teachers College. During this period, the curriculum, faculty, degree and credential programs, and facilities were each expanded. As a result of increased enrollment, the campus outgrew its location on Park Boulevard by the late 1920s. In 1928, Alphonzo E. Bell, who owned the Bell-Lloyd Investment Company of Los Angeles, donated 125 acres of the company’s Mission Palisades tract in San Diego for the construction of a new campus. Construction of the campus began on October 7, 1929, and by 1931, the college was moved to the newly completed campus, the present site of the SDSU campus (SDSU 2024; Wade et al. 1997: Section 7: 2).

As of 1931, the college consisted of six buildings and spanned approximately 125 acres. The buildings encircled a central, open space known as the Main Quad (Wade et al. 1997: Section 7: 2). In 1934, the *San Diego Sun* reported that, “San Diego State College has grown faster than any other state college in the past five years … Its enrollment has increased 275 per cent in that space of time” (SDS 1934: 13). The state legislature authorized the expansion of SDSU’s degree programs beyond teacher education to become a state college in 1935, thus San Diego State Teachers College became San Diego State College (SDSU 2024). Despite setbacks during the Great Depression, construction of the campus continued during the early 1930s with pre-allocated funds, donations, and the help of the Works Progress Administration (Wade et al. 1997: Section 7: 2). In 1937, the first off- campus student residence hall, Quetzal Hall, was constructed.

The onset of World War II saw a decrease in enrollment and faculty. Following World War II, the pent-up demand and rapid population growth throughout the state, along with the GI Bill and its educational funding component, helped trigger a significant expansion in enrollment numbers. Along with this rapid, significant growth, SDSU’s facilities expanded outward from the historic campus core. In 1960, San Diego State College was incorporated into the newly established California College system, currently known as the California State University (CSU) system. By the early 1970s, the school received legislative approval to become SDSU. After SDSU's integration into the California State College system, campus facilities were expanded to accommodate the ongoing increase in enrollment (SDSU 2024).

Beginning in the late 1970s, SDSU shifted its focus to academic research and innovation. A teacher-scholar model for faculty resulted in an increase of research grants and contracts; through following this model, SDSU was able to join the major public research universities throughout the state. Between 2011 and 2017, a new strategic plan was developed for scholarships and programs, as well as the new construction/remodel of facilities across the campus. By the 2020s, SDSU offered bachelor's degrees in nearly 100 programs, master's degrees in 87 programs, and doctoral degrees in 25 programs (SDSU 2024).

Modernism in San Diego

Early Modernism in San Diego was influenced by architects such as Irving Gill and Rudolph Schindler who emphasized functionalism and simple forms in their designs. Influences of the Mission style inspired Gill's work with its simplicity and complete lack of ornamentation. He began to incorporate stripped down Mission style elements into his Arts and Crafts designs using simple forms and pure geometry leading to some of the first Modernist designs in San Diego. Schindler's arrival in San Diego in 1923 saw the introduction of European early Modernism influenced by Cubist spatial form and massing. His Post and Beam style design for the Pueblo Ribera Courts in La Jolla resulted in a Modern design for multi-family residential housing that was novel to the area (Heritage Architecture & Planning 2007: 25–26).

During the Great Depression the Federal Housing Administration established a national priority of improving the design and efficiency of residential properties to regulate home building practices. These practices emphasized the use of the Modernist styles such as the Streamline Moderne and Art Deco styles with simplified forms and a lack of ornamentation (Heritage Architecture & Planning 2007: 26–27).

After the end of World War II in 1945, Contemporary and Modern styles were popularized and largely influenced by the Case Study Program, which was sponsored by Arts & Architecture magazine to emphasize contemporary and modern architecture. The houses were required to be designed within a specified budget, and to provide "good" living conditions among the climate and terrain of Southern California. Three Case Study Houses were constructed in San Diego. Influences of the program were widespread through San Diego as evident by the range of Modern residences constructed in the area during the post-war period until the end of the program in 1967 (Heritage Architecture & Planning 2007: 35–36).

Contemporary style buildings were prevalent throughout the entire United States between 1945 and 1990 and were common in California at roughly the same time period. The style rejects traditional decoration and exterior sleekness. There is also a relationship between outdoor spaces and interior rooms; in residential architecture, this can connect living space to gardens; in commercial spaces, it can provide an outlet from office space to a courtyard, garden, or park (McAlester 2019: 628–645). The Mid-Century Modern style is reflective of International and Bauhaus styles popular in Europe in the early twentieth century. The development of the Mid-Century Modern style in the United States was largely fostered by World War II. Materials and aesthetics evolved to reflect modern innovations that dominated design and construction following the war (ARG 2016: 98; McAlester 2019: 630–646; Morgan 2004: 362; Moruzzi 2013: E6).The Mid-Century Modern style was widely adopted in the building boom that followed World War II, particularly in the newly sprawling developments radiating from Southern California's major urban centers. The characteristics of Mid-Century Modern design could be appropriated for large-scale production in part due to the application of mass-produced building materials like concrete, steel, and glass, which made it the perfect style for growing cities (ARG 2016: 98; McAlester 2019: 630–646; Morgan 2004: 362; Moruzzi 2013: E6). While Mid-Century Modern architecture uses industrial materials and geometric forms, the style often references local vernacular traditions, particularly in the use of wood and the relationship between indoor and outdoor spaces (ARG 2016: 98; McAlester 2019: 630–646; Morgan 2004: 362; Moruzzi 2013: E6).

Historical Resources - Survey Methods and Overview

Built Environment Survey

Dudek Architectural Historian Katie Ahmanson, MHC, who meets the Secretary of the Interior's Professional Qualification Standards for architectural history, conducted an intensive survey of the Project area, which included the two areas that comprise the APE: Peninsula Component and the University Towers East Component, on August 19, 2024. The survey entailed viewing the exteriors of each building located on the properties, documenting each with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the properties.

Eight buildings/resources over 45 years of age at the time of survey were recorded and evaluated for historical significance. The Peninsula Component site consists of seven parcels: 5485 55th Street (APN 462-180-10-00), 5475 55th Street (APN 462-180-09-00), 5445 55th Street (APN 462-220-07-00), 5430 55th Street (APN 462-220-03-00), 5450 55th Street (APN 462-220-02-00), 5460 55th Street (APN 462-220-01-00), and 5484 55th Street (APN 462-180-01-00). These parcels consist of 10 multi-story apartment buildings along 55th Street, which terminates in a cul-de-sac in front of 5485 55th Street. The buildings are arranged in a semi-circle with asphalt parking lots on the outer edge of each parcel. 55th Street intersects with Aztec Circle Drive at the southern end of the site. Adjacent properties are developed with SDSU buildings to the east, multi-story residential buildings to the south and west, and the Mission Valley Freeway (I-8) to the north. The buildings at this site display Mid-Century Modern and Contemporary architectural styles.

The University Towers East Component site is 0.45 miles south of the Peninsula Component site and is located approximately 0.2 miles south of the SDSU campus at the southeast intersection of Montezuma Road and 55th Street. It consists of one parcel, 5505 Montezuma Road (APN 466-300-12-00). The site is rectangular and contains one multi-story apartment building with a paved surface parking lot located on the eastern portion of the parcel. Montezuma Road runs north of the parcel, 55th Street is to the west, and residential buildings surround the parcel to the south and east. An asphalt driveway provides access from Montezuma Road and a concrete alleyway to the rear (south) of the parcel provides access from 55th Street. The University Towers East Component site only includes surface parking and associated landscaping. There are no built environment resources present.

The following is a description relative to the assessment of historical significance of the buildings presently located within the Project APE:

Zacatepec Hall, 5485 55th Street (APN 462-180-10-00)

Zacatepec Hall is located at 5485 55th Street and was constructed in 1962. The parcel contains four two-story multi-family residential buildings: two on the northern side of the parcel that are rectangular in plan, and two buildings adjacent to the south, that are laid out as a semi-circle with rectangular wings on the east and west elevations. The buildings have flat roofs sheathed in rolled composition roofing with no overhang or eaves. Connecting the two farthest south buildings is a raised flat roofed stucco canopy with Mid-Century Modern detailing including a central chandelier and L-shaped stucco supports down the length of the canopy. The canopy creates a breezeway that leads from the metal entrance gate into the courtyard at the center of the complex. The exterior walls are clad in stucco with painted vertical wood panels at evenly spaced intervals on the primary (south) elevation of the building. Fenestration on the primary (south), east, west, and north elevations include grouped, metal frame sliding windows that repeat at regular intervals. Landscaping features grass lawns, mature palm trees, and shrubs. Relevant exterior alteration permits include a roof replacement in 2007 (Permit No. 564428, City of San Diego 2017a). Observed alterations include the addition of a gate to the main entrance on the primary (south) elevation ca. 2020 (Google Maps 2024).

Huaxtepec Hall, 5475 55th Street (APN 462-180-09-00)

Huaxtepec Hall, 5475 55th Street, was constructed in 1961. The parcel contains two U-shape and irregular in plan two-story multi-family residential buildings with an open courtyard in the center. The stucco-clad buildings have flat roofs sheathed in rolled composition roofing with metal gutters creating a minor overhang. The building on the northeast side of the parcel connects by what appears to be a breezeway or corridor to a smaller rectangular building in the middle of the courtyard. The primary entrance is located on the primary (southwest) elevation and features a metal rail security gate that provides access to the courtyard and wall projections. Uncovered concrete balconies with metal railings extend from first and second stories of the rear (northeast) elevation and the second story of the southeast elevation. Fenestration on the primary (southwest), southeast, rear (northeast), and northwest elevations include grouped, metal frame sliding windows that repeat at regular intervals. The southeast portion of the courtyard contains a kidney-shaped swimming pool. Landscaping features grass lawns, mature palm trees, and shrubs. There are two paved driveways along the northwest and southeast sides of the parcel that lead to a paved parking lot that encircles the parcel to the rear (northeast) elevation and the southeast elevation. Relevant exterior alteration permits include the 2010 removal of the wooden exterior stairs and replace with concrete (Permit No. 204971, City of San Diego 2010). The roof material was also replaced in 2014 (Permit No. 358180, City of San Diego 2014a). Observed alterations include the addition of a gate to the main entrance on the primary (west) elevation ca. 2018, and the replacement of the 10 balconies on the rear (east) elevation (Google Maps 2024).

Tarastec Hall, 5445 55th Street (APN 462-220-07-00)

Tarastec Hall, 5445 55th Street, was constructed in 1962. The parcel contains one multi-family residential building that is relatively "L" shaped in plan and four stories tall. The exterior walls are clad in smooth textured stucco and painted concrete masonry units (CMUs). The primary (southwest) elevation includes a paved driveway leading to the interior surface parking lot. The primary entrance consists of a metal security door set into a gate that leads to a stairwell. The stairwell is within a boxy five-story structure that extends approximately 8 feet from the main body of the building's primary (southwest) elevation and has exterior landings with concrete balconies and ornamental metal gates. The structure appears to provide access to the roof. The building's roof is flat with a wide overhang supported by metal poles on the primary (southwest) and rear (southeast) elevation that connect to the metal balcony railings below. This is repeated on floors two and three. Fenestration on all elevations include grouped, metal frame sliding windows with some floor-length glass sliding doors on the rear elevation. Landscaping features grass lawns, mature trees, and shrubs. Known alterations include the 2013 structural beam replacement (Permit No. 373573, City of San Diego 2014b). Observed alterations include recladding of the building in stucco at an unknown date, the replacement of stucco clad balcony railings with metal railings at an unknown date, and addition to the top of the boxy five-story structure on the primary (southwest) elevation at an unknown date (SDSU Library 2024; Google Maps 2024).

Metepec Hall, 5430 55th Street (APN 462-220-03-00)

Metepec Hall is located at 5430 55th Street and was constructed in 1959. The parcel contains one multi-family residential building that is U-shaped in plan. The northwest elevation opens to a central courtyard and pool accessed by a metal security door and fence. The building is two stories tall with exterior walls clad in smooth textured stucco and a flat roof with no eaves or overhang sheathed in rolled composition roofing. The primary (northeast) elevation with frontage on 55th Street does not have a direct entrance to the building. Landscaping on this elevation includes mature plants obscuring the majority of the first floor and a grass lawn extending to the sidewalk.

The primary (northeast) elevation displays as two sections. The left section is a two-story scored stucco wall with no fenestration. The right section displays a second-story projection with a band of concrete that supports evenly spaced and angled concrete folded plate wall sections. The angled sections appear to be decorative and do not contain windows or other openings. Fenestration on the northwest, northeast, southwest, and southeast elevations consist of grouped, metal frame sliding windows of varying sizes. The rear (southwest) elevation has a wooden staircase leading to a corner unit; the rest of the units are accessible through the courtyard. A paved driveway to the north of the building, as well as a pedestrian walkway along the south of the building, leads to the parking lot at the rear (southwest) of the building.

Observed alterations include recladding with stucco on the rear (southwest) and side elevations at an known date, vinyl sash window replacements on the rear (southwest) and side elevations at an known date, and the addition of metal rail fencing around the primary entrance at an unknown date.

Zapotec Hall, 5450 55th Street (APN 462-220-02-00)

Zapotec Hall is at 5450 55th Street was constructed in 1959. The parcel contains three two-story, multi-family residential buildings that are relatively L-shape, U-shape, and square in plan with an open-air courtyard and pool in the center. The buildings are clad with stucco and painted CMU and include flat roofs sheathed in rolled composition roofing featuring horizontal wood board overhangs and open eaves with exposed rafters. This wood board overhang continues beyond the building and connects the north and south buildings. This overhang is present on the other three elevations, but narrower and no eaves are present. A portion of the primary (northeast) elevation extends out farther to the sidewalk along 55th Street and includes two "Vista-Vue" concrete screen block decorations. A second-story balcony is visible on the primary (northeast) elevation. The rear (southwest) elevation contains one concrete balcony, as well as a tall metal frame security gate that leads to the interior courtyard. Fenestration on the northwest, southwest, and southeast elevations consists of grouped, metal frame sliding windows of varying sizes. There are paved driveways to the north and south of the buildings that lead to a parking lot at the western end of the parcel. A curved concrete pedestrian pathway leads from the sidewalk to the primary entrance, accessed by a metal security door and gate. The primary (northeast) elevation is landscaped with low hedges against the building, a grass lawn that extends to the sidewalk, as well as mature trees and plants. Noted alterations include replacing the exterior wood stairs with concrete and grading work for storm drain replacements in 2010 (Permit No. 204971, City of San Diego 2010; Permit No. 206021, City of San Diego 2014c). The roofing material was replaced in 2017 (Permit No. 564416, City of San Diego 2017b). Observed alterations include the addition of metal rail security doors and gates between 2014 and 2017, and at an unknown date the building was reclad in stucco (Google Maps 2024; SDSU Library 2024).

Toltec Hall, 5460 55th Street (APN 462-220-01-00)

Toltec Hall, 5460 55th Street, was constructed in 1960. The parcel contains three two-story, multi-family residential buildings that are relatively U-shape, rectangular, and L-shape in plan with an open-air courtyard and pool in the center. There are paved driveways to the north and south of the buildings that lead to a parking lot at the rear (southwest) elevation. The exterior walls are clad in rough textured stucco with sections of stone veneer. A paved pedestrian pathway under a stucco and wood awning that connects two of the buildings provides access to the interior courtyard. The roof is flat with a horizontal wood board overhang and open eaves. This wood board overhang continues beyond the building and connects the north and south buildings. This overhang is present on the other three elevations, but narrower and no eaves are present. Two balconies are visible on the primary elevation at opposite ends of the building. The primary entrance is accessed by a set of concrete steps leading to two metal frame glass doors from 55th Street. The rear (southwest) elevation contains three concrete balconies with a deeper roof overhang as well as a metal frame security gate that leads to the interior courtyard. Fenestration on all elevations consists of grouped, metal frame sliding windows of varying sizes. Landscaping includes low hedges, a grass lawn that extends to the sidewalk, as well as mature trees and plants.

Known alterations include the replacement of the exterior wooden stairs with concrete stairs in 2010, reroofing with plywood in 2014, the addition of ADA-compliant walkways and parking spaces in 2017, and the replacement of the roof in kind in 2016 (Permit No. 204971, City of San Diego 2010; Permit No. 409755, City of San Diego 2014d; Permit No. 504176, City of San Diego 2016). Observed alterations include recladding of the building in stucco at an unknown date, and the addition of a metal rail security gate to the primary entrance between 2014 and 2017 (SDSU Library 2024; Google Maps 2024).

Mixquic Hall, 5484 55th Street (APN 462-180-01-00)

Mixquic Hall at 5484 55th Street was constructed in 1958. The parcel contains one two-story multi-family residential building that is rectangular in plan and constructed on a semi-circular lot. Exterior walls are clad in smooth textured stucco with sections of painted horizontal wood board and decorative patterned CMU blocks. The flat roof is sheathed in rolled composition roofing. The primary (northeast) elevation has a metal stairway leading to units with frontage on 55th Street. Portions of the second story are cantilevered over a carport below some of the residential units. The cantilevered portion of the second floor has a balcony with a low metal railing that is connected to three metal poles supporting a roof overhang that is angled on one side. Along the north end of the property is a low concrete wall. An interior courtyard and pool are accessed from the southeast by a wood fence. The rear (southwest) of the building has balconies overlooking grass lawn and enclosed by chain link fencing. Fenestration includes floor to ceiling aluminum framed windows on both the first and second stories, metal frame horizontal sliding windows, as well as metal framed sliding windows that are grouped with the larger windows on some elevations. Landscaping includes hedges and a small portion of grass lawn. Observed alterations include reroofing at an unknown date, and the partial replacement of the second-story balcony railing with iron in 2020 (Google Maps 2024). Archival research indicates that the building has undergone minimal alterations since its construction (SDUT 1958: 75).

University Towers, 5505 Montezuma Road (APN 466-300-12-00)

University Towers, 5505 Montezuma Road, was constructed in 1967. The parcel contains one multi-family residential building that is rectangular in plan and nine-stories in height. To the direct west is a single-story commercial building connected to the residential building by a covered concrete walkway. The residential portion of the site is clad in rough-textured stucco CMU blocks. The flat roof is sheathed in rolled composition roofing with a low parapet that encircles the building. The primary entrance is a pair of glass entry doors located on the north elevation beneath a metal overhang with low brick walls supporting metal beams. Fenestration consists of metal framed sliding and fixed windows grouped and repeated at regular intervals. Below each window grouping is a decorative concrete platform that extends out from the main body of the building.

The commercial portion of the site is rectangular in plan with a rounded and extended decorative metal corner that faces out to the intersection of Montezuma Road and 55th Street. The building is clad in stucco with a decorative metal overhang that creates a parapet above the primary (north) elevation and entrance. A CMU block wall at the building's northwest corner creates an outdoor patio. The primary entrances are a pair and single metal storefront doors on the north elevation. Fenestration includes metal storefront windows with awning windows above. Landscaping around both buildings consists of mature trees, hedges in raised concrete planters, and small plantings. Observed alterations include reroofing of the one-story building and remodel of the primary (north) elevation ca. 2013, removal of driveway along the primary (north) elevation and addition of a curved covered walkway enclosed by a concrete wall ca. 2013, and window replacements at an unknown date (Google Maps 2024; NETR 2024).

Archaeological Resources

__Previously Conducted Cultural Resources Studies__

The Southern California Information Center (SCIC) records search identified 111 cultural resource studies previously conducted within a 1-mile radius of the Project APE (Appendix E-1 - Confidential Appendix A). Of these previous studies, seven intersect the Proposed Project's APE (Appendix E-1). Of the seven, the studies included four cultural resources studies, one archaeological and historical study, one archaeological resource analysis, and historical background information. These previous studies identified one previously recorded cultural resource, CA-SDI-009899 within the Project APE.

__Previously Identified Cultural Resources__

The SCIC records search also identified 52 previously recorded cultural *resources* within the 1-mile radius of the Project APE (Appendix E-1 – Confidential Appendix A). Of the 52 resources, one prehistoric resource, CA-SDI-009899 was identified within the southeastern portion of the Peninsula Component of the Project APE (Table 4.4-1). CA-SDI-009899 consists of a light shell scatter and a singular ground stone fragment. The remaining previously recorded resources consist of 43 historic buildings, two historic refuse scatters, an isolated historic bottle, three prehistoric bedrock milling sites, one isolated prehistoric lithic core, and one unknown resource with no description in its site record. The records search did not identify any historic addresses within the Project APE.

Table 4.4-1. Previously Identified Cultural Resources within the Project APE

Primary No.	Trinomial	Period	Description	Project Proximity
P-37-009899	CA-SDI-009899	Prehistoric	Lithic and shell scatter	Inside the APE

__CA-SDI-009899__

CA-SDI-009899 is a small prehistoric site originally recorded by CRM Center in 1984 (Kidder and Miller 1984). The site consists of a light shell scatter and one ground stone fragment. The ground stone fragment consists of a portable milling stone measuring 23 × 20 × 12 cm and containing one milling surface. Disturbances include disturbed soil evidenced by the construction activity for the paved parking lot. The original site record states that the shell scatter may have been introduced as fill by adjacent construction. Vegetation included mixed chapparal and the soil consisted of conglomerate and redeposited fill sediments from the construction of the parking lot.

Aerial Photograph Analysis

Historic aerial photographs of the Proposed Project APE were reviewed at historicaerials.com in order to assess land use and development changes over time (NETR 2024). Historic aerial photographs of the Project APE are available since 1953. The aerial imagery from 1953 shows the Peninsula Component as undeveloped with a single pedestrian trail bisecting the component and the University Towers East Component as undeveloped and graded from previous residential development. Additionally, the aerial imagery shows the development of the SDSU campus and residential housing within the general vicinity of the Project APE. By 1964, the aerial imagery shows the Peninsula Component as developed with the existing student residential buildings and one parking lot. There are no substantial changes to the University Towers Component in the 1964 aerial imagery. The aerial imagery from 1966 reveals development of an additional building within the southern portion of the Peninsula Component and the development of a surface parking lot in the University Towers East Component and the currently existing University Towers housing complex. There is a steady increase of residential and commercial properties being developed within the general vicinity of the Project APE. Between 1968 to 1993 there are no substantial changes to the Peninsula Component or the University Towers East Component. By 1993 the aerial imagery reveals the development of a building on the southeast corner of the Peninsula Component. There are no substantial changes in the University Towers East Component. By 2009 the aerial imagery reveals additional development of a building on the southeast corner of the Peninsula Component. There are no substantial changes in the University Towers East Component.

Historic topographic (topo) maps of the Project APE were reviewed (earliest map available is 1903). The historic topo map from 1942 shows SDSU, Interstate-8, Montezuma Road, and Valley Road as developed. The 1959 topo imagery shows the University Towers East Component as developed with roadways. The 1969 topo imagery shows the Peninsula Component as developed with buildings.

Overall, the review of historic topographic maps and historic aerial photographs indicate the majority of the Project APE is currently being used for SDSU's student housing and parking lots. This review also indicated the Peninsula Component has been developed since 1964 and the University Towers East Component has been disturbed by past grading since 1953.

Intensive Pedestrian Survey Results

The Project APE has been largely disturbed by years of development of SDSU's campus. Ground visibility of the University Towers East Component, located at 5505 Montezuma Road was poor (0%–5%) and completely obscured by the surface parking lot supporting the adjacent student housing complexes.

Ground visibility of the Peninsula Component, located north of Aztec Circle Drive and 55th Street also was poor (0%–5%) in areas where ground surface was obscured by existing development, roadways, and associated parking lots. Disturbances throughout the Peninsula Component include both underground and above-ground utilities and fencing.

The Peninsula Component site includes a small, undeveloped, sloped area leading to the drainages surrounding the developed terrace. However, the ground visibility is poor (0%–5%) within this undisturbed area due to dense vegetation. This undeveloped slope located within the southeastern portion of the Peninsula Component site is also the previously recorded location of CA-SDI-009899.Approximately 40% of the CA-SDI-009899 resource intersects the Project APE, while the remaining portion is situated on an eastern facing slope (Appendix E-1 - Confidential Appendix B). During the pedestrian survey, the mapped boundary of CA-SDI-009899 was revisited; however, no cultural material was identified. Ground visibility within the mapped boundary of the resource was obscured by dense vegetation and dead foliage. The soil consisted of gray silty loam with 20% cobbles. Disturbances include modern debris (food/beverage trash) along the slope. Due to the developed nature of the adjacent area, steep slope, and dense vegetation, there is a low chance of subsurface deposits being present. No additional cultural resources were identified within the Project APE.

Tribal Cultural Resources

Native American Heritage Commission Sacred Lands File and Native American Correspondence

As part of its analysis of the Proposed Project's impacts relative to tribal cultural resources, Dudek requested the NAHC search their Sacred Lands File (SLF) for the Proposed Project. The SLF consists of a database of known Native American resources. The NAHC responded on August 27, 2024, with negative results (Appendix E-1). As part of the process, the NAHC provided a list of tribal representatives who may possess tribal knowledge of the APE (Appendix E-1).

In response, Dudek sent outreach letters by mail to all representatives listed on the NAHC list on August 28, 2024. As of December 2024, Dudek has received one written response from the NAHC outreach letters. Angelina Gutierrez, Monitor Supervisor for the San Pasqual Band of Mission Indians, wrote a response letter to Dudek indicating that the Project is not within the boundaries of the recognized San Pasqual Indian Reservation. However, Ms. Gutierrez requested that the San Pasqual Band would like to engage in formal government-to-government consultation with the CSU/SDSU so that San Pasqual can have a voice developing any measures that may be necessary to protect any tribal cultural resources that may be present on site of the Proposed Project and, if applicable, mitigate any adverse impacts. Ms. Gutierrez also requested access to any cultural resource reports that have been or will be generated during the environmental review. The letter further stated that the San Pasqual Band can provide a Native American Monitor for this Project, although did not indicate if there are any tribal cultural resources within the Project APE. The NAHC SLF results and Native American Correspondence are included in Appendix E-1.

In response to the San Pasqual correspondence, SDSU representatives contacted Ms. Gutierrez to schedule a meeting/consultation. As of this writing, the meeting has not yet taken place. Additionally, the San Pasqual Band will receive notice of the public release of the requested cultural resources report as part of the Draft EIR public review process. On November 4, 2024, SDSU representatives were informed that Bernice Paipa, Cultural Resource Specialist for the Sycuan Band of the Kumeyaay Nation and a representative of the Kumeyaay Cultural Repatriation Committee (KCRC), expressed interested in the Project. On December 6, 2024, SDSU representatives and the Sycuan Band attended a pre-consultation meeting and requested additional information about the undeveloped landscape near the existing International Student Center, the copies of the cultural report and scoping meeting slides, and a site walk. Ms. Paipa also let SDSU representatives know that Daniel Tsosie, Tribal Historic Preservation Officer from the Campo Band of Diegueño Mission Indians, also expressed interest in the Project and may request consultation on the Project. The site visit with Sycuan and SDSU representatives commenced on December 10, 2024, and no additional requests were made during the site visit, aside from a follow-up consultation request. Consultation is currently ongoing and updated information will be provided as part of preparation of the Final Environmental Impact Report (EIR).

4.4.2 Regulatory Framework

Federal

National Register of Historic Places

The National Register of Historic Places (NRHP) is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service (NPS), under the U.S. Department of the Interior, the NRHP was authorized under the NHPA, as amended. Its listings encompass all National Historic Landmarks, as well as historic areas administered by NPS.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
B. That are associated with the lives of persons significant in our past; or
C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in NRHP guidance, How to Apply the National Register Criteria, as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1997). NRHP guidance further asserts that properties must have been completed at least 50 years before evaluation to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be "exceptionally important" (Criteria Consideration G) to be considered for listing.

A historic property is defined as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria" (36 CFR Sections 800.16[i][1]).

State

California Register of Historical Resources

In California, the term historical resource includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.” (Public Resources Code [PRC] Section 5020.1[j].) In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.” (Public Resources Code [PRC] section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our 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.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The 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 NRHP and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks (numbered 770 and higher) and points of historical interest designated by the State Historical Resources Commission. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

CEQA requires that the lead agency consider the impacts of a project on cultural resources, including archaeological, historical, and tribal cultural resources. Historical resources, which includes archaeological sites, are recognized as part of the environment under CEQA, which defines historical resources as, but not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (PRC section 5020.1[j]).

PRC Section 21084.1 defines historical resources as those listed, or eligible for listing, in the CRHR, or those officially designated or recognized as historically significant by a local government pursuant to a local county or city ordinance or jurisdiction, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. Historical resources also include "historic properties" in California that are listed, or determined eligible for listing, in the NRHP and CRHR. The CEQA Guidelines provide specific guidance for determining the significance of impacts on historical resources. As described in in Section 15064.5(b) of the CEQA Guidelines, a "project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."

- A "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (Section 15064.5[b][1]).
- The significance of an historical resource is materially impaired when a project:
  - Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources (Section 15064.5[b][2][A]); or
  - Demolishes or materially alters in an adverse manner those physical characteristics that account for it inclusion in a local register of historical resources pursuant to section 5020.1[k] of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1[g] of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant (Section 15064.5[b][2][B]); or
  - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historic significance and that justify its inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (Section 15064.5[b][2][B]); or

The CEQA Guidelines also provide guidance on minimizing or avoiding significant adverse impacts on historical resources as outlined in the following provisions of Section 15064.5(b)(3)-(5).

- Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource (Section 15064.5[b][3]).
- A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures (Section 15064.5[b][4]).
- When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of the environmental documents (Section 15064.5[b][5]).

CEQA applies to "unique archaeological resources." California PRC Section 21083.2(g) defines a "unique archaeological resource" as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In 2014, CEQA was amended through the passage of Assembly Bill 52 (AB 52) to apply to tribal cultural resources as well. Specifically, PRC Section 21074 provides as follows:

(a) ”Tribal cultural resources” are either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

   (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

   (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

All unique archaeological resources are presumed to be historically or culturally significant for purposes of CEQA (CEQA Guidelines Section 15064.5[c]). A site or resource that does not meet the definition of “unique archaeological resource” is not considered significant under CEQA and need not be analyzed further (PRC Section 21083.2[a]; CEQA Guidelines Section 15064.5[c][4]).

4.4.3 Significance Criteria

The criteria used to evaluate the Proposed Project’s potential impacts to cultural resources, including archaeological resources, and tribal cultural resources are based on Appendix G of the CEQA Guidelines, Section V, Cultural Resources, and Section XVIII, Tribal Cultural Resources. Based on these criteria, the Proposed Project would result in a significant impact related to these resources if the Project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
3. Disturb any human remains, including those interred outside of dedicated cemeteries.
4. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically

defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.4.4 Impacts Analysis

1. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

To determine if the Proposed Project would impact historical resources under CEQA, all buildings or structures over 45 years (constructed in or before 1979) in age within or immediately adjacent to the Project APE were evaluated for historical significance and integrity in consideration of the NRHP and the CRHR. Eight properties within the Peninsula Component site were over the age of 45 years and required inventory and evaluation. Each property was evaluated using all four criteria of the NRHP and the CRHR. Seven buildings did not meet the criteria of the NRHP or the CRHR and are not eligible for listing on the NRHP and the CRHR because they lack historical and architectural significance. None of these buildings are associated with significant trends or persons in history (NRHP Criteria A and B and CRHR Criteria 1 and 2). Architecturally, these seven buildings lack design and construction value because they do not possess architectural distinction or high artistic value, do not represent the work of a master or contribute to the significance of a district. These buildings were designed in the Mid-Century Modern architectural style, which was commonly applied to multi-family buildings in the region. These buildings reflect ubiquitous building trends from the period with rectangular plans, primarily painted stucco cladding, and parking lots surrounding the buildings. They are not important examples of the Mid-Century Modern style multi-family residential buildings in San Diego and merely follow a pattern of design previously established in the area. There are better and more intact examples of Mid-Century Modern multi-family residential buildings throughout San Diego, San Diego County, and California. The seven properties appear to have been constructed through already well-documented and common construction techniques and methods. Additionally, they do not appear to possess high artistic values by articulating a particular concept of design to the extent that it expresses an aesthetic ideal. Archival research could not identify the architect or builder for the properties. There is no indication they are associated with a significant method of construction. As a grouping the buildings do not represent their own district. Overall, the subject properties lack sufficient design and construction value to meet NRHP Criterion C or CRHR Criterion 3 in that they lack design and construction value because they do not possess architectural distinction or high artistic value, do not represent the work of a master, and do not contribute to the significance of a district. Therefore, they do not meet NRHP Criterion C or CRHR Criterion 3 There were no buildings on the University Towers East Component site that required evaluation.

Like the other properties Mixquic Hall at 5484 55th Street (APN 462-180-01-00), is not associated with significant trends or persons in history. However, it was found to meet NRHP Criterion C and CRHR Criterion 3 in the area of architecture. The period of significance is 1958, the year it was constructed. The historic property boundary is coincident with the boundary of APN 462-180-01-00. The building meets this criterion because it embodies the distinctive characteristics of the Contemporary stye, which is evidenced in the building's plan with an enclosed courtyard, flat roof with overhangs, stucco cladding, repetitive ornamental designs in the masonry walls, balconies and decks, attached carport, aluminum frame windows. The San Diego Modernism Historic Context Statement states that despite the Contemporary architectural style being relatively popular in San Diego post-World War II "many of these homes and buildings have been extensively remodeled diminishing their level of integrity and reducing the abundance of good examples from this sub-style substantially." Due to the low number of intact examples of the style, any property that retains a high degree of integrity such as Mixquic Hall "should therefore be considered for individual designation." For these reasons Mixquic Hall is an important local example of its design under this criterion., In addition to meeting NRHP Criterion C and CRHR Criterion 3, the property retains all seven aspects of integrity (location, design, workmanship, materials, setting, feeling, and association) to convey its significance as an important local example of the Contemporary architectural style. Mixquic Hall at 5484 55th Street (APN 462-180-01-00) is considered an historical resource under CEQA.

The Proposed Project includes the demolition of seven apartment buildings located in the Peninsula Component site, which were constructed between 1958 and 1967. Because Mixquic Hall at 5484 55th Street (APN 462-180-01-00) meets NRHP Criterion C and CRHR Criterion 3, its demolition would constitute a substantial adverse change in the significance of a historical resource pursuant to section 15064.5. The building's demolition would result in a loss of all seven aspects of integrity and render it unable to convey its significance in the area of architecture under NRHP Criterion C and CRHR Criterion 3. Therefore, the Proposed Project would cause a **potentially significant** impact to a historical resource. Implementation of **Mitigation Measure (MM) CUL-1**, which requires the preparation of an Historic American Building Survey (HABS)-like recordation of Mixquic Hall, would document the building. **MM-CUL-1** also requires SDSU to retain a qualified professional to prepare the documentation, and HABS-equivalent photography prior to construction activities.

Implementation of **MM-CUL-1** would reduce impacts to the extent feasible, but would not reduce the direct impact to a level that is less than significant. Therefore, the impact would remain **significant and unavoidable.**

2. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Construction/Temporary Impacts

Direct Impacts

As previously noted, the SCIC identified one previously recorded cultural resource, CA-SDI-009899, intersecting the Project APE. CA-SDI-09899 consists of a light shell scatter and singular ground stone fragment. Approximately 40% of the resource's boundary intersects the southeastern portion of the Peninsula Component within the Project APE, while the remaining portion is situated on an eastern facing steep slope, outside of the Project APE. The portion of CA-SDI-009899 located within the Project APE was revisited during the intensive-level pedestrian cultural resources survey; however, no cultural material was observed. Any potential resource will have been substantially disturbed by prior development of the student housing complexes and associated parking lot. Due to the disturbances of the surrounding area, steep slope, and dense vegetation within the mapped boundary of the resource, it is unlikely that the site contains intact subsurface archaeological deposits. For that reason, Dudek does not recommend archaeological and Native American monitoring during construction activities within the Project APE.

However, there is a low potential for construction activity related to the Proposed Project to uncover previously unidentified archaeological resources. Should construction activities disturb any archaeological or tribal cultural resources material within the Project APE, the Project would result in **potentially significant** impacts. Therefore, mitigation is provided (see **MM-CUL-2**) that would require construction activities to stop upon the discovery of a potentially unique archaeological resource and that a qualified archaeologist examine the find and, if warranted, direct that appropriate steps be taken to mitigate any potential significant impacts. Without mitigation, the potential damage to archeological resources during construction would result in a potentially significant impact. With implementation of the recommended mitigation measure (**MM-CUL-2**), impacts would be reduced to below a level of significance. Impacts of the Project are considered **less than significant with mitigation** incorporated during construction.

Indirect Impacts

As previously noted, the SCIC identified one previously recorded resource, CA-SDI-009899, intersecting the Project APE. No additional cultural resources were identified within the Project APE. Additionally, the NAHC Sacred Lands File results were negative.

Construction activities within the Project APE would not indirectly impact surrounding archaeological resources beyond those potential direct impacts previously identified as no resources have been identified along the steep slopes surrounding the Project APE. As such, construction would not result in significant indirect impacts to archaeological resources. **No impact** would occur.

Operational/Permanent Impacts

Once construction is complete, operation of the Proposed Project would not have a direct impact on previously identified archaeological resources since any discovery would have been identified and properly mitigated during construction activities. Because the Project APE has been substantially developed and the new development is within the existing development footprint, the Project would not increase access to surrounding undeveloped areas and Project operation would pose no additional risk of impacts to unknown archaeological resources in the Project vicinity. After construction is finished, operational/permanent activities would not result in significant impacts to archaeological resources. **No impact** would occur.

3. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Construction/Temporary Impacts

Direct Impacts

No known human remains localities were identified through the SCIC records search, NAHC Sacred Lands File results, or through intensive pedestrian survey of the Project APE. As such, Dudek does not recommend archaeological and Native American monitoring occur during construction activities. However, in the event construction or other personnel encounter any previously undocumented human remains during construction activities, the Proposed Project would result in a **potentially significant** impact. Therefore, mitigation is provided that would reduce any potential impacts to less than significant (see **MM-CUL-3**). With implementation of the recommended mitigation measure (**MM-CUL-3**), impacts would be reduced to below a level of significance. Impacts of the Project are considered **less than significant with mitigation** incorporated during construction.

Indirect Impacts

As noted, no known human remains localities were identified through the SCIC records search, NAHC Sacred Lands File results, or through the intensive pedestrian survey of the Project APE. Further, because the Project APE has been substantially developed, it is unlikely that undiscovered buried human remains exist within the Project APE. Therefore, it is anticipated Project construction would pose little risk to undiscovered human remains in the Project APE beyond those potential impacts previously identified. Any construction activities related to the Proposed Project would not have an indirect impact on previously recorded human remains. Indirect impacts would be **less than significant**.

Operational/Permanent Impacts

As noted, no known human remains were identified through the SCIC records search, NAHC Sacred Lands File, or through intensive pedestrian survey of the Project APE. Operational/permanent activities related to the Project would not have a direct impact on previously identified human remains since they would have been identified and properly mitigated during construction activities. Project operational/permanent activities would not increase access or pose additional risk to human remains in the Project APE. Operational/permanent activities related to the Proposed Project would not have an indirect impact on previously recorded human remains. **No impact** would occur.

4. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? or

No CRHR-listed or eligible historical resources have been identified through the SCIC records search or through the intensive pedestrian survey of the Project APE. The Project APE has been substantially disturbed through past development of the existing student housing complexes and associated parking lots. Due to past disturbances, it is unlikely that either of the Project sites would contain intact Native American archaeological deposits. Thus, there is a low potential for construction activity related to the Proposed Project to uncover previously unidentified tribal cultural resources. As such, construction activity related to the Project would not result in significant direct impacts to CRHR or locally registered historical resources. Impacts would be **less than significant.**

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Under AB 52, tribal cultural resources are defined as resources that the lead agency determines to be a tribal cultural resource with a substantial burden of evidence. SDSU representatives contacted the San Pasqual Band to schedule a meeting/consultation. As of this writing, the meeting has not yet taken place. On November 4, 2024, SDSU representatives were informed that Bernice Paipa, Cultural Resource Specialist for the Sycuan Band of the Kumeyaay Nation and a representative of the Kumeyaay Cultural Repatriation Committee (KCRC), expressed interested in the Project. On December 6, 2024, SDSU representatives and the Sycuan Band attended a pre-consultation meeting and a site walk was requested. Ms. Paipa also let SDSU representatives know that Daniel Tsosie, Tribal Historic Preservation Officer from the Campo Band of Diegueño Mission Indians, also expressed interest in the Project and may request consultation on the Project. The site visit commenced on December 10, 2024, and no additional requests were made during the site visit, aside from a follow-up consultation request. Consultation is currently ongoing and updated information will be provided as part of preparation of the Final EIR. Updated information will be provided as part of the preparation of the Final EIR.

To date, no tribal cultural resources have been identified through consultation that would be impacted by Project implementation. The discovery of tribal cultural resources poses a potential significant impact to tribal cultural resources Therefore, mitigation is provided that would reduce any potential impacts to less than significant (see **MM-CUL-4**). With implementation of the recommended mitigation measure (**MM-CUL-4**), impacts would be reduced to below a level of significance. Impacts of the Project are considered **less than significant with mitigation** incorporated during construction.

4.4.5 Cumulative Analysis

The proposed project would not directly impact any known prehistoric cultural resources because no prehistoric or historic-era archaeological resources, human remains have been identified within the Project APE and the area is considered to be of low to moderate potential to contain unanticipated cultural resources. As previously noted, the SCIC identified one previously recorded resource, CA-SDI-009899 intersecting the Project APE. The intensive-level pedestrian survey revisited the mapped boundary of CA-SDI-009899 and no cultural resources were observed. No additional cultural resources were identified within the Project APE. Additionally, the NAHC Sacred Lands File results were negative.

The Proposed Project would demolish an historical resource to accommodate future development. Urban development in the City of San Diego and also redevelopment of land within the SDSU campus has resulted in the loss and alteration of significant cultural resources, and it is reasonable to assume that past, present and future development activities would continue to damage and/or destroy significant cultural resources. The Project, in combination with the cumulative projects would affect significant cultural resources and because all significant cultural resources are unique and non-renewable, all adverse effects or negative impacts contribute to a dwindling resource base, this is considered a **significant cumulative impact relative to historic resources.**

As to archaeological resources and human remains, due to the size of the Project APE and its location and disturbed nature, it is reasonable to assume the Project's incremental contribution to the cumulative loss of cultural resources would not be considerable. In addition, compliance with existing laws and implementation of **MM-CUL-1** through **MM-CUL-3** would require investigation and handling by a qualified archaeologist in the event that an unknown resource is encountered ensuring the project-level impact to archeological resources and human remains would be reduced to less than significant. Therefore, the Proposed Project would not contribute to an existing cumulative impact to archaeological resources or human remains and the Project's cumulative contribution would be **less than significant.**

The Proposed Project would remove Mixquic Hall which meets NRHP Criterion C and CRHR Criterion 3 and its demolition would constitute a cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5 of the CEQA Guidelines. The building would no longer exist causing a direct impact and its demolition would result in a loss of all seven aspects of integrity and render the building unable to convey its significance in the area of architecture under NRHP Criterion C and CRHR Criterion 3. This is a significant and unavoidable impact. The loss of a single building relative to the number of NRHP or CRHR eligible buildings within the City and on the SDSU campus could be considered a considerable contribution to the loss of historic resources. There are no feasible mitigation measures available to reduce the impact to less than significant. Therefore, the Proposed Project's contribution to the loss of historic resources would be considerable resulting in a **significant and unavoidable cumulative impact.**

The potential for discovery of tribal cultural resources on the Project site is considered low. To date, no tribal cultural resources have been identified through consultation that would be impacted by Project implementation. Mitigation is nevertheless provided that would reduce any potential impacts related to discovery of tribal cultural resources (**MM-CUL-4**). With implementation of the recommended mitigation measure (**MM-CUL-4**), impacts would be reduced to below a level of significance.

4.4.6 Summary of Impacts Prior to Mitigation

The Proposed Project has the potential to result in the following impacts prior to mitigation.

The Proposed Project has the potential to cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. This would be a **potentially significant impact.**

During construction activities, the Proposed Project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. This would be a **potentially significant impact.**

During construction activities, the Proposed Project has the potential to disturb any human remains, including those interred outside of dedicated cemeteries. This would be a **potentially significant impact.**

During construction activities, the Proposed Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource. This would be a **potentially significant impact.**

4.4.7 Mitigation Measures

The following mitigation measures would be implemented to reduce the identified potentially significant impacts to cultural and tribal resources to less than significant.

MM-CUL-1 **Prepare a Historic American Building Survey-Like Documentation.** The California State University (CSU)/San Diego State University (SDSU), or its designee, shall prepare a Historic American Building Survey (HABS) Level III-like documentation for Mixquic Hall. All work shall be prepared by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or history. The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for a HABS Short Format. This mitigation measure is being proposed in compliance with CEQA and does not necessitate consultation or approval of the documentation by NPS or the State Historic Preservation Officer. The HABS-like short format document shall be limited to the following:

- Digital photographs
- Photograph index

- Written Short Form for a HABS Level III using the NPS template

Digital photographs shall be completed prior to issuance of any Project related permitting or construction. Photograph documentation shall be prepared according to the 2024 NPS National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy. The photographer must be familiar with the NPS photograph policy. A minimum of 15 photographs must be taken. The photographer shall work with a qualified architectural historian to determine what shall be photographed, which shall include the overall parcel and all elevations of the building, existing setting, surrounding viewsheds, and character-defining details. No interior spaces (communal or private living spaces) are required. Photographs shall be indexed according to 2024 NPS National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy.

The written documentation shall be printed on archival paper according to NPS standards for HABS documentation. Archival CD/DVD containing a PDF of the written documentation and photographs shall be produced according to NPS standards. Four digital copies of the HABS documentation and photographs shall be prepared and distributed to the San Diego State University Special Collections & University Archives, City of San Diego's Digital Archives, Save Our Heritage Organization, and the San Diego History Center.

MM-CUL-2 In the event that archaeological resources (sites, features, or artifacts) are exposed/uncovered during construction activities associated with the Project, the California State University/San Diego State University (CSU/SDSU), or its designee, shall immediately stop all construction work occurring within 50 feet of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas but shall be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. In such an event, a data recovery plan shall be developed by the qualified archaeologist in consultation with the CSU/SDSU and Native American representatives, if applicable. Ground disturbing work can continue in the area of the find only after impacts to the resources have been mitigated consistent with the data recovery plan.

MM-CUL-3 In the event that any human remains are discovered during construction activities, the California State University/San Diego State University (CSU/SDSU), or its designee, shall contact the San Diego County Medical Examiner. Upon identification of human remains, no further disturbance shall occur in the immediate area of the find until the County Medical Examiner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative to make recommendations regarding the proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until the opportunity to complete consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has occurred. All relevant provisions of California Public Resources Code Section 5097.98, CEQA Section 15064.5, and California Health and Safety Code Section 7050.5 shall be followed.

MM-CUL-4 Although the potential for discovery of tribal cultural resources on the project site is considered low, in response to the requests made during AB 52 consultation meetings, the CSU/SDSU shall authorize tribal monitoring of such resources during project construction grading activities and shall provide appropriate remuneration for such monitoring consistent with standard practices. SDSU retains the authority to select the monitor, which shall be provided by either the Sycuan Band of the Kumeyaay Nation or the San Pasqual Band of Mission Indians. Such monitoring by a single tribal monitor shall be authorized on a daily basis during project construction grading activities; however, in the event a monitor is not available on any given day, project construction activities may continue uninterrupted. In the event tribal cultural resources are inadvertently encountered during project construction activities, work in the immediate area must stop and a qualified archaeologist meeting the Secretary of the Interior's Professional Standards shall assess the discovery in consultation with the Sycuan Band of the Kumeyaay Nation and the San Pasqual Band of Mission Indians to evaluate the resource and develop a plan for treatment and disposition of the resource. If avoidance is not feasible, additional work such as data recovery may be warranted. Following evaluation by a qualified archaeologist, in consultation with the Sycuan Band of the Kumeyaay Nation, the San Pasqual Band of Mission Indians, and the CSU/SDSU, construction shall be permitted to resume.

4.4.8 Level of Significance After Mitigation

As discussed above in Section 4.4.4, implementation of **MM-CUL-1** would reduce potentially significant impacts associated with historic resources to less than significant. While this measure would reduce the significance of the impact, the impact to Mixquic Hall at 5484 55th Street (APN 462-180-01-00) would remain **significant and unavoidable** because the Project would demolish the building's character-defining features which defines the building as a historic resource.

Construction of the Proposed Project could result in potentially significant impacts to previously unidentified archaeological resources. However, implementation of **MM-CUL-2** would assure the proper treatment of unanticipated archaeological material. Therefore, impacts to archaeological resources during construction of the Proposed Project would be **less than significant with mitigation incorporated.**

Construction of the Proposed Project could result in potential impacts to human remains. A significant impact to human remains would occur as a result of the Proposed Project should construction or other personnel encounter any previously undocumented human remains. However, implementation of **MM-CUL-3** would assure proper treatment of unanticipated finds during construction activities, and compliance with applicable regulations. Therefore, impacts to cultural resources during construction of the Proposed Project would be **less than significant with mitigation incorporated.**

To date, no tribal cultural resources have been identified through consultation that would be impacted by Project implementation. However, construction of the Proposed Project could result in potential impacts to tribal cultural resources. However, implementation of **MM-CUL-4** would assure the proper treatment of unanticipated tribal cultural resources. Therefore, impacts to tribal cultural resources during construction of the Proposed Project would be **less than significant with mitigation incorporated.**

4.4.9 References

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4.5 Energy

This section describes the existing energy conditions of the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Energy. The information and analysis presented in this section is supported by Appendix C, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received energy-related comments concerning the implementation of solar power generation, building efficiency standards, off-road construction equipment, and natural gas consumption. These public comments/concerns are addressed in the analysis within this section. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.5.1 Existing Conditions

Electricity

According to the U.S. Energy Information Administration, California used approximately 239,480 gigawatt-hours of electricity in 2023 (EIA 2024a). Electricity usage in California for different land uses varies substantially based on the types of uses in a building, the types of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the state's numerous energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita in the residential sector is lower than any other state in the nation, except for Hawai'i (EIA 2024b).

San Diego Gas and Electric Company (SDG&E) provides electrical and natural gas service to the region. SDG&E is a regulated public utility that provides energy service to 3.7 million people through 1.5 million electric meters and 900,000 natural gas meters in San Diego County and southern Orange County. The SDG&E service area spans 4,100 square miles. SDG&E and other utilities in the state are regulated by the California Public Utilities Commission (SDG&E 2024). According to the California Energy Commission (CEC), approximately 78 billion kilowatt-hours (kWh) of electricity were used in SDG&E's service area in 2019 (CEC 2024a).

The Proposed Project would connect to and be served by SDG&E electrical infrastructure. The SDSU electric grid also provides electrical infrastructure to the campus. The SDSU campus is served by four 12-kilovolt substations powered by its own facilities. The Proposed Project's Peninsula Component is on the SDSU electrical grid and thus would not put demand on SDG&E. With the exception of the Peninsula Component, the Proposed Project would connect to and be served by SDG&E electrical infrastructure.

Natural Gas

According to the U.S. Energy Information Administration, California used approximately 2,139.3 trillion British thermal units of natural gas in 2022 (EIA 2024b). Natural gas is used for cooking, space heating, and generating electricity, and as an alternative transportation fuel. In 2022, by sector, industrial uses utilized 33% of the state's natural gas, followed by 31% from electric power generation, 21% from residential, 12% from commercial, and 2% from transportation uses (EIA 2022a).

The California Public Utilities Commission regulates California's natural gas rates and natural gas services, including in-state transmission and distribution pipeline systems, storage, procurement, metering, and billing. Most of the natural gas used in California comes from out-of-state natural gas basins. Biogas (e.g., from wastewater treatment facilities or dairy farms) is just beginning to be delivered into the gas utility pipeline systems, and the state has been encouraging its development (CPUC 2022).

In 2019, SDG&E delivered approximately 4.9 billion therms of natural gas to the region, with 3 billion therms for nonresidential use and 1.9 billion therms for residential use (CEC 2023).

The Proposed Project would connect to and be served by SDG&E natural gas infrastructure for the limited purpose of the Project's Amenity Building.

Petroleum

According to the U.S. Energy Information Administration, California used approximately 628 million barrels of petroleum in 2022, with the majority (534 million barrels) used for the transportation sector (EIA 2022b). There are 42 U.S. gallons in a barrel, so this equates to a total daily use of approximately 60 million gallons of petroleum among all sectors and 50 million gallons for the transportation sector.

Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented numerous regulations and policies to improve vehicle efficiency and to support the use of alternative transportation, which are described in Section 4.5.2, Regulatory Framework. As such, the CEC anticipates an overall decrease of gasoline demand in the state over the next decade (CEC 2024b).

4.5.2 Regulatory Framework

Federal

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards, including fuel economy standards for various vehicle classifications. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes the following other provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

The EISA's RFS requires ever-increasing levels of renewable fuels to replace petroleum (EPA 2024). The U.S. Environmental Protection Agency is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with fuel refiners, renewable fuel producers, and many other participants.

The RFS program originally was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under that act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that laid the foundation for achieving significant reductions of greenhouse gas (GHG) emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of our nation's renewable fuels sector. The updated program (RFS2) includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the U.S. Environmental Protection Agency to apply life cycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State

California Environmental Quality Act

To ensure that energy implications are considered by lead agencies as part of the CEQA process, environmental impact reports (EIRs) must include a discussion of the potential significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in an EIR. While not described as significance thresholds for determining the significance of impacts related to energy, Appendix F provides the following topics that the lead agency may consider in the energy analysis of an EIR, where topics are applicable or relevant to the project:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Warren–Alquist Act

The California legislature passed the Warren–Alquist Act in 1974, which created the CEC. The legislation also incorporated the following three key provisions designed to address the demand side of the energy equation:

- It directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California.
- The act removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to the more impartial CEC.
- The CEC was directed to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as nonconventional energy sources.

Senate Bill 1368

On September 29, 2006, Governor Arnold Schwarzenegger signed into law Senate Bill (SB) 1368 (Perata, Chapter 598, Statutes of 2006). The law limits long-term investments in baseload generation (minimum level of demand on an electrical grid over a span of time) by the state's utilities to those power plants that meet an emissions performance standard jointly established by the CEC and the California Public Utilities Commission.

The CEC has designed regulations with the following goals:

- Establish a standard for baseload generation owned by, or under long-term contract to, publicly owned utilities of 1,100 pounds of carbon dioxide (CO_2) per megawatt-hour to encourage the development of power plants that meet California's growing energy needs while minimizing their GHG emissions
- Require posting of notices of public deliberations by publicly owned utilities on long-term investments on the CEC website to facilitate public awareness of utility efforts to meet customer needs for energy over the long-term while meeting the state's standards for environmental impact
- Establish a public process for determining the compliance of proposed investments with the emissions performance standard (Perata, Chapter 598, Statutes of 2006)

Assembly Bill 1007

Assembly Bill (AB) 1007 (2005) required the CEC to prepare a statewide plan to increase the use of alternative fuels in California (State Alternative Fuels Plan). The CEC prepared the plan in partnership with the California Air Resources Board (CARB) and in consultation with other state agencies, plus federal and local agencies. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Other Energy Reduction Regulations

The following state executive orders, statutes, and regulations achieve energy reduction co-benefits and are described in Section 4.7, Greenhouse Gas Emissions: AB 32 and SB 32; California Building Standards (California Code of Regulations [CCR], Title 20 and Title 24, Parts 6 and 11); AB 1493 ("Pavley" regulations); Executive Order

(EO) S-1-07; SB 375; CARB Truck and Bus Regulation; CARB On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation; CARB Advanced Clean Car and Trucks Program; EO B-16-12; SB 350; and SB 100. Please refer to Draft EIR Section 4.7.2, Regulatory Framework, for additional relevant information.

4.5.3 Significance Criteria

The criteria used to evaluate the Proposed Project's potential impacts to energy are based on Appendix G of the CEQA Guidelines, Section VI, Energy. Based on these criteria, the Proposed Project would result in a significant impact related to energy if the Project would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

In regard to Threshold 2, SDSU, as a public university under the jurisdiction of the state, is not subject to compliance with local plans and regulations. Project consistency with Threshold 2 is discussed further in Section 4.5.4, Impacts Analysis, below.

Approach and Methodology

Petroleum

Potential impacts related to the Proposed Project's consumption of petroleum (transportation fuels) were assessed through consideration of the projected traffic trip generation during construction and operation, as detailed in the California Emissions Estimator Model (CalEEMod) outputs that were prepared for the Proposed Project (Appendix B of Appendix C). Trip generation for the Proposed Project was provided by LLG (Appendix I, Transportation Study San Diego State University Evolve). The methodology used to evaluate the Project's petroleum consumption accounts for the reductions in consumption attributable to the Project's provision of additional on-campus student housing opportunities, as described further below in Section 4.5.4.

Fuel consumption by the Proposed Project's construction equipment, including haul trucks and worker and vendor trips, was estimated by converting the total CO_2 emissions from each construction phase to gallons using conversion factors for CO_2 to gallons of gasoline or diesel. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2023). All off-road construction equipment, haul trucks involved in importing or exporting material to and from the site, and vendor vehicles are assumed to use diesel fuel. Conversely, it is assumed that construction workers would travel in the Project area in gasoline-powered vehicles.

The fuel consumption resulting from the Proposed Project's operational phase would be attributable to vehicle travel within the Project area. Similar to the construction analysis, fuel consumption for operation was estimated by converting the total CO_2 emissions from the Project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel.

Per CEQA Guidelines Appendix F, this analysis considers these factors and provides the Proposed Project's estimated petroleum consumption for the purposes of evaluating the associated impacts on energy resources and requirements.

Electricity and Natural Gas

The estimation of operational electricity and natural gas consumption was based on the CalEEMod land use defaults and units or total area (i.e., square footage) of the Proposed Project's land uses. The residential buildings are all-electric; as such, no natural gas would be used during their operation. The Project's Amenity Building, however, would include natural gas service for purposes of its dining facilities.

The National Renewable Energy Laboratory PVWatts estimator was used to estimate the energy produced by the solar component of the Proposed Project.

Of note, the methodology used to evaluate the Proposed Project's consumption of electricity and natural gas does not account for the existing consumption of the 13 buildings currently located on the Peninsula Component that would be demolished to facilitate implementation of the Project. This is a conservative approach that serves to overestimate the Project's consumption of electricity and natural gas, as it utilizes a baseline of zero consumption in lieu of reporting an incremental change in consumption from the non-zero baseline that is part of the existing condition.

Per CEQA Guidelines Appendix F, this analysis quantifies the Proposed Project's electricity and natural gas consumption; evaluates the associated impacts on energy resources and requirements, peak and base period demand, and effects on the local and regional energy supplies; and analyzes the Proposed Project's compliance with existing energy standards.

4.5.4 Impacts Analysis

1. ***Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***

Implementation of the Proposed Project would increase the demand for electricity, gasoline, and diesel consumption in the Project area during construction and operation, which are evaluated below.

Construction Use

Electricity

Temporary electric power for lighting and electronic equipment, such as computers, may be needed inside temporary construction trailers. Therefore, the focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the Proposed Project. The 2022 National Construction Estimator identifies a typical power cost per 1,000 square feet of construction land area per month of $2.41, which was used to calculate the Project's total construction power cost (Pray 2022).

Based on information provided in Section 4.2, Air Quality, construction activities are anticipated to occur over 105 months. Each phase is broken down into the schedule proposed for construction. As detailed in Table 4.5-1, Construction Power Cost, the total electrical cost of the on-site electricity usage during the construction of the Proposed Project is estimated to be approximately $52,865.18 in 2022 dollars.

Table 4.5-1. Construction Power Cost

Land Use	Power Cost (per 1,000 square feet of construction per month)	Size (1,000 square feet)	Construction Duration (months)	Project Construction Power Cost
Phase 1	$2.41	292.2	22	$15,492.44
Phase 2	$2.41	174.24	18	$7,558.53
Phase 3	$2.41	174.24	18	$7,558.53
Phase 4	$2.41	174.24	17	$7,138.61
Phase 5	$2.41	174.24	17	$7,138.61
Phase 6	$2.41	174.24	19	$7,978.45
			Construction Power Cost in 2022 Dollars	**$52,865.18**

Source: Pray 2022.

SDG&E's general service rate schedule was then used to determine the Project's electrical usage during the construction phase. As of January 1, 2022, SDG&E's general service rate is $0.13 per kWh of electricity for industrial services (SDG&E 2022). By dividing the cost in Table 4.5-1 by the SDG&E rate, the total electricity usage from on-site Project construction-related activities is estimated to be approximately 406,655 kWh (Table 4.5-2, Construction Electricity Usage).

Table 4.5-2. Construction Electricity Usage

Project Component and Land Use	Cost per kWh	Project Construction Power Cost	Project Construction Electricity Usage (kWh)
Phase 1	$0.13	$15,492.44	119,173
Phase 2	$0.13	$7,558.53	58,143
Phase 3	$0.13	$7,558.53	58,143
Phase 4	$0.13	$7,138.61	54,912
Phase 5	$0.13	$7,138.61	54,912
Phase 6	$0.13	$7,978.45	61,373
		Total Construction Electricity Usage (kWh)	**406,655**

Source: SDG&E 2022.
Note: kWh = kilowatt-hour.

Natural Gas

Natural gas is not anticipated to be required during the Proposed Project's construction phase because construction activities for new buildings and facilities do not typically utilize natural gas. Nonetheless, any use of natural gas during construction would be sufficiently served by existing supply from SDG&E and would not require additional local or regional capacity. Any minor amounts of natural gas that may be consumed because of construction would be temporary and negligible and would not have an adverse effect.[1]

1 While no natural gas is anticipated to be used during construction because heavy-duty construction equipment is typically diesel-fueled, the possibility of natural gas use is acknowledged in the event a natural gas–fueled piece of equipment is used. However, as noted previously, all equipment was assumed to be diesel-fueled in CalEEMod.

Petroleum

Heavy-duty equipment associated with construction during development of the Proposed Project would rely on diesel fuel, as would vendor trucks involved in the delivery of materials and haul trucks responsible for importing or exporting materials. Construction workers would travel to and from the Project area throughout the duration of construction. Appendix C lists the assumed equipment usage and vehicle trips.

As previously discussed, fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in Table 4.5-3, Total Project Construction Petroleum Demand.

Table 4.5-3. Total Project Construction Petroleum Demand

Year	Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
	Gallons			
2025	13,479.92	21,614.40	15,179.86	15,399.77
2026	17,303.62	6,182.17	45,099.90	48,603.64
2027	11,642.70	0.00	24,850.15	47,923.69
2028	11,227.23	12,477.96	14,441.72	26,784.74
2029	13,350.64	80,281.10	12,565.13	26,452.16
2030	9,282.08	0.00	19,250.73	51,777.90
2031	13,654.26	2,448.58	16,283.06	30,700.46
2032	14,534.77	2,378.06	13,751.22	28,954.44
2033	13,533.79	0.00	16,857.00	35,452.16
2034	0.00	0.00	29.38	380.41
Total	**108,009.01**	**125,382.27**	**178,308.27**	**312,429.38**

Note: See Appendix C for outputs.

In summary, construction activities associated with the Proposed Project would consume approximately 312,429 gallons of gasoline from worker vehicles and approximately 421,699 gallons of diesel for off-road equipment, haul trucks, and vendor trucks. In San Diego County, it is estimated that approximately 9.5 million gallons of petroleum would be consumed in 2025 from off-road equipment and 639 million gallons from on-road vehicles (CARB 2024).

The Proposed Project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the Best Achievable Control Technology requirements.

Overall, the Proposed Project would not be unusual when compared to overall local and regional demand for construction-related energy resources and would not require equipment that would be less energy-efficient than equipment at comparable construction sites in the region or state. Although not required to reduce petroleum use, the Proposed Project would employ electric construction equipment where feasible.

Considering these factors, the Proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of construction energy. Therefore, construction impacts associated with the consumption of electricity, natural gas, and petroleum would be **less than significant**, and no mitigation is required.

Operational Use

Electricity

Project operation would require electricity for multiple purposes including, but not limited to, building heating and cooling, water heating, lighting, appliances, and electronics. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage.

CalEEMod was used to estimate Project emissions from electricity uses (see Appendix C for calculations). Default electricity generation rates in CalEEMod were used based on the proposed land use and climate zone. The increase in electricity demand for the future potential buildout of the Proposed Project is presented in Table 4.5-4, Project Annual Operational Electricity Demand Summary. As shown in Table 4.5-4, the Proposed Project is estimated to have a total electrical demand of approximately 18,078,438 kWh per year.

Table 4.5-4. Project Annual Operational Electricity Demand Summary

Phase	Electricity Demand (kWh/year)
Phase 1	5,186,343
Phase 2	2,578,419
Phase 3	2,578,419
Phase 4	2,578,419
Phase 5	2,578,419
Phase 6	2,578,419
Total Project Electricity Demand	**18,078,438**

Notes: kWh = kilowatt-hour.
See Appendix C for detailed results.

According to PVWatts, the Proposed Project's 308-kilowatt rooftop solar system is estimated to produce 528,254 kWh per year of renewable energy (NREL 2024). Therefore, the Proposed Project would result in the net consumption of 17,550,184 kWh of electricity per year

In 2022, the nonresidential and residential electricity demand within San Diego County was 20,242,901,498 kWh (20,243 gigawatt-hours) (CEC 2024a). For context, therefore, the Proposed Project's electricity demand would represent an approximate 0.09% increase in San Diego County's annual electricity demand.

Title 24 of the CCR serves to enhance and regulate California's building standards. The most recently adopted amendments to CCR Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2023. The proposed 2025 CCR Title 24 standards—if adopted—likely would become effective on January 1, 2026, and would apply to phases of the Proposed Project built after that date. Compliance with the applicable CCR Title 24 standards, which is required as a matter of law, would further ensure that the Proposed Project's energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Under peak conditions, the Project would have a peak demand of 14.7 megawatts on the SDG&E grid. In comparison to the SDG&E power grid base peak load of 4,942 megawatts for 2034, the Project would represent approximately 0.3% of the SDG&E base peak load conditions. Therefore, the Project would represent a minimal increase in the SDG&E grid base peak load. Furthermore, the Proposed Project's Peninsula Component is on the SDSU electric grid and thus would not put demand on SDG&E.

In summary, the impacts related to electrical supply and infrastructure capacity and the Proposed Project's effect on peak and base period demands would be **less than significant.**

Natural Gas

Operation of the Proposed Project's Amenity Building would use natural gas for cooking. Natural gas consumption associated with operation is based on the CalEEMod outputs presented in Appendix C.

CalEEMod default values for energy consumption for each land use were applied for the Project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to CCR Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning [HVAC] system, water heating system, and integrated lighting) and those not subject to CCR Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses). Table 4.5-5, Project Annual Operational Natural Gas Demand Summary, shows the estimated natural gas demand from the Proposed Project.

Table 4.5-5. Project Annual Operational Natural Gas Demand Summary

Land Use	Natural Gas Demand (kBTU/year)
Amenity Building	1,686,087

Source: Appendix C.
Note: kBTU = thousand British thermal units.

As shown in Table 4.5-5, the increase in natural gas demand from the Proposed Project is estimated to be 1,686,087 thousand British thermal units per year. In comparison, the natural gas consumption in 2022 was 52,230,924,400 thousand British thermal units for San Diego County (CEC 2024c).

According to SDG&E data, natural gas demand is estimated to be 83 billion cubic feet per year in 2025. Based on the Proposed Project's estimated natural gas consumption as shown in Table 4.5-5, the Proposed Project would account for approximately 0.002% of SDG&E's 2025 demand. Therefore, it is anticipated that SDG&E's existing and planned natural gas supplies would be sufficient to support the Proposed Project's demand for natural gas.

Based on the above, the Proposed Project would not have a significant effect on local and regional natural gas supplies or require additional capacity. Therefore, impacts related to natural gas would be **less than significant.**

Petroleum

During operations, the majority of fuel consumption resulting from the Proposed Project would involve the use of motor vehicles traveling to and from the Project site, as well as fuels used for alternative modes of transportation that may be used by residents. Petroleum fuel consumption associated with motor vehicles traveling to and from the Project site is a function of the vehicle miles traveled (VMT) as a result of Project operation. As shown in Appendix C, the annual VMT attributable to the Proposed Project is expected to be 7,933,640 VMT. However, as discussed in Section 4.2, of this Draft EIR, the Proposed Project also would avoid approximately 30,039,266 VMT per year by providing students with increased on-campus housing opportunities that otherwise would need to reside at off-campus locations. Stated differently, by increasing the number of on-campus student beds available to serve SDSU students and creating opportunities for students to reside on campus in lieu of more distant off-campus locations, the Proposed Project would improve the efficiency of VMT per student travel patterns. The Proposed Project would therefore beneficially result in a reduction of 22,105,626 VMT per year. Countywide, the annual VMT is estimated to be 36,294,565,157 per year in 2034 (CARB 2024).

Similar to the construction analysis above, fuel consumption is estimated by converting the total CO_2 emissions from operation of the Proposed Project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Based on the annual fleet mix provided in CalEEMod, 80.4% of the fleet range (from light-duty to medium-duty vehicles and motorcycles) are assumed to be fueled by gasoline. The remaining 19.6% of vehicles (medium-heavy duty to heavy-duty vehicles and buses) are assumed to run on diesel. The gasoline consumption also includes fuel used for landscaping equipment.

Calculations for annual mobile source fuel consumption are provided in Table 4.5-6, Annual Petroleum Demand.

Table 4.5-6. Annual Petroleum Demand

Fuel	Vehicle MT CO2[a]	kg/CO2/Gallon[b]	Gallons
Project			
Gasoline	2,157.44	8.78	245,722.10
Diesel	526.98	10.21	51,614.10
		Total	**297,336.20**
Existing			
Gasoline	9,030.47	8.78	1,028,527.33
Diesel	2,205.80	10.21	216,043.10
		Total	**1,244,570.43**
		Net (Project minus Existing)	**(947,234.23)**

Sources:
[a] Appendix C.
[b] The Climate Registry 2023.
Note: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

As shown in Table 4.5-6, the Proposed Project would result in a net reduction in petroleum usage of 947,234 gallons per year. By comparison, California as a whole consumes approximately 26.4 billion gallons of petroleum per year (EIA 2024b). Countywide total petroleum use by on-road vehicles is expected to be 639 million gallons per year by 2025 (CARB 2024).

With respect to operational transportation-related fuel usage and in relation to CEQA Guidelines Appendix F, enhanced fuel economies realized pursuant to federal and state regulatory actions and the related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT.

Based on the above, the Proposed Project's operational consumption of petroleum would be **less than significant.**

Renewable Energy Potential

As part of the Proposed Project's planning process, SDSU considered how the Project could potentially increase its reliance on renewable energy sources to meet the Proposed Project's anticipated energy demand. Consistent with the CEC's definition of eligible renewables, energy sources that were considered for their potential to power the project include biomass, geothermal, solar, wind, and small hydroelectric facilities.

Given the Proposed Project's location and the nature of the Project, there are anticipated to be considerable site constraints at a parcel level that would eliminate the potential for biomass, geothermal, and hydroelectric renewable energy to be installed within the Project area. These constraints include, but are not necessarily limited to, incompatibility with on-site and surrounding land uses for large-scale power generation facilities, unknown interconnection feasibility concerns, potential incompatibility issues with utility provider systems, and no known water or geothermal resources to harness. Regarding wind power, due to the nature of the Project area parcels and surrounding land uses, wind turbines are generally anticipated to be unfeasible, because they represent significant visual and noise impacts that are incompatible with the existing land uses and community preferences.[2]

Regarding solar power, the Proposed Project is designed to include at least a 308 kW solar system. As SDG&E moves toward decarbonizing its power sources in accordance with SB 100, the renewable content of the grid-sourced electricity also will increase over time.

As explained above, the Proposed Project is a student housing project and would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum during Project construction or operation, and impacts would be **less than significant.**

2. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Construction

The Proposed Project's construction contractors would be required to demonstrate compliance with applicable regulations, including federal and state requirements for construction equipment. For example, with respect to construction truck fleet operators, the U.S. Environmental Protection Agency and National Highway Traffic Safety Administration have adopted fuel-efficiency standards for medium- and heavy-duty trucks that have been phased in over time. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6% to 23% over the 2010 baseline, depending on the vehicle type (76 FR 57106–57513). The Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027, require the phase-in of a 5% to 25% reduction in fuel consumption over the 2017 baseline, depending on the compliance year and vehicle type (EPA and NHTSA 2024). The energy modeling presented in this section for trucks does not consider specific fuel

2 A general rule of thumb is to install a wind turbine on a tower with the bottom of the rotor blades at least 30 feet above anything within a 500-foot horizontal radius and to site it upwind of buildings and trees (APA 2011; NREL 2015).

reductions from these regulations because they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding idling limits of 5 minutes per occurrence. Off-road emissions standards would also increase equipment efficiencies as they are phased in over time and as less efficient equipment is phased out of construction fleets. These regulatory standards achieve energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. Thus, based on the information above, construction and operation of the Proposed Project would comply with state and local plans for renewable energy or energy efficiency.

Per CEQA Guidelines Appendix F, the Proposed Project's construction equipment would be consistent with the energy standards applicable to construction equipment, including limiting idling fuel consumption and using contractors that comply with applicable CARB regulatory standards that affect energy efficiency. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency during project construction, and impacts would be **less than significant.**

Operation

The solar generation infrastructure included as part of the Proposed Project supports the renewable energy goals of SDSU's Climate Action Plan and the California State University Sustainability Policy. Additionally, Part 6 of CCR Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the state of California in order to reduce energy demand and consumption. The Proposed Project would comply with CCR Title 24, Part 6, per state regulations. In accordance with CCR Title 24, Part 6, the Proposed Project would have (a) sensor-based lighting controls—for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and (b) efficient process equipment—improved technology offers significant savings through more efficient processing equipment. CCR Title 24, Part 11, contains voluntary and mandatory energy measures that are applicable to the Proposed Project under the California Green Building Standards Code. In accordance with CCR Title 24, Part 11, mandatory compliance, the Proposed Project would have (a) 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. Compliance with all of these mandatory measures would decrease the consumption of electricity, natural gas, and petroleum.

Because the Proposed Project would comply with CCR Title 24, Part 6 and Part 11, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be **less than significant.**

4.5.5 Cumulative Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Proposed Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines. Where a lead agency concludes that the cumulative effects of a project taken together with the impacts of other closely related past, present, and reasonably foreseeable future projects are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself).

Cumulative projects that could exacerbate the Proposed Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, cumulative projects would be required, as applicable, to conform to current federal, state, and local energy conservation standards, including those identified in earlier portions of this section. For example, future development would be subject to the CCR Title 24 standards in place at the time of construction.

As a result, the Proposed Project, in combination with other reasonably foreseeable projects, would not cause a wasteful use of energy or other nonrenewable natural resources. Therefore, the energy demand and use associated with the Project and cumulative projects would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources and would not cause a significant cumulative impact on energy resources.

The Proposed Project would result in a net reduction in VMT and associated petroleum use and would therefore not contribute to the petroleum use within San Diego County. Therefore, the Proposed Project would not result in a cumulatively considerable impact to petroleum use.

Similarly, the Proposed Project would not conflict with applicable plans for renewable energy or energy efficiency, as it would be required to include solar and adhere to other building efficiency standards pursuant to CCR Title 24. As such, the Project, in combination with other reasonably foreseeable projects, would not conflict with a state or local plan for renewable energy or energy efficiency.

Cumulative energy impacts would be considered **less than significant.**

4.5.6 Summary of Impacts Prior to Mitigation

The Proposed Project is a student housing project and would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum, during Project construction or operation, and impacts would be **less than significant.**

Because the Proposed Project would comply with CCR Title 24, Part 6 and Part 11, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be **less than significant.**

4.5.7 Mitigation Measures

No mitigation measures associated with energy would be required.

4.5.8 References

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4.6 Geology and Soils

This section describes the existing geological conditions of the Project site and vicinity; identifies associated regulatory requirements; evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criterion provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Geology and Soils; and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

Summary of Notice of Preparation Comments

A Notice of Preparation was circulated August 25, 2024. Of the letters and comments received, no comments related to geology and soils. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.6.1 Existing Conditions

Stratigraphy

The Peninsula Component and University Towers East Component are located on the coastal plain of the Peninsular Ranges geomorphic province of Southern California. The coastal plain includes ancient, flat, wave cut terraces consisting of marine and nonmarine sedimentary rock. Regional tectonic uplift has raised the marine terraces that are locally preserved as the elevated flat mesas in the San Diego region. Erosion of these terraces by rivers and creeks created canyons that expose the underlying sedimentary rock (Appendices F-1 and F-2).

As illustrated on Figure 4.6-1, Geologic Map, regional geologic mapping by Kennedy and Tan (2008) indicates very old paralic deposits (middle to early Pleistocene) underlie the University Towers East Component, and the Mission Valley Formation (middle Eocene) and the Stadium Conglomerate (middle Eocene) underlie the Peninsula Component. Based on soil borings, the University Towers East Component is also underlain by the Eocene deposits. The very old paralic deposits are a very old surficial unit comprising siltstone, sandstone, and conglomerate that is slightly to well indurated (i.e., hard). The Mission Valley Formation is a sedimentary bedrock unit comprising soft and friable, fine to medium grained sandstone, containing cobbles. The Stadium Conglomerate is a sedimentary bedrock unit comprising cobble conglomerate in a sandstone matrix (Appendices F-1 and F-2).

More specifically, based on soil borings and a site reconnaissance, the very old paralic deposits consist primarily of massive cobble conglomerate in a fine to coarse grained silty sand matrix, with beds of very dense sandstone, siltstone, and claystone. The conglomerate clasts are typically less than 3 inches in diameter but locally up to 18 inches. The Mission Valley Formation and Stadium Conglomerate consist of massive cobble conglomerate that contains well-rounded gravel and cobble, making up 30% to 60% of the conglomerate by mass. The cobbles are typically 3 to 6 inches in diameter, but locally up to 24 inches. The matrix of the conglomerate consists of dense to very dense silty and clayey sands and poorly graded gravel, with silt and sand. The Mission Valley Formation deposits are present beneath the variable thickness of artificial fill deposits. The Stadium Conglomerate underlies the Mission Valley Formation at variable depths beneath the site and forms the lower hillsides in the Peninsula Component area, below an elevation of about 375 feet (Appendices F-1 and F-2).

Both sites include a layer of undocumented fill that was placed over the sedimentary deposits. Undocumented fill is soil that has been placed and compacted with no documentation of observation and compaction testing by a geotechnical engineer. Based on a 1953 aerial photograph, fill appears to have been placed over the natural canyon rim in several locations at the Peninsula Component during the original development in the late 1950s and early 1960s (Appendix F-2). A wedge of fill ranging from 10 to 40 feet thick now exists along the northern and western site perimeter, with the thickest area of fill in the southwest portion of the Peninsula Component site. The fill was observed to consist predominantly of clayey sand with varying amounts of gravel and cobble. Based on soil boring blow counts, the apparent density of the fill at the Peninsula Component is medium dense to dense. Based on soil borings, fill at the University Towers East Component is approximately 5 to 7 feet thick and consists of clayey sand and clay (Appendix F-2).

Regional Seismicity

Southern California is considered one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. The San Diego region, and Southern California in general, lies within the broad margins of the San Andreas Fault System, which marks the boundary between the North American and Pacific tectonic plates. San Diego is located approximately 100 miles west of the San Andreas Fault, the predominant earthquake hazard in the state, but is also close to several other large active faults capable of producing severe ground shaking. Faults influencing local seismicity include the Elsinore, San Jacinto, Coronado Bank, San Diego Trough, San Clemente, and La Nacion faults (Figure 4.6-2, Fault Map). In addition, the downtown area of San Diego is underlain by the active Rose Canyon Fault Zone. Situated in such proximity to large faults creates a significant seismic risk to the City of San Diego. Potential damage to structures and improvements caused by a major earthquake would depend on the distance to the epicenter, the magnitude of the event, the underlying soil, and the quality of construction. The severity of an earthquake can be expressed in terms of both intensity and magnitude. The magnitude of an earthquake is measured by the amount of energy released at the source of the quake (City of San Diego 2024). The City of San Diego Seismic Safety Study (City of San Diego 2008) includes the Project site within Geologic Hazard Category 53, which is characterized as "level or sloping terrain, unfavorable geologic structure, low to moderate risk."

Seismic Hazards

Liquefaction and Lateral Spreading

Liquefaction is the phenomenon in which loose, saturated, granular soils lose strength due to excess pore water pressure buildup during an earthquake. Liquefaction is usually manifested by the formation of boils and mud-spouts at the ground surface, by seepage of water through ground cracks, or in some cases by the development of quicksand-like conditions. Where the latter occurs, structures or equipment may sink substantially into the ground (i.e., dynamic settlement) or tilt excessively, lightweight structures may float upwards, and foundations may displace vertically or laterally, causing structural failures. The phenomenon of liquefaction generally adds to the damages that would otherwise be caused by strong ground motions alone. Lateral spreading typically occurs in association with liquefaction. Lateral spreading occurs when liquefaction of a subsurface layer causes the mass to flow down slope, moving blocks of ground at the surface. During a liquefaction event, the soils tend to spread laterally toward the free face of the slope.

State of California Liquefaction Hazard Zones have not been established for San Diego County. To date, the California Geological Survey has created liquefaction hazard maps for U.S. Geological Survey quadrangle maps in the greater Los Angeles and San Francisco Bay areas (CGS 2024). Based on site-specific geotechnical investigations (Appendices F-1 and F-2), the formational soils on the site (i.e., Mission Valley Formation, Stadium Conglomerate, as discussed above) are dense and there is no regional groundwater within the upper 50 feet of the ground surface. As a result, the potential for liquefaction and associated secondary effects (i.e., lateral spreading, seismic compaction) is very low.

Strong Ground Motion

A nearby or more distant, large magnitude earthquake occurring during the expected life span of the Project could subject the site to moderate to strong ground motion. Numerous regional and local faults can produce large earthquakes with magnitudes 7.0 or greater (Appendices F-1 and F-2).

Fault Rupture

Surface fault rupture is the displacement of ground surface that occurs along a fault line during an earthquake event. Based on criteria established by the California Geological Survey, faults are classified as either Holocene-active, pre-Holocene, or age-undetermined. Faults are considered active when they have shown evidence of movement within the past 11,700 years (i.e., Holocene Epoch). Pre-Holocene faults, also known as potentially active faults, are those that have shown evidence of movement more than 11,700 years ago and generally before 1.6 million years (Quaternary age). Faults whose age of most recent movement is not known or is unconstrained by dating methods or by limitations in stratigraphic resolution are considered age-undetermined and inactive (CGS 2018).

The Alquist-Priolo Earthquake Fault Zoning Act (formerly known as the Alquist-Priolo Special Studies Zones Act) established state policy to identify active faults and determine a boundary zone on either side of a known fault trace, called the Alquist-Priolo Earthquake Fault Zone. The delineated width of an Alquist-Priolo Earthquake Fault Zone is based on the location, precision, complexity, or regional significance of the fault and can be between 200 and 500 feet in width on either side of the fault trace. If a site lies within a designated Alquist-Priolo Earthquake Fault Zone, a geologic fault rupture investigation must be performed to demonstrate that a proposed building site is not threatened by surface displacement from the fault before development permits may be issued (CGS 2018).

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest Alquist-Priolo Earthquake Fault Zone to the Project site is the Rose Canyon Fault Zone, approximately 6 miles southwest of the Project site (Figure 4.6-2) (CGS 2024). The Rose Canyon Fault Zone represents the most significant seismic hazard to the San Diego area. This fault zone is comprised of a complex set of fault segments that strike north-northwest through San Diego (Kennedy et al. 1979; Rockwell 2010; DeFrisco 2021). Although San Diego is generally considered an area of low seismicity, the historical seismic record indicates many seismic events might be associated with the Rose Canyon Fault Zone. Among other potential earthquakes in the Rose Canyon Fault Zone, a series of earthquakes in 1985 with magnitudes up to 4.2 were attributed to a portion of the fault zone that traverses San Diego Bay. Recent studies of the geologic history of the Rose Canyon Fault Zone suggest the Holocene recurrence interval for a relatively large magnitude earthquake (magnitude 6.7–7.0) that ruptured the entire onshore portion of the Rose Canyon Fault Zone is approximately 700 to 800 years, which is several hundred years shorter than previous estimates (DeFrisco 2021). The maximum probable earthquake predicted for the coastal and metropolitan areas of San Diego is a magnitude 6.9 on the Rose Canyon Fault Zone (Earthquake Engineering Research Institute, San Diego Chapter 2020). Due to the proximity of the fault to the City of San Diego, a moderately large earthquake on this fault could potentially do significant damage to the city and surroundings, both in terms of shaking and ground rupture within the fault zone (Rockwell 2010).

The closest City of San Diego Earthquake Fault Hazard Zone is the La Nacion Fault Zone. The northern terminus of the north-trending La Nacion Fault Zone is located approximately 2,800 feet southwest of the Peninsula Component and 2,300 feet southwest of the University Towers East Component (Figure 4.6-3, Seismic Safety Map) (City of San Diego 2008). As such, the Project site is not located within the fault zone. This fault is considered potentially active, as there is evidence of Pleistocene Epoch fault movement, but not Holocene Epoch movement. Although not proven definitively active, the La Nacion Fault is structurally tied to the Rose Canyon Fault Zone. One possible reason that geologists have not found definitive proof of its Holocene Epoch activity is that the movement of the fault is expected to be small on an event-by-event basis, so its expression in the active Holocene Epoch soil could easily be obscured (Rockwell 2010). Similar to the Rose Canyon Fault, the La Nacion Fault is capable of producing a moderate to large magnitude earthquake. The largest credible earthquake predicted for the La Nacion Fault is a magnitude 6.2 to 6.6 (County of San Diego 2024).

Topography and Slope Stability

The Project site is located on an elevated natural terrace to the south of Alvarado Canyon. Several smaller secondary canyons have incised into this terrace, some of which have been filled in and built over during historic development in the area. The Peninsula Component site is situated on a ridge of preserved terrace immediately south of Alvarado Canyon, between two relatively deep secondary canyons to the east and west. Steep slopes descend from the relatively flat-lying terrace into the canyons to the west, north, and east at gradients of 2:1 to 2.5:1 (horizontal to vertical units). As previously discussed, fill appears to have been placed over the natural canyon rim in several locations at the Peninsula Component during the original development in the late 1950s and early 1960s. As a result, the original topography of the perimeter of the Peninsula Component site has been somewhat altered. Review of historic aerial images and topographic maps indicates that grades at the University Towers East Component site did not changed significantly during initial development. The University Towers East Component is situated on the interior portion of the relatively flat-lying natural terrace and is not immediately adjacent to any current or historic canyons (Appendices F-1 and F-2).

Based on a review of historic aerial photographs, geologic mapping of the slope surfaces, publicly available geologic information, and prior experience within the SDSU campus, evidence of deep-seated landslides or slope instabilities, such as scarps and tension cracks, was not documented at the Peninsula Component site. Based on borings drilled near the top of slopes, a thick and/or continuous zone of topsoil, colluvial, or residual soils between the fill and the underlying Eocene deposits, which could create a potential for overall slope instability, was not observed. The formational materials underlying the sites at depth (very old paralic deposits, Stadium Conglomerate, and/or Mission Valley Formation) are not known regionally to be unstable or particularly susceptible to landslides. However, the steep slopes descending from the Peninsula Component site may be susceptible to slope creep or slow downward movement of surficial soils (Appendices F-1 and F-2).

Groundwater

Based on geotechnical investigations completed for the Project site (Appendices F-1 and F-2), substantial groundwater is likely not present beneath the site. However, changes in rainfall, irrigation, or site drainage may produce seepage or locally perched groundwater at any location within the fill or formational units underlying the site. Light to moderate seepage is common at or near the geologic contact between the fill and underlying formational soils throughout the SDSU campus. The formational materials also contain permeable zones that may collect perched groundwater from nearby irrigation (Appendices F-1 and F-2).

Soil Expansion

Clay-rich soils are commonly expansive, resulting in expansion when wet and contraction when dry. Repeated shrink-swell cycles during alternating periods of dry weather and rainy weather can result in cracked foundations and ruptured utilities. The undocumented fill soils at the Project site consist primarily of stiff to very stiff, lean to fat clay, with few gravels and cobbles. These soils have a high to very high potential for expansion. However, the underlying formation materials, consisting of massive cobble conglomerate in a fine to coarse grained silty sand matrix, with beds of very dense sandstone, siltstone, and claystone, have a low to very low potential for expansion (Appendices F-1 and F-2).

Subsidence

Subsidence is the permanent collapse of the pore space within a soil or rock and downward settling of the earth's surface relative to its surrounding area. Subsidence can result from the extraction of water, oil, or geothermal resources and the addition of water to the land surface—a condition called "hydrocompaction," or peat loss. The compaction of subsurface sediment caused by the withdrawal or addition of fluids can cause subsidence. Land subsidence can disrupt surface drainage; reduce aquifer storage; cause earth fissures; damage buildings and structures; and damage wells, roads, and utility infrastructure. According to the U.S. Geological Survey Areas of Land Subsidence in California map, there have been no recorded instances of subsidence in the Project area associated with groundwater pumping, peat loss, or oil extraction (USGS 2024).

Paleontological Resources

Paleontological resources are those remains of prehistoric organisms preserved as fossils in geologic deposits. Paleontological resources are nonrenewable resources that contribute to our knowledge of extinct and extant organisms and their past environments.

A paleontological records search request was sent to the San Diego Natural History Museum on August 23, 2024. There were 26 fossil localities reported within a 1-mile radius of the Project site (Appendix F-3). Of these localities, 14 are from the San Diego Formation, 6 are from the Mission Valley Formation, and 1 is from the Stadium Conglomerate. The remaining localities are from the Friars Formation, which is not expected to be impacted by Project construction.

Quaternary very old paralic deposits (equivalent to the Lindavista Formation) deposited by shoreline estuary environments produced significant paleontological resources (marine invertebrates and sparse marine vertebrates) elsewhere in San Diego. The Lindavista Formation has a moderate paleontological resource sensitivity locally (Appendix F-3).

In its response to the search request, the San Diego Natural History Museum indicated that the San Diego Formation likely underlies the southern portion of the Project site at subsurface depths. This formation has yielded significant paleontological resources in and around the vicinity of the Project site (Appendix F-3). Fossilized specimens within the formation include trace fossils, marine invertebrates, marine vertebrates, and rare terrestrial vertebrate specimens (Deméré and Walsh 1993). The San Diego Formation is assigned high paleontological sensitivity (Appendix F-3; City of San Diego 2007).

The Mission Valley Formation has yielded significant paleontological resources in and around the vicinity of the Project site (Appendix F-3). Fossilized specimens within the formation include trace fossils, marine invertebrates, marine vertebrates, and terrestrial vertebrate specimens (Deméré and Walsh 1993). Because of the significance of the previously discovered paleontological resources, the Mission Valley Formation is assigned high paleontological sensitivity (Appendix F-3).

The Stadium Conglomerate, composed of a cobble conglomerate in a muddy to sandy matrix lower assemblage and moderately sorted to well-sorted cobble to boulder conglomerate with occasional lenses of reddish tan cross-bedded sandstone upper assemblage, has yielded significant paleontological resources near the vicinity of the Project site including invertebrates (pulmonated snails) and an assemblage of terrestrial vertebrates. Therefore, the geological unit is assigned high paleontological sensitivity (Appendix F-3).

4.6.2 Regulatory Framework

Federal

There are no federal regulations regarding geology and soils applicable to the Proposed Project.

State

The statewide minimum public safety standard for mitigation of earthquake hazards (as established through the Alquist–Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and the California Building Code [CBC]) is that the minimum level of mitigation for a project should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy; in most cases, preventing or avoiding the ground failure itself is not required. It is not feasible to design all structures to completely avoid damage in worst-case earthquake scenarios. Accordingly, regulatory agencies have generally defined an “acceptable level” of risk as that which provides reasonable protection of the public safety, although it does not necessarily ensure continued structural integrity and functionality of a project (14 CCR 3721[a]).

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (California Public Resources Code, Division 2, Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The purpose of this act is to prohibit the location of most structures for human occupancy across the traces of active faults and thereby mitigate the hazard of fault rupture. In accordance with this act, the State Geologist established regulatory zones, called Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and has published maps showing these zones. Earthquake Fault Zones are designated by the California Geological Survey and are delineated along traces of faults where mapping demonstrates surface fault rupture has occurred within the past 11,700 years (i.e., Holocene Epoch). Construction within these zones cannot be permitted until a geologic investigation has been conducted to prove that a building planned for human occupancy will not be constructed across an active fault. These types of site evaluations address the precise location and recency of rupture along traces of the faults and are typically based on observations made in trenches excavated across fault traces.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (California Public Resources Code, Chapter 7.8, Sections 2690–2699.6) directs the California Department of Conservation to protect the public from earthquake-induced liquefaction and landslide hazards (these hazards are distinct from the fault surface rupture hazard regulated by the Alquist-Priolo

Earthquake Fault Zoning Act of 1972). This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones (i.e., zones of required investigation). Before a development permit may be granted for a site within a seismic hazard zone, a geotechnical investigation of the site must be conducted and appropriate mitigation measures incorporated into the proposed project design. Evaluation and mitigation of potential risks from seismic hazards within zones of required investigation must be conducted in accordance with the California Geological Survey, Special Publication 117A, adopted March 13, 1997, by the State Mining and Geology Board, as updated in 2008 (CGS 2008).

To date, Seismic Hazard Zone Maps have been prepared for portions of Southern California and the San Francisco Bay area; however, no seismic hazard zones have yet been delineated for the Project area (i.e., the La Mesa U.S. Geological Survey 7.5-minute quadrangle). As a result, the provisions of the Seismic Hazards Mapping Act do not apply to the Proposed Project.

California Building Code

The CBC has been codified in the California Code of Regulations as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 to be enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

The 2022 edition of the CBC is based on the 2021 International Building Code published by the International Code Conference. The 2022 CBC contains California amendments based on the American Society of Civil Engineers Minimum Design Standards 7-16, which provides requirements for general structural design and includes means for determining earthquake loads and other loads (such as wind loads) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure, or any appurtenances connected or attached to such buildings or structures, throughout California.

The CBC uses data on frequency of earthquakes, as well as locations of fault zones, in order to set forth requirements for new developments to be prepared for earthquake events. The earthquake design requirements also consider the occupancy category of the structure, site class, soil classifications, and various other seismic coefficients, which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC.

California Environmental Quality Act

CEQA and the CEQA Guidelines require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects related to geology and soils and paleontological resources. CEQA Guidelines, Appendix G, Geology and Soils, provides the criterion against which a proposed project is to be analyzed for potential impacts related to earthquake fault, landslides, soil erosion, unstable soil or geologic units, expansive soils, and paleontological resources.

Paleontological resources, which are limited, nonrenewable resources of scientific, cultural, and educational value, are recognized as part of the environment under these state guidelines. The paleontological report prepared for the Proposed Project is included as Appendix F-3, Paleontological Resources Inventory Report for the San Diego State University Evolve Student Housing Project. This study satisfies project requirements in accordance with CEQA (California Public Resources Code Section 21000 et seq.) and the CEQA guidelines (California Public Resources Code Section 15000 et seq.), and California Public Resources Code Section 5097.5.

4.6.3 Significance Criteria

The criteria used to evaluate the Proposed Project's potential impacts to geology and soils, including paleontological resources, are based on Appendix G of the CEQA Guidelines, Section VII, Geology and Soils. Based on these criteria, the Proposed Project would result in a significant impact related to geology and soils if the Project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
   a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.
   b. Strong seismic ground shaking.
   c. Seismic-related ground failure, including liquefaction.
   d. Landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Be located on expansive soil, as defined in Section 1803.5.3 of the 2022 California Building Code, creating substantial direct or indirect risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Methodology

Information contained in this section is based on Project site plans, two Project-specific geotechnical engineering reports, a Project-specific paleontological resources report, and publicly available maps, data, and reports from the U.S. Geological Survey and the California Geological Survey. The geotechnical investigation reports, which address both the Peninsula Component and the University Towers East Component, are included as Appendix F-1, Report of Preliminary Geotechnical Investigation – Evolve Student Housing, and Appendix F-2, Report of Geotechnical Investigation - Evolve Student Housing. Appendix F-1 is based on a site reconnaissance and desktop analysis (including prior soil borings), and Appendix F-2 is based on recent soil borings (to a maximum depth of 50 feet), soil laboratory analyses, and a geophysical survey of the sites. The paleontological report prepared for the Proposed Project is included as Appendix F-3, Paleontological Resources Inventory Report for the San Diego State University Evolve Student Housing Project.

4.6.4 Impacts Analysis

1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of as known fault. Refer to Division of Mines and Geology Special Publication 42.

As discussed above in Section 4.6.1, the closest Alquist-Priolo Earthquake Fault Zone to the Project site is the Rose Canyon Fault Zone, approximately 6 miles southwest of the Project site (Figure 4.6-2). In addition, the northern terminus of the north-trending La Nacion Fault Zone is located approximately 2,800 feet southwest of the Peninsula Component and 2,300 feet southwest of the University Towers East Component (Figure 4.6-3). This fault is considered potentially active, as there is evidence of Pleistocene Epoch fault movement, but not Holocene Epoch movement. Because neither the Rose Canyon Fault Zone nor the La Nacion Fault Zones underlie the Project site, surface fault rupture is not anticipated at the Project site, and the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault. No impact would occur.

b. Strong seismic ground shaking, or

c. Seismic-related ground failure, including liquefaction?

As discussed in Section 4.6.1, Southern California is considered one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. San Diego is located approximately 100 miles west of the San Andreas Fault, the predominant earthquake hazard in the state, but is also close to several other large active faults capable of producing severe ground shaking. Being situated in such proximity to large faults creates a significant seismic risk to the Project site. Damage to Project structures and improvements caused by a major earthquake would depend on the distance to the epicenter, the magnitude of the event, and the underlying soils and geology. A nearby or more distant, large magnitude earthquake occurring during the expected lifespan of the Project could subject the site to moderate to strong ground motion. Numerous regional and local faults can produce large earthquakes with magnitude 7.0 or greater.

Based on site-specific geotechnical investigations (Appendices F-1 and F-2), the formational soils on the site (i.e., Mission Valley Formation, Stadium Conglomerate, as discussed above) are dense and there is no regional groundwater within the upper 50 feet of the ground surface. As a result, the potential for liquefaction and associated secondary effects (i.e., lateral spreading, seismic compaction) is very low. Based on the CEQA environmental thresholds, impacts would only be considered significant in the event the Project directly or indirectly caused seismic impacts to occur. Because the potential for liquefaction and associated secondary effects is very low, construction and operation of the proposed residential buildings would not induce seismicity and, therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. No impacts would occur.

As required by the 2022 CBC, the proposed buildings and associated infrastructure improvements would be constructed in accordance with the recommendations of the Project-specific geotechnical reports Appendices F-1 and F-2, which include recommendations for remedial grading and foundation design. Each recommendation is required by law to be implemented. More specifically, the geotechnical reports recommend using Site Class C for the preliminary design of structures at the Peninsula Component site and University Towers East Component site due to the variability of shear wave velocity in the upper 30 meters of sediments that is inherent in the very old paralic deposits. This recommendation could change depending on actual site conditions encountered during the design phase final geotechnical investigation. Design and construction in accordance with these recommendations would provide, to the extent feasible, an acceptable level of earthquake safety for construction and operation of the Project.

In addition, the Project would be designed in accordance with the California State University (CSU) Seismic Requirements document (CSU 2024), which includes specific requirements for the construction of new buildings, to ensure that all CSU buildings provide an acceptable level of earthquake safety for students, employees, and the public. The CSU Seismic Requirements apply to all structures within the bounds of a CSU campus master plan. As part of the Proposed Project, the SDSU Campus Master Plan would be revised to accommodate the new housing and related facilities. These seismic requirements set forth procedures to follow to manage current construction programs and limit future seismic risk to acceptable levels. The CSU has established campus-specific seismic ground motion parameters that supersede CBC values and implement a conservative evaluation on CBC Structural Risk Category assignments.

The CSU Seismic Requirements (CSU 2024) state that all building projects and all engineered structures, such as the Proposed Project, are to be peer reviewed. This process starts at project inception and continues until construction completion. Peer review concurrence letters are typically issued at completion of the schematic preliminary design and construction documents phases, and during the course of construction on deferred submittals that have a seismic component. Resolution of outstanding Seismic Review Board peer review comments is required before start of construction, and resolution of Seismic Review Board construction phase submittals is required prior to occupancy.

The proposed buildings and infrastructure improvements would be constructed under the supervision of a California Geotechnical Engineer and/or California Certified Engineering Geologist. In addition, construction and operation of Proposed Project facilities would not increase the potential for earthquakes or seismically induced ground failure to occur. As a result, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction. For these reasons, **no impacts** would occur.

d. Landslides?

As discussed in Section 4.6.1, based on a review of historic aerial photographs, geologic mapping of the slope surfaces, publicly available geologic information, and prior experience within the SDSU campus, evidence of deep-seated landslides or slope instabilities, such as scarps and tension cracks, was not documented at the Peninsula Component site. The topography of the University Towers East Component is flat and therefore not subject to slope failure. The formational materials underlying the sites at depth (very old paralic deposits, Stadium Conglomerate, and/or Mission Valley Formation) are not known regionally to be unstable or particularly susceptible to landslides. However, the steep slopes descending from the Peninsula Component site may be susceptible to slope creep or slow downward movement of surficial soils.

As discussed for Threshold c), as required by the 2022 CBC, the proposed buildings and associated infrastructure improvements would be constructed in accordance with the recommendations of the Project-specific geotechnical reports (Appendices F-1 and F-2), which include recommendations for remedial grading. The geotechnical reports recommend reconstruction of perimeter fill slopes at the Peninsula Component site such that fill slope inclinations are 2:1 (horizontal to vertical) or flatter, using a keyway and benches to the maximum extent practicable. In addition, cut slopes should be constructed at ratios of 1.5:1 to 2:1, depending on the height, location, and other factors. These recommendations are required by law to be implemented. Design and construction in accordance with these recommendations would provide, to the extent feasible, an acceptable level of slope stability safety for students and employees of the residential buildings. As a result, slope stability impacts would be **less than significant.**

2. Would the project result in substantial soil erosion or the loss of topsoil?

The proposed Peninsula Component would be located on an approximately 10.57-acre site and the proposed University Towers East Component would be developed on an approximately 1.1-acre site. Construction staging and storage areas would be located within the Peninsula and University Towers East Component sites. Project construction would involve demolition of 13 existing buildings, grading, and excavations for utilities. These activities would temporarily expose on-site soils to wind and water erosion, which in turn could result in sedimentation of downstream drainages. However, because Project construction would involve ground disturbance in excess of 1 acre, demolition, grading, and construction would be completed in accordance with the requirements outlined in the National Pollutant Discharge Elimination System Construction Stormwater General Permit (2022-0057-DWQ), effective September 8, 2022, which includes the development of a stormwater pollution prevention plan. The stormwater pollution prevention plan would identify potential water quality pollutants (including erosion-induced sedimentation), identify minimum best management practices to prevent off-site sedimentation, and develop a construction site monitoring plan for the Project. Best management practices would also be consistent with construction site runoff controls detailed in the SDSU Stormwater Management Plan (SDSU 2022), including erosion controls, sediment controls, and run-on/runoff controls. Typical best management practices that could be incorporated into the stormwater pollution prevention plan to minimize soil erosion and protect water quality include the following:

- Covering stockpiled soil at the end of each workday
- Diverting off-site runoff away from the construction site
- Vegetating landscaped/vegetated swale areas as soon as feasible following grading activities
- Placing perimeter straw wattles to prevent off-site transport of sediment
- Using drop inlet protection (filters and sandbags or straw wattles), with sandbag check dams within paved areas
- Regular watering of exposed soils to control dust during demolition and construction
- Maintaining erosion and sedimentation control measures throughout the construction period
- Stabilizing construction entrances to avoid trucks from imprinting soil and debris onto the project site and adjoining roadways

After construction, the Project site would be developed with impervious surfaces and landscaping, with the Peninsula Component site including 285,000 square feet of on-site landscaping and the University Towers East Component including 14,000 square feet of landscaping, thus eliminating the potential for soil erosion. As a result, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be **less than significant.** (The proposed Project would not result in impacts to agricultural resources [e.g., prime soils] as the Project site is largely developed, with no agricultural practices or topsoil on the Project site.)

3. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As previously discussed, the potential for liquefaction and associated secondary effects (i.e., lateral spreading, seismic compaction) is very low. The Project site is not located in an area of recorded regional ground subsidence, historical or current, due to groundwater pumping, peat loss, or oil extraction. The formational materials underlying the sites at depth (very old paralic deposits, Stadium Conglomerate, and/or Mission Valley Formation) are not known regionally to be unstable or particularly susceptible to landslides. However, the steep slopes descending from the Peninsula Component site may be susceptible to slope creep or slow downward movement of surficial soils. In addition, the existing undocumented fill is not suitable for support of the proposed buildings, as it possesses a highly variable soil shear strength and a highly variable compressibility, making it susceptible to settlement or collapse. However, as required by the 2022 CBC, the proposed buildings and associated infrastructure improvements would be constructed in accordance with the recommendations of the Project-specific geotechnical reports (Appendices F-1 and F-2), which include recommendations for remedial grading of the perimeter slopes, as described above, and remedial grading of undocumented fill. Remedial grading is required such that building foundations would be entirely embedded in the stable Eocene-age Stadium Conglomerate and/or Mission Valley Formation deposits. These recommendations are required by law to be implemented. Project design would also be completed in accordance with the CSU architecture and engineering review process. Design and construction in accordance with geotechnical report recommendations and the CSU review process would provide, to the extent feasible, an acceptable level of slope stability safety for students and employees of the residential buildings. As a result, impacts associated with potentially unstable geologic units or soil would be **less than significant.**

4. Would the project be located on expansive soil, as defined in Section 1803.5.3 of the 2022 California Building Code, creating substantial direct or indirect risks to life or property?

As described in Section 4.6.1, the undocumented fill soils at the site consist primarily of stiff to very stiff, lean to fat clay, with few gravels and cobbles. These soils have a high to very high potential for expansion, which can cause distress and cracking of foundations, piping, and related infrastructure. The underlying formation materials, consisting of massive cobble conglomerate in a fine to coarse grained silty sand matrix, with beds of very dense sandstone, siltstone, and claystone, have a low to very low potential for expansion. As required by the 2022 CBC, the proposed buildings and associated infrastructure improvements would be constructed in accordance with the recommendations of Appendices F-1 and F-2, which indicates that remedial grading is required such that building foundations would be entirely embedded in the non-expansive, Eocene-age Stadium Conglomerate and/or Mission Valley Formation deposits. These recommendations are required by law to be implemented. Project design would also be completed in accordance with the CSU architecture and engineering review process. Design and construction in accordance with geotechnical report recommendations and the CSU review process would provide, to the extent feasible, an acceptable level of structural foundation safety for students and employees of the residential buildings. As a result, the Project would not create substantial direct or indirect risks to life or property. Impacts would be **less than significant.**

5. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Wastewater generated from the Project would be diverted to sanitary sewers on the SDSU campus. No septic tanks or alternative wastewater disposal systems would be utilized for the Project. **No impacts** would occur.

6. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No significant paleontological resources were identified within the Project site as a result of the institutional records search and desktop geological review. However, 26 fossil localities are located within 1 mile of the Project site (Appendix F-3). Based on the San Diego Natural History Museum records search results, map, geotechnical reports, and literature review, significant ground disturbing activities on the site of the Proposed Project site have high potential to result in the discovery/uncovering of paleontological resources as the Project site is immediately underlain by geological units with moderate to high paleontological resource sensitivity or potential. To reduce these potentially significant impacts, mitigation is recommended requiring that a qualified monitor be on site during significant ground-disturbing activities and, in the event that intact paleontological resources are discovered, ground-disturbing activities in the impacted area that have the potential to destroy a unique paleontological resource or site would be suspended until appropriate safeguards are put in place. Without mitigation, the potential damage to paleontological resources during construction would result in a potentially significant impact. With implementation of recommended **Mitigation Measure (MM) GEO-1**, impacts would be reduced to below a level of significance. Impacts of the Project would be **less than significant with mitigation** incorporated during construction.

4.6.5 Cumulative Analysis

A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in an environmental impact report, together with other projects causing related impacts. The geographic scope of cumulative geologic and soil impacts is generally the area immediately surrounding the Project site for soils and in the general region for geology and seismic concerns. Most potential impacts related to geology and soil risks would be minimized due to compliance with regulatory requirements. These regulations, as detailed in Section 4.6.2, minimize potential for risks associated with the geology and soils of the Project site. Cumulative projects would also be subject to federal, state, and local regulations related to development requirements, as well as paleontological resources. In a manner similar to the Proposed Project, adherence to these regulatory requirements would reduce incremental impacts in each of the affected project areas. Additionally, paleontological impacts are localized, generally affecting a specific site area, thus minimizing the potential for an impact to combine with another project to create a cumulative scenario. Because cumulative projects would be fully regulated, thus reducing the potential for impacts, cumulative impacts associated with geology and soils would be less than significant. Through mitigation and compliance with regulatory requirements, the construction or operation of the Proposed Project itself would not create significant impacts to geology or soils that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the Proposed Project would **not result in cumulatively considerable impacts** related to geology and soils.

4.6.6 Summary of Impacts Prior to Mitigation

Based on the geologic conditions in the site area, the Proposed Project has the potential to result in the following impacts. Because neither the Rose Canyon Fault Zone nor the La Nacion Fault Zones underlie the Project sites, surface fault rupture is not anticipated at the Project sites, and the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault. **No impact** would occur.

Because the potential for liquefaction and associated secondary effects is very low, construction and operation of the proposed residential buildings would not induce seismicity and, therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. **No impacts** would occur.

Design and construction in accordance with geotechnical report recommendations would provide, to the extent feasible, an acceptable level of slope stability safety for students and employees of the residential buildings. As a result, slope stability impacts would be **less than significant.**

With implementation of a stormwater pollution prevention plan, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be **less than significant.**

Design and construction in accordance with geotechnical report recommendations and the CSU review process would provide, to the extent feasible, an acceptable level of slope stability safety for students and employees of the residential buildings. As a result, impacts associated with potentially unstable geologic units or soil would be **less than significant.**

Design and construction in accordance with geotechnical report recommendations and the CSU review process would provide, to the extent feasible, an acceptable level of structural foundation safety for students and employees of the residential buildings. As a result, the Project would not create substantial direct or indirect risks to life or property as a result of expansive soils**. Impacts would be less than significant.**

No septic tanks or alternative wastewater disposal systems would be utilized for the Project. **No impacts** would occur.

During construction activities, the Proposed Project has the **potential to create a significant impact** to paleontological resources that may be present on the Project site.

Through mitigation and compliance with regulatory requirements, the construction or operation of the Proposed Project itself would not create significant impacts to geology or soils that could combine with other project impacts to create a significant and cumulatively considerable impact. For these reasons, the Proposed Project would **not result in cumulatively considerable impacts** related to geology and soils.

4.6.7 Mitigation Measures

The following mitigation measure would be implemented to reduce the identified potential impacts to paleontological resources. With implementation of mitigation, all potential impacts would be reduced to less than significant.

MM-GEO-1 Prior to commencement of any ground-disturbing activity on site, San Diego State University (SDSU), or its designee, shall retain a qualified paleontologist as defined by the 2010 Society of Vertebrate Paleontology guidelines, subject to the review and approval of SDSU. The qualified paleontologist shall attend the preconstruction meeting and be on site during all rough grading and other significant ground-disturbing activities in previously undisturbed Eocene Mission Valley Formation and/or Stadium Conglomerate, late Pliocene to early Pleistocene San Diego Formation, or Pleistocene very old paralic deposits. In the event that paleontological resources (e.g., fossils) are unearthed during ground disturbing activities, the paleontological monitor will temporarily halt and/or divert grading activity in the impacted area to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow ground-disturbing activities to recommence in the impacted area. Upon completion of the paleontological monitoring program, the qualified paleontologist shall prepare a final monitoring report documenting the results of the mitigation program. This report is recommended to include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. Costs of laboratory processing and curation of any fossils recovered during the monitoring program are the responsibility of the Project applicant.

4.6.8 Level of Significance After Mitigation

The potential damage to paleontological resources during construction would result in a potentially significant impact. To mitigate this potentially significant impact, the Proposed Project would implement **MM-GEO-1**. Implementation of this mitigation measure would reduce impacts to **less than significant with mitigation.**

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EXPLANATION

CONTACT

FAULT

ANTICLINE FOLD

SYNCLINE FOLD

LANDSLIDE

STRIKE AND DIP OF BEDS INCLINED

STRIKE AND DIP OF IGNEOUS JOINTS INCLINED

STRIKE AND DIP OF IGNEOUS JOINTS VERTICAL

STRIKE AND DIP OF METAMORPHIC FOLIATION INCLINED

MAP UNITS

MODERN SURFICIAL DEPOSITS

Qls — LANDSLIDE DEPOSITS, UNDIVIDED (HOLOCENE AND PLEISTOCENE)

YOUNG COLLUVIAL DEPOSITS (HOLOCENE AND SURFICIAL DEPOSITS)

OLD SURFICIAL DEPOSITS

Qoa

VERY OLD SURFICIAL UNITS

Qvop — VERY OLD PARALIC DEPOSITS, UNDIVIDED (MIDDLE TO EARLY PLEISTOCENE)

$Qvop_7$ — UNIT 7 $Qvop_8$ — UNIT 8

SEDIMENTARY AND VOLCANIC BEDROCK UNITS

Tsd, Tsdcg, Tsdss — SAN DIEGO FORMATION (EARLY PLEISTOCENE AND LATE PLIOCENE)
Tsd - UNDIVIDED
Tsdcg - TRANSITIONAL MARINE AND NON MARINE
Tsdss - MARINE SANDSTONE

Tp, Tpm — POMERADO CONGLOMERATE (MIDDLE EOCENE)
Tpm - MIRAMAR SANDSTONE MEMBER

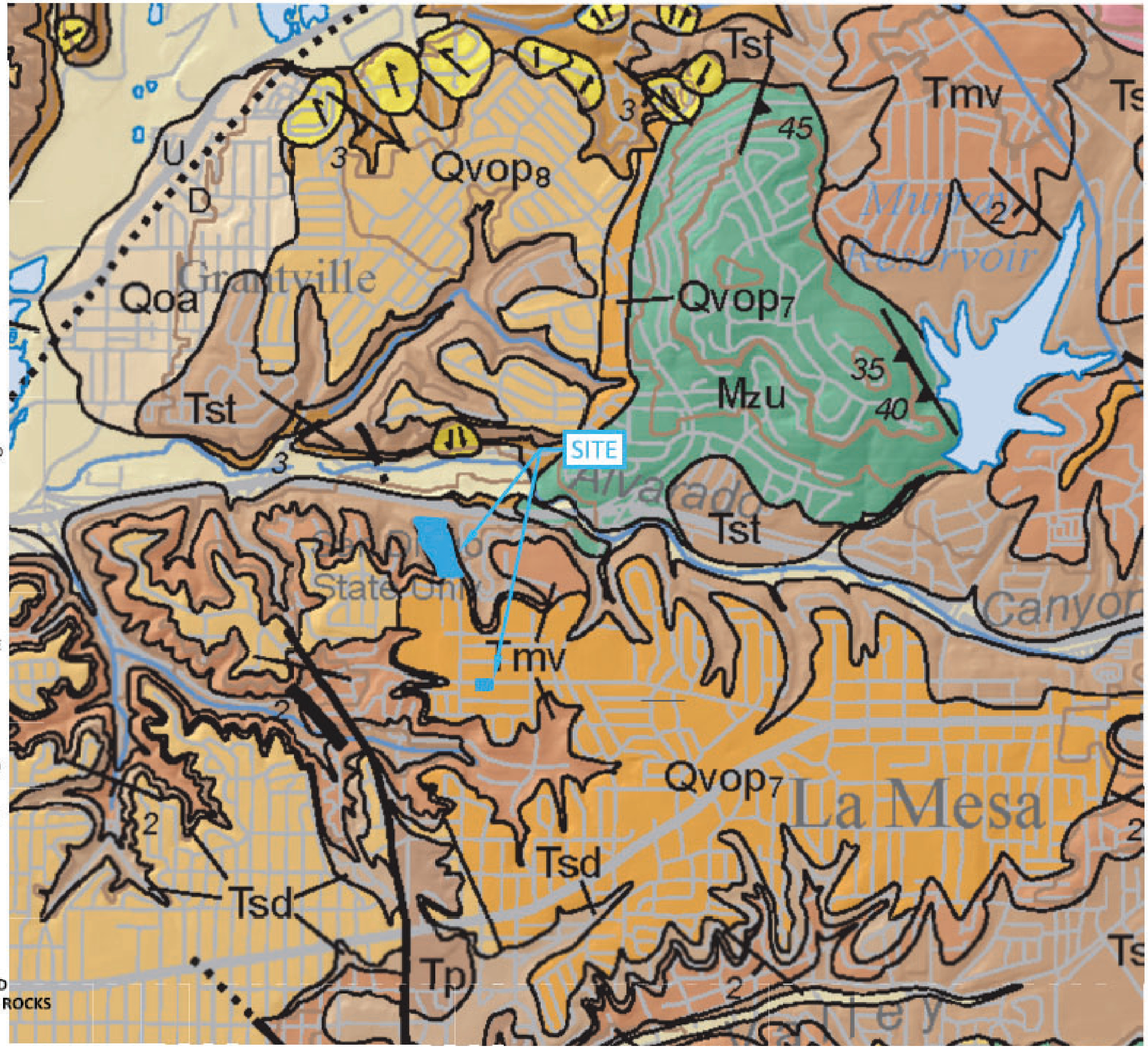
Tmv — MISSION VALLEY FORMATION (MIDDLE EOCENE)

Tst — STADIUM CONGLOMERATE (MIDDLE EOCENE)

JURASSIC AND CREATACEOUS METAMORPHOSED AND UNMETAMORPHOSED VOLCANIC AND SEDIMENTARY ROCKS

Mzu — METAMORPHOSED AND UNMETAMORPHOSED VOLCANIC AND SEDIMENTARY ROCKS, UNDIVIDED (MESOZOIC)

N 0 1500 3000 Feet



SOURCE: GROUP DELTA 2024 (GEOLOGIC MAP OF THE SAN DIEGO 30"X60" QUADRANGLE, CALIFORNIA BY KENNEDY AND TAN, 2008)

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.6-1
Geologic Map

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Quaternary Faults
- fault, approx. located
- fault, certain
- fault, concealed
- dextral fault, certain
- fault, certain (ball and bar)
- fault, approx. located (ball and bar)
- dextral fault, certain (ball and bar)
- reverse fault, certain

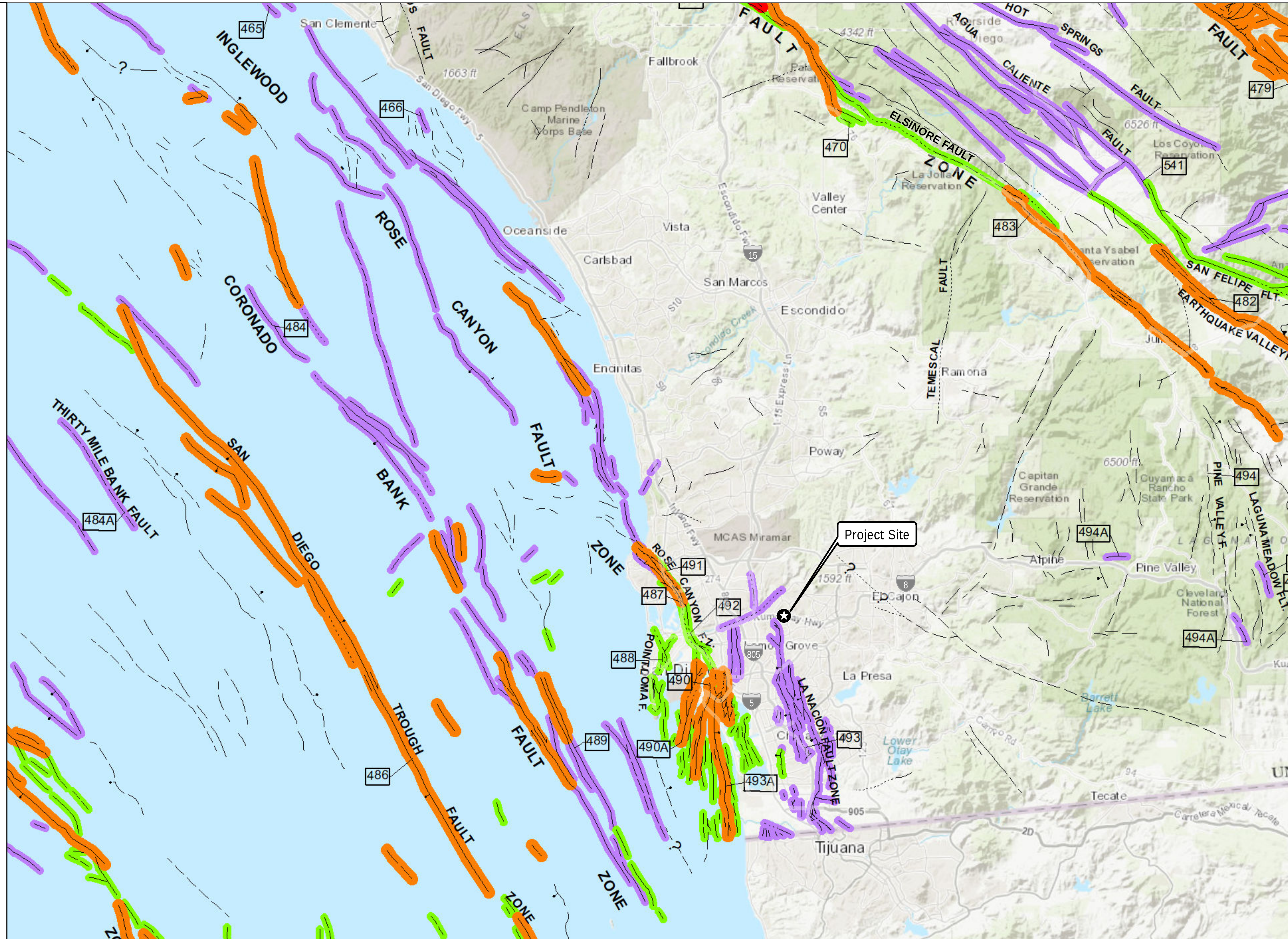
Pre-Quaternary Faults
- fault, certain
- fault, approx. located
- fault, concealed
- thrust fault, certain
- fault, certain (ball and bar)
- fault, approx. located (ball and bar)

Fault Classification

Recency of Movement
- Historic
- Holocene
- Late Quaternary
- Quaternary

0 5 10 Miles

SOURCE: Calfornia Geological Survey 2023



SDSU Evolve Student Housing

San Diego State University

FIGURE 4.6-2

Fault Map

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LEGEND

Geologic Hazard Categories

FAULT ZONES

- 11 Active, Alquist-Priolo Earthquake Fault Zone
- 12 Potentially Active, Inactive, Presumed Inactive, or Activity Unknown
- 13 Downtown special fault zone

LANDSLIDES

- 21 Confirmed, known, or highly suspected
- 22 Possible or conjectured

SLIDE-PRONE FORMATIONS

- 23 Friars: neutral or favorable geologic structure
- 24 Friars: unfavorable geologic structure
- 25 Ardath: neutral or favorable geologic structure
- 26 Ardath: unfavorable geologic structure
- 27 Otay, Sweetwater, and others

LIQUEFACTION

- 31 High Potential -- shallow groundwater major drainages, hydraulic fills
- 32 Low Potential -- fluctuating groundwater minor drainages

COASTAL BLUFFS

- 41 Generally unstable Numerous landslides, high steep bluffs, severe erosion, unfavorable geologic structure
- 42 Generally unstable Unfavorable bedding plains, high erosion
- 43 Generally unstable Unfavorable jointing, local high erosion
- 44 Moderately stable Mostly stable formations, local high erosion
- 45 Moderately stable Some minor landslides, minor erosion
- 46 Moderately stable Some unfavorable geologic structure, minor or no erosion
- 47 Generally stable Favorable geologic structure, minor or no erosion, no landslides
- 48 Generally stable Broad beach areas, developed harbor

OTHER TERRAIN

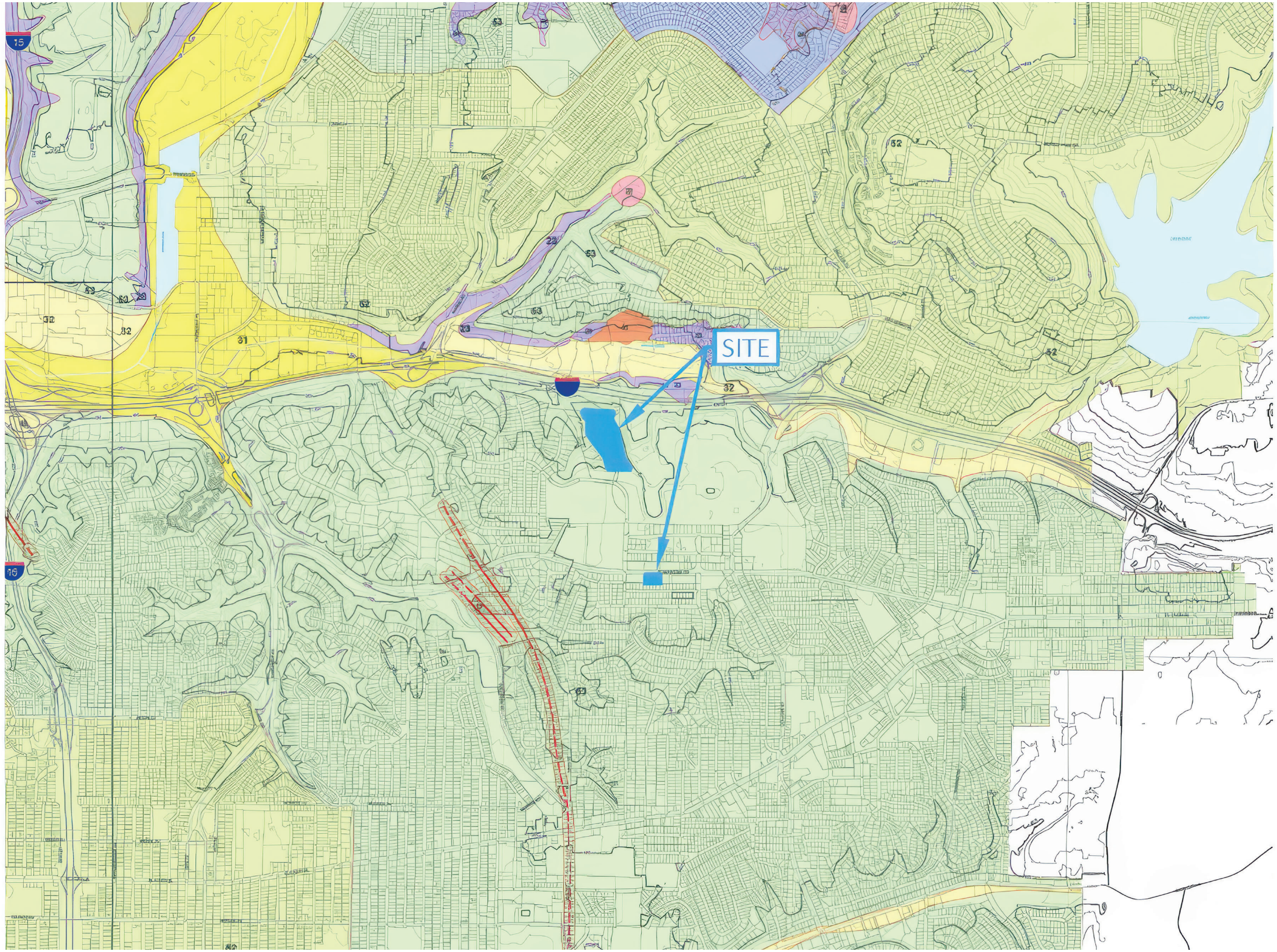
- 51 Level mesas -- underlain by terrace deposits and bedrock nominal risk
- 52 Other level areas, gently sloping to steep terrain, favorable geologic structure, Low risk
- 53 Level or sloping terrain, unfavorable geologic structure, Low to moderate risk
- 54 Steeply sloping terrain, unfavorable or fault controlled geologic structure, Moderate risk
- 55 Modified terrain (graded sites) Nominal risk

Water (Bays and Lakes)

FAULTS

- Fault
- Inferred Fault
- Concealed Fault
- Shear Zone

0 1500 3000 Feet



SOURCE: GROUP DELTA 2024 (CITY OF SAN DIEGO 2008. SEISMIC SAFETY STUDY, GEOLOGIC HAZARDS AND FAULTS, GRIDS 21, 22, 26, AND 27 DATED 04-03-2008)

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.6-3
Seismic Safety Map

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4.7 Greenhouse Gas Emissions

This section describes the existing greenhouse gas emission (GHG) conditions of the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria in California Environmental Quality Act (CEQA) Guidelines Appendix G, Greenhouse Gas Emissions. The information and analysis presented in this section is supported by Appendix C.

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to GHGs, specifically concerning construction equipment, operational emissions, emissions from vehicle use, the implementation of solar generating facilities, and natural gas consumption. These public comments/concerns are addressed in the analysis within this section. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.7.1 Existing Conditions

Climate Change Overview

Climate change refers to any significant change in measures of climate—such as temperature, precipitation, or wind patterns—lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in Earth's energy balance, including variations in the Sun's energy reaching Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere (EPA 2017).

The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature and creates a pleasant, livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

The scientific record of the Earth's climate shows that the climate system varies naturally over a wide range of time scales and that, in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. However, recent climate changes, particularly the warming observed over the past century, cannot be explained by natural causes alone. Rather, it is extremely likely that human activities have been the dominant cause of that warming since the mid-20th century and are the most significant driver of observed climate change (EPA 2017; IPCC 2013). Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming, and improved understanding of the climate system (IPCC 2013). The atmospheric concentrations of GHGs have increased to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions and secondarily from emissions associated with land use changes (IPCC 2013). Continued emissions of GHGs will cause further warming and changes in all components of the climate system.

Greenhouse Gases

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. GHGs include, but are not limited to, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), water vapor, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).[1] Some GHGs—such as CO_2, CH_4, and N_2O— are emitted to the atmosphere through both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases (e.g., HFCs, HCFCs, PFCs, and SF_6) and are associated with certain industrial products and processes. A summary of the most common GHGs and their sources is included in the following text.[2] Also included is a discussion of other climate-forcing substances.

Carbon Dioxide. CO_2 is both a naturally occurring gas and a byproduct of human activities, and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are the combustion of fuels (e.g., coal, oil, natural gas, and wood) and changes in land use.

Methane. CH_4 is also produced through both natural and human activities. CH_4 is a flammable gas and is the main component of natural gas. CH_4 is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. N_2O is also produced through natural and human activities, mainly through agricultural activities and natural biological processes, although fuel burning and other processes also create N_2O. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers; manure management; industrial processes, such as in nitric acid production, nylon production, and fossil-fuel-fired power plants; vehicle emissions; and using N_2O as a propellant (such as in rockets, race cars, and aerosol sprays).

Fluorinated Gases. Fluorinated gases (also referred to as F-gases) are synthetic powerful GHGs emitted from many industrial processes. Fluorinated gases are commonly used as substitutes for stratospheric O_3-depleting substances (e.g., chlorofluorocarbons, HCFCs, and halons). The most prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals used as alternatives to O_3-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as byproducts of industrial processes and are used in manufacturing.
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, along with HFCs, to O_3-depleting substances. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

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1 California Health and Safety Code, Section 38505, identifies seven GHGs that the California Air Resources Board (CARB) is responsible for monitoring and regulating to reduce emissions: CO_2, CH_4, N_2O, SF_6, HFCs, PFCs, and nitrogen trifluoride.

2 The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (IPCC 1995), IPCC Fourth Assessment Report (IPCC 2007), CARB's Glossary of Terms Used in GHG Inventories (CARB 2016), and the U.S. Environmental Protection Agency's Glossary of Climate Change Terms (EPA 2016).

- **Sulfur Hexafluoride:** SF_6 is a colorless gas that is soluble in alcohol and ether and slightly soluble in water. SF_6 is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Nitrogen Trifluoride:** Nitrogen trifluoride is used in the manufacture of a variety of electronics, including semiconductors and flat panel displays.
- **Chlorofluorocarbons:** Chlorofluorocarbons are synthetic chemicals that have been used as cleaning solvents, refrigerants, and aerosol propellants. Chlorofluorocarbons are chemically unreactive in the lower atmosphere (troposphere), and their production was prohibited in 1987 due to the chemical destruction of stratospheric O_3.
- **Hydrochlorofluorocarbons:** HCFCs are a large group of compounds with a structure very close to that of chlorofluorocarbons—containing fluorine, chlorine, and carbon atoms—but including one or more hydrogen atoms. Like HFCs, HCFCs are used in refrigerants and propellants. HCFCs were also used in place of chlorofluorocarbons for some applications; however, their use in general is being phased out.

Black Carbon. Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is short lived and varies spatially, which makes it difficult to quantify its global warming potential (GWP). Diesel particulate matter emissions are a major source of black carbon and are toxic air contaminants that have been regulated and controlled in California for several decades to protect public health. (See Draft Environmental Impact Report [EIR] Section 4.2, Air Quality, for additional information regarding diesel particulate matter specifically and toxic air contaminants generally.) In relation to declining diesel particulate matter from the California Air Resources Board (CARB) regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2015).

Water Vapor. The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.

Ozone. Tropospheric O_3, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O_3, created by the interaction between solar ultraviolet radiation and molecular oxygen, plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O_3, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.

Aerosols. Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2016). The Intergovernmental Panel on Climate Change developed the GWP concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of carbon dioxide equivalent (CO_2e).

The current version of the California Emissions Estimator Model (CalEEMod) (Version 2022.1.1.28) utilizes 25 as the GWP for CH_4 (so emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2) and 298 as the GWP for N_2O, based on the Intergovernmental Panel on Climate Change Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the Proposed Project.

Greenhouse Gas Inventories and Climate Change Conditions

Sources of Greenhouse Gas Emissions

Global Inventory

GHG emissions worldwide in 2022 (the most recent year for which data are available) totaled approximately 53,786 million metric tons (MMT) CO_2e, excluding land use change and forestry (Joint Research Centre 2023). Six countries—China, the United States, Russia, India, Japan, and Brazil—and the European community accounted for approximately 62% of the total global emissions, or approximately 33,124 MMT CO_2e (Joint Research Centre 2023). Table 4.7-1 presents the top GHG-emissions-producing countries and the European Union.

Table 4.7-1. Six Top GHG Producer Countries and the European Union

Emitting Countries	2022 GHG Emissions (MMT CO_2e)[a,b]
China	15,685
United States	6,017
India	3,943
European Union	3,588
Russia	2,580
Brazil	1,311
Total	**33,124**

Source: Joint Research Centre 2023.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent.
[a] Column may not add due to rounding.
[b] GHG emissions do not include land use change and forestry-related GHG emissions.

National, State, and Campus Inventories

Per the 2024 U.S. Environmental Protection Agency (EPA) Inventory of U.S. GHG Emissions and Sinks: 1990–2022, total U.S. GHG emissions were approximately 6,343 MMT CO_2e in 2022 (EPA 2024). The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 79.7% of total GHG emissions (5,053 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 93.0% of CO_2 emissions in 2022 (4,699 MMT CO_2e). Relative to the 1990 emissions level, gross U.S. GHG emissions in 2022 were 3.0% lower. GHG emissions increased from 2021 to 2022 by 0.2% (14.4 MMT CO_2e) and, overall, net emissions in 2022 were 15.4% below 2005 levels (EPA 2024).

According to California's 2000 through 2022 GHG emissions inventory (2024 edition), California emitted 371.1 MMT CO_2e in 2022, including emissions resulting from out-of-state electrical generation (CARB 2024). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high GWP substances, and recycling and waste. The California GHG emissions source categories and their relative contributions in 2022 are presented in Table 4.7-2.

Table 4.7-2. GHG Emissions Sources in California

Source Category	Annual GHG Emissions (MMT CO2e)	Percent of Totala
Transportation	139.9	37.7%
Industrial	72.7	19.6%
Electricity (in state)	42.2	11.4%
Electricity (imports)	17.5	4.7%
Agriculture	29.8	8.0%
Residential	24.7	6.6%
Commercial	14.8	4.0%
High global-warming potential substances	21.3	5.7%
Recycling and waste	8.2	2.2%
Total	**371.1**	**100%**

Source: CARB 2024.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent.
[a] Column may not add due to rounding.

From 2000 to 2022, the carbon intensity of California's economy decreased by 54.8% while the gross state product increased by 77.5%. California's gross state product increased 0.7% in 2022. Emissions per gross state product declined by 3.1% from 2021 to 2022 (CARB 2024).

SDSU prepared a GHG inventory in their 2017 Climate Action Plan (CAP). The emission inventory year was fiscal year 2014/2015. The emissions and sources from this inventory are shown in Table 4.7-3.

Table 4.7-3. SDSU GHG Emissions Sources

Source Category	Annual GHG Emissions (MT CO_2e)	Percent of Total[a]
Student Commuting	11,577.41	30.8%
Co-Gen Electricity	10,524.92	28.0%
Co-Gen Steam	7,668.16	20.4%
Faculty/Staff Commuting	2,292.93	6.1%
Directly Financed Air Travel	1,766.68	4.7%
Other On-Campus Stationary	1,465.97	3.9%
Purchased Electricity	1,390.79	3.7%
Water and Wastewater	375.89	1%
Solid Waste	225.53	0.6%

Table 4.7-3. SDSU GHG Emissions Sources

Source Category	Annual GHG Emissions (MT CO_2e)	Percent of Total[a]
Direct Transportation	225.53	0.6%
Other Directly Financed Travel	75.18	0.2%
Scope 2 T&D Losses	75.18	0.2%
Totals	**37,589**	**100%**

Source: SDSU 2017.
Notes: SDSU = San Diego State University; GHG = greenhouse gas; MT CO2e = metric tons of carbon dioxide equivalent per year; T&D = transmission and distribution.
Emissions reflect the 2017 SDSU GHG inventory.
[a] Percentage of total has been rounded, and total may not sum due to rounding.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 Intergovernmental Panel on Climate Change Synthesis Report indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply (CCCC 2006). The primary effect of global climate change has been a 0.2°C rise in average global tropospheric temperature per decade, determined from meteorological measurements worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. A warming of about 0.2°C [0.36°F]) per decade is projected, and there are identifiable signs that global warming could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western United States reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been the greatest in the Sierra Nevada (CCCC 2012). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1°F to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer. There will be fewer extremely cold nights (CCCC 2012). It is predicted that the Sierra snowpack, which accounts for approximately half of the surface water storage in California and much of the state's water supply, will decline by 30% to as much as 90% over the next 100 years (CAT 2006).

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late 21st century in central and, most notably, Southern California. By late-century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10% below the historical average (CCCC 2012).

A summary of current and future climate change impacts to resource areas in California, as discussed in Safeguarding California: Reducing Climate Risk (CNRA 2014), is provided below.

Agriculture. The impacts of climate change on the agricultural sector are far more severe than the typical variability in weather and precipitation patterns that occur year to year. The agriculture sector and farmers face some specific challenges that include more drastic and unpredictable precipitation and weather patterns; extreme weather events that range from severe flooding and extreme drought to destructive storm events; significant shifts in water availably and water quality; changes in pollinator lifecycles; temperature fluctuations, including extreme heat stress and decreased chill hours; increased risks from invasive species and weeds, agricultural pests, and plant diseases; and disruptions to the transportation and energy infrastructure supporting agricultural production. These challenges and associated short-term and long-term impacts can have both positive and negative effects on agricultural production. Nonetheless, it is predicted that current crop and livestock production will suffer long-term negative effects resulting in a substantial decrease in the agricultural sector if climate change is not managed or mitigated.

Biodiversity and Habitat. The state's extensive biodiversity stems from its varied climate and assorted landscapes, which have resulted in numerous habitats where species have evolved and adapted over time. Specific climate change challenges to biodiversity and habitat include species migration in response to climatic changes, range shift and novel combinations of species; pathogens, parasites, and disease; invasive species; extinction risks; changes in the timing of seasonal life-cycle events; food web disruptions; and threshold effects (i.e., a change in the ecosystem that results in a "tipping point" beyond which irreversible damage or loss has occurred). Habitat restoration, conservation, and resource management across California and through collaborative efforts among public, private, and nonprofit agencies has assisted in the effort to fight climate change impacts on biodiversity and habitat. One of the key measures in these efforts is ensuring species' ability to relocate as temperature and water availability fluctuate as a result of climate change.

Energy. The energy sector provides California residents with a supply of reliable and affordable energy through a complex integrated system. Specific climate change challenges for the energy sector include temperature, fluctuating precipitation patterns, increasing extreme weather events, and sea-level rise. Increasing temperatures and reduced snowpack negatively impact the availability of a steady flow of snowmelt to hydroelectric reservoirs. Higher temperatures also reduce the capacity of thermal power plants since power plant cooling is less efficient at higher ambient temperatures. Increased temperatures will also increase electricity demand associated with air conditioning. Natural gas infrastructure in coastal California is threatened by sea-level rise and extreme storm events.

Forestry. Forests occupy approximately 33% of California's 100 million acres and provide key benefits, such as wildlife habitat, absorption of CO_2, renewable energy, and building materials. The most significant climate change-related risks to forests are accelerated risk of wildfire and more frequent and severe droughts. Droughts have resulted in more large-scale forestry mortalities and, combined with increasing temperatures, have led to an overall increase in wildfire risks. Increased wildfire intensity subsequently increases public safety risks, property damage, fire suppression and emergency response costs, watershed and water quality impacts, and vegetation conversions. These factors contribute to decreased forest growth, geographic shifts in tree distribution, loss of fish and wildlife habitat, and decreased carbon absorption. Climate change may result in increased establishment of non-native species, particularly in rangelands where invasive species are already a problem. Invasive species may be able to exploit temperature or precipitation changes or quickly occupy areas denuded by fire, insect mortality, or other climate change effects on vegetation.

Ocean and Coastal Ecosystems and Resources. Sea-level rise, changing ocean conditions, and other climate change stressors are likely to exacerbate long-standing challenges related to ocean and coastal ecosystems in addition to threatening people and infrastructure located along the California coastline and in coastal communities. Sea-level rise, in addition to more frequent and severe coastal storms and erosion, is threatening vital infrastructure, such as roads, bridges, power plants, ports and airports, gasoline pipes, and emergency facilities, as well as negatively impacting the coastal recreational assets, such as beaches and tidal wetlands. Water quality and ocean acidification threaten the abundance of seafood and other plant and wildlife habitats throughout California and globally.

Public Health. Climate change can impact public health through various environmental changes and is the largest threat to human health in the 21st century. Changes in precipitation patterns affect public health primarily through potential for altered water supplies and extreme events, such as heat, floods, droughts, and wildfires. Increased frequency, intensity, and duration of extreme heat and heat waves is likely to increase the risk of mortality due to heat-related illness, as well as exacerbate existing chronic health conditions. Other extreme weather events are likely to negatively impact air quality and increase or intensify respiratory illness, such as asthma and allergies. Additional health impacts that may be caused by climate change include cardiovascular disease, vector-borne diseases, mental health impacts, and malnutrition injuries. Increased frequency of these ailments is likely to subsequently increase the direct risk of injury and/or mortality.

Transportation. Residents of California rely on airports, seaports, public transportation, and an extensive roadway network to gain access to destinations, goods, and services. While the transportation industry is a source of GHG emissions, it is also vulnerable to climate change risks. Particularly, sea-level rise and erosion threaten many coastal California roadways, airports, seaports, transit systems, bridge supports, and energy and fueling infrastructure. Increasing temperatures and extended periods of extreme heat threaten the integrity of the roadways and rail lines. High temperatures cause the road surfaces to expand, which leads to increased pressure and pavement buckling. High temperatures can also cause rail breakages, which could lead to train derailment. Other forms of extreme weather events, such as extreme storm events, can negatively impact infrastructure, which can impair movement of people and goods or potentially block evacuation routes and emergency access roads. Increased wildfires, flooding, erosion risks, landslides, mudslides, and rockslides can all profoundly impact the transportation system and pose a serious risk to public safety.

Water. Water resources in California support residences, plants, wildlife, farmland, landscapes, and ecosystems and bring trillions of dollars in economic activity. Climate change could seriously impact the timing, form, and amount of precipitation; runoff patterns; and frequency and severity of precipitation events. Higher temperatures reduce the amount of snowpack and lead to earlier snowmelt, which can impact water supply availability, natural ecosystems, and winter recreation. Water supply availability during the intense dry summer months is heavily dependent on the snowpack accumulated during the winter. Increased risk of flooding has a variety of public health concerns, including water quality, public safety, property damage, displacement, and post-disaster mental health problems. Prolonged and intensified droughts can also negatively affect groundwater reserves and result in increased overdraft and subsidence. Droughts can negatively impact agriculture and farmland throughout the state. The higher risk of wildfires can lead to increased erosion, which can negatively impact watersheds and result in poor water quality. Water temperatures are also prone to increase, which can negatively impact wildlife that rely on a specific range of temperatures for suitable habitat.

In March 2019, the California Natural Resources Agency released the California's Fourth Climate Change Assessment, San Diego Region Report, which was a survey of programmatic responses for climate change and contained recommendations for further actions within San Diego County (CNRA 2019).

4.7.2 Regulatory Framework

Federal

Massachusetts v. EPA

In *Massachusetts v. EPA* (April 2007), the U.S. Supreme Court directed the EPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In December 2009, the administrator signed a final rule with the following two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The administrator found that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is the "endangerment finding."
- The administrator further found the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national GHG emissions (EPA 2007):

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Vehicle Standards

NHTSA's Corporate Average Fuel Economy standards regulate how far vehicles must travel on a gallon of fuel. NHTSA sets Corporate Average Fuel Economy standards for passenger cars and for light trucks (collectively, light-duty vehicles), and separately sets fuel consumption standards for medium- and heavy-duty trucks and engines. NHTSA also regulates the fuel-economy window stickers on new vehicles. The Corporate Average Fuel Economy standards are developed for a range of model years at a time. For example, the most recent proposal for light-duty vehicles is for model years 2027–2031 and for heavy-duty pickup trucks and vans is for model years 2030–2035.

The Clean Air Act allows California to seek a waiver of the preemption that prohibits states from enacting emission standards for new motor vehicles. EPA must grant a waiver, however, before California's rules may be enforced. When California files a waiver request, EPA publishes a notice for public hearing and written comment in the Federal Register. The written comment period remains open for a period of time after the public hearing. Once the comment period expires, EPA reviews the comments and the administrator determines whether the requirements for obtaining a waiver have been met. California has petitioned for a waiver to implement more stringent vehicle emission standards from EPA since 1998 and continues to do so.

In 2019, during the first Trump administration, EPA and NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (SAFE-1) (Title 84 Federal Register Part 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued by EPA and NHTSA, which set CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026.

In March 2022, during the Biden administration, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards and ZEV sales mandate. EPA also concluded that the actions taken under the previous administration as a part of SAFE-1 were decided in error and, therefore, rescinded SAFE-1.

State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. The following text describes executive orders, legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

California Climate Change Targets

Executive Order S-3-05

Executive Order (EO) S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

Assembly Bill 32 and CARB's Climate Change Scoping Plan

In furtherance of the goals established in EO S-3-05, the legislature enacted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020.

Under AB 32, CARB is responsible for and is recognized as having the expertise in carrying out and developing the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 relatedly authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for the year 2020 consistent with the determined 1990 baseline (427 MMT CO_2e). CARB's adoption of this limit is in accordance with California Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan) in accordance with California Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020 (CARB 2008). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
2. Achieving a statewide renewable energy mix of 33%.
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
4. Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets.
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard.
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 29% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations [referred to as "business-as-usual"]). For purposes of calculating this percent reduction, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the Scoping Plan's Functional Equivalent Document (Final Supplement), CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG-reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 22% (down from 29%) from the business-as-usual conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 29%) from the business-as-usual conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California was on track to meet the 2020 emissions reduction mandate established by AB 32, and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050" (CARB 2014). Those six areas are energy, transportation (e.g., vehicles/ equipment, sustainable communities, housing, fuels, infrastructure), agriculture, water, waste management, and natural and working lands. The First Update identifies key recommended actions for each sector to facilitate achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050" (CARB 2014). Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies (CARB 2014).

As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the Intergovernmental Panel on Climate Change. Using the recalculated 1990 emissions level (431 MMT CO_2e) and the revised 2020 emissions level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 29% or 16%) from the business-as-usual conditions (CARB 2014).

In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update (Second Update) (CARB 2017). This update identifies CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below), including continuing the cap-and-trade program through 2030. The Second Update incorporated approaches to cutting short-lived climate pollutants (SLCPs) under the SLCP Reduction Strategy (adopted by CARB in March 2017) and acknowledged the need for reducing emissions in agriculture and highlighted the work underway to ensure that California's natural and working lands increasingly sequester carbon. When discussing project-level GHG emissions-reduction actions and thresholds, the Second Update stated, "Achieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA" (CARB 2017).

The most recent update adopted by CARB in November 2022, the 2022 Scoping Plan, outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022). The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines) (CARB 2022). Appendix D of the 2022 Scoping Plan outlines local actions that residential and mixed-use projects can implement to address their largest sources of emissions including transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization. CARB identifies these three sources as "Priority Areas" given that they represent those with the highest GHG reduction potential and GHG reduction opportunities for which local governments and agencies have the most authority (CARB 2022). The 2045 carbon neutrality goal required CARB to expand proposed actions in the 2022 Scoping Plan to include those that capture and store carbon in addition to those that reduce only human-caused sources of GHG emissions.

Many of the measures and programs included in the 2022 Scoping Plan would result in the reduction of Project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). The 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture).

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050, as set forth in EO S-3-05.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, made changes to CARB's membership, increased legislative oversight of CARB's climate change–based activities, and expanded dissemination of GHG and other air-quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the senate and three members of the assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the legislature to CARB as nonvoting members; required CARB to make available and update (at least annually through its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and required CARB to identify specific information for GHG emissions-reduction measures when updating the Scoping Plan.

Senate Bill 605 and Senate Bill 1383

SB 605 (2014) required CARB to complete a comprehensive strategy to reduce emissions of SLCPs in the state; SB 1383 (2016) required CARB to approve and implement the SLCP Reduction Strategy. SB 1383 also established specific targets for the reduction of SLCPs (40% below 2013 levels by 2030 for CH_4 and HFCs and 50% below 2013 levels by 2030 for anthropogenic black carbon) and provided direction for reductions from dairy and livestock operations and landfills. Accordingly, and as mentioned above, CARB adopted its SLCP Reduction Strategy in March 2017, which established a framework for the statewide reduction of emissions of black carbon, CH_4, and fluorinated gases.

Executive Order B-55-18

EO B-55-18 (September 2018) established a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." This executive order directed CARB to "work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal."

Assembly Bill 1279

AB 1279 (2022) establishes that it is the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that, by 2045, statewide anthropogenic GHG emissions are reduced to at least 85% below 1990 levels. The 2022 Scoping Plan summarized above addresses AB 1279.

Building Energy

Title 24, Part 6 of the California Code of Regulations

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402[d]) and cost effectiveness (California Public Resources Code, Sections 25402[b][2] and [b][3]). These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment. The 2022 standards went into effect on January 1, 2023. The 2025 standards are under development as of the writing of this section; if adopted, those standards are anticipated to go into effect on January 1, 2026.

Title 24, Part 11 of the California Code of Regulations

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR 11) is commonly referred to as CALGreen and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, schools, and hospitals. The CALGreen 2022 standards went into effect on January 1, 2023. The 2025 CALGreen standards are under development as of the writing of this section; if adopted, those standards are anticipated to go into effect on January 1, 2026.

Title 20 of the California Code of Regulations

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations, and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Renewable Energy and Energy Procurement

SB 1078, SBX1-2, SB 350, and SB 100

SB 1078 (September 2002) established the state's Renewables Portfolio Standard (RPS) program and required an annual increase in renewable generation by utilities equivalent to at least 1% of sales, with an aggregate goal of 20% by 2017. SB X1-2 expanded the Renewables Portfolio Standard by establishing a renewable energy target of 20% of the total electricity sold to retail customers in California per year by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. SB 350 (October 2015) further expanded the Renewables Portfolio Standard by establishing a goal of 50% of the total electricity sold to retail customers in California per year be sourced from eligible renewable sources by December 31, 2030. SB 100 (2018) increased, once again, the standards set forth in SB 350 establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 also states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California.

Mobile Sources

Low Carbon Fuel Standard

CARB's Low Carbon Fuel Standard program is designed to decrease the carbon intensity of California's transportation fuel pool and provide a range of low-carbon and renewable fuel alternatives. CARB's implementing regulations originally were adopted in 2009, with the most recent program amendments approved in 2018. As most recently amended, the Low Carbon Fuel Standard program sets carbon intensity benchmarks for transportation fuels through calendar year 2030.

Senate Bill 375

SB 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations were then responsible for preparing sustainable communities strategies (SCSs) within their regional transportation plans (RTPs). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, would achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an alternative planning strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code Section 65080(b)(2)(K), an SCS does not (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

The San Diego Association of Governments (SANDAG) adopted its most recent RTP/SCS, the 2021 Regional Plan, in December 2021. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources (SANDAG 2021). The plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies.

The 2021 Regional Plan's SCS describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by CARB. The state-mandated target is a 19% reduction—compared with 2005—in per capita GHG emissions from cars and light-duty trucks by 2035. The 2021 Regional Plan achieves a 20% reduction by then.

The 2021 Regional Plan also puts forth a forecasted development pattern driven by regional goals for sustainability, mobility, housing affordability, and economic prosperity.

Advanced Clean Cars Program and Zero-Emissions Vehicle Program

CARB's Advanced Clean Cars (ACC) I program (as adopted in January 2012) is an emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package of regulations: the Low-Emission Vehicle regulation for criteria air pollutant and GHG emissions and a technology forcing regulation for ZEV that contributes to both types of emission reductions (CARB 2021a). The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide fuels for clean cars. It is estimated that, in 2025, cars will emit 75% less smog-forming pollution than the average new car sold in 2015. The ZEV program will act as the focused technology of the ACC I program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles (EVs) in the 2018 to 2025 model years.

CARB's ACC II program established the next set of low-emission vehicle and ZEV requirements for model years after 2025 to contribute to meeting federal ambient air quality O_3 standards and California's carbon neutrality standards (CARB 2021a). The main objectives of ACC II are as follows:

1. Maximize criteria and GHG emission reductions through increased stringency and real-world reductions.
2. Accelerate the transition to ZEVs through both increased stringency of requirements and associated actions to support wide-scale adoption and use.

An ACC II rulemaking package, which considered technological feasibility, environmental impacts, equity, economic impacts, and consumer impacts, was adopted by CARB on November 30, 2022.

Advanced Clean Trucks Regulation

The Advanced Clean Trucks regulation was approved by CARB in 2020. The purpose of the Advanced Clean Trucks regulation is to accelerate the market for ZEVs in the medium- and heavy-duty truck sector and to reduce air pollutant emissions generated from on-road mobile sources (CARB 2021b). The regulation has two components including (1) a manufacturer sales requirement and (2) a reporting requirement:

- **Zero-emission truck sales:** Manufacturers who certify Class 2b–8 chassis or complete vehicles with combustion engines will be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b–3 truck sales, 75% of Class 4–8 straight truck sales, and 40% of truck tractor sales.
- **Company and fleet reporting:** Large employers including retailers, manufacturers, brokers, and others will be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, will be required to report about their existing fleet operations. This information will help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

Senate Bill 350

In 2015, SB 350—the Clean Energy and Pollution Reduction Act—was enacted into law. As one of its elements, SB 350 established a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for achievement of the state's 2030 and 2050 reduction targets (see California Public Utilities Code, Section 740.12).

Executive Order B-48-18

EO B-48-18 (2018) launched an 8-year initiative to accelerate the sale of EVs through a mix of rebate programs and infrastructure improvements. The order also set a new EV target of 5 million EVs in California by 2030. EO B-48-18 included funding for multiple state agencies, including the CEC, to increase EV charging infrastructure and for CARB to provide rebates for the purchase of new EVs and purchase incentives for low-income customers.

Solid Waste

Assembly Bill 939 and Assembly Bill 341

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code, Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by the year 2000.

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of

Resources Recycling and Recovery to develop strategies to achieve the state's policy goal. The California Department of Resources Recycling and Recovery has conducted multiple workshops and published documents that identify priority strategies that it believes would assist the state in reaching the 75% goal by 2020 (CalRecycle 2015).

Water

Executive Order B-29-15

In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have since become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Other State Regulations and Goals

Senate Bill 97

SB 97 (August 2007) directed the Governor's Office of Planning and Research (now known as the Governor's Office of Land Use and Climate Innovation) and the California Natural Resources Agency to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended that the lead agency determine the significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The California Natural Resources Agency subsequently adopted the CEQA Guidelines amendments pertaining to GHG emissions called for by SB 97 in December 2009. Those amendments to the CEQA Guidelines became effective in March 2010 (CNRA 2009).

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or performance based standards" (14 CCR 15064.4[a], [c]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]).

Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea-level rise. Therefore, the EO directs state agencies to take specified actions to assess and plan for such impacts. The final 2009 California Climate Adaptation Strategy report was issued in December 2009 (CNRA 2009), and an update, Safeguarding California: Reducing Climate Risk, followed in July 2014 (CNRA 2014). To assess the state's vulnerability, the report summarizes key climate change impacts to the state for the following areas: agriculture, biodiversity and habitat, emergency management, energy, forestry, ocean and coastal ecosystems and resources, public health, transportation, and water. Issuance of the Safeguarding California: Implementation Action Plans followed in March 2016 (CNRA 2016). In January 2018, the California Natural Resources Agency released the Safeguarding California Plan: 2018 Update, which communicates current and needed actions that state government should take to build climate change resiliency (CNRA 2018).

Local

San Diego Air Pollution Control District

The San Diego Air Pollution Control District does not have established GHG rules, regulations, or policies.

The California State University Sustainability Policy

The California State University (CSU) Board of Trustees adopted its first systemwide Sustainability Policy in May 2014, and most recently revised the Sustainability Policy in May 2022. The Sustainability Policy was developed to integrate sustainability into all facets of the CSU, including academics, facilities operations, built environment, and student life. The Sustainability Policy focuses mainly on energy and GHG emissions and largely aligns with the State of California's energy and GHG emissions reduction goals (CSU 2022). It aims to reduce the environmental impact of construction and operation of buildings and to integrate sustainability across the curriculum through 11 broad policies, including university sustainability; climate action plan; energy resilience and procurement; energy conservation, carbon reduction, and utility management; water conservation; sustainable procurement; waste management; sustainable food service; sustainable building and lands practices; physical plant management; and transportation.

San Diego State University

On March 5, 2014, former SDSU President Elliot Hirshman signed Second Nature's American College and University Presidents' Climate Commitment to ensure SDSU's commitment to sustainability. Thereafter, the SDSU Climate Action Planning Council was formed to oversee the development of SDSU's climate and sustainability initiatives. The council includes representation from administrators, staff, faculty and students.

The SDSU Climate Action Planning Council encompasses a wide variety of efforts to steward the university's resources and reduce their environmental impact. Sustainability includes areas such as climate action, energy, water, waste reduction, transportation, food, green buildings, social responsibility, and academics.

The SDSU CAP was published in 2017 and provides a set of interim goals and strategies in order to achieve carbon neutrality and to improve sustainability efforts on campus (SDSU 2017). These strategies address operational efforts, engagement, and academics. SDSU has a goal of achieving campus carbon neutrality by 2050 and operational neutrality by 2040. Operational neutrality consists of emissions the university has direct control over, namely electricity and steam generation, energy purchases, and fuel used for university-owned vehicles. The SDSU CAP is not a qualified GHG reduction plan in accordance with CEQA Guidelines Section 15183.5 and, therefore, cannot be tiered from for purposes of determining the significance of the Proposed Project's GHG emissions. SDSU is currently updating the 2017 CAP, with an anticipated release date in 2025.

The campus has undertaken plant optimization of the cogeneration facility, installation of several solar photovoltaic systems, and implemented energy retro-fits around campus. The campus has a trolley station and bus operation to provide a convenient and responsible way to commute around campus. There is also an extensive bike path network and Zipcar access for people to borrow cars as needed. The campus is committed to building green and has six buildings with the Leadership in Energy and Environmental Design (LEED) accreditation. SDSU also has committed academically to prepare students as sustainable stewards with both major and minor programs in various disciplines associated with environmental policy and science.

4.7.3 Significance Criteria

California has developed guidelines to address the significance of GHG emissions impacts that are contained in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.). Appendix G provides that a project would have a significant environmental impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The Appendix G thresholds for GHGs do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009). Additional guidance regarding the assessment of GHGs is discussed below.

CEQA Guidelines

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance based standards" (14 CCR 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (14 CCR 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (14 CCR 15064.4[b]):

1. The extent a project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In addition, the CEQA Guidelines specify that "when adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

The extent to which a project increases or decreases GHG emissions in the existing environmental setting should be estimated in accordance with Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions, of the CEQA Guidelines. The CEQA Guidelines indicate that when calculating GHG emissions resulting from a project, lead agencies shall make a good-faith effort based on scientific and factual data (14 CCR 15064.4[a]), and lead agencies have discretion to select the model or methodology deemed most appropriate for enabling decision makers to intelligently assess the project's incremental contribution to climate change (14 CCR 15064.4[c]).

The CEQA Guidelines do not indicate an amount of GHG emissions that constitutes a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (14 CCR 15064.4[a] and 15064.7[c]). Several agencies throughout the state have drafted and/or adopted numerical threshold approaches and guidelines for analyzing the significance of project-related GHG emissions, including the South Coast Air Quality Management District's 3,000 MT CO_2e annual threshold for residential/commercial or mixed use projects (SCAQMD 2010), among others. However, no numerical thresholds have been formally adopted by an air district or lead agency for use in the San Diego region.

In the absence of an adopted numerical threshold for the region, the significance of project-related GHG emissions can be determined by evaluating a project's compliance with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions. As discussed in Section 4.7.2, the state's 2030 target (reduce GHG emissions to 40% below 1990 levels by 2030) has been codified in law through SB 32, and the 2045 target (net zero GHG emissions and reduce anthropogenic GHG emissions to 85% below 1990 levels by 2045) has been codified into law through AB 1279. Therefore, 2030 and 2045 mark the next statutory statewide milestone targets applicable to the Proposed Project.

In this case, the significance of impacts related to Proposed Project-generated GHG emissions can be determined through an assessment of compliance with statewide regulations and requirements adopted to implement GHG reduction plans that align with the SB 32 2030 and AB 1279 2045 targets, such as CARB's 2022 Scoping Plan. The specific threshold approach used to assess the significance of the Project's GHG emission impacts is informed by the guidance summarized here and is discussed in further detail in the following section.

Governor's Office of Planning and Research Guidance

The Governor's Office of Planning and Research technical advisory titled "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review" states the following (OPR 2008):

> Public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact.

Furthermore, the advisory document indicates that, "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice" (OPR 2008).

Approach to Determining Significance

The approach for evaluating the Proposed Project's impacts related to GHG emissions relies on an assessment of the Project's compliance with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. At the state level, this includes consideration of CARB's Scoping Plan and the CSU Sustainability Policy; at the local level, this includes consideration of the SANDAG RTP/SCS and the SDSU CAP.[3] The compliance evaluation is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

In accordance with Section 15064.4 of the CEQA Guidelines, GHG emissions resulting from construction and operation of the Project also were quantitatively estimated. Project-related GHG emissions were assessed based on the total increase above the existing environmental setting, with some conservative limitations described further below that serve to overestimate the Project's incremental increase above existing, on-site emissions. The GHG emissions associated with implementation of the Project were estimated using industry standard and accepted software tools, techniques, and emissions factors, as described below for construction and operation. Estimation of emissions is for informational purposes only, for comparison with existing environmental conditions.

Approach and Methodology

Construction

The construction methodology outlined in Section 4.2.3, Significance Criteria, of Draft EIR Section 4.2, including the use of CalEEMod Version 2022.1.1.28, also applies to this section. Additionally, relevant information pertaining to construction-related electricity consumption and carbon sequestration loss is provided below.

Energy Use

Temporary electric power for lighting and electronic equipment, such as computers, may be needed inside temporary construction trailers. Based on the information and analysis presented in Section 4.5.4, Impacts Analysis, of Draft EIR Section 4.5, Energy, the Proposed Project is estimated to use 406,655 kilowatt-hours of electricity during construction.

Carbon Sequestration (Loss)

This GHG analysis estimates the loss of sequestered carbon that would result from removal of trees on site during construction. The calculation methodology and default values provided in i-Tree Planting were used to estimate the one-time carbon-stock change from planting new trees based on the trees provided in the landscaping plan for the Project (i-Tree 2022). The i-Tree Planting tool quantifies increased carbon sequestration from urban tree planting using species-based biomass equations that account for user defined site-specific variables and tree growth rates. The tool also quantifies GHG reductions from energy savings (e.g., kilowatt-hours), if applicable. Trees sequester CO_2 while they are actively growing, and the amount of CO_2 sequestered depends on the type of tree. Thereafter,

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3 As discussed in Section 4.7.2, SDSU has not adopted a qualified CAP to be used in CEQA analyses per CEQA Guidelines Section 15183.5.

the accumulation of carbon in biomass slows with age and is assumed to be offset by losses from clipping, pruning, and occasional death. Active growing periods are subject to, among other things, species, climate regime, and planting density; however, for modeling purposes, an active growing period of 30 years was assumed consistent with the Project lifetime.

While a detailed tree inventory was not available for the site, an aerial survey was conducted to determine the potential species of trees to be removed. Of those species found on site, the most CO_2 dense species was selected to be overly conservative. The Project is expected to remove 190 eucalyptus[4] trees on the Peninsula Component site and 29 palm trees on the University Towers East Component site.

Operation

CalEEMod Version 2022.1.1.28 was used to estimate potential operational GHG emissions from area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, refrigerants, solid waste, stationary sources (emergency generators), and water supply and wastewater treatment.

The methodology described herein and used to estimate the Proposed Project's incremental change in GHG emissions does not account for the existing GHG emissions generated by the 13 buildings currently located on the Peninsula Component site that would be demolished to facilitate implementation of the Project. This is a conservative approach that serves to overestimate the Project's GHG emissions, as it utilizes a baseline of zero in lieu of reporting an incremental change in emissions generation from the non-zero baseline that is part of the existing condition.

Conversely, the methodology used to estimate the Proposed Project's mobile source-related GHG emissions does account for the beneficial reduction in GHG emissions attributable to the Project's provision of additional on-campus student housing opportunities, as described further below.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text. The Project does not include fireplaces or wood-burning stoves.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days.

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage. The Proposed Project's residential units would be all-electric. The Amenity Building would include limited

4 It is not expected that all 190 trees removed are eucalyptus. Without a full tree inventory, for carbon removal estimation purposes, the most carbon-intensive tree to be removed was eucalyptus. Therefore, this over-estimates the carbon released from tree removal.

natural gas service for purposes of providing food service to the Peninsula Component residences. The emissions from electricity use and natural gas are quantified for GHGs in CalEEMod.

Mobile Sources

Following the completion of construction activities, the Proposed Project would generate GHG emissions from mobile sources (vehicular traffic) as a result of the residents of the Proposed Project. The baseline and new trips for the Project were estimated as discussed in Section 4.2.3 of Draft EIR Section 4.2. As discussed therein, the Proposed Project would increase the number of on-campus student beds available to serve SDSU students and thereby create opportunities for students to reside on-campus in lieu of more distant off-campus locations. The Proposed Project, as a result of this design attribute, would improve the efficiency of VMT per student travel patterns, correspondingly reducing and offsetting the existing GHG emissions attributable to student travel to-and-from campus.

Refrigerants

CalEEMod was utilized to estimate fugitive GHG emissions from refrigerants used for air conditioning and refrigeration equipment. Different types of refrigeration equipment are utilized for different types of land uses and CalEEMod generates default refrigerant values based on land use subtype and industry data from EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate but does not quantify emissions from the disposal of refrigeration and air conditioning equipment at the end of its lifetime.

Most of the refrigerants used today are HFCs or blends thereof, which can have high GWP values. However, California is required to reduce HFC emissions 40% below 2013 levels by 2030 under SB 1383, and regulations have been adopted to place GWP limits on HFCs, such as SB 120. As CalEEMod default refrigerant values were assumed for the restaurant land use, the corresponding emissions estimate is anticipated to be conservative.

Solid Waste

The Project would generate solid waste and therefore result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Stationary Sources

Following the completion of construction activities, the Proposed Project would generate GHG emissions from the maintenance and testing of stationary sources (e.g., emergency generators). Emissions were estimated using CalEEMod, as discussed in Section 4.2.3 of Draft EIR Section 4.2.

Water and Wastewater

The supply, conveyance, treatment, and distribution of water for the Project would require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the Project would require the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use were provided by SDSU. The electricity consumption from water use and wastewater generation was estimated using CalEEMod default values.

Carbon Sequestration (Gain)

This GHG analysis estimates the gain of sequestered carbon that would result from the planting and growth of trees on site. The calculation methodology and default values provided in i-Tree Planting were used to estimate the one-time carbon-stock change from planting new trees based on the trees provided in the landscaping plan for the Project (i-Tree 2022). Trees sequester CO_2 while they are actively growing, and the amount of CO_2 sequestered depends on the type of tree. Thereafter, the accumulation of carbon in biomass slows with age, and is assumed to be offset by losses from clipping, pruning, and occasional death. Active growing periods are subject to, among other things, species, climate regime, and planting density; however, for modeling purposes, an active growing period of 30 years was assumed consistent with the Project lifetime. The model also assumes a tree mortality of 70% over a project's lifetime.

The sequestered carbon from new tree modeling does not include CO_2 emissions estimates associated with planting, care, and maintenance activities (e.g., tree planting and care vehicle travel and maintenance equipment operation). Landscape maintenance equipment emissions were included in the area source emissions estimates included in the operational GHG emissions calculations. In addition, operational GHG emissions associated with these maintenance activities are anticipated to be minimal.

While a detailed tree planting schedule was not available for the site yet, a schedule of the types of trees to be planted was available. Of those species proposed, the least CO_2 dense species was selected to be overly conservative. The Project is expected to plant 195 trees on the Peninsula Component site and 30 trees on the University Towers East Component site.

4.7.4 Impacts Analysis

1. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

2. Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans for the Proposed Project include the CSU Sustainability Policy, as most recently revised in May 2022; the 2017 SDSU CAP; SANDAG's RTP/SCS, and CARB's Scoping Plan. Each of these plans is described below along with an analysis of the Proposed Project's potential to conflict with the related GHG emission reduction goals.

Consistency with Applicable GHG Reduction Plans

California State University Sustainability Policy

As discussed previously, the CSU Sustainability Policy was developed to integrate sustainability into all facets of the CSU, including academics, facilities operations, built environment, and student life. The Sustainability Policy largely aligns with the state's energy and GHG emissions reduction goals and aims to reduce impacts from construction and operation activities associated with the CSU. Actions within the CSU Sustainability Policy address energy resilience and procurement; energy conservation, carbon reduction, and utility management; water conservation; sustainable procurement; waste management; sustainable food service; sustainable building and lands practices; physical plant management; and transportation (CSU 2022). The Proposed Project would comply with all relevant requirements of the CSU Sustainability Policy, which include those related to energy resilience and procurement, water conservation, sustainable building, waste management, and transportation.

Pursuant to the CSU Sustainability Policy, to reduce energy consumption-related emissions, all future CSU new construction, remodeling, renovation, and repair projects, regardless of funding source, will be designed with consideration of optimum energy utilization, decarbonization, and low life-cycle operating costs and shall exceed by 10% all applicable energy codes and regulations (Building Energy Efficiency Standards, 24 CCR 6). Capital planning for state facilities, non-state facilities, and infrastructure shall also consider features of a sustainable and durable design to achieve a low life-cycle cost. Additionally, campuses shall design, construct, operate, and maintain green building certified high performing buildings, regardless of funding source, that improve occupant productivity and wellness, optimize life-cycle costs, and minimize carbon impact. The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED Silver, and each campus shall strive to achieve a higher standard equivalent to LEED Gold or Platinum within project budget constraints (CSU 2022).

To reduce emissions from solid waste, the CSU seeks to reduce landfill-bound waste to 50% of total campus waste by 2030 and divert at least 80% from the landfill by 2040 in pursuit of their zero-waste goal (CSU 2022). The Proposed Project would be consistent with the CSU's solid waste targets as it will minimize waste during construction. The Project would also not conflict with the CSU's future zero waste goals as the project would incorporate waste diversion strategies consistent with the campus.

To reduce emissions from transportation, the CSU Sustainability Policy encourages and promotes use of alternative transportation and the development of transportation demand management plans to reduce VMT at the CSU campuses (CSU 2022). As discussed previously, the Proposed Project would reduce average daily trips and VMT when compared to off-campus student housing locations by resulting in a substantial increase in the net number of student beds located on campus, thereby providing more students with the opportunity to live on campus while attending university.

As a member of the CSU system, SDSU and its campus development adhere to the CSU Sustainability Policy as applicable. The Proposed Project would not conflict with the CSU Sustainability Policy as its design has been informed by the tenets of the CSU Sustainability Policy that apply to specific campus development proposals.

San Diego State University Climate Action Plan

Emissions sources in the SDSU CAP's baseline inventory and emissions projections include energy use, solid waste, water use, and student and faculty/staff commute (i.e., mobile source emissions) associated with activity at SDSU's main campus. Overall, emissions from energy use and mobile sources accounted for the majority of GHG emissions in the baseline inventory and therefore present the greatest opportunity for future GHG emissions reductions (SDSU 2017).

The SDSU CAP's vision for energy highlights a shift from natural gas-based co-generation toward grid energy and on-site renewables. For solid waste, the CAP aims to encourage recycling and move toward zero-waste in the future. The CAP's vision for water use is to encourage efficient landscaping (e.g., drought-resistant and native species, limited turf, and efficient irrigation systems) and ensure ultra-low flow and high-performance fixtures are used for potable systems. Finally, the SDSU CAP's vision for transportation emissions includes improvement of bicycle and pedestrian amenities and an overall reduction in single-occupancy vehicle trips to the campus (SDSU 2017).

Consistent with the CAP's GHG-reducing objectives, the Proposed Project's residential buildings would be all-electric. Additionally, there would be solar installed on the Project site and around campus to support the Project, which would serve to increase the campus's renewable energy resources. The Project would minimize waste during construction and implement operational waste management practices that reduce the overall landfill waste stream. All landscaping/re-planting associated with the Proposed Project would use drought-resistant and native species. The Project would also result in a net reduction of average daily trips and VMT, with an associated reduction in mobile source GHG emissions, due to its provision of increased on-campus student housing opportunities that would reduce the demand for housing at off-campus locations less proximate to university-serving uses.

In summary, the Proposed Project would support the vision of and not conflict with the relevant goals of the SDSU CAP.

SANDAG's San Diego Forward: The 2021 Regional Plan

As discussed in Section 4.2, SANDAG's 2021 Regional Plan identifies how the San Diego region will reduce GHG emissions as it relates to transportation, pursuant to SB 375. The SCS contained within the 2021 Regional Plan describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by CARB. The state-mandated target is a 19% reduction—compared with 2005—in per capita GHG emissions from cars and light-duty trucks by 2035. The 2021 Regional Plan achieves a 20% reduction. According to the SANDAG land use data used to prepare the 2021 Regional Plan, the planned land use for the Project site is "Multi-Family Residential" for the Peninsula Component site and "Dormitory" for the University Towers East Component site (SANDAG 2021).

The 2021 Regional Plan identifies the following 10 implementation actions designed as specific steps to be taken to bring projects, polices, and programs to reality, and each one supports the 2021 Regional Plan's defined strategies (SANDAG 2021):

1. Apply the Social Equity Planning Framework and ensure that equity is considered throughout 2021 Regional Plan implementation.
2. Develop Comprehensive Multimodal Corridor Plans (CMCPs) to refine 2021 Regional Plan projects at the corridor level and qualify the region for future funding opportunities.
3. Update SANDAG policies, including the TransNet Ordinance, to reflect 2021 Regional Plan projects and priorities.
4. Evaluate the transition to free public transit and develop a Value Pricing and User Fee Implementation Strategy.
5. Seek new local funding in addition to pursuing state and federal funding opportunities.
6. Advance the Next Operating System (Next OS) by preparing technical and planning studies and initiating pilot opportunities.
7. Implement the Regional Transportation Improvement Program (RTIP) and near-term projects.
8. Partner with local jurisdictions, tribal governments, agencies in Mexico, the military, and other agencies on collaborative efforts to implement the 2021 Regional Plan.
9. Expand regional programs and seek funding to fully support low-carbon transportation options, roadway safety and maintenance, habitat conservation, and nature-based climate solutions.

10. Advance a data science program to better understand travel behavior in the region, update travel demand modeling tools, and improve transparency and reporting on program effectiveness and project delivery.

The 2021 Regional Plan then identifies 11 policy and program areas that support the 10 priority implementation actions listed above. These 11 policy and program areas are provided in Table 4.7-4, alongside analysis of the Proposed Project's potential to conflict with the SANDAG 2021 Regional Plan.

Table 4.7-4. Project Potential to Conflict with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict Prior to Mitigation
Land Use and Habitat	The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas to preserve the region's habitat and open space while supporting transportation investments and reducing vehicle miles traveled (VMT).... SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grant programs to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs.	***No conflict.*** The Project is located in a Transit Priority Area (TPA) according to the City of San Diego's TPA interactive mapping service. The Project also is located on land currently developed in an urban, infill setting. It is noted that the SDSU main campus, within which the Proposed Project would be located, is served by the SDSU Transit Center, a multi-floor complex that provides access to multiple MTS buses and the MTS Green Line trolley.
Housing	The 2021 Regional Plan addresses the housing crisis through Mobility Hubs, bringing locations where people live and work closer together and providing more housing options for more San Diegans through increased density. SANDAG will rely on building stronger partnerships with local jurisdictions to increase housing in the region, especially housing available to low-income residents.	***No conflict.*** The Project would add approximately 4,468 new residential beds on SDSU's main campus, which—as described immediately above—is served by multiple transit options. Increasing on-campus student housing opportunities at SDSU would result in numerous environmental co-benefits, as students are brought into close proximity to the university-serving uses designed to support their educational objectives. By increasing on-campus housing opportunities, and thereby reducing the demand of SDSU students for off-campus housing opportunities, the Proposed Project also would support SANDAG's initiative to increase housing in the region.
Climate Action Planning	To help reach regional and state greenhouse gas (GHG) emissions–reduction targets, the 2021 Regional Plan focuses heavily on the conversion to clean transportation and a shift from personal vehicle dependency through the 5 Big Moves. To help local jurisdictions make this transition and achieve broader reductions in GHG emissions, SANDAG will provide technical assistance, guidance resources,	***No conflict.*** This action is not within the purview of this Project and is instead directed towards local governments and those preparing plans for local jurisdictions. Implementation of the Project would not prevent SANDAG from providing the expressed guidance and resources for incorporating the 5 Big Moves and SCS actions into local CAPs.

Table 4.7-4. Project Potential to Conflict with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict Prior to Mitigation
	templates, and grant funding to incorporate the 5 Big Moves and Sustainable Communities Strategy actions into their climate action plans (CAP) and plan for more well-connected, sustainable, healthy communities that are accessible to all.	
Climate Adaptation and Resilience	The 2021 Regional Plan aims to better prepare San Diego communities and habitats for these climate change impacts by considering evacuation and rapid mobility needs in our transit corridors, evaluating and considering climate vulnerabilities to the region's transportation infrastructure, and using natural lands and conservation to absorb and protect against climate change impacts. SANDAG will establish a coordinated effort across agencies and local jurisdictions for a more holistic, comprehensive, equitable, sustainable, and resilient region.	***No conflict.*** This action is not within the purview of this Project and is instead directed towards SANDAG and local governments. Implementation of the Project would not prevent SANDAG from coordinating efforts across agencies to evaluate and consider climate vulnerabilities in the region. It also is noted that the importance of climate resilience is recognized by the CSU Sustainability Policy. The Proposed Project's final design specifications will consider climate resilience, as such resilience is incorporated into various building design standards and best practices.
Electric Vehicles	Electrification is included in the 2021 Regional Plan as a way to reach regional greenhouse gas (GHG) emission–reduction targets. Electric vehicles (EVs) are zero-emission vehicles that include plug-in battery EVs and hydrogen fuel cell EVs. SANDAG aims to incentivize and encourage the incorporation of all types of EVs into Flexible Fleets, Transit Leap, and goods movement and to support funding programs that increase the number of EVs and charging stations throughout the region and within Mobility Hubs and as part of the Complete Corridor strategy.	***No conflict.*** SDSU provides ChargePoint and DirtRoad EV charging stations at the following on-campus locations: Parking 1, Parking 2C, Parking 3, Parking 7, Parking 8, Student Services Garage, Parking 12, Parking 14, South Campus Plaza, and Parking 2A. These charging stations, which consist of a mixture of Level 2 and DC fast charging stations, are available to students, faculty, staff, and visitors.
Parking and Curb Management	The 2021 Regional Plan promotes policies that use land more efficiently and encourage people to consider switching from driving alone to walking, biking, taking transit, carpooling, and using shared mobility. Effective parking-management policies include reduced parking requirements, including near transit, unbundling parking from housing costs, and parking cash-out incentives for employees that commute to work without personal vehicles.	***No conflict.*** As previously discussed, the SDSU main campus is served by a transit complex that provides connections to MTS bus and trolley options. Additionally, the main campus maintains a network of pathways and travel routes for pedestrians and bicyclists. As shown in Draft EIR Table 2-2, Proposed Evolve Student Housing Summary, the Proposed Project would include a limited number of parking stalls for purposes of supporting the Project's Amenity Building. The Proposed Project also would reduce existing ADT and VMT

Table 4.7-4. Project Potential to Conflict with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict Prior to Mitigation
		generated by SDSU students by increasing the supply of on-campus housing opportunities. In summary, the Proposed Project's residents would be located in an urban campus environment that supports non-vehicular travel modes, consistent with this action.
Transportation Demand Management	Transportation Demand Management (TDM) innovations have the potential to transform the way people travel within and between communities. Managing demands on the existing transportation system is a vital strategy for making the overall system more effective in reducing drive-alone commute trips. SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, and bike education and secure parking services to help reduce commute-related traffic congestion and vehicle miles traveled.	*No conflict.* The Proposed Project, which would not increase SDSU student enrollment, would not result in growth affecting transit in the region. The Project also would beneficially result in a reduction in ADT and VMT, consistent with TDM principles. As such, the Project would support SANDAG's goal of reducing drive-alone commute trips by locating students closer to the on-campus amenities that serve their daily needs.
Vision Zero	Vision Zero is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. In adopting Vision Zero, SANDAG will work toward Zero by collecting and analyzing crash data to identify safety issues and recommend solutions; developing a regional safety policy; continuing to construct the Regional Bike Network; working with local jurisdictions to conduct outreach for and build out their complete streets networks; and funding educational programs, including opportunities to collaborate with tribal nations.	*No conflict.* This action is not within the purview of this Project and is instead directed towards SANDAG to prepare and implement a regional safety policy and to coordinate with local jurisdictions to provide resources and assistance on safe roadway design. Implementation of the Proposed Project would not prevent SANDAG from providing the expressed guidance and resources for Vision Zero planning efforts.
Fix It First	To optimize investments in the region's transportation infrastructure, the Regional Plan and the 5 Big Moves focus on improving upon existing roads, rails, and sidewalks. The Fix It First strategy aims to repair existing roads and create a system for sustained maintenance in the future, creating a safe and efficient transportation network for all users.	*No conflict.* This action is not within the purview of the Proposed Project and is instead aimed at repair and maintenance of the regional transportation system. Implementation of the Project would not prevent SANDAG from improving the existing roads, rails, and sidewalks.

Table 4.7-4. Project Potential to Conflict with SANDAG 2021 Regional Plan

Programs, Planning, and Policies	Implementation Actions	Potential to Conflict Prior to Mitigation
Transportation System Management and Operations	Transportation System Management and Operations (TSMO) employs a series of intelligent transportation system strategies designed to maximize the capacity and efficiency of the existing and future transportation system. TSMO includes the establishment of institutional and governance actions to help advance and facilitate cross-agency collaboration to ensure existing and proposed transportation systems are not operated or managed as independent systems but as a multimodal transportation system.	***No conflict.*** This action is not within the purview of the Proposed Project and is instead directed towards SANDAG to develop the TSMO through cross-agency collaboration. Implementation of the Project would not prevent SANDAG from employing the strategies in support of TSMO and multimodal transportation system.
Value Pricing and User Fees	The 2021 Regional Plan incorporates a variety of value pricing and user fee strategies as tools to improve mobility by encouraging changes in travel behaviors while generating revenue to address aging infrastructure and expand travel options. These strategies include a network of Managed Lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by transportation network companies, and further subsidization of transit fares.	***No conflict.*** This action is not within the purview of the Proposed Project and is instead directed towards SANDAG to develop and implement pricing and fee strategies. Implementation of the Project would not prevent SANDAG from designing fee structures and other pricing tools to support infrastructure and expansion of travel options.

Source: SANDAG 2021.
Notes: SANDAG = San Diego Association of Governments; SDSU = San Diego State University; MTS = Metropolitan Transit System; SCS = Sustainable Communities Strategy; CSU = The California State University; EIR = environmental impact report; ADT = average daily trips.

As shown in Table 4.7-4, the Proposed Project would not conflict with actions from the SANDAG 2021 Regional Plan related to situating affordable housing near mobility hubs, conservation strategies to protect against climate change, parking and curb management, and transportation demand management and reduction of VMT. Rather, the objectives and design of the Proposed Project are compatible and consistent with the 2021 Regional Plan, as the Project would increase the supply of on-campus student housing opportunities in a transit-served environment and thereby improve the efficiency of student travel patterns. Given these considerations, the Project would not conflict with SANDAG's 2021 Regional Plan.

CARB's 2022 Scoping Plan for Achieving Carbon Neutrality

The 2022 Scoping Plan reflects the statewide 2030 target of a 40% reduction below 1990 emissions levels codified by SB 32 and the statewide 2045 target of an 85% reduction below 1990 emissions levels and carbon neutrality codified by AB 1279. Table 4.7-5 evaluates the Proposed Project's potential to conflict with the 2022 Scoping Plan, and specifically the project attributes identified by CARB to reduce operational GHG emissions identified in Appendix D of the 2022 Scoping Plan (CARB 2022). Per the Scoping Plan, empirical evidence shows that residential development projects that are consistent with the Appendix D project attributes to reduce GHG emissions will accommodate growth in a manner that aligns with the GHG and equity goals of SB 32. Additionally, consistency with the Appendix D project attributes will ensure that projects are addressing the largest sources of their operational emissions, are in alignment with the priority areas defined by CARB for Local Climate Action, and are in alignment with the state's climate goals.

Before providing the tabular assessment of the Proposed Project's consistency with the Appendix D project attributes, it is relevant to revisit the Proposed Project's purpose and description and its relationship to statewide climate policies. To begin, the primary goal of the Proposed Project is to increase the on-campus housing opportunities and supporting amenities available to SDSU students. The Proposed Project would accomplish this objective through the construction of residential buildings, resulting in a net increase of approximately 4,468 student beds on the SDSU main campus. The environmental co-benefits of on-campus student housing opportunities are numerous, as students are afforded an opportunity to reside on the very campus where they are attending classes, which serves to measurably reduce student commuting and VMT. Additionally, the Proposed Project is located on two infill sites that are proximate to transit service and would maximizes site utilization and density for residential development. Further, within the Peninsula Component, the Proposed Project would demolish existing student housing providing 702 beds and replace it with new student housing providing 4,450 beds. Not only would this increase the number of overall student beds, but it also would result in an improvement of the efficiency of the built environment, as the Proposed Project would be built in compliance with the latest building energy efficiency standards. Each of these facets of the Proposed Project is compatible with statewide climate policies that recognize the importance of locating residential development in infill areas served by supporting amenities and services.

Table 4.7-5. Project Potential to Conflict with Appendix D of the 2022 Scoping Plan

Project Attributes	Potential to Conflict Prior to Mitigation
Transportation Electrification	
Provide EV charging infrastructure at least in accordance with CALGreen Tier 2 standards	***No conflict.*** SDSU provides ChargePoint and DirtRoad EV charging stations at the following on-campus locations: Parking 1, Parking 2C, Parking 3, Parking 7, Parking 8, Student Services Garage, Parking 12, Parking 14, South Campus Plaza, and Parking 2A. These charging stations, which consist of a mixture of Level 2 and DC fast charging stations, are available to students, faculty, staff, and visitors.
VMT Reduction	
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelop previously undeveloped or underutilized land presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	***No conflict.*** The Project would be sited on an existing developed area in an urban, infill setting. The Proposed Project would not convert existing natural or working lands.
Do not result in the loss or conversion of the State's natural and working lands	***No conflict.*** The Proposed Project would not convert existing natural or working lands.
Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), *or* In in proximity to existing transit (within ½ mile), *or*	***No conflict.*** The Proposed Project has a density of 453 dwelling units per acre. The Peninsula Component site is 0.47 miles from the closest transit stop and the University Towers East Component site is 0.06 miles from the closest transit stop. The Proposed Project is estimated to result in a reduction of 22,105,626 VMT

Table 4.7-5. Project Potential to Conflict with Appendix D of the 2022 Scoping Plan

Project Attributes	Potential to Conflict Prior to Mitigation
Satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS)	per year due to students moving from off-campus locations to on-campus housing.
Relax parking requirements by: • Eliminating parking requirements or including maximum allowable parking ratios. • Providing residential parking supply at a ratio of <1 parking space per unit. • Unbundling residential parking costs from costs to rent or lease.	***No conflict.*** As shown in Draft EIR Table 2-2, Proposed Evolve Student Housing Summary, the Proposed Project would include a limited number (15) of parking stalls for purposes of supporting the Project's Amenity Building. SDSU students with parking needs who reside at the Proposed Project would be served by parking opportunities located elsewhere on the main campus. Overall, the SDSU main campus is designed to facilitate alternative modes of transportation through its bicycle and pedestrian infrastructure and inclusion of the SDSU Transit Center, which provides access to both MTS bus and trolley service.
At least 20 percent of the units are affordable to lower-income residents	***No conflict.*** The Proposed Project does not designate a specific quantity of beds as being reserved for lower-income students. However, SDSU has robust and diverse financial aid programs (including grants, loans, workstudy, and scholarships) to assist students with all types of income backgrounds. SDSU also provides resources for students experiencing financial hardships.
Result in no net loss of existing affordable units	***No conflict.*** The Proposed Project would not result in a net loss of existing affordable residential units.
Building Decarbonization	
Use all electric appliances, without any natural gas connections, and would not use propane or other fossil fuels for space heating, water heating, or indoor cooking	***No conflict.*** The Proposed Project's residential units would be all-electric. The Project's Amenity Building would include limited natural gas service for purposes of providing food service to the Peninsula Component residences.

Source: CARB 2022.
Notes: EV = electric vehicle; CALGreen = California Green Building Standards; SDSU = San Diego State University; VMT = vehicle miles traveled; EIR = environmental impact report; MTS = Metropolitan Transit System.

As shown in Table 4.7-5, the Proposed Project is consistent with the project attributes that reduce GHG emissions identified by the 2022 Scoping Plan. According to the 2022 Plan, these attributes are a guide to determine projects that are clearly consistent with the state's climate strategy for CEQA purposes and are not necessarily required, and a project that incorporates some but not all of the key project attributes may still be consistent with the state's climate goals.

Based on the analysis provided above, the Proposed Project would not potentially conflict with the CSU Sustainability Policy, SDSU CAP, SANDAG Regional Plan, or CARB Scoping Plan, each of which was adopted for the purpose of reducing GHG emissions. This conclusion flows logically from the design of the Proposed Project and its intended objectives, which largely are oriented around the environmental co-benefits of co-locating student housing opportunities on the same campus where the student's educational needs are served. By increasing student housing opportunities on the SDSU main campus through the development of residence halls, the Proposed Project simultaneously would reduce GHG emissions attributable to student commute patterns while providing students with a living environment that capitalizes on the latest building efficiency requirements. As such, the Proposed Project would result in a **less-than-significant** impact attributable to its GHG emissions.

Quantification of Greenhouse Gas Emissions

The following GHG emissions analysis is provided for informational purposes only.

Construction

Table 4.7-6 provides estimated construction-related GHG emissions from the Proposed Project. Detailed calculations are provided within Appendix C.

Table 4.7-6. Estimated Construction Greenhouse Gas Emissions

Emission Source	CO2	CH4	N2O	R	CO2e
	Metric Tons per Year				
2025	630.66	0.03	0.06	0.61	650.69
2026	1,153.20	0.05	0.09	1.21	1,183.81
2027	825.49	0.04	0.05	0.86	842.91
2028	624.75	0.02	0.05	0.54	641.18
2029	685.81	0.02	0.06	0.52	704.70
2030	600.47	0.02	0.04	0.49	613.28
2031	607.56	0.02	0.04	0.40	620.24
2032	580.12	0.02	0.04	0.33	591.33
2033	627.02	0.02	0.03	0.34	636.23
2034	9.10	0.00	0.00	0.00	9.14
				Total	**6,493.51**
				30-Year Amortized Emissions	**216.45**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerants; CO_2e = carbon dioxide equivalent.
See Appendix C for detailed calculations.

Operation

Table 4.7-7 provides estimated operation-related GHG emissions from full buildout of the Proposed Project in 2034. As previously discussed, this quantified emissions inventory accounts for the Proposed Project's reduction in VMT attributable to the provision of additional on-campus housing opportunities. The inventory, however, conservatively does not account for the existing emissions generated by the 13 buildings on the Project's Peninsula Component site that currently generate GHG emissions but would be demolished in order to facilitate Project development. Detailed calculations are provided within Appendix C.

Table 4.7-7. Estimated Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Project					
Area	64.25	0.00	0.00	0.00	64.47
Energy (natural gas and electricity)	4,918.27	0.28	0.03	0.00	4,933.79
Mobile	2,684.42	0.13	0.11	2.84	2,723.83
Refrigerants	0.00	0.00	0.00	9.77	9.77
Solid waste	357.00	35.68	0.00	0.00	1,249.01
Stationary	66.24	0.00	0.00	0.00	66.46
Water supply and wastewater	370.82	7.14	0.17	0.00	600.44
Vegetation	35.11	0.00	0.00	0.00	35.11
				30-Year Amortized Emissions	**216.45**
				Total Emissions	**9,899.33**
Existing					
Mobile	11,236.27	0.50	0.43	19.90	11,398.22
				Net Emissions (Project – Existing)	**(1,498.89)**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; R = refrigerants; CO_2e = carbon dioxide equivalent.
See Appendix C for detailed calculations. Values within parentheses indicate negative values.

As shown in Table 4.7-7, net annual emissions from buildout of the Proposed Project would be a reduction of 1,499 MT CO_2e per year, including amortized construction emissions over a 30-year project life.

4.7.5 Cumulative Analysis

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., cumulative projects) used for this analysis are presented in Chapter 3, Cumulative Methods and Projects, of this Draft EIR. For purposes of GHG emissions, the geographical area of cumulative impacts is global, as further detailed below.

Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable future projects, are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself).

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. As previously discussed in Section 4.7.1, Existing Conditions, GHG emissions inherently contribute to cumulative impacts, and thus, any additional GHG emissions would result in a cumulative impact. As discussed in Section 4.7.4, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore. the Project would not make a cumulatively considerable contribution to a cumulative impact with regard to the generation of GHG emissions, and the cumulative impact would be **less than significant.**

4.7.6 Summary of Impacts Prior to Mitigation

1. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

2. Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Given that neither the CSU, SDSU, CARB, nor the San Diego Air Pollution Control District have established a numerical threshold of significance for GHG emissions within the Project area, the approach for evaluating the Project's impacts related to GHG emissions relies on compliance with applicable plans, policies, or regulations adopted for the purposed of reducing the emissions of GHGs, which include the CSU Sustainability Policy, as most recently revised in May 2022; the 2017 SDSU CAP; SANDAG's RTP/SCS; and CARB's Scoping Plan. As discussed in detail in Section 4.7.4, the Proposed Project would not conflict with these plans, and impacts would be **less than significant.**

4.7.7 Mitigation Measures

As discussed in Section 4.7.6, impacts prior to mitigation were less than significant; therefore, no mitigation is required.

4.7.8 References

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4.8 Hazards and Hazardous Materials

This section describes the existing hazards and hazardous materials conditions of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to the implementation of the Proposed Project based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Hazards and Hazardous Materials, and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to hazards issues concerning fire hazards, emergency response plans, hazardous material and petroleum use and storage, hazardous wastes, contaminated or impacted soil, lead-based paint, and asbestos. The analysis presented below addresses each of these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.8.1 Existing Conditions

Environmental Setting

The Project site, which consists of the Peninsula Component and the University Towers East Component, is located on an approximately combined 11.4 acres of land within the City of San Diego (City) in San Diego County (County) (refer to Figure 2-2 in Chapter 2, Project Description, of this draft environmental impact report [EIR]). The Project site is located in the southeastern region of the City, in the western and southern portions of the SDSU main campus, situated along Interstate 8 within the College Area Community of the City. Adjacent land uses to the Peninsula Component site include a mix of vacant land, a trolley line, and Interstate 8 to the north; a mix of vacant land and residences to the west; a mix of vacant land, a parking lot and structure, a recreational field, and a warehouse for campus mail and shipments to the east; and a mix of campus housing, a parking lot, and the Aztec Recreation Center to the south. Land uses adjacent to the University Towers East Component site include Montezuma Road and residential housing to the north, the University Towers residential housing and additional parking areas to the west, additional residential housing and associated parking area to the east, and an alleyway and residences to the south.

Current Site Uses

The Peninsula Component site currently consists of 13 buildings, including multiple two- and three- story residential student housing developments (Metepec, Zapotec, Toltec, Mixquic, Zacatapec, Huaxtepec, and Tarastec) and the International Affairs complex that includes the International Student Center, the SDSU Passport Office, the SDSU Global Education Office, and the Faculty International Engagement Office buildings. The proposed University Towers East Component site currently consists of a parking lot utilized for the existing University Towers building, which is located adjoining to the west of the existing parking lot.

Historical Site Uses

The Peninsula Component site has consisted of multi-unit residential housing, beginning in 1958, when the first of the buildings was constructed. Previous to construction of the current buildings, the land was vacant and undeveloped. The University Towers East Component site has consisted of a parking lot since at least 1966. Previous to the parking lot, the land was vacant and undeveloped.

Previous Environmental Investigations

Dudek completed Phase I Environmental Site Assessments (ESAs) for both the Peninsula Component and University Towers East Component sites (Appendices G-1 and G-2). As part of those ESAs, the following two historical assessments were reviewed, which identified known current or past environmental hazardous waste and/or materials conditions on the Project site:

Phase I Environmental Site Assessment – Albert's College Apartments

A 2009 assessment was completed for the Albert's College Apartments by Professional Service Industries Inc. (PSI 2009). The property was identified as 5430-5485 55th Street in San Diego California and consisted of six apartment buildings, landscaped areas, and associated asphalt paved parking areas that now encompass the Peninsula Component site. The assessment did not identify any recognized environmental concerns (RECs) but did note a potential asbestos-containing materials (ACM) and/or lead-based paint (LBP) concern, due to the age of construction of the on-site buildings.

Asbestos and Lead-Based Paint Assessment – Tarastec Building

Surveys were completed on the Tarastec Building, also located on the Peninsula Component site, in August 2024, evaluating the presence of both ACM and LBP (Allstate 2024a, 2024b). ACM, defined by the State of California as material that contains more than one tenth of one percent asbestos by weight (0.1%), was identified in various building materials throughout the Tarastec building, including plaster, mastics, floor tiles, and exterior wall stucco. All materials were determined to be in "good condition." LBP, defined by the State of California as paints with lead concentrations greater than 1.0 milligram per square centimeter (mg/cm^2), was found on interior baseboards and an exterior pillar.

The survey company, Allstate Services, recommended protection of ACM to avoid damage, removal of ACM before demolition/renovation activities, and proper handling of asbestos-containing construction materials in accordance with CalOSHA. Allstate Services also recommended multiple options for abatement, interim control, and removal of LBP, all of which must be completed by someone certified by the State of California, Department of Public Health.

Phase I Environmental Site Assessments – Peninsula Component and University Towers East Component

As noted above, a Phase I ESA was prepared for each component of the Project site. The Phase I ESAs are provided in Appendices G-1 and G-2. The Phase I ESA did not identify any recognized environmental concerns (RECs), historical RECs, or controlled RECs, but did identify the potential for ACM and LBP to be present within the structures on the Peninsula Component site. Multiple regulatory database listings were reviewed for the Peninsula Component site, including hazardous waste manifests and reporting of asbestos and waste oil removal. Details regarding the amount or location of asbestos removed were not available in the records provided. As such, there is evidence that ACM have historically been removed from the on-site structures, but there is also evidence of remaining ACM, as noted in the asbestos survey prepared for the Tarastec building (Allstate 2024a). As identified in the Phase I ESA, based on the age of the structures at the Peninsula Component site, there is a potential for all structures to have ACM and LBP.

Hazardous Material Use and Storage

As noted in the Phase I ESAs (Appendices G-1 and G-2), hazardous material storage was observed in a Conex box in the northeastern corner of the Peninsula Component site, and hydraulic oil storage was observed in the elevator room of the Tarastec building. Materials were observed in compatible containers that were in good condition, within containment inside building or storage containers, and no evidence of releases, spills, or leaks were observed.

In addition to ACM and LBP, due to the age of the buildings, other hazardous building materials may be present on the Peninsula Component site. These may include polychlorinated biphenyls (PCBs) and mercury in old electrical equipment, and other universal wastes (batteries, fluorescent bulbs, halogen bulbs, etc.).

Fire Hazards and Emergency Response

As further discussed in Section 4.16, Wildfire, the Project site is located within areas designated as Very High Fire Hazard Severity Zones (VHFHSZ) by CAL FIRE within Local Responsibility Areas (LRA) (CAL FIRE 2024). The Peninsula Component site was identified as a VHFHSZ while the University Towers East Component site was identified as a non-VHFHSZ. The Project site lies within the jurisdiction of the City of San Diego Fire-Rescue Department (SDFD 2024).

The City of San Diego Office of Homeland Security oversees the City's emergency prevention and protection program, mitigation and finance program, response and recovery program, and regional training program. Through these programs, the City of San Diego Office of Homeland Security supports and coordinates numerous risk management planning efforts; trains City employees; assists with the integration of emergency plans; ensures information flow to the public to assist in their emergency preparation and response; interfaces with County, state, and federal jurisdictions; maintains the City's two emergency operations centers; and secures grants from state and federal agencies related to homeland security (City of San Diego Office of Homeland Security 2017).

Schools

The Project site is located within 0.25 miles of an existing or proposed pre-kindergarten through 12th grade school (GreenInfo 2021; CDE 2024). Hardy Elementary School, which is located at 5420 Montezuma Road and serves students in kindergarten to fifth grade, is located approximately 0.25 miles south of the Peninsula Component site, and approximately 0.23 miles west-northwest of University Towers East Component site.

Airports

The Project site is not located within 2 miles of any public use airports (AirNav 2024). According to the San Diego County Regional Airport Authority, the Project site is located within the Review Area for Montgomery Field, which is an airport located approximately 3.75 miles northwest of the Peninsula Component site (SDCRAA 2024). The Review Area indicates areas of airspace protection under Federal Aviation Regulations (FAR) Part 77 (Ricondo 2010). FAR Part 77 regulates the presence of objects affecting navigable airspace in the vicinity of airports. Objects that exceed the Part 77 height limits constitute airspace obstructions. The Project site was evaluated using the OE/AAA Notice Criteria Tool (FAA 2024). The Peninsula Component, with an assumed 13-story structure and 10-foot height per story, would not exceed the FAA notice criteria. The University Towers East Component, with an assumed 9-story structure and 10-foot height per story, also would not exceed the FAA notice criteria.

4.8.2 Regulatory Framework

Federal

U.S. Environmental Protection Agency

Title 40 Code of Federal Regulations, Parts 260–265: Solid Waste Disposal Act/Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act, establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 Code of Federal Regulations, Part 273: Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 Code of Federal Regulations, Part 112: Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a spill prevention, control, and countermeasure plan if oil is stored in excess of 1,320 gallons in aboveground storage (or if there is a buried capacity of 42,000 gallons). Spill prevention, control, and countermeasure regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 Code of Federal Regulations, Part 61: National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants and names ACM as one of these materials. ACM use, removal, and disposal are regulated by the EPA under this law. In addition, notification of friable ACM removal prior to a proposed demolition project is required by this law.

Title 42 Code of Federal Regulations, Parts 350–372: Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act provides for public access to information about chemical hazards. This law and its regulations, included in Title 40 Code of Federal Regulations, Parts 350–372, establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. The EPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 Code of Federal Regulations, Section 2601 et seq.: Toxic Substances Control Act of 1976

The Toxic Substances Control Act of 1976 empowers the EPA to require reporting, record keeping, and testing, as well as to place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials and it also sets requirements for the use, handling, and disposal of ACM and LBP waste. As discussed above, the EPA has also established the National Emission Standards for Hazardous Air Pollutants, which govern the use, removal, and disposal of ACM as a hazardous air pollutant, mandate the removal of friable ACM before a building is demolished, and require notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

Regional Screening Levels

The EPA provides regional screening levels (RSLs) for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, DTSC HERO incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels based on review of the EPA RSLs. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 Code of Federal Regulations, Part 1926 et seq.: Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey be prepared prior to demolition.

Title 29 Code of Federal Regulations, Part 1910 et seq.: Occupational Safety and Health Standards

Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training, inventory safety equipment relevant to potential hazards, have knowledge on safety equipment use, prepare an illness prevention program, provide hazardous substance exposure warnings, prepare an emergency response plan, and prepare a fire prevention plan.

U.S. Department of Transportation

Title 49 Code of Federal Regulations, Part 172, Subchapter C: Shipping Papers

The U.S. Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

Federal Aviation Administration

Title 14 Code of Federal Regulations, Part 77: Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace

This regulation establishes requirements for notifying the Federal Aviation Administration (FAA) of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

Federal Response Plan

The Federal Response Plan of 1999, as amended in 2003 (FEMA 2003) is a signed agreement among 27 federal departments and agencies, including the American Red Cross, that (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency, (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act and individual agency statutory authorities, and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what measures are required to protect against structural fires. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

State

California Unified Program for Management of Hazardous Waste and Materials

California Health and Safety Code, Sections 25404–25404.9: Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Under the California Environmental Protection Agency, the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (DTSC 2019). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California Health and Safety Code made by Senate Bill 1082 in 1994. The following programs make up the Unified Program:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans [HMBPs])
- Hazardous Material Management Plans and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the City of San Diego is the County DEHQ, Hazardous Materials Division.

Title 19 California Code of Regulations, Sections 2729–2734, and California Health and Safety Code, Sections 25500–25520: Hazardous Materials Release Response Plans and Inventory – Business and Area Plans

This regulation requires the preparation of a Hazardous Materials Business Plan (HMBP) by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on site. The HMBP is submitted to the CUPA for emergency planning purposes. The project site is currently subject to these requirements and there is an HMBP in place.

Hazardous Waste Management

Title 22 California Code of Regulations, Division 4.5: Environmental Health Standards for the Management of Hazardous Waste

In the State of California, the DTSC regulates hazardous wastes. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal Resource Conservation and Recovery Act. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters.

In addition, Chapter 31, Waste Minimization, Article 1, Pollution Prevention, and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every 4 years and, as applicable, select and implement viable source reduction alternatives. This act does not apply to nontypical hazardous waste, including ACM and PCBs, among others).

California Health and Safety Code, Chapter 6.5: California Hazardous Waste Control Act of 1972

This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program (regulated by DTSC) that administers and implements the provisions of the federal Resource Conservation and Recovery Act program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels

Human Health Risk Assessment Note 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Aboveground and Underground Petroleum Storage Tanks

California Health and Safety Code, Sections 25270 to 25270.13: Aboveground Petroleum Storage Act

This law applies if a facility is subject to spill prevention, control, and countermeasure regulations under Title 40 Code of Federal Regulations, Part 112, or if the facility has 10,000 gallons or more of petroleum in any or combination of aboveground storage tanks and connecting pipes. If a facility exceeds these criteria, it must prepare a spill prevention, control, and countermeasure plan.

Environmental Cleanup Levels

Environmental Screening Levels

Environmental Screening Levels (ESLs) provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs are prepared by the staff of the San Francisco Bay RWQCB. While ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California may elect to use the ESLs; in general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (RWQCB 2019). Dudek's recent experience indicates that regulatory agencies in the San Diego region use ESLs as regulatory cleanup levels. The ESLs are not generally used at sites where the contamination is solely related to a LUST; those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Integrated Waste Management Board

Title 14 California Code of Regulations, Chapter 8.2: Electronic Waste Recovery and Recycling Act of 2003

This regulation sets requirements regarding the use and disposal of hazardous substances in electronics. When discarded, the DTSC considers the following materials manufactured before 2006 to be hazardous waste: cathode ray tube devices, liquid-crystal display (LCD) desktop monitors, laptop computers with LCD displays, LCD televisions, plasma televisions, and portable DVD Players with LCD screens.

California Department of Transportation/California Highway Patrol

Title 13 California Code of Regulations, Chapter 6: Hazardous Materials

California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakages and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

Occupational Safety and Health

Title 8 California Code of Regulations: Safety Orders

Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the California Code of Regulations. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that material safety data sheets be available to employees and that employee information and training programs be documented.

In Division 1, Chapter 4, Subchapter 4, Construction Safety Orders, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations (8 CCR 1529). Only a CalOSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by the Business and Professions Code, 7180–7189.7, and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in construction projects and to perform lead-related construction work in an effective and safe manner.

California Building Standards Commission

<u>Title 24 California Code of Regulations: California Building Standards Code</u>

The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, which constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the California Building Standards Code contains requirements regarding the storage and handling of hazardous materials.

California Building Code, Chapter 7A: Materials and Construction Methods for Exterior Wildfire Exposure

This chapter of the California Building Standards Code establishes minimum standards for buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire.

California Forestry and Fire Protection

<u>2010 Strategic Fire Plan for California</u>

California Public Resources Code, Sections 4114 and 4130, authorize the State Board of Forestry to establish a fire plan that establishes the levels of statewide fire protection services for State Responsibility Area lands. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and statewide emergency response capability. In addition, California's integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California fire plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health.

California State Fire Marshal

<u>Title 19 California Code of Regulations, Chapter 10: Explosives</u>

This regulation addresses the sale, transportation, storage, use, and handling of explosives in California. Requirements for obtaining permits from the local fire chief having jurisdiction and blasting guidelines (such as blasting times, warning devices, and protection of adjacent structures and utilities) are also explained in Chapter 10 of Title 19.

California Emergency Services Act

Under the Emergency Services Act (California Government Code, Section 8550 et seq.), the State of California developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the EPA, CHP, RWQCBs, air quality management districts, and county disaster response offices.

California Accidental Release Prevention Program

Similar to the EPA Risk Management Program, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. Under the regulations, industrial facilities that handle hazardous materials above threshold quantities are required to prepare and submit an HMBP to the local CUPA via the California Environmental Reporting System. As part of the HMBP, a facility is further required to specify applicability of other state regulatory programs. The overall purpose of the CalARP Program is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act amendments.

California's Green Building Standards Code (CALGreen) Section 5.408.1: Construction Waste Diversion

California's Green Building Standards Code (known as CALGreen) requires at least 65% of construction site debris generated be diverted from landfill disposal for recycling, reuse, or other purposes.

Local/Regional

County of San Diego Department of Environmental Health and Quality – Hazardous Materials Division

The County of San Diego Department of Environmental Health and Quality (DEHQ) Hazardous Materials Division (HMD) is the CUPA for the City of San Diego and has the authority to implement hazardous waste and material standards under California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404–25404.9. As such, the following county programs are applicable to the project site.

- **Plan Check.** Prior to issuance of a certificate of occupancy, a Hazardous Materials Questionnaire must be submitted to, and Hazardous Materials Plan Check Review must be completed by, the DEHQ HMD.
- **Hazardous Material Reporting.** If hazardous materials/wastes are stored in site in quantities that exceed applicable thresholds (55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of gas), the inventory must be reported under the existing hazardous material permit for SDSU (DEH2002-HUPFP-11510; CERS ID 10127458) and the Hazardous Materials Business Plan (HMBP) must be updated. The HMBP must be updated within 30 days of the new hazardous material/waste being placed on site.
- **Hazardous Wastes.** Construction-related hazardous wastes generated must be properly labeled, handled, transported, and disposed of in accordance with local and state laws and regulations. The transportation and disposal must be completed by a registered hazardous waste transporter.
- **Aboveground Petroleum Storage.** According to DEHQ HMD records, SDSU currently reports 7,561 gallons of petroleum in aboveground storage tanks, and is subject to regulatory requirements under the California

Aboveground Petroleum Storage Act (APSA) and federal requirements under 40 CFR 112 (Spill Prevention, Control, and Countermeasure Plans [SPCC]) (DEHQ 2024). If any petroleum products will be stored on site in containers greater than 55-gallons, the existing SPCC Plan must be updated and the additional petroleum volume must be reported with the HMBP. Facilities storing greater than 10,000 gallons of petroleum products/oils must have their SPCC Plans certified by a professional engineer.

- **Spill and Release Reporting.** Significant or threatened releases of hazardous materials or petroleum products that occur on the project site must be reported in accordance with California Office of Emergency services and DEHQ HMD. Reporting thresholds include any amount to waters of the state, greater than 42 gallons of petroleum products to land, or any volume of hazardous materials above the reportable quantity. Reportable quantities vary for each hazardous material; a full list can be found in Table 302.4 of Title 40 Code of Federal Regulations, Section 302.4.

Asbestos and Air Quality

Regulation XI, Subpart M: National Emission Standards for Asbestos, Rule 361.145 – Standard for Demolition and Renovation

The San Diego Air Pollution Control District (SDAPCD) requires that the proponent of a proposed demolition or renovation project submit an asbestos demolition or renovation operational plan (notice of intention) at least 10 days prior to the onset of any asbestos stripping or removal work. It should be noted that the notice of intention is required for all demolition projects, regardless of the presence of asbestos.

Rule 50 – Visible Emissions, Rule 51 – Nuisance, and Rule 55 – Fugitive Dust Control

Any commercial construction or demolition activity capable of generating fugitive dust emissions is subject to regulation under SDAPCD Rules 50, 51, and 55. Under these rules,

- no construction or demolition activity will discharge visible dust emissions beyond the property line for a period or aggregate periods more than 3 minutes in any 60-minute period (Rule 55);
- no single source shall discharge visible emissions that are darker in shade or have opacity greater than Number 1 on the Ringleman Chart (published by U.S. Bureau of Mines) for a period or aggregate periods more than 3 minutes in any 60-minute period (Rule 50);
- no discharges shall occur that emit quantities of air contaminants or other material that may cause injury, detriment, nuisance, or annoyance to any considerable number of the public which endanger the comfort, repose, health, or safety of the public or which have a natural tendency to cause injury or damage to business or property.

Montgomery Field Airport Land Use Compatibility Plan

As further described in Section 4.10, Land Use and Planning, the County Airport Land Use Commission's ALUCPs serve to promote compatibility between airports and the land uses around them. ALUCPs are required to review land use plans, development proposals, and certain airport development plans for their consistency with the land use compatibility plan (Ricondo 2010). In the case of the Proposed Project, the applicable plan is the Montgomery Field ALUCP. This plan is also referenced in the Airports subsection of Section 4.8.1, Existing Conditions.

San Diego County Emergency Services

2018 Unified San Diego County Emergency Services Organization and County of San Diego Emergency Operations Plan

The Emergency Operations Plan includes a comprehensive emergency management system that provides planned response in disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The plan also describes tasks and overall responsibilities for protecting life and property and identifies sources of outside support. The plan is for use by the County and its cities to respond to major emergencies and disasters (Unified San Diego County Emergency Services Organization 2018).

San Diego State University Department of Environment, Health, and Safety

The Department of Environment, Health, and Safety works with university departments to educate, facilitate, and support working with and around potential hazards on campus, including hazardous waste disposal, training, and emergency procedures and accident reporting. Environment, Health, and Safety also ensures SDSU complies with applicable regulations and permit conditions for all potential air pollutants, including asbestos removal (SDSU 2024).

4.8.3 Significance Criteria

The significance criteria used to evaluate the project's potential impacts related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to hazards and hazardous material would occur if the Project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as result, would it create a significant hazard to the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Methodology

The following impact analysis for the significance thresholds numbers 1 through 5, listed above, was prepared based on information gathered from the previous site investigations performed, as well as the Phase I ESAs prepared for the Proposed Project and included in this Draft EIR as Appendices G-1 and G-2.

The impact analysis for significance thresholds numbers 6 and 7 above was prepared based on the reporting and analysis provided in the Wildfire Evacuation Study prepared for the Project and included as Appendix J-2 to this Draft EIR.

4.8.4 Impacts Analysis

1. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Demolition and Construction

Hazardous materials that may be used during construction and demolition activities of the Proposed Project include gasoline, diesel fuel, oil, lubricants, grease, welding gases (e.g., acetylene, oxygen, and argon), solvents, paints, and explosives. These materials would be used and stored in designated construction staging areas within the boundaries of the project site and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Hazardous wastes accumulated during Project construction may include unused or off-specification paint and primer, paint thinner, solvents, and vehicle- and equipment maintenance–related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. Hazardous waste that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

Given the age of the current structures on the Peninsula Component site (built between 1953 and 1964) and information provided in the Phase I ESA, asbestos survey, and lead-based paint survey (Appendix G-1), ACM, LBP, and universal wastes (some potentially containing PCBs) are present in the existing buildings and would be disturbed during the demolition process. Additionally, remaining hazardous materials located in storage rooms and areas on site, including inside the metal storage container and inside the elevator room, would be disturbed and potentially released during the demolition process if not removed. Due to the potential to encounter asbestos, ACM, universal wastes, and hazardous materials during the demolition process, the Proposed Project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of hazardous materials.

Mitigation Measure (MM) HAZ-1, requires implementation of abatement procedures during demolition that include abatement of the existing buildings for positive asbestos- and lead-containing materials, PCB-containing items, universal wastes, and other hazardous materials. Once abated, the buildings would be prepared for demolition. After demolition, the remaining materials would be sorted for reuse, recycling, and landfill disposal. Materials to be hauled off the project site would be transported in accordance with local, state, and federal laws and regulations. In accordance with CALGreen's diversion requirements, at least 65% of construction and demolition debris will be recycled, reused, or otherwise diverted from landfill. With implementation of **MM-HAZ-1**, the identified potentially significant impacts would be reduced to **less than significant with mitigation incorporated.**

Operation

The operational phase of the Proposed Project is not expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the Project would introduce commercially available potentially hazardous materials (e.g., associated with maintenance operations) to future residents, employees, and visitors of the Project site, the use of these substances would be subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. Therefore, operational impacts related to hazardous materials would be **less than significant.**

2. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed above, the Proposed Project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials including ACM, LBP, PCB-containing items, universal wastes, and other hazardous materials and wastes present in the existing buildings. Management of hazardous materials and waste during pre-demolition surveys and abatement activities would be addressed and mitigated with implementation of **MM-HAZ-1.**

Additionally, during construction, grading would be required, which requires import of large quantities of soil. Soils would be screened for both structural compatibility and to verify contaminants of concern are not present. A soils report would be prepared for the Proposed Project at the outset of ground disturbing construction activities that outlines screening requirements for imported soil, which will meet industry standards, as well as applicable rules and regulations.

Also, as discussed above, construction and demolition activities will require the use of hazardous materials and will likely result in the generation of hazardous wastes. State regulations (see Section 4.8.2) require preparation of a Hazardous Material Business Plan if quantities of hazardous materials stored on site exceed 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of gas. This plan requires training, emergency response procedures, and reporting to the local CUPA (DEHQ HMD). Reported sites are subject to regulatory inspections that verify storage, labeling, reporting, and disposal and are conducted in accordance with applicable rules and regulations. Petroleum storage above 1,320 gallons also requires preparation of a Spill Prevention, Control, and Countermeasures (SPCC) Plan, which requires secondary containment, spill prevention, and training for proper handling of petroleum products. With these regulatory requirements, and implementation of **MM-HAZ-1**, any potential for reasonably foreseeable upset or accident conditions to occur on site during demolition and construction activities would be **less than significant with mitigation incorporated.**

Operation

Once operational, the Proposed Project is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The Project involves new student housing and related support facilities, with associated landscape and facility maintenance. Hazardous materials would be limited to use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the Project would introduce residential units to the project site, resulting in an increased use of commercially available potentially hazardous materials, the use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials. As such, potential impacts would be **less than significant.**

3. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest school is Hardy Elementary School, 5420 Montezuma Road, approximately 0.25 miles south and 0.23 miles west-northwest of the Peninsula Component site and University Towers East Component site, respectively. As discussed in previous sections, during construction and operation of the Proposed Project, any hazardous materials would be used, transported, handled, stored, and disposed of in accordance with all applicable rules and regulations, which are protective of both project site receptors and surrounding receptors. During construction, **MM-HAZ-1** would limit potential emissions from asbestos, lead-based paints, or other hazardous materials by requiring proper abatement. These abatement measures also adhere to regulations that limit potential asbestos and lead emissions, including NESHAP Rule 361.145 and Title 8 of California Code of Regulations. Also, construction practices would follow SDAPCD rules that limit potential emissions, nuisances, and dust, and would be followed as outlined in Section 4.8.2 (SDAPCD Rules 50, 51, and 55). With adherence to applicable rules and regulations, as well as implementation of **MM-HAZ-1**, potential impacts would be **less than significant with mitigation.**

4. Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The site of the Proposed Project is not on, nor impacted by, a Cortese List hazardous materials site listed pursuant to Government Code Section 65962.5. **No impact would occur.**

5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

As discussed in Section 4.8.1, the Project site is located within the Review Area for Montgomery Field. The Review Area indicates areas of airspace protection under FAR Part 77, which regulates the presence of objects affecting navigable airspace in the vicinity of airports. The Proposed Project would not exceed the FAA notice criteria (see Section 4.8.1), and is not located within designated noise or safety impact areas defined by the Montgomery Field ALUCP. Potential impacts would be **less than significant.**

6. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As explained below, the Proposed Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project also would not remove or impair any evacuation routes that would be utilized by the occupants of the Project or by occupants of any nearby land uses. Please also see Section 4.16 of this Draft EIR, for further analysis of the potential impacts to emergency evacuation due to the Proposed Project.

Depending on the scale of the emergency, response and recovery operations (e.g., mass care, evacuation, etc.) are conducted in accordance with the policies and procedures outlined in the SDSU Emergency Operations Plan (EOP) (SDSU 2019), City of San Diego Emergency Operations Procedures (City of San Diego 2018), and the County of San Diego Operations Area (OA) EOP (County of San Diego 2022). These various emergency operations plans are all prepared in accordance with the State Emergency Plan, the State of California's Standardized Emergency Management System and the National Incident Command System, which ensures as an emergency scales, there is an established framework for interagency coordination. The Wildfire Evacuation Study, Appendix J-2 of this Draft EIR, was prepared for the Proposed Project based on the procedures and policies of the SDSU EOP, City of San Diego Emergency Operations Procedures, and San Diego County Emergency Operations Plan, including Annex Q – Evacuation.

Evacuations in the County are primarily a result of wildfire events. Due to the immediate threat that wildfire can present, current evacuation practice in the City and County of San Diego is targeted evacuation, which typically targets the scope of the evacuation to only the area in immediate danger and placing a larger area on standby for evacuation; and has replaced mass evacuation as the standard protocol for conducting evacuations. This practice allows for better evacuation operations, reduces gridlock, and reserves sufficient travel way for emergency vehicles. The SDSU campus, including the Peninsula Component site, is within evacuation zone SDC – 1905. The University Towers East Component site is in evacuation zone SDC – 1996 (Esri 2024).

The Peninsula Component site is within a designated VHFHSZ in a local responsibility area (LRA), which are areas considered to have a high fire potential based on available fuels, topography and climate. As seen in both the 2019 Fairmount Fire and 2024 Montezuma Fire, the time between ignition and spread to developed areas would be short; however, San Diego Fire-Rescue Department (SDFRD) was able to capitalize on its mutual aid resources, ultimately preventing either fire from progressing into the adjacent neighborhoods and with minimal damage to structures. As required for all development within a VHFHSZ, the Proposed Project would implement a comprehensive layered fire protection system, as detailed in Appendix J-1, Fire Protection Plan, of this Draft EIR, to reduce flame lengths and fire spread adjacent to Project structures and allow for SDSU campus police (University Police Department [UPD]) and/or the City of San Diego Police Department (SDPD) the contingency option to shelter students on site. Further, there are multiple sites available on campus that can serve as assembly points or temporary shelter that can provide safe refuge.

An evacuation of the Peninsula Component site resulting from a fire that starts in the unmaintained fuels to the east and driven by Santa Ana winds (i.e., from the northeast) or a fire in the unmaintained fuels in the canyon to the west from a fire driven by onshore wind (i.e., from the west) is possible. In the event of an evacuation, the Proposed Project would implement the procedures outlined in Appendix J-2, which are consistent with the SDSU EOP, City of San Diego Evacuation Procedures, and the County of San Diego OA EOP; therefore, the Proposed Project would not conflict with an adopted emergency response plan or evacuation plan.

As explained in Appendix J-2, safely undertaking large-scale evacuations is a complicated process that involves many factors that cannot necessarily be determined in advance. The SDSU Evolve Student Housing Project would be located in an area that is described as an urban-wildland intermix, which is characterized by the higher-density urban development around the canyons and hillsides that are characteristic of the region. However, given the Project's urban setting, a large wildfire advancing through a vast bed of natural fuels towards the Project site is not possible. The closest wildland fuels are associated with the Mission Trails Regional Park, approximately 3 miles northeast of the Project site. The communities of San Carlos and Del Cerro, as well as Interstate 8 separate the Project site from these expansive fuel beds.

As discussed in the Project's FPP, fire risk in the canyon adjacent to the Project in post-Project conditions is considered low to moderate and, further, the relatively small size of the canyon does not provide sufficient natural cover to fuel a large wildfire advancing toward the Project. Further, due to the Peninsula Component Site's designation of a VHFHSZ in an LRA, the Peninsula Component Site would be required to comply with all CBC and CFC codes applicable to development in a VHFHSZ (i.e., CBC Chapter 7A and CFC Chapter 49), which includes requirements for ignition resistant construction, emergency access, and defensible space that have shown to reduce fire behavior and fire risk (Knapp et al. 2021; CBIA 2022). Additionally, these same features that protect the Project structures also help to reduce fire from spreading off site. Further, in the event structures in the northwest portion of campus (nearest the Peninsula Component site) are damaged and students are not able to return to the building, SDSU has sufficient capacity to shelter students on campus. As seen in previous fires in the area, UPD works closely with SDPD and SDFRD to support area evacuations and there have been no evacuations of campus related to wildfire.

As discussed above and detailed in Appendix J-2, the Project would be consistent with the SDSU EOP, City of San Diego Emergency Operations Procedures, and the County OA EOP; would not eliminate any existing evacuation routes; and would provide a shelter in place alternative for Project residents as a result of compliance with fire safety features that meet the requirements of Chapter 7A of the CBC (e.g., ignition resistant construction, fuel modification). Further, the Proposed Project would implement **MM-WLD-1** to educate students and support orderly evacuations. Considering these facts and others discussed herein, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and would not interfere with evacuation response planning or result in inadequate emergency access. The impact would be **less than significant with mitigation**.

7. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

In addition to the following analysis, please also see Section 4.16 of this Draft EIR, for further analysis of the potential impacts of the Proposed Project related to wildland fire.

The lack of many fires having occurred near the Proposed Project during the historical record, as discussed in Section 4.16.1, Existing Conditions, can be largely attributed to the presence of vast development that predates the dataset. Such development makes the spread of wildfire less likely due to the presence of infrastructure that is non-combustible or less likely to ignite than natural fuels. Further, the development would have also meant emergency response to any ignition would have likely been faster with greater access to water than in a wildland setting. Given the large amount of development in the area, a large wildfire advancing through a vast bed of natural fuels towards the Project site, specifically the Peninsula Component site, is not a threat, as seen in the recent historical record. This leaves the adjacent canyons as the greatest threat to the Project from a wildland fire perspective. This area is limited in size and thus should any ignition occur, it would not have to spread very far to reach the Project at the top of the slope. However, while there is certain risk of wildland fire, available construction practice, including, but not limited to, fire-retardant materials and brush management requirements, that will be employed as part of the Proposed Project, would reduce the risk present to those residing in the area.

Given the anticipated growing population of the County's wildland urban interface areas, including in the City, and the region's fire history, it can be anticipated that periodic wildfires will occur in the open space areas, even in isolated canyons such as the vegetated areas west, north, and east of the Project site where there is little fire history. This was exemplified by the 2024 Montezuma Fire which burned approximately three quarters of a mile away from the Project site in vegetation and terrain similar to that found adjacent on the Project site. However, unlike most of the structures directly exposed to the Montezuma Fire, the Proposed Project would include a comprehensive, layered fire protection system. The Proposed Project would introduce construction and an increased population and therefore additional potential ignition sources to the site; however, all new structures would be constructed to, at minimum, 2022 CBC Chapter 7A, and 2022 CFC standards. Buildings on the Peninsula Component site would also implement a fire hardened landscape, highly ignition resistant structures of Type I-B construction that exceed the requirements of Chapter 7A, and a 100-foot wide FMZ separating structures from wildland fuels (except north of Building 4, which would include 85 feet of FMZ). Fires from off site would not have continuous fuels across this site and would therefore be expected to burn around the site.

The Proposed Project is not expected to result in the heightened fire hazard typically associated with the wildland urban interface, since the entirety of the Project is being converted to high density, ignition resistant structures and landscaping. As previously discussed, the fire hazard of wildland urban interface areas is more closely correlated to lower density residential areas that have combustible vegetation between homes that allow for fire spread. The ignition-resistant features of the Proposed Project would form a redundant system of protection to minimize the likelihood of exposing residents and visitors, as well as structures, to the uncontrolled spread of a wildfire. This same fire protection system would provide protection from an on-site fire spreading to off-site vegetation. As such, accidental fires within the maintained landscape or structures that would be built as part of the Proposed Project would have limited ability to spread. The project, once developed, would not facilitate wildfire spread and is expected to reduce fire intensity to levels that would be manageable by firefighting resources for protecting the site's structures, especially given the ignition resistance of the structures and the planned ongoing maintenance of the entire site landscape. Therefore, wildfire occurrence, frequency or size is not expected to be significantly exacerbated by construction of the project. With adherence to all required building and fire codes, and with implementation of **MM-WLD-3** through **MM-WLD-5,** as presented in Section 4.16, the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and impacts would be **less than significant with mitigation incorporated.**

4.8.5 Cumulative Analysis

Impacts associated with hazardous materials, including environmental contamination and releases, are generally localized and specific to the project site in question. Secondly, site redevelopment often times results in a reduction of environmental contamination, if such exists, through soil removal and excavation activities and abatement of hazardous building materials. Through regulatory requirements and mitigation for each specific project, impacts are ultimately reduced and not cumulative. Environmental regulations in place to protect site-specific workers and occupants are also protective of nearby occupants and receptors, such as spill control requirements and hazardous material management regulations.

Development and redevelopment activities have the potential to use hazardous materials or expose workers and the public to pre-existing contamination. However, these cumulative projects would be fully regulated per local, state, and federal requirements, thus reducing potential for public safety risks, cumulative impacts associated with exposure to hazards and hazardous materials would be less than significant. Additionally, through mitigation and compliance with regulatory requirements, the construction or operation of the proposed project itself would reduce the potential to combine with other project impacts to create a significant and cumulatively considerable environmental health or safety risks impact. For these reasons, the proposed project would **not result in cumulatively considerable contribution to cumulatively significant impacts** related to hazards and hazardous materials.

4.8.6 Summary of Impacts Prior to Mitigation

The Proposed Project has the potential to result in the following impacts relative to Hazards and Hazardous Materials, prior to mitigation.

Demolition and construction activities have the potential to disturb ACM, LBP, PCB-containing items, universal wastes, and remaining hazardous materials and hazardous wastes in existing building materials on the Project site. A **potentially significant** impact to the public or the environment due to the routine disposal, transport, and/or release of hazardous materials could occur.

As discussed in threshold 2, demolition, construction, and operation have the potential to result in upset and/or accident conditions that could create a hazard to the public, thereby resulting in a **potentially significant** impact.

The Peninsula Component site and the University Towers East Component site are within one-quarter mile of an existing school. Project activities would include the routine use of a variety of hazardous materials. A **potentially significant** impact would result.

The Project site is within a designated VHFHSZ in a LRA, and in a wildland-urban interface area. As such, the Proposed Project could result in an impact to an existing emergency evacuation plan. The impact is **potentially significant.**

The Proposed Project would introduce construction and an increased population and therefore, additional potential ignition sources to the Project site. The Project would potentially expose people or structures to a risk of loss, injury, or death involving wildland fires, thereby resulting in a **potentially significant** impact.

Less than significant impacts as a result of the Proposed Project include the operational impacts related to the potential hazard to the public or environment through the routine transfer, use, or disposal of hazardous materials, as well as the operational impacts related to the potential hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and the potential impacts related to the potential safety hazard or excessive noise from its proximity to a public airport or public use airport.

4.8.7 Mitigation Measures

The following mitigation measure would be implemented to reduce all impacts described in Section 4.8.4 to levels below significance.

MM-HAZ-1 **Pre-Demolition Hazardous Materials Abatement.** The California State University/San Diego State University, or its designee, shall ensure that demolition or renovation plans and contract specifications incorporate appropriate abatement procedures for the removal and, where applicable delivery of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, petroleum and oil products, and universal waste items. Further, all abatement work shall be done in accordance with federal, state, and local regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), California Department of

Public Health (which certifies lead paint workers), and the San Diego County Air Pollution Control District.

MM-WLD-1 **(See Section 4.16, Wildfire)**

MM-WLD-3 **(See Section 4.16, Wildfire)**

MM-WLD-5 **(See Section 4.16, Wildfire)**

4.8.8 Level of Significance After Mitigation

The abatement of hazardous materials identified on the project site would remove the potential for exposure of the public and the environment to accidental release of hazardous materials (**MM-HAZ-1**). Additionally, these materials would be removed, handled, and transported in accordance with applicable laws and regulations, removing the potential for exposure due to routine handling and transport. This mitigation would also reduce potential impacts due to potential upset/accident conditions and handling of hazardous materials near a school. As such, impacts would be **less than significant with mitigation incorporated.**

With the implementation of **MM-WLD-1**, **MM-WLD-3**, and **MM-WLD-5**, potential impacts associated with interference with an existing emergency evacuation plan and potentially expose people or structures to a risk of loss, injury, or death involving wildland fires would be reduced to **less than significant with mitigation incorporated.**

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4.9 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions of the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criterion provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Hydrology and Water Quality.

This section is based on a review of available studies, maps and documents, including available information from the California Department of Water Resources (DWR 2004), U.S. Geological Survey (USGS 2024), Federal Emergency Management Agency (FEMA 2012), and the geotechnical reports prepared specifically for the Proposed Project, included as Appendices F-1 and F-2.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to hydrology and water quality, including comments addressing indirect drainage, erosion, and groundwater extraction–related impacts to the City of San Diego Multi-Habitat Planning Area; requesting use of rainwater collection and reuse facilities; and relating to drainage and erosion related impacts to the surrounding open space adjacent to and below the Project. The analysis presented below addresses each of these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.9.1 Existing Conditions

4.9.1.1 Environmental Setting

The Proposed Project includes two components: the Peninsula Component located at the northern terminus of 55th Street and the University Towers East Component, which would be located east and immediately adjacent to the existing University Towers building on Montezuma Road (see Figure 4.9-1, Topography and Drainage). Both sites are located atop a mesa terrace intersected by north-trending canyons that drain into west-trending Alvarado Canyon Creek, located approximately 600 feet north of the Peninsula Component site and 3,300 feet north of the University Towers East Component site, at the closest point (Figure 4.9-1). Alvarado Canyon Creek is a natural-bottom tributary to the San Diego River, which eventually discharges into the Pacific Ocean immediately south of Mission Bay.

The Project vicinity is heavily developed with SDSU buildings, roads, and utility infrastructure, which has resulted in topography and soils that have been altered from their natural state. Although there are no natural water bodies within the Project footprint, the Peninsula Component is located adjacent to open space consisting of steep west, north, and east facing hillsides, upslope of Alvarado Creek and its tributary canyons.

The surrounding region is a broad, urbanized coastal plain bounded by the Pacific Ocean to the west and by foothills and mountains to the east. Prior to development of the campus and surrounding area, the topography was characterized by deeply incised drainage canyons dissecting the relatively level mesa, which is commonly called Montezuma Mesa, at the location of the main SDSU campus. Many of the smaller canyons/ravines and the heads of some of the larger canyons were filled in to create level, buildable sites.

4.9.1.2 Climate

The climate of San Diego County is characterized by warm, dry summers and mild, wet winters. The average rainfall is about 10 to 13 inches per year, most of which falls between November and March. The average mean temperature for the area is approximately 65°F in the coastal zone and 57°F in the surrounding foothills (San Diego RWQCB 2021). The Proposed Project is located in a Mediterranean climate region with seasonally influenced precipitation. Seasons consist of hot, dry summers and cooler, wetter winters, although San Diego is more arid than most areas with a similar climate classification. Global climate change is expected to cause a future warming trend in Southern California even under moderate emissions scenarios; however, there is no clear trend in annual precipitation. Current climate projections suggest an increase in extreme events in the San Diego region in the future with 16% fewer rainy days and 8% more rainfall during the biggest rainstorms (San Diego Foundation 2014).

4.9.1.3 Watershed Hydrology

The Proposed Project's receiving waters include Alvarado Creek and the Lower San Diego River (Figure 4.9-1 and Figure 4.9-2, San Diego River Watershed Map). The U.S. Geological Survey Watershed Boundary Dataset delineates watersheds according to hydrologic units, which are identified by name and by hydrologic unit code (HUC). Hydrologic units consist of large regions and sub-regions draining to a common outlet. The Proposed Project is within the Murray Reservoir Subwatershed (HUC 180703040704), a subregion of the Lower San Diego River Watershed (HUC 1807030407), which is in turn a subregion of the 11,100-square-mile Southern California Coastal Subregion (HUC 1807) (Table 4.9-1).

The San Diego Regional Water Quality Control Board (RWQCB) and the local co-permittees classify watersheds using a similar system but with somewhat different watershed names and boundaries.[1] These geographic boundaries are watershed based but are typically referred to as "hydrologic basins," around which many surface water quality impairments and goals/objectives are generally defined. The Proposed Project is within the Mission San Diego hydrologic subarea (Basin No. 9.07.1.1), which is one of the many subareas within the San Diego Basin (Table 4.9-1).

Table 4.9-1. San Diego Basin Subareas – Watershed Designations by Agency/Source

Agency/Source	HUC/ Basin No.	Watershed Name	Size (sq km)
USGS Watershed Boundary Dataset	180703	Laguna–San Diego Coastal Accounting Unit	14,142
	18070304	San Diego Cataloguing Unit	4,022
	1807030407	Lower San Diego River Watershed	419
	180703040704	Murray Reservoir Subwatershed	43
San Diego RWQCB and "Project Clean Water" Co-Permittees	9	San Diego Region	10,102
	9.07	San Diego Hydrologic Unit	1,140
	9.07.1	Lower San Diego Hydrologic Area	449
	9.07.1.1	Mission San Diego Hydrologic Subarea	150

Sources: USGS 2024; San Diego RWQCB 2021.
Notes: HUC = hydrologic unit code; sq km = square kilometers; USGS = U.S. Geological Survey; RWQCB = Regional Water Quality Control Board.

1 The stormwater co-permittees are the owners of municipal separate storm sewer systems through which urban runoff discharges into waters of the United States within the San Diego region. Together, the co-permittees (which include 18 cities, the County of San Diego, the Port of San Diego, and the Regional Airport Authority) implement the National Pollutant Discharge Elimination System Permit.

The San Diego River Watershed encompasses 434 square miles, making it the second largest watershed in San Diego County. The watershed lies in the central portion of the county and neighbors the Los Penasquitos and San Dieguito River Watersheds to the north and the San Diego Bay Watershed management area to the south. The San Diego River Watershed is divided into four distinct hydrological areas, including the Lower San Diego, San Vicente, El Capitan, and Boulder Creek areas, each with unique geological and environmental features. Currently, approximately 44% of the San Diego River Watershed remains undeveloped. The remaining 56% of the land includes open space and park land (23%), residential areas (19%), transportation (6%), and other (2%). (Project Clean Water 2022).

4.9.1.4 Topography and Drainage

The Project site is located on an elevated natural terrace to the south of Alvarado Canyon (see Figure 4.9-1). Several smaller secondary canyons have incised into this terrace, some of which have been filled in and built over during historic development in the area. A review of historic aerial images and topographic maps indicates that grades at the Project site were not changed significantly during initial development and no significant canyon in-fill was identified at either component site. The University Towers East Component site is situated on the interior portion of a relatively flat-lying natural terrace and is not immediately adjacent to any current or historic canyons. The Peninsula Component site is situated on a ridge of preserved terrace immediately south of Alvarado Canyon, between two relatively deep secondary canyons to the east and west. Steep slopes descend from the relatively flat-lying terrace into the canyons to the west, north, and east at gradients of 2:1 to 2.5:1 (horizontal to vertical units). Original site earthwork is not believed to have filled any major canyons or drainages at the Peninsula Component site; however, some smaller drainage fill or isolated areas of deeper fill may have occurred, particularly near the canyon rim (edge of terrace), where some slope grading may have occurred (Appendix F-2).

As discussed in Section 4.15, Utilities and Service Systems, several 12- to 24-inch storm drains are located on the west, northwest, north, and east portions of the Peninsula Component site. The western storm drains exit the site via the canyon located west of the Peninsula Component site (Figure 4.9-1) and all of the storm drains empty into existing City of San Diego (City) owned and maintained stormwater conveyance infrastructure.

The University Towers East Component site is located at a relative highpoint on Montezuma Road; therefore, stormwater from the site occurs as sheet flow, which flows west, north, and east into a series of existing surface drainage features and ultimately into a 12-inch storm drain located approximately 1,440 feet west of the University Towers East Component site and an 18- to 24-inch storm drain located approximately 1,200 feet east of the site.

4.9.1.5 Flood Hazards

The Project site is not located within a 100- or 500-year floodplain (FEMA 2012) (see Figure 4.9-1 and Figure 4.9-3, Flood Map). Furthermore, the Proposed Project, due to its elevation of over 340 feet above mean sea level and its location 10 miles inland, is not subject to dam inundation or tsunami hazards.

4.9.1.6 Water Quality

Runoff conveyed and discharged by municipal stormwater systems has been identified by local, regional, and national research programs as one of the principal causes of water quality problems in urban areas. This runoff potentially contains a host of pollutants including trash, debris, bacteria, viruses, oil, grease, sediments, nutrients, metals, and toxic chemicals. These contaminants can adversely affect the beneficial uses of receiving creeks, coastal waters, associated wildlife habitat, and public health. Urban runoff pollution is a problem during rainy seasons and throughout the year due to urban water uses that discharge non-stormwater runoff through dry-weather flows to the stormwater conveyance system (City of San Diego 2021).

Land development and construction activities introduce the following water quality concerns:

- Contribution of pollutants to receiving waters based on the creation of new impervious surfaces and the permanent use of the project site
- Contribution of pollutants to receiving waters based on the removal or change of vegetation during construction
- Contribution of pollutant-based sediment transport caused by increased impervious cover and the resultant increased erosive force
- Significant alteration of drainage patterns

When areas are developed, new impervious areas are also created (e.g., roads, parking lots, structures). Since the natural landscape's ability to infiltrate and cleanse urban runoff is "capped" by the impervious surfaces, rainfall that would have normally percolated into the soil is instead converted to runoff that flows directly to downstream creeks, bays, and beaches. This phenomenon is especially pronounced during high-intensity rainfall events. Historic increases in the amount of impervious cover have increased the frequency and intensity of stormwater flows that occur within the region's watercourses (City of San Diego 2021).

The Clean Water Act (CWA), Section 303(d), requires states to develop a list of waters that do not meet water quality standards. These waters are called "water quality limited segments." This list classifies seven segments within the San Diego Hydrologic Unit as impaired water bodies. Two of these water bodies are located downstream of the Proposed Project—Alvarado Creek and the San Diego River (Lower). The pollutants/stressors and potential sources for these impaired water bodies are identified in Table 4.9-2 (SWRCB 2022).

Table 4.9-2. 2020–2022 Section 303(d) Pollutants/Stressors Alvarado Creek and San Diego River (Lower)

Location	Pollutant/ Stressor	Potential Source	Proposed TMDL Completion	Estimated Size Affected (Miles)
Alvarado Creek	Nitrogen	Source unknown	2023	5
	Selenium	Source unknown	2021	5
San Diego River (Lower)	Benthic community effects	Source unknown	2025	29
	Bifenthrin	Source unknown	2033	29
	Chlordane	Source unknown	2033	29
	Chloride	Source unknown	2033	29
	Color	Source unknown	2033	29
	Cyfluthrin	Source unknown	2033	29
	Cypermethrin	Source unknown	2033	29
	Indicator bacteria	Source unknown	NP	29
	Nitrogen	Source unknown	2029	29
	Low dissolved oxygen	Source unknown	2033	29

Table 4.9-2. 2020–2022 Section 303(d) Pollutants/Stressors Alvarado Creek and San Diego River (Lower)

Location	Pollutant/ Stressor	Potential Source	Proposed TMDL Completion	Estimated Size Affected (Miles)
	Permethrin	Source unknown	2033	29
	Phosphorus	Source unknown	2033	29
	Pyrethroids	Source unknown	2033	29
	Total dissolved solids	Source unknown	2019	29
	Toxicity	Source unknown	2025	29
	Turbidity	Source unknown	2033	29

Source: SWRCB 2022.
Note: TMDL = total maximum daily load; NP = Not provided.

4.9.1.7 Groundwater

A groundwater basin is a hydrogeologic unit containing one large aquifer and several connected and interrelated aquifers. Major watersheds in the San Diego Region contain groundwater basins. Based on site-specific geotechnical investigations (Appendices F-1 and F-2), the formational soils on the Project site (i.e., Eocene Mission Valley Formation and Stadium Conglomerate) are dense and there is no regional groundwater within the upper 50 feet of the ground surface. The nearest groundwater basin to the Project site is the Mission Valley Groundwater Basin, located approximately 0.75 miles northwest of the Peninsula Component site (see Figure 4.9-4, Mission Valley Groundwater Basin). The Project site is located outside the groundwater basin footprint, as defined by the San Diego County Water Authority. Drained by the San Diego River, this basin underlies a west-southwest-trending valley and is bounded by lower-permeable San Diego, Poway, and Lindavista Formations. The aquifers within the Mission Valley Groundwater Aquifer, located within the Mission Valley Groundwater Basin, are summarized in Table 4.9-3.

Table 4.9-3. Mission Valley Groundwater Aquifers

Aquifer	Description	Thickness (Feet)
Shallow alluvium	Quaternary-age medium- to coarse-grained sand and gravel	Approximately 80–100
San Diego Formation	Thick accumulation of older, semi-consolidated alluvial sediments	Generally less than 100

Source: DWR 2004.

Based on Project-specific geotechnical investigations (Appendices F-1 and F-2), groundwater and/or seepage was not encountered in any current or prior borings at the sites. However, based on previous SDSU geotechnical investigations, a light to moderate volume of seepage is often encountered at or near the geologic contact between the fill and the conglomerate beds within the Eocene deposits throughout the SDSU main campus. The Eocene deposits may also contain permeable zones that collect perched groundwater from nearby irrigation, leaking utilities, or other water sources.

4.9.2 Regulatory Framework

Federal

Clean Water Act

The CWA, as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality (33 USC 1251 et seq.). The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA establishes basic guidelines for regulating discharges of both point and non-point sources of pollutants into the waters of the United States. The CWA requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA. Relevant sections of the CWA are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d) of the CWA, the State of California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives. California is required to establish total maximum daily loads (TMDLs) for each pollutant/stressor. A TMDL defines how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. Once a water body is placed on the Section 303(d) List of Water Quality Limited Segments, it remains on the list until a TMDL is adopted and the water quality standards are attained, or there are sufficient data to demonstrate that water quality standards have been met and delisting from the Section 303(d) list should take place.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. This process is known as the Water Quality Certification/Waste Discharge Requirements (WDRs) process.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine RWQCBs, which have several programs that implement individual and general permits related to construction activities, stormwater runoff quality, and various kinds of non-stormwater discharges.
- Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program, known as the Discharge of Dredged or Fill Material into Waters of the United States, is jointly administered by the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency (EPA).

Numerous agencies have responsibilities for administration and enforcement of the CWA. At the federal level this includes EPA, the U.S. Army Corps of Engineers, the Bureau of Reclamation, and the major federal land management agencies, such as the U.S. Forest Service and the Bureau of Land Management. At the state level, with the exception of tribal lands, the California Environmental Protection Agency and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the certain provisions of the CWA in California. At the local level, the San Diego RWQCB, municipalities, and special districts have implementation and enforcement responsibilities under the CWA.

Revised TMDL for Indicator Bacteria

Indicator bacteria is a common impairment for water bodies of the San Diego Region, including the Lower San Diego River. Indicator bacteria such as fecal coliform and enterococcus originate in the intestines of warm-blooded animals. Sources of such bacteria include leaking sewer pipes, wildlife, pet wastes, municipal wastewater treatment plants, and homeless encampments, among other sources. When present in surface water, indicator bacteria may cause gastrointestinal illnesses.

In 2010, the San Diego RWQCB adopted Resolution No. R9-2010-0001, an amendment incorporating revised bacterial TMDLs into the San Diego RWQCB Basin Plan. After being approved by the SWRCB and the Office of Administrative Law, this TMDL Basin Plan Amendment became fully effective in April 2011.

Bacteria TMDLs have been established under the TMDL Basin Plan Amendment for the lower 6 miles of the San Diego River, among 20 other water bodies listed on the 2002 CWA Section 303(d) List of Water Quality Limited Segments. Bacteria densities in the waters of the Lower San Diego River unreasonably impair and/or threaten to impair the water quality needed to support the beneficial use of waters designated for contact recreation (REC-1). Different REC-1 Water Quality Objectives were used as the basis for wet weather and dry weather allowable load because the bacteria transport mechanisms to receiving waters are different under wet and dry weather conditions. Wet weather days are defined as days with rainfall events of 0.2 inches or greater and the following 72 hours. Table 4.9-4 below summarizes the current total allowable loads for fecal coliform and enterococcus in the Lower San Diego River. These TMDLs also apply to the beaches and creeks in the San Diego region.

Table 4.9-4. TMDLs for San Diego River (Lower)

Indicator Bacteria	Wet Weather Numeric Target Total Allowable Load or TMDL (CFU/100 mL)	Dry Weather Numeric Target Total Allowable Load or TMDL (CFU/100 mL)
Fecal Coliform	400	200
Enterococcus	104	35

Source: San Diego RWQCB 2017.
Notes: TMDL = total maximum daily load; CFU/100 mL = colony forming units per 100 milliliters.

Federal Antidegradation Policy

The federal Antidegradation Policy (40 CFR 131.12) is designed to protect water quality and water resources. The policy requires states to develop statewide antidegradation policies and identify methods for implementing those policies. State antidegradation policies and implementation measures must include the following provisions: (1) existing instream uses and the water quality necessary to protect those uses shall be maintained and protected; (2) where existing water quality is better than necessary to support fishing and swimming conditions, that quality shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development; and (3) where high-quality waters constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected. State permitting actions must be consistent with the federal Antidegradation Policy.

California Toxics Rule

The California Toxics Rule (CTR) is a federal regulation issued by EPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in the State of California (EPA 2000). EPA adopted the CTR in 2000 to create legally applicable water quality criteria for priority toxic pollutants for inland surface waters, enclosed bays, and estuaries to protect human health and the environment for all purposes and programs under the CWA. The CTR aquatic life criterion were derived using a CWA Section 304(a) method that produces an estimate of the highest concentration of a substance in water that does not present a significant risk to the aquatic organisms in the water and their uses (EPA 2000). The CTR water quality criteria provide a reasonable and adequate amount of protection with only a small possibility of substantial overprotection or under protection.

The CTR's numerical aquatic life criteria are expressed as short-term (acute) and long-term (chronic) averages, rather than one number, in order that the criteria more accurately reflect toxicological and practical realities (EPA 2000). Due to the intermittent nature of stormwater runoff, especially in Southern California, the acute criteria are considered to be more applicable to stormwater conditions than chronic criteria and therefore are used in assessing project impacts. Acute criteria represent the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time (1 hour) without deleterious effects; chronic criteria equal the highest concentration to which aquatic life can be exposed for an extended period of time (4 days) without deleterious effects.

State

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state,[2] which includes isolated wetlands and groundwater in addition to federal waters. The Porter-Cologne Act grants the SWRCB and the nine RWQCBs power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the federal CWA and also its responsibilities to adopt plans and policies, to regulate discharges of waste to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. Further, the Porter–Cologne Act establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

The act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. California Water Code, Section 13260(a), requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system, that could affect the quality of the waters of the state, to file a Report of Waste Discharge with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law; for other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), WDRs are required and are issued exclusively under state law. WDRs typically require many of the same best management practices (BMPs) and pollution control technologies as required by NPDES-derived permits.

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2 "Waters of the state" are defined in the Porter–Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]).

California Antidegradation Policy

The California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California, was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the state, not just surface waters. The policy requires that, with limited exceptions, whenever the existing quality of a water body is better than the quality established in individual Basin Plans (see description below), such high quality must be maintained, and discharges to that water body must not unreasonably affect any present or anticipated beneficial use of the water resource.

Water Quality Control Plan for the San Diego Basin

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The San Diego RWQCB implements the Water Quality Control Plan for the San Diego Basin (Basin Plan) (San Diego RWQCB 2021), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan (California Water Code, Sections 13240–13247). The Porter–Cologne Act also provides the RWQCBs with authority to include within their Basin Plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The Basin Plan is continually updated to include amendments related to implementation of TMDLs, revisions of programs and policies within the San Diego RWQCB region, and changes to beneficial use designations and associated water quality objectives. The Basin Plan is the guiding document that establishes water quality standards for the region.

The basin plan for each region provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins. Specific criteria are provided for the larger, designated water bodies within the region, as well as general criteria or guidelines for ocean waters, bays, and estuaries; inland surface waters; and groundwaters. In general, the narrative criteria require that degradation of water quality not occur due to increases in pollutant loads that will adversely impact the designated beneficial uses of a water body.

Statewide Trash Control Requirements

In 2015, the SWRCB adopted statewide requirements, referred to as the Trash Amendments, for the implementation of trash controls in priority land uses.[3] The Trash Amendments do the following: (1) establish a narrative water quality objective for trash, (2) establish corresponding applicability, (3) establish a prohibition on the discharge of trash, (4) provide implementation requirements for permitted stormwater and other discharges, (5) set a time schedule for compliance, and (6) provide a framework for monitoring and reporting requirements (SWRCB 2015).

Upon reissuance or amendment, SWRCB and RWQCB municipal separate storm sewer system (MS4) permits will contain trash control implementation requirements and compliance milestones to demonstrate progress towards 100% compliance with the Trash Amendments. The General Permits for Stormwater Discharges Associated with Industrial and

[3] On April 7, 2015, the SWRCB (1) adopted an Amendment to the Water Quality Control Plan for the Ocean Waters of California (Ocean Plan) to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California, collectively referred to as the "Trash Amendments," and (2) approved the Final Staff Report, including the Substitute Environmental Documentation. Priority land uses include commercial areas.

Construction Activities will also contain the prohibition of trash in stormwater and non-stormwater discharges when those permits are reissued.

Construction General Permit

For stormwater discharges associated with construction activity in the State of California, the SWRCB has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit [CGP]) to avoid and minimize water quality impacts attributable to such activities. The CGP applies to all projects in which construction activity disturbs 1 acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The CGP requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which would specify water quality BMPs designed to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. Routine inspection of all BMPs is required under the provisions of the CGP, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

To receive coverage under the CGP, a project applicant must submit a Notice of Intent and permit registration documents to the SWRCB. Permit registration documents include completing a construction site risk assessment to determine appropriate coverage level; detailed site maps showing disturbance area, drainage area, and BMP types/locations; the SWPPP; and, where applicable, post-construction water balance calculations and active treatment systems design documentation. The Proposed Project would be required to obtain a CGP and prepare a SWPPP.

Phase II Small MS4 Permit

To enable efficient permitting under both the CWA and the Porter–Cologne Act, the SWRCB and the RWQCBs administer permit programs that group similar types of activities with similar threats to water quality. These "general permit" programs include the Phase II Small MS4 Permit,[4] the CGP, and other general permits for low-threat discharges. SDSU is considered a non-traditional permittee under the Small (Phase II) MS4 Permit. The surrounding municipalities (i.e., the City) and the California Department of Transportation are subject to separate Phase I MS4 Permits (Order No. R9-2013-0001, as amended, and Water Quality Order No. 2012-0011-DWQ, as amended, respectively).

The Small MS4 Permit consists of several program elements: program management, public involvement/participation, illicit discharge detection and elimination, construction site stormwater runoff control, pollution prevention/good housekeeping for permittee operations, post-construction stormwater management for new development and re-development, water quality monitoring requirements, program effectiveness assessment, and annual reporting. Besides requiring implementation of construction site BMPs and performance criteria and design guidelines for development within the Small MS4's service area, the Small MS4 Permit also requires operators to map their outfalls, properly maintain the storm drain system, educate the public on pollution prevention, and monitor and report on the quality of MS4 discharges to receiving waters so that the effectiveness of the program can be evaluated. Collectively, the program elements are designed to ensure discharges from the storm drain system do not contain pollutant loads at levels that violate water quality standards and Basin Plan

4 A Small MS4 is defined as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, or storm drains) that serve populations of less than 100,000 persons.

objectives and policies (such as a TMDL for a CWA Section 303[d] impaired water body). Implementation of the program elements are the responsibility of the Small MS4 operator, in this case, SDSU.

Of particular relevance to the Proposed Project is that the Small MS4 Permit requires Regulated Projects[5] to implement post-construction measures in the form of site design, source control, stormwater treatment measures, and baseline hydromodification management measures to reduce the discharge of pollutants in stormwater to the maximum extent practicable. Examples include the following:

- **Source Control Measures:** Source control measures seek to avoid introduction of water quality pollution/degradation in the first instance. Source control strategies include covering refuse/trash areas, properly managing outdoor storage of equipment/materials, minimizing use of pesticides and fertilizers in landscaping, using sumps or special area drains to send non-stormwater discharges to the sewer, and ensuring regular grounds maintenance.
- **Site Design Measures:** Site design measures require early assessment and evaluation of how site conditions, such as soils, vegetation, and flow paths, will influence the placement of buildings and paved surfaces. The evaluation is used to meet the goals of capturing and treating runoff and maximizing opportunities to mimic natural hydrology. Options for site design measures include preserving trees, buffering natural water features, disconnecting impervious surfaces, and using green roofs or porous pavement.
- **Treatment Control Measures:** Treatment control measures retain, treat, and/or infiltrate the site runoff produced under normal circumstances, controlling both the quality and quantity of stormwater released to the stormwater conveyance system and natural receiving waters. In most situations, this means implementing structural BMPs (e.g., infiltration, bioretention and/or rainfall harvest and re-use) to address the volume and rate of runoff produced by 85th percentile storm[6] (i.e., design capture volume). The Small MS4 Permit requires regulated projects to prioritize stormwater capture (e.g., infiltration and/or harvest and re-use) unless site conditions (e.g., low-permeability soils) make it infeasible.
- **Hydromodification Measures:** Hydromodification measures are required for projects that create or replace 1 or more acres of impervious surfacing so that post-project runoff shall not exceed the estimated pre-project flow rate for the 2-year, 24-hour storm. If the project creates or replaces less than 1 acre of impervious surfaces, and the project demonstrates that post-project flows from the site are less than pre-project flows, then no hydromodification measures from Section E.12.e.(ii)(f) from the Phase II Small MS4 General Permit are required.
- **Operation and Maintenance Requirements:** The Small MS4 Permit requires that maintenance agreements stay in place with each property to ensure permanent treatment control measures developed on site are properly maintained and/or repaired in accordance with the stormwater quality control plan.

The aforementioned site design, treatment control, and hydromodification measures are often collectively referred to as “low impact development” (LID) standards or design. The Proposed Project meets the criteria as a Regulated Project and, thus, is required to comply with the stormwater management requirements of the Small MS4 Permit. Regulated Projects are required to implement BMPs that are designed to evapotranspire, infiltrate, harvest/use, and/or biotreat stormwater by retaining the volume of stormwater runoff produced from a 24-hour, 85th percentile

5 Regulated Projects are defined in Section E.12.c of Water Quality Order 2013-0001-DWQ and include all projects that create and/or replace 5,000 square feet or more of impervious surface, not including detached single-family home projects that are not part of a larger plan of development, interior remodels, routine maintenance or repair within the existing footprint, or linear underground/overhead projects.

6 The 85th percentile storm represents a value of rainfall, in inches, such that 85% of the observed 24-hour rainfall totals within the historical record will be less than that value.

storm event, or the volume of annual runoff required to achieve 80% or more capture (i.e., the design capture volume). For flow-based criteria, BMPs must be designed to accommodate the flow of runoff from a rain event equal to or at least 0.2 inches per hour intensity, or the flow of runoff produced by a rain event equal to at least two times the 85th percentile hourly rainfall intensity.

The Small MS4 Permit is administered by the SWRCB, while other general WDRs are administered by the San Diego RWQCB. Point source discharges or other activities that threaten water quality that are not covered under a general permit must seek individual NPDES permits and/or WDRs, depending on the type, location, and destination of the discharge. For these types of discharges, the initial step in the process is to submit a "Report of Waste Discharge" to the San Diego RWQCB, which then determines the appropriate permitting pathway.

California Green Building Standards Code

The 2022 California Green Building Standards Code (CALGreen), Part 11 of the California Building Standards Code (Title 24), became effective on January 1, 2023. CALGreen measures are designed to improve public health, safety, and general welfare by utilizing design and construction methods that reduce the negative environmental impact of development and encourage sustainable construction practices.

CALGreen provides mandatory direction to developers of all new construction and renovations of residential and nonresidential structures with regard to all aspects of design and construction, including but not limited to site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards that are designed to encourage developers and cities to aim for a higher standard of development.

Under CALGreen, all residential and nonresidential sites are required to be planned and developed to keep surface water from entering buildings and to incorporate efficient outdoor water use measures. Construction plans are required to show appropriate grading and surface water management methods such as swales, water collection and disposal systems, French drains, water retention gardens, and other water measures that keep surface water away from buildings and aid in groundwater recharge. Plans should also include outdoor water use plans that utilize weather or soil moisture-controlled irrigation systems. In addition to the above requirements, nonresidential structures are also required to develop an irrigation water budget for landscapes greater than 2,500 square feet that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources Model Water Efficient Landscape Ordinance where no local ordinance is applicable.

Dewatering General Permit

The San Diego RWQCB issued General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region (Order No. R9-2015-0013, NPDES No. CAG919003) (effective October 1, 2015). The General Order regulates groundwater extraction discharges to surface water including construction dewatering, foundation drains, and groundwater extraction related to groundwater remediation cleanup projects. The General Order states for groundwater extraction discharges to surface waters, pollutant concentrations in the discharge shall not cause, have a reasonable potential to cause, or contribute to an excursion above any applicable water quality criterion established by EPA pursuant to CWA Section 303 or adopted by the SWRCB or RWQCBs. In no case shall waste be discharged to areas designated as being of special biological significance. Pollutant concentrations in the discharge must comply with the specifications in the General Order. Effluent limitations for groundwater extraction waste discharges vary based on the receiving water type; the four categories are freshwater inland surface waters, saltwater inland surface waters, bays and estuaries including San Diego Bay, and the surf zone of the Pacific Ocean. As part of obtaining the Notice of Intent, dischargers must include an initial sampling and monitoring report.

4.9.3 Significance Criteria

The significance criteria used to evaluate the Project impacts to hydrology and water quality are based on Appendix G of the CEQA Guidelines, Hydrology and Water Quality. According to Appendix G, a significant impact related to hydrology and water quality would occur if the Project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. result in substantial erosion or siltation on or off site;
    b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
    c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    d. impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Methodology

Potential impacts related to water quality and hydrology are evaluated based on the anticipated changes in topography, land cover, drainage infrastructure, and water pollutant sources associated with the Proposed Project. The assessment considers the sensitivity of the surrounding environment and downstream waters to Project-related impacts, as well as the effectiveness of standard industry practice with regard to hydrology and hydraulics, including required compliance with applicable permits, laws, and regulations.

The analysis contained in this section is based on design information necessary to conduct an adequate impact analysis under CEQA. As the engineering and design of the Proposed Project proceed to final stages, the Project engineer will perform the calculations necessary to refine the location, design, and size of stormwater and water quality features, if necessary, to remain compliant with applicable stormwater standards. While exact details regarding the stormwater drainage design may be further refined as the design process moves forward, the Project's proposed uses, overall footprint, and stormwater discharge locations will not change. Therefore, the conclusions reached in the analysis would be unaffected by any changes in stormwater drainage design specifics.

4.9.4 Impacts Analysis

1. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction

Project construction activities, such as grading, excavation, and trenching, would result in disturbance of soils on the Project site. Construction site runoff can contain soil particles and sediments from these activities. Dust from construction sites, in addition to spills or leaks from heavy equipment and machinery, staging areas, or building sites, can also contribute runoff to adjacent water bodies. Typical pollutants could include petroleum products and heavy metals from equipment, as well as products such as paints, solvents, and cleaning agents, which could contain hazardous constituents. Sediment from erosion of graded or excavated surface materials, leaks or spills from equipment, or inadvertent releases of construction materials could result in water quality degradation of drainages within the open space adjacent to the Peninsula Component site (see Figure 4.9-1) and downstream in Alvarado Creek and the San Diego River, if runoff containing sediment or pollutants enters receiving waters in sufficient quantities to exceed water quality objectives. In addition, a portion of the City's Multi-Habitat Plan Area has been designated over the Peninsula Component site. As a result, construction related runoff could adversely impact biological resources within this designated area. (See Section 4.3, Biological Resources, for additional information.)

The prevailing standard is to reduce pollutant contributions to the maximum extent practicable regardless of how minor the sediment contribution might be. As discussed in Section 4.9.2, for stormwater discharges associated with construction activity in the State of California, a CGP must be obtained by the applicant to avoid and minimize water quality impacts attributable to such activities. The CGP applies to all projects in which construction activity disturbs 1 acre or more of soil. Construction activity subject to this permit includes site clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The CGP requires the development and implementation of a SWPPP, which would specify water quality BMPs designed to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. Routine inspection of all BMPs is required under the provisions of the CGP, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB. The Proposed Project would be required to obtain a CGP, prepare a SWPPP, and follow required BMPs during construction.

Typical erosion and sediment control features that would be required as part of construction would include gravel bag silt basins installed immediately upstream of storm drain inlets; silt and mud cleanup on adjacent streets and storm drain systems; silt and debris removal from lined and unlined ditches after each major rainfall event; inclusion of equipment and workers for emergency work, including stockpiling materials on site, to facilitate rapid construction of temporary devices when rain is imminent; and restoration of erosion/sediment control devices, to the satisfaction of the SDSU campus engineer, after each runoff producing rainfall. Additional erosion/sediment control measures would be installed as may be required by the campus engineer due to uncompleted grading operations or unforeseen circumstances that may arise. Based on recommendations by a site-specific geotechnical investigation (Appendix F-2), graded areas around the Peninsula Component site perimeter would be required to drain away from the face of the slope at the conclusion of each working day to reduce slope erosion. Although the topography of the University Towers East site is flat and no slopes are present, stormwater runoff would be controlled through temporary detention basins, straw wattles, and other sediment control features to minimize off-site stormwater runoff velocities and associated erosion. A copy of the applicable SWPPP would be kept at the construction site.

Non-stormwater discharges during construction would include periodic application of water for dust control purposes. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil but not so excessively as to produce runoff from the construction site. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. These requirements are routine in SWPPPs, which typically state that water would only be applied in a manner that does not generate runoff. Therefore, water applied for dust control would not result in appreciable effects on groundwater or surface water features and thus would not cause or contribute to exceedances of water quality objectives contained in the San Diego RWQCB Basin Plan.

Based on implementation of the above practices, construction-related water quality impacts would be **less than significant.**

Operation

The Project site is currently predominantly paved/developed and impervious to infiltration of stormwater runoff. The Peninsula Component site consists of residential buildings, paved parking areas, and limited landscaping (see Figure 2-3a in Chapter 2, Project Description). The University East Component site is covered entirely by a paved parking lot (Figure 2-3b). As illustrated in the proposed site plans (Figures 2-6a and 2-6b), Project construction would result in an increase in pervious landscaping. Parking would be limited to small staff parking areas, resulting in a reduction of combined parking spaces from 403 (Table 2-1, Existing Uses Summary) to 15 (Table 2-2, Proposed Evolve Student Housing Summary). Construction of the Peninsula Component would result in installation of approximately 285,000 square feet of landscaping. Construction of the University Towers East Component would result in installation of approximately 14,000 square feet of landscaping. Increased landscaping would minimize stormwater runoff by reducing stormwater runoff rates, allowing percolation into underlying soils, and filtering out contaminants, resulting in beneficial water quality impacts in comparison to existing conditions.

Although the amount of pervious surfaces would increase at the Project site, runoff from building rooftops, driveways, and landscaped areas would potentially contain nonpoint source pollutants such as sediment, trash, oil, grease, heavy metals, pesticides, herbicides, and/or fertilizers. Concentrations of pollutants carried in urban runoff are extremely variable, depending on factors such as the volume of runoff reaching the storm drains, time since the last rainfall, and degree to which street cleaning occurs. Without design features to capture and treat stormwater runoff, the increase in the developed area could have adverse water quality impacts on downstream drainages, including drainages within the City's Multi-Habitat Plan Area adjacent to the Peninsula Component site (Figure 4.9-1), nearby Alvarado Creek, and downstream San Diego River, along with the runoff from the 7,100-acre urban watershed area (see Figure 4.9-2).

As a non-traditional permittee, SDSU is subject to Phase II Small MS4 regulations, which require implementation of construction site BMPs, performance criteria, and design guidelines for development within the Small MS4's service area. It also requires operators to map their outfalls, properly maintain the storm drain system, educate the public on pollution prevention, and monitor and report on the quality of MS4 discharges to receiving waters so the effectiveness of the program can be evaluated. Collectively, the program elements are designed to ensure that discharges from the storm drain system do not contain pollutant loads at levels that violate water quality standards and Basin Plan objectives and policies (such as a TMDL for Clean Water Act, Section 303[d], or an impaired water body). Implementation of the program elements is the responsibility of the Small MS4 operator, which, for the Proposed Project, is SDSU.

Based on the Small MS4 Permit requirements, the Project is considered a Regulated Project because it would create and/or replace 5,000 square feet or more of impervious surfaces. Regulated Projects are required to implement BMPs that are designed to retain the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event, or the volume of annual runoff required to achieve 80% or more capture (i.e., the design capture volume). For flow-based criteria, BMPs must be designed to accommodate the flow of runoff from a rain event equal to or at least 0.2 inches per hour intensity, or the flow of runoff produced by a rain event equal to at least two times the 85th percentile hourly rainfall intensity.

Based on recommendations by the site-specific geotechnical investigation (Appendix F-1), on-site soils are not expected to support full or partial stormwater infiltration. Rather, the report recommends that lined (e.g., minimum 20-millimeter high-density polyethylene or PVC impermeable membrane) permeable pavement (e.g., interlocking concrete paver blocks), planters, and landscaped areas be constructed and connected to a dedicated drainage system to channel the water by pipe to a suitable drainage outlet.

In compliance with regulated Small MS4 Permit requirements, the Peninsula Component would include installation of a stormwater quality unit, such as a modular wetland system or an approved equivalent, in combination with an underground stormwater storage tank. A flow splitter would be installed to bypass peak stormwater flows. In addition, a lined stormwater storage pond or lined biofiltration basin would be constructed, in combination with stormwater quality units, such as a modular wetland system. The University Towers East Component would include installation of a stormwater quality treatment unit, such as a modular wetland system or approved equivalent, in combination with underground stormwater storage tanks and a pump vault with a triplex pump to discharge into the curb and gutter. At both sites, stormwater would flow through a series of catch basins, swales, and storm drain pipes; sheet flow and discharge to the permanent BMPs described above; and/or be routed to landscape areas where feasible. Roof drains would be hard-piped into the permanent BMPs for treatment. After treatment, stormwater would be discharged off site via existing storm drain pipes and/or curb and gutter (Abdellatif, pers. comm., 2024).

In addition, in compliance with regulated Small MS4 Permit requirements, hydromodification measures would be designed so that post-construction flow rates and durations do not exceed pre-development runoff conditions for the range of flows that could result in increased potential for erosion or degraded instream habitat downstream. As a result, water quality impacts related to operations would be **less than significant.**

SDSU's compliance with the water quality and stormwater standards for state-sponsored projects, particularly with respect to the general permit for Small MS4s described above, would achieve a similar result as compliance with local development standards.

2. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As described above, Project construction would result in an increase in pervious areas, resulting in beneficial impacts due to an increase in potential groundwater recharge. Based on site-specific geotechnical investigations (Appendices F-1 and F-2), groundwater and/or seepage was not encountered in any current or prior borings at the sites. However, based on previous SDSU geotechnical investigations, a light to moderate volume of seepage is often encountered at or near the geologic contact between the fill and the conglomerate beds within the Eocene deposits throughout the SDSU main campus. The Eocene deposits may also contain permeable zones that collect perched groundwater from nearby irrigation, leaking utilities, or other water sources. Accordingly, zones of seepage may be encountered in excavations at the Project site, particularly around the contact between the fill and underlying Eocene deposits.

As a result, it is possible that construction contractors may need to pump groundwater seepage out of excavations during construction of sub-grade foundations and facilities (i.e., groundwater dewatering). If this activity is required, its effects on shallow groundwater levels would be temporary and highly localized. Any impacts would be limited to the perched groundwater and, therefore, would not affect static water levels in the Mission Valley Groundwater Basin, located approximately 0.75 miles northwest of the site (Figure 4.9-4). Furthermore, the campus (and the City as a whole) is reliant on municipal water supplies, which are primarily imported from the Colorado River and Northern California (City of San Diego 2024). As a result, there are no existing or proposed groundwater wells in or adjacent to the Proposed Project that could be adversely affected by construction-related dewatering activities. As such, direct impacts of the Proposed Project on aquifer volumes, the local groundwater table, and the production rate of nearby wells would be **less than significant.**

3. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- *i)* ***result in substantial erosion or siltation on- or off-site;***
- *ii)* ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; or***
- *iii)* ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

As discussed in Section 4.15, several 12- to 24-inch storm drains are located on the west, northwest, north, and east portions of the Peninsula Component site. The western storm drains exit the site via the canyon located west of the site (see Figure 4.9-2) and all of the storm drains empty into existing City owned and maintained stormwater conveyance infrastructure. The University Towers East Component site is located at a relative highpoint on Montezuma Road; therefore, stormwater from the site occurs as sheet flow, which flows west, north, and east into a series of existing surface drainage features, and ultimately into a 12-inch storm drain located approximately 1,440 feet west of the Project site and an 18- to 24-inch storm drain located approximately 1,200 feet east of the site.

As discussed above, the Project would represent an increase in pervious surfaces due to the proposed increase in landscaping. Construction of the Peninsula Component would include installation of approximately 285,000 square feet of landscaping. Similarly, construction of the University Towers East Component would result in installation of approximately 14,000 square feet of landscaping. Increased landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

Also as previously discussed, the Proposed Project would be required to comply with the stormwater management requirements for Regulated Projects under the Small MS4 Permit. As a result, the Project must be constructed such that post-construction flow rates and durations do not exceed pre-development runoff conditions for the range of flows that potentially result in increased potential for erosion or degraded instream habitat downstream. As described above, stormwater at the Project site would flow through a series of catch basins, swales, storm drain pipes; sheet flow and discharge to the permanent BMPs described above; and/or be routed to landscape areas where feasible. Roof drains would be hard-piped into the permanent BMPs for treatment. The proposed LID features would reduce stormwater runoff rates such that post-construction flow rates would not exceed pre-development runoff conditions. After treatment, stormwater would be discharged off site via existing storm drain pipes and/or curb and gutter. At the Peninsula Component site, stormwater would drain into the existing 12- to 24-inch storm drains located along the west, northwest, north, and east side of the site. At the University Towers East Component site, stormwater would drain into the curb and gutter along the north side of the site before flowing west toward the curb and gutter along Montezuma Road (KPFF, pers. comm., 2024).

As a result, Project related stormwater runoff would not cause on- or off-site erosive scour and siltation of downstream canyon drainages and Alvarado Creek, would not result in on- or off-site flooding, and would not exceed the capacity of downstream stormwater drainages. In addition, water quality BMPs, including proposed partial stormwater discharge into landscape areas, would minimize polluted runoff. As a result, impacts relative to existing drainage patterns would be **less than significant**.

iv) impede or redirect flood flows?

The SDSU campus is not located within a flood hazard area (see Figures 4.9-1 and 4.9-3). Therefore, neither construction nor operation of the Proposed Project would impede or redirect flood flows, and **no impacts** would occur relative to flood flows.

4. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The SDSU campus is not located within a flood hazard, tsunami, or seiche-prone area. Therefore, neither construction nor operation of the Proposed Project would risk the release of pollutants due to Project inundation. As such, **no impacts** related to pollutant release would occur.

5. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Construction

As previously noted, the Proposed Project would be required to comply with the CGP, requiring preparation and implementation of a SWPPP to control runoff from construction work sites. The SWPPP would include BMPs to address transport of sediment and protect properties from erosion, flooding, or the deposition of mud, debris, or construction-related pollutants. Implementation of BMPs, including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures, would substantially reduce the potential for impacts to surface water quality occurring during construction. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts from construction would be **less than significant**.

Operation

The Proposed Project would be subject to the requirements of the Basin Plan, which outlines water quality objectives for all surface water resources within the basin, including the nearby Alvarado Creek and downstream San Diego River. Compliance with the Basin Plan is implemented through WDRs for all surface water discharges, including stormwater. SDSU, as a Permittee under the SWRCB Phase II Small MS4 General Permit (2013-0001 DWQ), is required to implement stormwater BMPs that comply with water quality objectives, including capturing and treating stormwater runoff. The Proposed Project meets the criteria as a Regulated Project and is therefore required to comply with the LID stormwater management requirements of the Small MS4 Permit.

Further, groundwater would not be used as a water source for the Project. SDSU (and the City as a whole) is reliant on municipal water supplies, which are primarily imported from the Colorado River and Northern California. Therefore, the Project would not conflict with or obstruct implementation of the Basin Plan or a groundwater sustainability plan (under the Sustainable Groundwater Management Act). As a result, operational impacts would be **less than significant.**

4.9.5 Cumulative Analysis

The Proposed Project, along with other projects producing related impacts in the area, would be required to comply with applicable federal, state, and local water quality regulations. The Proposed Project, along with other projects of greater than 1 acre (which includes most of the projects in the cumulative scenario), would be required to obtain coverage under the NPDES CGP, which requires project proponents to identify and implement stormwater BMPs that effectively control erosion and sedimentation and other construction-related pollutants. Further, nearly all projects identified in the cumulative scenario would meet the definition of "new development and redevelopment projects" under the San Diego County MS4 Permit. Such projects are required to implement site design, source control, and, in some cases, treatment control BMPs to control the volume, rate, and water quality of stormwater runoff from the project during long-term operations. Because adverse water quality and major hydrologic alterations are linked to large-scale development projects and industrial and agricultural land uses, the provisions within the various NPDES permits seek to address impacts. Therefore, the impacts of the Proposed Project, when considered in combination with other related or cumulative projects, would not be cumulatively considerable and, therefore, would not result in a significant cumulative impact.

The anticipated quality of effluent from the Proposed Project BMPs, in addition to the cumulative projects, which would also be required to comply with BMPs, would not contribute concentrations of pollutants of concern that are expected to cause or contribute to a violation of the water quality objectives for receiving surface waters. In addition, the Proposed Project's LID BMPs would control stormwater discharges in accordance with the Small MS4 Permit and Phase II Permit requirements for hydromodification control. Therefore, the Proposed Project's impact contribution would not be cumulatively considerable and, as such, cumulative impacts would be less than significant.

Cumulative impacts to water quality and hydromodification resulting from the Proposed Project, in combination with impacts from other cumulative projects in the watershed, would be addressed through compliance with the CGP, MS4 Permit, San Diego RWQCB Basin Plan water quality objectives, and CWA 303(d) listings, which are intended to be protective of beneficial uses of the receiving waters. Based on compliance with these requirements designed to protect beneficial uses, the Proposed Project's impacts to cumulative water quality and hydromodification impacts would not be cumulatively considerable and, therefore, would be **less than significant.** The Proposed Project would not contribute to a significant cumulative impact.

4.9.6 Summary of Impacts Prior to Mitigation

Based on implementation of a SWPPP, construction-related water quality impacts would be **less than significant.**

In compliance with regulated Small MS4 Permit requirements, hydromodification measures would be designed so that post-construction flow rates and durations would not exceed pre-development runoff conditions for the range of flows that could result in increased potential for erosion or degraded instream habitat downstream. As a result, water quality impacts related to operations would be **less than significant.**

There are no existing or proposed groundwater wells in or adjacent to the Proposed Project that could be adversely affected by construction-related dewatering activities. As such, direct impacts of the Proposed Project on aquifer volumes, the local groundwater table, and the production rate of nearby wells would be **less than significant.**

Project related stormwater runoff would not cause on- or off-site erosive scour and siltation of downstream canyon drainages and Alvarado Creek, would not result in on- or off-site flooding, and would not exceed the capacity of downstream stormwater drainages. In addition, water quality BMPs, including proposed partial stormwater discharge into landscape areas, would minimize polluted runoff. As a result, impacts relative to existing drainage patterns would be **less than significant.**

Neither construction nor operation of the Proposed Project would impede or redirect flood flows, and **no impacts** would occur related to flood flows.

Neither construction nor operation of the Proposed Project would risk the release of pollutants due to Project inundation. As such, **no impacts** related to pollutant release would occur.

The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts from construction would be **less than significant.**

The Project would not conflict with or obstruct implementation of the Basin Plan or a groundwater sustainability plan (under the Sustainable Groundwater Management Act). As a result, operational impacts would be **less than significant.**

Based on compliance with the CGP, MS4 Permit, San Diego RWQCB Basin Plan water quality objectives, and CWA 303(d) listings designed to protect beneficial uses, the cumulative water quality and hydromodification impacts would be **less than significant** and thus the Proposed Project would not contribute to a significant cumulative impact.

4.9.7 Mitigation Measures

Because all potential impacts of the Proposed Project would be less than significant as a result of compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs, the Proposed Project would not result in significant impacts related to hydrology and water quality. No mitigation measures are required.

4.9.8 References

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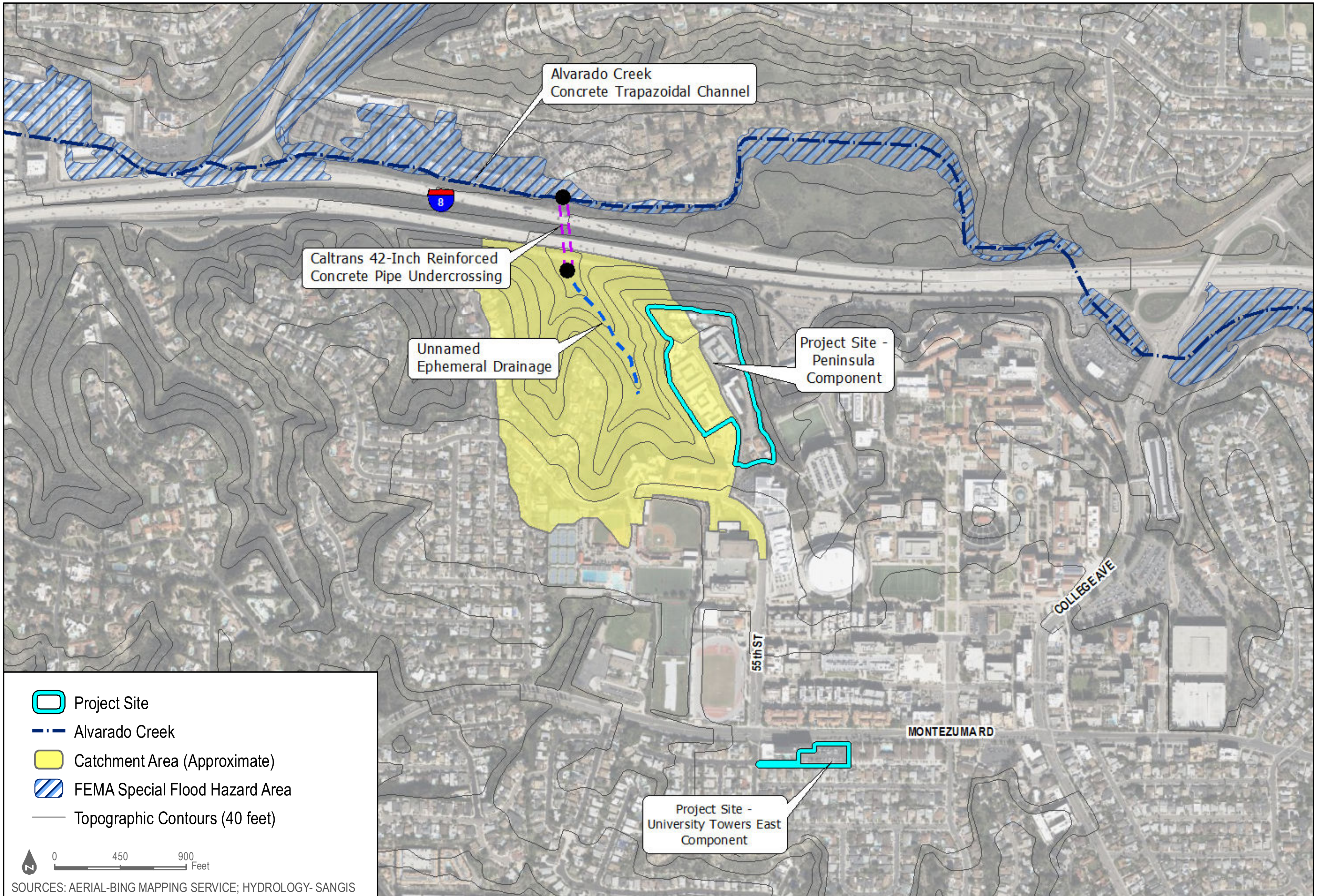

Document Path: Z:\Projects\j1546400 CSU MEA\1546412 SDSU Evolve Student Housing\MAPDOC\EIR\Sec 4\4.9 Hydrology\Figure4.9-1 Topography and Drainage.mxd

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.9-1
Topography and Drainage

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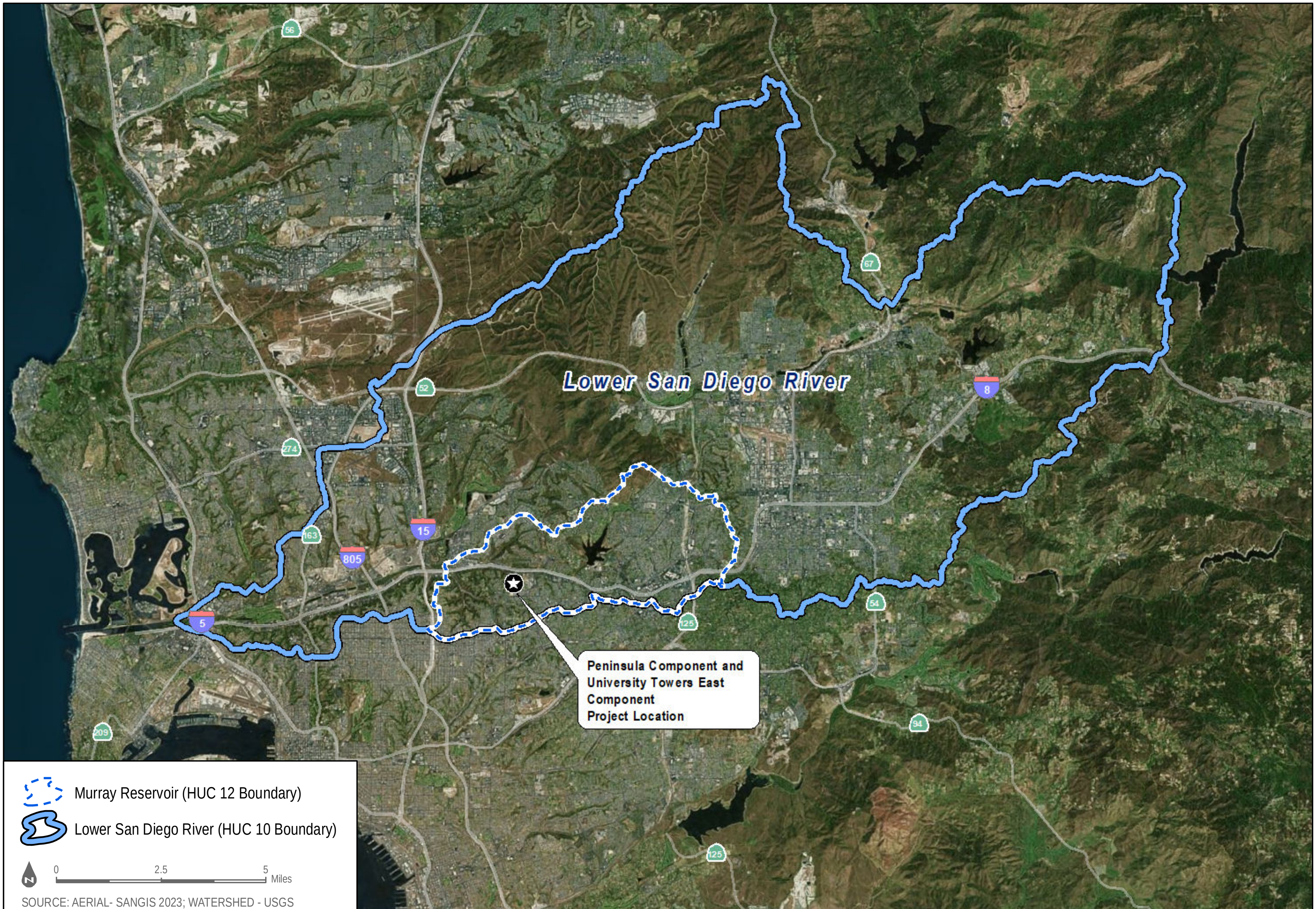

SDSU Evolve Student Housing

San Diego State University

Figure 4.9-2
San Diego River Watershed Map

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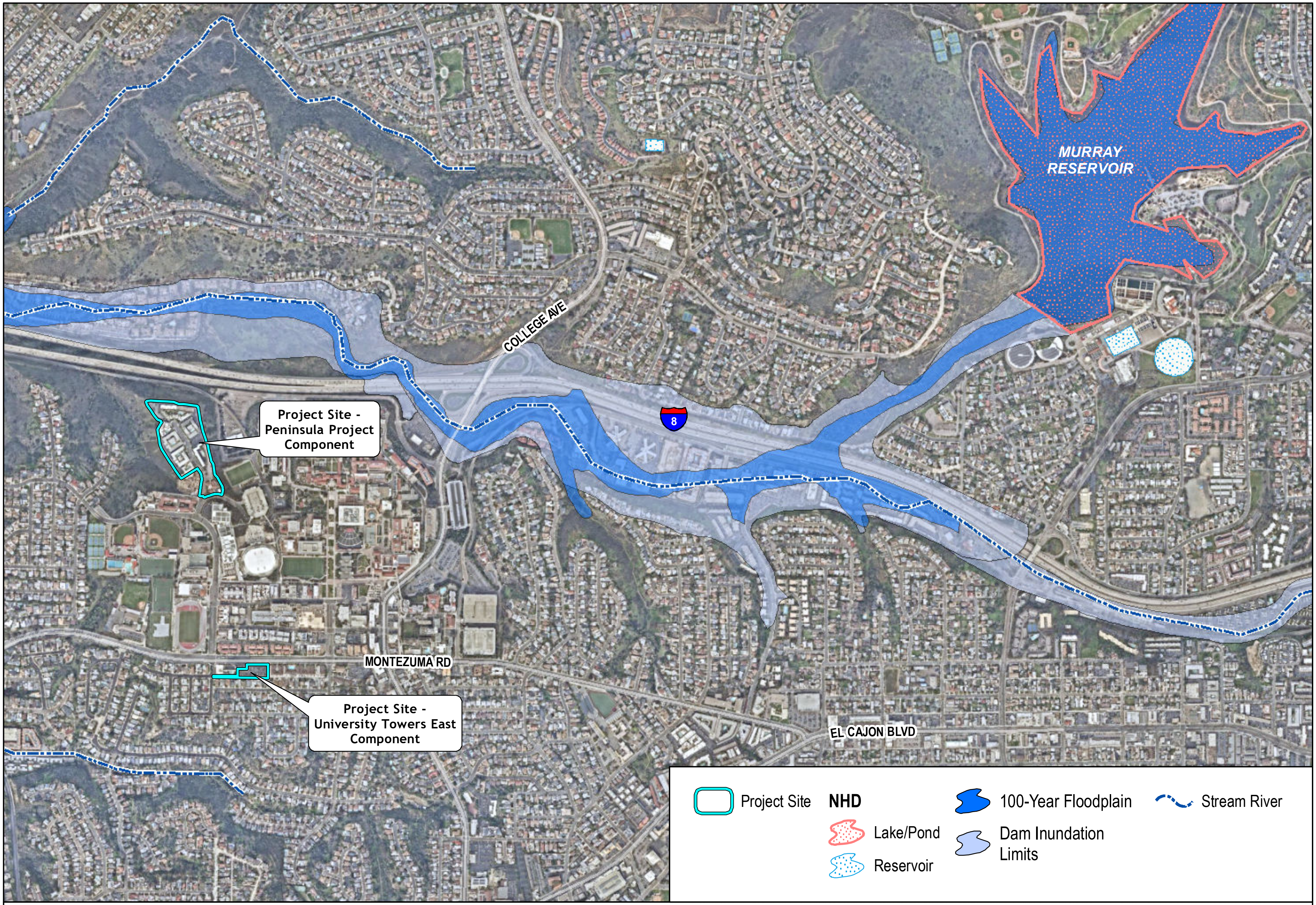

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.9-3
Flood Map

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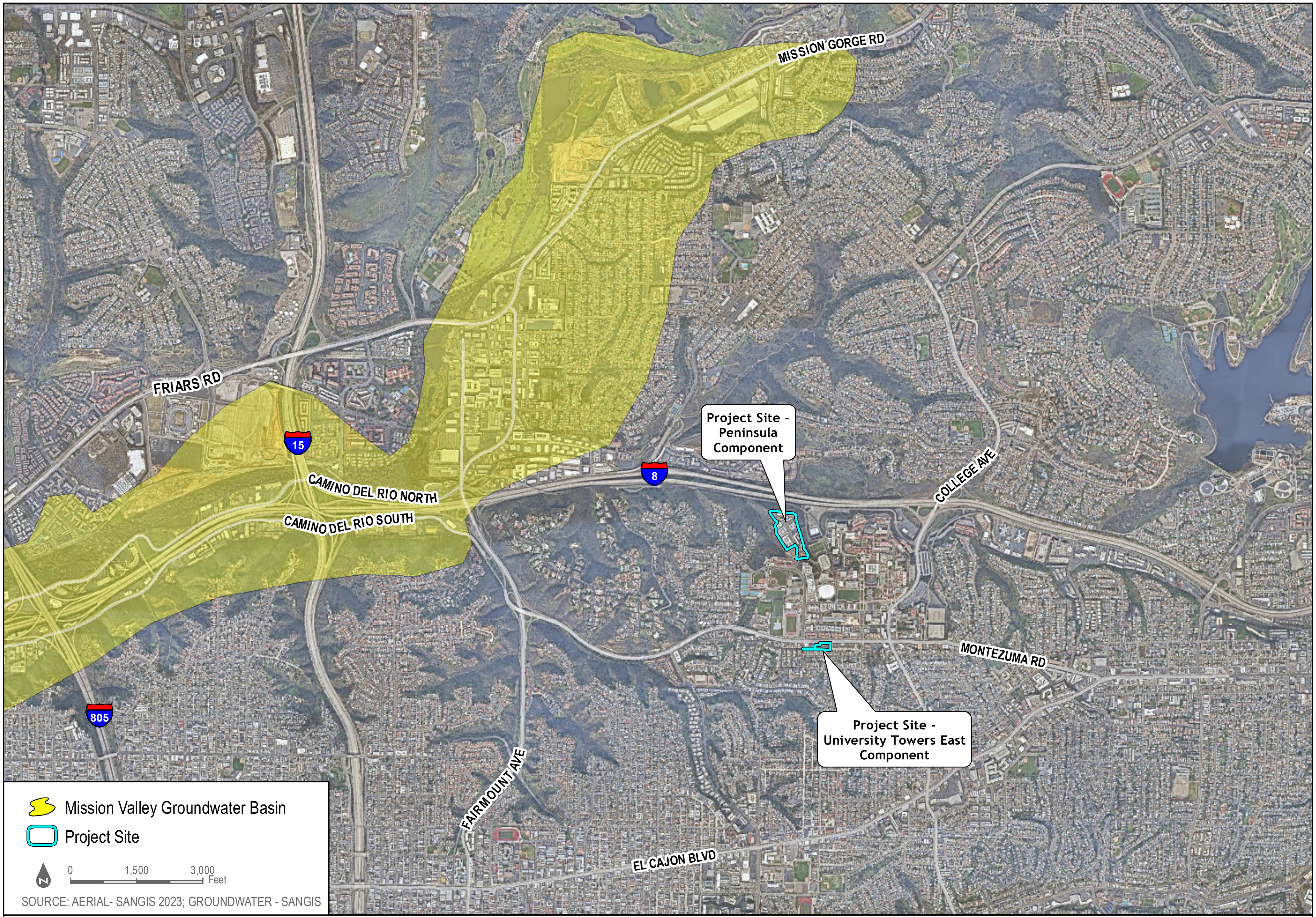

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.9-4
Mission Valley Groundwater Basin

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4.10 Land Use and Planning

This section describes the existing land use and planning conditions of the Project site and its vicinity, identifies applicable planning requirements, evaluates potential land use and planning impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Land Use, and, as necessary, identifies mitigation measures to reduce any identified potentially significant impacts to less than significant.

As a state entity, the California State University (CSU)/SDSU is not subject to local government planning policies and regulations, including the City of San Diego's (City) General Plan and zoning ordinances and Multiple Species Conservation Program (MSCP) Subarea Plan. Consequently, local general plans, zoning codes, and ordinances do not apply to the CSU/SDSU. It should also be noted that the CSU/SDSU is not a signatory to the MSCP and, therefore, is not subject to its land use provisions.

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received a comment related to land use and planning concerning purported zoning violations and compliance with the MSCP. As noted above, the CSU/SDSU is not a signatory to the MSCP, nor is it subject to local planning regulations, including the City's zoning ordinances. Accordingly, the issues raised by the comment are without basis and are not discussed further here. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation, including the referenced comment.

4.10.1 Existing Conditions

There are two components to the Proposed Project, the Peninsula Component and the University Towers East Component, with each located in two different areas of the SDSU campus. Each is described separately below.

Subsequent to approval of the 2007 Campus Master Plan,

Peninsula Component

The Peninsula Component site is located in the northwest portion of the campus, just south of Interstate (I) 8 and west of Canyon Crest Drive. As previously noted, the site currently contains eight, two-story apartment-style student residential buildings, a three-story apartment-style student residential building, the SDSU International Center complex, the SDSU Passport Office, the SDSU Global Education Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). The existing student residential buildings provide housing for 702 students.

Surrounding uses include open space and residential housing to the west, open space, I-8, and residential housing to the north, university uses including parking, recreational fields, academic buildings, and student residential buildings to the east, south, and southwest of the Peninsula Component site. For a detailed view of the existing land uses at the site, see Figure 4.10-1, Project Site Existing Land Uses. For the broader context of existing land uses around the Peninsula Component site, see Figure 4.10-2, Project Vicinity Existing Land Uses.

Figure 4.10-3, Existing vs Proposed Land Uses – Peninsula Component illustrates the transformation from existing land uses to those proposed by the Project, providing a visual comparison of the change in land use to illustrate how the Proposed Project would change the area.

University Towers East Component

The University Towers East Component site is currently used as a parking lot for University Towers, which is located immediately east of the site. The existing parking lot provides 146 parking stalls. Surrounding uses include residential housing to the east, south and west. The site is bordered on the south by Mary Lane Drive, which separates the site from the adjacent single-family residences. Montezuma Road and university uses, including student-housing and recreation fields, are located to the north of the University Towers East Component site. Refer to Figure 4.10-1 for the layout of existing land uses at this site. For the site layout and surrounding uses, see Figure 4.10-2.

4.10.2 Regulatory Framework

Federal

There are no federal plans, policies, or ordinances relevant to land use and planning that would apply to the Proposed Project.

State

There are no state plans, policies, or ordinances relevant to land use and planning that would apply to the Proposed Project.

Local

SDSU Campus Master Plan

SDSU was established in 1897 and moved to its current location on Montezuma Mesa in 1930. The campus initially centered around the Main Quad and expanded north and southeast, utilizing canyon areas for auxiliary uses like sports venues and parking lots.

A comprehensive planning effort began in the 1960s due to parking issues and the need for a functional layout for the campus. SDSU approved its first campus master plan in 1963, with the purpose of outlining directives for facility placement and providing target square footage for academic, support, or athletic spaces. The first campus master plan was updated in 1967 and underwent minor revisions throughout the 1970s. In 1997, several major planning efforts were undertaken at the university via a two-phase master planning process. Phase I documented the existing conditions and proposed development guidelines, while Phase II led to the SDSU Aztec Walk Master Plan (1999) and the SDSU Campus Master Plan 2000 (2001), which focused on redeveloping and expanding campus facilities.

The 2007 SDSU Campus Master Plan Revision provided the framework for implementing SDSU's long-term goals and programs for the campus by identifying needed buildings, facilities, improvements, and services to support campus growth and development from 25,000 on-campus full-time equivalent students (FTES) to 35,000 FTES. Following litigation, the Master Plan was re-approved in 2018. .

In the interim, in 2010, the Campus Master Plan was updated as part of the South Campus Plaza/Plaza Linda Verde Project, which entailed expansion of the campus boundary to the south and east near the intersection of Montezuma Road and College Avenue. In 2017, the Master Plan was further revised following approval of the New Student Housing Project.

Since that time, there have been several minor amendments to the Campus Master Plan, with the most recent revisions in 2022 (SDSU 2022), as shown on Figure 4.10-4, Existing vs Proposed Land Uses – University Towers East Component. As shown on the figure, the site of the Proposed Project is suitable for redevelopment and use as on-campus student residences and would further the campus goal of expanding on-campus student housing opportunities in close proximity to existing student housing and amenities.

SDSU Physical Master Plan

As noted above, in 1997, several major planning efforts were undertaken at the university, one of which was the preparation and adoption of the SDSU Physical Master Plan Phase 1 Existing Conditions (SDSU Physical Master Plan). The Physical Master Plan provides a comprehensive, campus-wide build-out strategy, and includes the following elements: campus background & history, land uses & facilities, and planning & design. Draft design guidelines are also provided in the Master Plan.

The draft design guidelines, included as Chapter 5 of the SDSU Physical Master Plan, provide criteria and standards for the continuing development of the campus. The guidelines consist of spatial environmental elements, architectural elements, landscape architectural elements, and circulation elements. Spatial environmental elements (campus entries, campus edges, campus landmarks, campus nodes, and campus views) generally create the spatial environment of the SDSU campus. Architectural elements (site form and layout; campus neighborhoods; and building character, function and materials) are responsible for setting the design character of the campus and determining the circulation system. Landscape architecture elements (informal open space area; formal urban space area; landscape materials, furnishings & lighting; wayfinding systems; and memorial and public art) are responsible for creating a high visual and aesthetic quality to integrate architecture, landscape architecture, and other site components. Circulation elements (vehicular circulation and parking; pedestrian and bicycle circulation; transit facilities; and utility elements) are responsible for establishing access points and traffic patterns to minimize impacts with adjacent streets and facilities.

4.10.3 Significance Criteria

The significance criteria used to evaluate the project impacts to land use and planning are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to land use and planning would occur if the Project would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Methodology

This section evaluates the existing land use and planning conditions of the Project site and its vicinity, identifies applicable planning requirements, and assesses potential land use and planning impacts of the Proposed Project. The analysis follows the criteria provided in CEQA Guidelines Appendix G and considers whether the Proposed

Project would result in significant impacts or conflicts with existing plans and policies. As a state entity, the CSU/SDSU is not subject not local governing planning policies and regulations, including the City of San Diego's General Plan, zoning ordinances, or the MSCP. Therefore, local general plans, zoning codes, and ordinances are not applicable to the Proposed Project. Following the issuance of the NOP SDSU addressed comments related to purported zoning violations and MSCP compliance, clarifying that, as a non-signatory to the MSCP and not subject to local planning regulations, these concerns are not applicable to the Proposed Project. The evaluation primarily relies on the SDSU Campus Master Plan and the SDSU Physical Master Plan, which guide the development and use of land within the campus. The analysis found that the Proposed Project would be consistent with these plans, and no significant land use or planning impacts were identified. Consequently, no mitigation measures are necessary, and the potential land use impacts of the Project would be less than significant.

4.10.4 Impacts Analysis

1. Would the Project physically divide an established community?

The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, which would impair mobility within an existing community or between a community and an outlying area. The Proposed Project involves the development of new student housing, dining facilities, and auxiliary uses within SDSU's main campus, comprising two main components: the Peninsula Component and the University Towers East Component.

The Proposed Project would require removal of existing buildings on the Peninsula Component site and a parking lot on the University Towers East Component site to accommodate development of new student housing and other amenities. The Proposed Project is situated on the SDSU campus though outside of the existing Campus Master Plan boundaries, on land owned by the university auxiliary and already dedicated to campus activities and development. Land surrounding the Peninsula Component site includes open space and residential housing to the west, open space, I-8, and residential housing to the north, university uses including parking, recreational fields, academic buildings, and student residential buildings to the east, south, and southwest, as shown on Figure 2-2, Vicinity Map, in Chapter 2, Project Description. The University Towers East Component is surrounded by university and urban uses to the north, east, and west, and residential uses to the south.

The Proposed Project is not proposing any land uses that would create an obstruction, such as a new road or rail lines that would physically divide or impair access between the Project sites and the existing surrounding uses. The Proposed Project would be compatible with the surrounding uses and would fulfill the planned use of these areas and the increased student housing goals set out by SDSU.

By concentrating growth within the SDSU campus and other developed areas in the city, the Proposed Project would not cause any physical division of the established community. Instead, it would contribute to the preservation and enhancement of existing neighborhoods by providing much-needed student housing within the SDSU campus boundaries. Accordingly, impacts related to the division of an established community would be **less than significant.**

2. Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

As previously discussed, SDSU, is part of the CSU system, a state agency, and thus is not subject to local government planning and land use plans, policies, or regulations. Consequently, the City's General Plan, College

Area Community Plan, College Area Public Facilities Financing Plan, Multiple Species Conservation Program (MSCP) and MSCP Subarea Plan, as well as the City's Municipal Code, do not apply to SDSU. Therefore, the Proposed Project would not conflict or be inconsistent with these local plans, policies, or regulations adopted for the purpose of mitigating an environmental effect. For information regarding the MSCP as related to potential impacts to biological resources, please see Draft Environmental Impact Report Section 4.3, Biological Resources.

The following discussion presents a detailed analysis of the consistency of the Proposed Project with the applicable land use plans – the SDSU Campus Master Plan and Physical Master Plan.

SDSU Campus Master Plan

As part of the Proposed Project, the Campus Master Plan land use map would be amended to include the new housing and related facilities within both the Peninsula Component and University Towers East Component sites. The revision is consistent with SDSU's goals of increasing on-campus student housing and fostering a vibrant campus community. By enhancing housing options for students, the Proposed Project would assist in alleviating housing shortages within the area and promote a stronger sense of community among residents. The integration of amenities such as study lounges and communal spaces will further encourage student interaction and engagement.

This proposed amendment to the Campus Master Plan would reflect the proposed physical changes to the campus and ensure consistency between the Proposed Project and the Master Plan (see Figure 2-5a, Proposed Campus Master Plan, and Figure 2-5b, Proposed Campus Master Plan Legend, in Chapter 2). Therefore, upon approval of the amended Master Plan, the Proposed Project would be consistent with the applicable land use plan.

SDSU Physical Master Plan

As previously noted, the SDSU Physical Master Plan Chapter 5 includes Draft Design Guidelines that serve as general guidance relative to development on the SDSU campus. The Proposed Project's consistency with the applicable Master Plan Design Guidelines (SDSU 1997) is presented in Table 4.10-1.

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
5.1 Campus Entries. Campus entries should be examined at two levels-entries for vehicles into the campus area and its associated parking areas, and the pedestrian entries into the central core of the campus. Entries are an integral part of the campus wayfinding system.	Consistent: The Peninsula Component would be located at the northern terminus of 55th Street, in the northwest portion of campus just south of I-8 and west of Canyon Crest Drive. I-8 is a major entry gateway into the campus as the northern entry to SDSU. The SDSU campus can be accessed from the north by College Avenue and can be accessed from the east or west by Montezuma Road, an east-west roadway near the southern boundary of the campus, and accessed from the south via College Avenue. A perimeter road would circle the proposed development and this road would be designated for pedestrians, student micro-mobility devices, and utility/service and emergency vehicle access. In addition to providing site circulation, the perimeter road would double as a wellness and fitness

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
	path, accommodating a two-way bicycle/micro-mobility path, and a separate pedestrian path. The University Towers East Component entry would be accessed by pedestrians via Montezuma Road to the immediate north and Mary Lane Alley to the immediate south, and by vehicles via Montezuma Road.
5.2 Campus Edges. The campus edge Is the first visual element that all visitors, staff, faculty and students experience. A vast majority of the general public may never enter the campus and therefore their perception of the campus will be limited to these edges. Edges are also very important in identifying a sense of arrival and they form the first visual clues to warn the traveler that turning and entry decisions will need to be made.	Consistent: As described above, the northern terminus of 55th Street providing entry to the Peninsula Component represents a campus edge and will be improved as part of the Proposed Project consistent with campus visual elements. Additionally, the campus edge along Montezuma Road and the University Towers East Component serves as another crucial visual element for visitors, staff, faculty, and students and will be improved as part of the Proposed Project consistent with the existing SDSU residential buildings to ensure harmony with the campus edges/boundaries.
5.3 Campus Landmarks. Landmarks establish identity for the campus and help to serve as entry points and wayfinding tools. A hierarchy of landmarks are needed including those seen from off-campus to those that identify on-campus pathways and small spaces. Generally, the largest landmarks are buildings, spires and towers. Each new building established on the campus should include a landmark feature as a basic part of its design. The role and prominence of this landmark should be determined based on adjacent landmarks, visibility and the intensity of the proposed building use. The role that the landmark may have within the spatial hierarchy of the campus must be analyzed in relation to the project site and more remote areas of the campus.	Consistent: The Proposed Project would establish new campus landmarks as appropriate entry points and wayfinding tools.
5.4 Campus Nodes. Nodes are important centers of activity that should encourage social interaction and provide places of rest and observation. Although a variety of nodes exist that include minor pedestrian activities, seating areas and plazas, these guidelines primarily address the larger nodes identified in Chapter 4.[2]	Consistent: The Peninsula Component would include a courtyard with outdoor amenities such as study areas, outdoor gaming, student gathering, lounge seating areas, a large plaza area, outdoor dining, and event space. The University Towers East Component would include open space and exterior amenity areas.
5.5 Campus Views. Both internal and external views exist on campus. Internal views are covered under the guidelines for site layout and form. This section will discuss off-campus views that originate from on-campus viewpoints.	Consistent: As shown in Figure 4-5 of the SDSU Physical Master Plan, the Peninsula Component would have major views of distant landmarks including Lower Mission Valley and Mount Soledad. The Project would not obstruct these views because the proposed structures would not display spatial or scale dominance in the broad, horizontal landscape visible from these views, specifically those from the proposed residence halls on the Peninsula Component site. In contrast, the University Towers East Component, located along Montezuma Road, does not encompass major views or

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
	viewpoints, thus maintaining consistency with the Campus Views guidelines.
5.6 Site Form and Layout. Implementation of basic site planning principles and spatial design guidelines will help to provide an understandable layout of the campus. Buildings should be arranged in a manner that promotes a coherent physical appearance, image and Identity for SDSU. A consistent and unified architectural approach to site planning fosters a 'sense of order' and a 'sense of place.' Buildings which are properly sited provide a positive sense of order that will enhance the campus image.	Consistent: The Project's site layout has been designed in accordance with SDSU's basic site planning principles and spatial design guidelines as the buildings would be arranged in a manner that promotes a coherent physical appearance, image and identify for SDSU.
5.7 Campus Neighborhoods. It is intended that specific neighborhood guidelines be established to help each of these neighborhoods or design districts, establish an individual identity while still being harmonious on a campus wide basis.	Consistent: The Peninsula Component would be located in the referenced 55th Street Residential campus neighborhood and the University Towers East Component would be located below the South Residential campus neighborhood. The Proposed Project has been designed to be consistent with these campus neighborhoods, as the Project would involve the development of new student housing.
5.8 Building Character, Function & Materials. These architectural guidelines focus primarily on those elements that relate to the context and character of the campus and upon appropriate architectural design.	Consistent: The proposed buildings at both the Peninsula Component and the University Towers East Component would be designed to reflect the architectural character and context of the SDSU campus. Compliance with the California Building Code Chapter 7A, which governs materials and construction methods for exterior wildfire exposure, ensures that the buildings would utilize appropriate, durable materials. Furthermore, the architectural design would incorporate features that harmonize with the existing campus aesthetic, enhancing the overall visual coherence of the area while meeting functional requirements.
5.9 Informal Open Space Areas. Open Space integration. SDSU contains areas of indigenous plant and wildlife habitat and natural landforms. These elements provide a pleasant setting and also help to mitigate and buffer the environmental impacts of a harsh urban environment. Open space should not be considered unused space, but rather natural or planned space. Its role in defining districts and helping people map out the arrangement of the campus is very important. Similarly, the character of the campus is defined best by the existing natural open space and vegetative cover found in this region.	Consistent: Landscaping at the Peninsula Component would be designed to complement the architecture and accentuate the assets of the site by extending a natural aesthetic into the open space character. The Peninsula Component would include approximately 285,000 square feet of landscaping, including 195 trees, and 170,000 square feet of hardscape. The landscape plan would include a combination of accent trees, shade trees, and drought tolerant plant material. The University Towers East Component would include approximately 14,000 square feet of landscaping, including 30 trees, and 24,000 square feet of hardscape.
5.10 Formal Urban Space Areas. The exterior spaces of the campus are its most	Consistent: The Peninsula Component would include outdoor amenities and landscape features such as an

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
important resources. The social life of the campus as well as its structural organization are dependent upon these exterior spaces. Courtyards and plazas serve as the outdoor playrooms, dining rooms, studies and living rooms of the campus. They can exist on a small scale directly adjacent to a building, or can be larger scale forming the focus of a complex of building.	entry plaza and flexible use turf areas, study and work areas, outdoor gaming, student gathering, lounge seating areas, plazas, outdoor dining, bike & scooter hubs, and event space. A shade structure and large plaza area, located in the central northern portion of the site, would serve as the terminus to the paseo. Gathering areas would be located around the perimeter of the site. The University Towers East Component would include open space and exterior amenity areas.
5.11 Landscape Materials, Furnishings & Lighting. A major component of landscape architectural guidelines is that of plant materials. Although this is just one of many components under landscape architecture, it is often thought by many as the definition of landscape. Site furnishings provide for functional use of exterior spaces and help to set the character of the space and relate it to adjacent architectural elements. Site furnishings are those items which make the outdoor environment safer, easier and more pleasant to use and enjoy. Site furnishings include amenities such as benches and other objects used for sitting, tables, drinking fountains, trash containers, flag poles, bicycle racks and other man-made items located within the landscape. Arbors, overheads, pergolas and trellises are other elements that can extend architectural treatments into the open landscape. Exterior lighting performs a number of functional uses, primarily related to night-time safety, security and wayfinding. The lighting system should define and reinforce the vehicular and pedestrian circulation systems. Even during daylight hours, lighting standards can help to define primary and secondary streets. Lighting is also necessary to highlight design treatments and spaces. Lights can be used artistically while still providing functional requirements of illumination and wayfinding	Consistent: Project landscaping would be designed to complement the architecture and accentuate the assets of the site by extending a natural aesthetic into the open space character (see Guideline 5.9 and 5.10). Additionally, the proposed landscape and hardscape plan would facilitate a pedestrian-oriented environment and would include avenues for multimodal circulation. Similar to the Peninsula Component, the proposed landscaping and overall site character of the University Towers East Component would be pedestrian oriented.
5.12 Wayfinding Systems. Although wayfinding systems generally include all spatial, architectural and landscape architectural elements discussed above, this section will focus specifically on signage systems.	Consistent: The Project would provide Campus Standard/code required wayfinding and room identification signage.
5.13 Memorials and Public Art. The historic nature of the campus and the wishes of the alumni combine to indicate the clear need to accommodate memorials and plaques. Considering the number of existing and potential public spaces on this campus, the use of public art is not only warranted, but should be encouraged. The role these elements play in defining spaces and wayfinding should be considered	Not applicable

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
along with the educational and aesthetic aspects memorials and public art provide.	
5.14 Vehicular Circulation and Parking. The vehicular circulation system provides the means for primary access, as well as a vantage point from which most people see particular facilities and find their way into the campus. Even though the road network at SDSU is an existing system, much can be done to improve the functional and visual aspects of the roadways.	Consistent: The Proposed Project would not adversely affect the existing campus circulation system, nor the vantage points from which most people see and find the campus. As to parking, as part of the Proposed Project, 278 parking stalls would be removed from the Peninsula Component site. Approximately five staff parking spaces, five short-term parking spaces, five Americans with Disabilities Act accessible stalls, parking spaces for several ZipCar (short-term rental cars), and two truck spaces would be constructed. Adequate parking for student residents who choose to bring a car to campus is provided throughout the campus. A total of 5 accessible, 140 standard, and 1 van accessible parking stalls (totaling 146 parking stalls) would be removed from University Towers East Component, which is designated exclusively for first-year students who are not permitted to have cars. Consequently, the University Towers East Component would not require significant parking, and would include 5 staff parking spaces, one ADA accessible space, and several ZipCar spaces to be provided at the southwest corner of the Project site.
5.15 Pedestrian and Bicycle Circulation. The life flow of the campus depends on efficient pedestrian circulation systems. The role that foot traffic plays on this campus will continue to increase as surface parking is centralized in parking structures and as campus enrollment increases. Bicycle use throughout the campus should be encouraged to help decrease excessive traffic and parking requirements. Bicycle facilities should be provided in parking structures, 'bike barns,' or similar designated areas where bikes can be clustered for security and shielded from view corridors. Bike parking may be located adjacent to existing bicycle circulation routes such as curbed streets, and where accessible by such routes, In close proximity to academic, recreational and residence hall facilities between classrooms, student activities, recreation facilities and resident halls. Bike-use restrictions must occur in order to limit safety conflicts between pedestrians and cyclists. In general, bike use should be encouraged along all primary, secondary and tertiary streets. All other areas should be restricted, although the walking of bikes to Internal areas with bike parking should be accommodated.	Consistent: The Proposed Project would facilitate pedestrian and bicycle circulation. Within the Peninsula Component, a perimeter road would circle the proposed development. This road would be designated for pedestrians, bicycles, student micro-mobility devices, and utility/service and emergency vehicle access. On event days (such as move-in or move-out), the perimeter road would be open to limited vehicular use. In addition to providing site circulation, the perimeter road would double as a wellness and fitness path, accommodating a two-way bicycle/micro-mobility path, and a separate pedestrian path. The proposed landscaping and overall site character of the University Towers East Component would be pedestrian oriented.
5.16 Transit Facilities.	Consistent: The Proposed Project would not alter the

Table 4.10-1. Master Plan Design Guidelines Consistency Analysis

Guideline[1]	Analysis
Transportation is an important element for the SDSU campus to consider. The guidelines and policies included within the Master Plan Design Guidelines of the SDSU Physical Master Plan are limited to those physical elements of a public transportation system as they affect the character and arrangement of the campus.	physical elements of the existing SDSU public transportation system on campus and, as a result, would not affect the character and arrangement of the campus.
5.17 Utility Elements. Specific guidelines for infrastructure are not within the scope of this study. Only those elements of utilities that have the ability to affect the character of the campus or that represent important constraints to development, are included here.	Consistent: As described in Chapter 2, Project Description, the Project would require new points of connection for the residence halls for domestic water, fire water, and sewer from the existing utility mains. Such connections would not affect the character of the campus.

Notes:
1 Chapter 5, Draft Design Guidelines, of the SDSU Physical Master Plan contains in-depth discussion of the referenced guidelines; for purposes of the analysis presented here, this section includes only the introduction of each guideline, which is sufficient to for the analysis.
2 Chapter 4 identifies locations of high volume pedestrian nodes that encourage social interaction, high level activity nodes, and potential node projects. The Project site is not included as a node location; nevertheless, the Project's consistency with this standard is described in the corresponding analysis column.

As demonstrated above in Table 4.10-1, the Proposed Project would be consistent with the applicable Master Plan Design Guidelines of the SDSU Physical Master Plan.

The Proposed Project includes an amendment to the existing Campus Master Plan, which would expand the Master Plan boundaries to include the proposed student housing and related facilities,. Additionally, the Proposed Project would be consistent with the applicable Master Plan Design Guidelines of the SDSU Physical Master Plan. As such, the Proposed Project would be consistent with the applicable land use plans and guidelines such that there would be no conflict or inconsistency and impacts would be **less than significant.**

4.10.5 Cumulative Analysis

The Proposed Project is designed to integrate with the existing land use patterns and planning framework of the SDSU campus, and it does not introduce any significant conflicts with applicable land use plans, policies, or regulations. The physical division of an existing community, as well as conflicts with plans or policies adopted to avoid an environmental effect, are site-specific and, therefore, would not combine with other projects to create a cumulative impact. Therefore, the Proposed Project **would not result in significant cumulative land use impacts.**

4.10.6 Summary of Impacts Prior to Mitigation

The Proposed Project is not anticipated to physically divide an established community. The Project is located within the boundaries of SDSU's main campus, outside of the existing Campus Master Plan boundaries but on land already owned by the university and dedicated to campus activities and development. The surrounding land uses include a mix of open space, residential housing, and university facilities. The Project does not propose any new roads or other physical barriers that would impede mobility or access between existing communities and the

Project sites. Therefore, the Project would not cause a physical division of the community, and impacts related to this issue would be **less than significant.**

Regarding potential conflicts with land use plans, policies, or regulations, the Proposed Project would be consistent with the SDSU Campus Master Plan and Physical Master Plan. Although the Project is not subject to local planning and zoning regulations due to SDSU's status as a state agency, it aligns with the goals of the Campus Master Plan, which seeks to increase on-campus student housing and enhance the campus environment. The Project would involve an amendment to the Campus Master Plan to include the new student housing and related facilities, ensuring consistency with the plan's goals. Furthermore, the Project would comply with the applicable design guidelines of the SDSU Physical Master Plan. As a result, the Project would not conflict with any land use plans or regulations, and impacts would be **less than significant.**

4.10.7 Mitigation Measures

No mitigation measures associated with land use and planning would be required.

4.10.9 References

SDSU (San Diego State University). 1997. Physical Master Plan. Accessed October 25, 2024.

SDSU. 2022. Campus Master Plan. Updated July 5, 2022. Accessed October 25, 2024.

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

FIGURE 4.10-1

Project Site Existing Land Uses

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SDSU Evolve Student Housing

San Diego State University

FIGURE 4.10-2

Project Vicinity Existing Land Uses

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

FIGURE 4.10-3

Existing vs Proposed Land Uses - Peninsula Component

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SDSU Evolve Student Housing

San Diego State University

FIGURE 4.10-4

Existing vs Proposed Land Uses - University Towers East Component

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4.11 Noise

This section describes the existing noise conditions of the Project site and vicinity; identifies associated regulatory requirements; evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Noise; and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to noise concerning long-term construction noise and potential noise impacts to surrounding uses. The analysis presented below addresses each of these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a compilation of all comments received on the Notice of Preparation.

4.11.1 Existing Conditions

The following section provides a brief discussion of fundamental noise concepts and terminology and contextualizes the environmental setting of the Proposed Project in relation to noise.

Fundamentals of Noise and Vibration

Although the terms may be used interchangeably in the right context, "sound" is defined as any gas or fluid pressure variation detected by the human ear, and "noise" is unwanted sound. The preferred unit for measuring sound is the decibel (dB), which expresses the ratio of sound pressures to a reference value logarithmically, enabling a wide range of audible sound to be evaluated and discussed conveniently. On the low end of this range, 0 dB is not the absence of sound energy, but instead corresponds approximately to the threshold of average healthy human hearing; on the upper end, 120–140 dB corresponds to an average person's threshold of pain (Caltrans 2013).

The human ear is not equally responsive to all frequencies of the audible sound spectrum. An electronic filter is normally used when taking sound measurements that de-emphasizes certain frequencies in a manner that mimics the human ear's response to sound; this method is referred to as A-weighting. Sound levels expressed under the A-weighted system are sometimes designated as A-weighted decibels (dBA). All sound levels discussed in this report are A-weighted.

The equivalent continuous sound level (L_{eq}) is a single dB value which, if held constant during the specified time period, would represent the same total acoustical energy of a fluctuating noise level over that same time period. L_{eq} values are commonly expressed for periods of 1 hour, but longer or shorter time periods may be specified. Another descriptor is maximum sound level, which is the greatest sound level measured during a designated time interval or event. The minimum sound level is the lowest measured level and often called the floor of a measurement period. Percentile-exceed sound levels (L_{xx}) represent the sound level exceeded for a cumulative percentage of a specified period; for example, L_{90} is the sound level exceeded 90% of the time.

In-depth definitions of additional common acoustical descriptors and terms that may assist the reader in framing the evaluation and discussion of noise in this Draft EIR section are provided in Section 1.4 of the Noise Technical Report for the Proposed Project, included as Appendix H to this Draft EIR.

Regional and Local Setting

The SDSU campus is located along the Interstate 8 corridor, approximately 8 miles from downtown San Diego (see Figure 2-1, Regional Map, and Figure 2-2, Vicinity Map, in Chapter 2, Project Description). The campus is within the College Area Community of the City of San Diego. The College Area Community is characterized by SDSU as a major hub of activity, with single-family and multifamily residential uses and neighborhood commercial developments that serve the surrounding community, including SDSU.

The Proposed Project would consist of two components: the Peninsula Component and the University Towers East Component. The Peninsula Component would be located within the approximately 10.57-acre site at the northern terminus of 55th Street, at the northwest portion of campus just south of Interstate 8 and west of Canyon Crest Drive. The University Towers East Component would be located on an approximately 1.1-acre site on Montezuma Road that is currently used as a parking lot (see Figure 2-2).

The SDSU campus can be accessed from the north by College Avenue, which also provides local access to Interstate 8. The campus can be accessed from the east or west by Montezuma Road, an east–west roadway near the southern boundary of the campus, and accessed from the south via College Avenue.

Environmental Setting

Field measurements of sound pressure level were conducted near the Project site on August 27, 2024, to quantify and characterize the existing outdoor ambient sound levels. Table 4.11-1 provides the location, date, and time period at which these baseline sound level measurements were performed by an attending Dudek field investigator using a Rion-branded Model NL-62 sound level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute standard for a Type 1 (Precision Grade) sound level meter. The accuracy of the sound level meter was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four short-term sound level measurement locations (ST1–ST4) that represent existing noise-sensitive receivers were selected on and near the Project site. These locations, depicted as receivers ST1–ST4 in Figure 4.11-1, Noise Measurement and Modeling Locations, were selected to characterize the baseline outdoor ambient sound levels for City of San Diego residential noise-sensitive receptors and the traffic noise exposure from Project adjacent roadways (see Figure 4.11-1). The measured L_{eq} and maximum noise levels are provided in Table 4.11-1. The primary sound sources at the sites identified in Table 4.11-1 consisted of traffic along adjacent roadways and conversations/yelling. As shown in Table 4.11-1, the measured sound pressure level ranged from approximately 57.8 dBA L_{eq} at ST4 to 69.8 dBA L_{eq} at ST3. Beyond the summarized information presented in Table 4.11-1, detailed sound measurement data are included in the appendices to the Noise Technical Report, Appendix H to this Draft EIR.

Table 4.11-1. Measured Baseline Outdoor Ambient Noise Levels

Site	Location/Address	Date/Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	South of the Peninsula Component at the intersection of Remington Road and 55th Street	2024-08-27, 02:24 p.m. to 02:39 p.m.	60.7	70.6
ST2	Northwest of the University Towers East Component, at the intersection of Montezuma Road and 55th Street	2024-08-27, 01:54 p.m. to 02:09 p.m.	65.6	71.4
ST3	Northern boundary of the University Towers East Component along Montezuma Road	2024-08-27, 01:32 p.m. to 01:47 p.m.	69.8	83.6
ST4	East of the University Towers East Component along Campanile Drive	2024-08-27, 01:07 p.m. to 01:22 p.m.	57.8	64.7

Source: Appendix H.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L_{max} = maximum sound level during the measurement interval; ST = short-term sound measurement locations.

Generally, the measured samples of daytime L_{eq} agree with expectations: at ST2 and ST3, L_{eq} values are above 65 dBA due largely to being close to a heavily trafficked roadway (Montezuma Road), whereas ST1 and ST4 were near smaller, local roadways (Remington Road and Campanile Drive) and farther from Montezuma Road.

Two long-term sound level measurement locations (LT1 and LT2) that represent existing noise-sensitive receivers were also selected near the Project site. Measurement location LT1 was selected to characterize the daytime, evening, and nighttime baseline outdoor ambient sound levels at the nearest residential noise-sensitive receptors to the west of the Peninsula Component. Measurement location LT2 was selected to characterize the daytime, evening, and nighttime baseline outdoor ambient sound levels at the nearest residential noise-sensitive receptors to the east and south of the University Towers East Component. The long-term sound measurements at locations LT1 and LT2 spanned a full 24-hour cycle, totaling 1,440 consecutive minutes in duration. Both L_{eq} and L_{90} metrics were measured. While L_{eq} provides insight into the overall sound exposure level detected by a sound level meter, as introduced in Appendix H, the L_{90} value (the level exceeded 90% of the measurement time) is a good indicator of the background sound environment, offering a perspective clear of short-lived disturbances. Exhibit 4.11A shows the L_{eq} vs. L_{90} plot derived from the LT1 measurement data and Exhibit 4.11B shows the L_{eq} vs. L_{90} plot derived from the LT2 measurement data.

Exhibit 4.11A. LT1 L_{eq} vs. L_{90} Measurement Results (Hourly dBA)

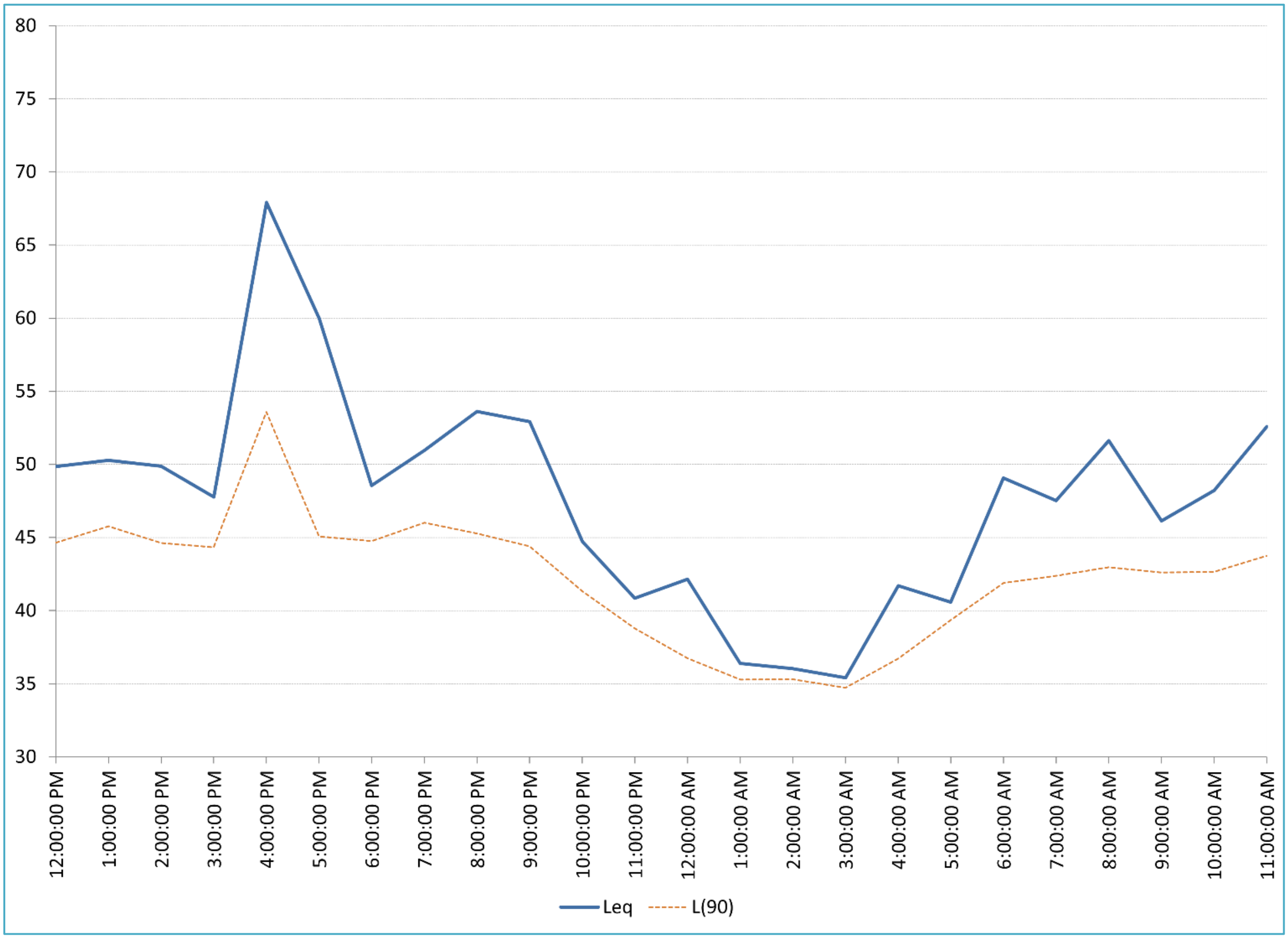
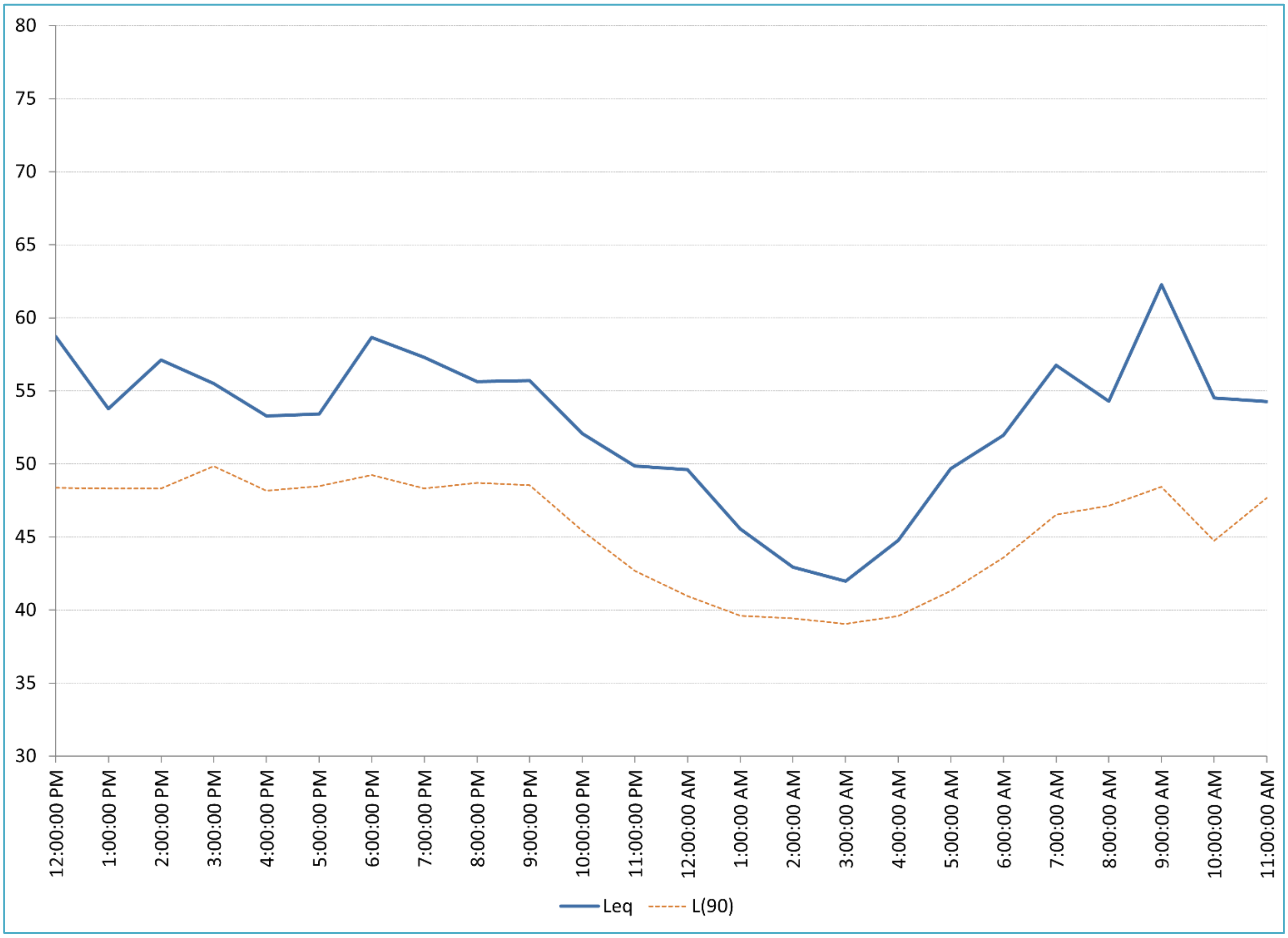


Exhibit 4.11B. LT2 L_{eq} vs. L_{90} Measurement Results (Hourly dBA)



Throughout the day, the general ambient outdoor sound environment at LT1, located at the neighborhood west of the Peninsula Component, shows higher L_{90} sound levels that trend with anticipated traditional "rush hour" roadway traffic in the early morning and late afternoon period and lower L_{90} levels during nighttime hours (10:00 p.m. to 7:00 a.m.). This becomes evident when observing the A-weighted L_{eq} values that are often elevated by brief, but relatively high contributions. Such noise patterns are consistent with transient roadway vehicle noise. LT2, located at the southeast corner of the University Towers East Component Project boundary, was close to a major roadway with a consistent heavy traffic flow (Montezuma Road), which would explain L_{90} levels remaining generally consistent during daytime hours.

4.11.2 Regulatory Framework

Federal

Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA L_{eq} over an 8-hour period (FTA 2018), when detailed construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such noise limits at the state and local jurisdictional levels.

With respect to vibration, Table 4.11-2 presents FTA guidance thresholds for assessing building damage risk and human annoyance. Similar to the guidance for construction noise, the values in Table 4.11-2 represent recommended assessment guidance when local regulations lack such standards.

Table 4.11-2. Federal Transit Administration Vibration Threshold Guidance

Vibration Receptor	Vibration Assessment Metric	
	Peak Particle Velocity (PPV, ips)	*Approximate Root Mean Square VdB**
Potential Damage to Structures by Building/Structural Category		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
Residential Building Occupant Human Response		
Frequent events *(more than 70 events per day)*		72
Occasional events *(30–70 events per day)*		75
Infrequent events *(fewer than 30 events per day)*		80
Institutional Land Use (Primarily Daytime Use) Occupant Human Response		
Frequent events *(more than 70 events per day)*		75
Occasional events *(30–70 events per day)*		78
Infrequent events *(fewer than 30 events per day)*		83

Source: FTA 2018.
Notes: PPV = peak particle velocity; ips = inches per second; VdB = vibration decibels.
* Root mean square VdB is calculated from the PPV using a crest factor of 4 and is with respect to 1 micro-inch per second.

State

California Department of Transportation – Vibration

In its Transportation and Construction Vibration Guidance Manual (Caltrans 2020), the California Department of Transportation (Caltrans) recommends 0.5 inches per second (ips) peak particle velocity (PPV) as a threshold for the avoidance of structural damage to typical newer residential buildings exposed to continuous or frequent intermittent sources of ground-borne vibration. For transient vibration events, such as blasting, the damage risk threshold would be 1.0 ips PPV (Caltrans 2020) at the same type of newer residential structures. For older structures, these guidance thresholds would be more stringent: 0.3 ips PPV for continuous/intermittent vibration sources, and 0.5 ips PPV for transient vibration events. With respect to human annoyance, Caltrans guidance indicates that building occupants exposed to continuous ground-borne vibration in the range of 0.1 ips PPV ("strongly perceptible") to 0.4 ips PPV ("severe") would find it "annoying" at 0.2 ips PPV and "unpleasant" at the 0.4 ips PPV value. Although these Caltrans guidance thresholds are not regulations, they can serve as quantified standards in the absence of such limits at the local jurisdictional level.

Local/Regional

The noise limits outlined in Table 4.11-3 reflect generally applicable standards for sound levels in the region. While the Project is not required to adhere to local or regional standards, the guidelines presented in Table 4.11-3 are used in the analysis because they provide the most relevant guidelines for evaluating noise impacts. The limits specify that the 1-hour average sound level should not exceed the values indicated in the table at any location on or beyond the boundaries of the property where the noise is generated.

Table 4.11-3. Noise Guidelines

Land Use	Time of Day	1-Hour A-Weighted Average Sound Level (dBA)
Single-family residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multifamily residential (up to a maximum density of 1/2,000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or agricultural	Any time	75

Note: dBA = A-weighted decibel.

As to construction noise, absent a special permit, it is generally held throughout the state that construction activities that generate noise be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday, and excluding legal holidays. During the permissible hours, noise levels at or beyond the property lines of any property zoned residential should not exceed an average sound level greater than 75 dBA during the 12-hour period from 7:00 a.m. to 7:00 p.m.

4.11.3 Significance Criteria

The criteria used to evaluate the Project's potential impacts to noise are based on Appendix G of the CEQA Guidelines, Noise. Based on these criteria, the Proposed Project would result in a significant impact related to noise if the Project would:

1. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Result in generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Methodology

In light of the above significance criteria, this analysis uses the following standards to evaluate potential noise and vibration impacts:

- **Construction noise** – Temporary construction noise that exceeds 75 dBA L_{eq} during the 12-hour period between 7:00 a.m. and 7:00 p.m. at a sensitive receptor would be considered a significant impact. In particular, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB L_{eq} during the 12-hour period from 7:00 a.m. to 7:00 p.m. Additionally, where temporary construction noise would substantially interfere with normal business communication or affect sensitive receptors, such as educational facilities, a significant noise impact may be identified.
- **Construction vibration** – Guidance from Caltrans indicates that a vibration velocity of 0.2 ips PPV received at a structure would be considered annoying by occupants within it (Caltrans 2020). As for the receiving structure itself, aforementioned Caltrans guidance from Section 4.11.2 recommends that a vibration level of 0.3 ips PPV would represent the threshold for building damage risk to older residential structures exposed to continuous or frequently intermittent sources of ground-borne vibration.
- **Project-attributed stationary source noise emission to the community** – Project-attributed stationary source noise must adhere to the maximum exterior L_{eq} for single-family residential land uses of 50 dBA hourly L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m.), 45 dBA hourly L_{eq} during evening hours (7:00 p.m. to 10:00 p.m.), and 40 dBA hourly L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.).
- **Off-site Project-attributed transportation noise** – For purposes of this analysis, a direct roadway noise impact would be considered significant if increases in roadway traffic noise levels attributed to the Proposed Project were greater than 3 dBA community noise equivalent level (CNEL) at an existing noise-sensitive land use.
- **Exterior to interior traffic noise intrusion** – For purposes of this analysis, traffic noise intrusion to the Proposed Project would be considered significant if interior noise levels exceed 45 dBA.

- **Exposure of project workers or visitors to excessive aviation noise** - Typically, Project areas where outdoor workers or visitors may be present that intersect the 65 dBA CNEL aviation noise contour of a public or private airport would be considered a potentially significant noise impact.

4.11.4 Impacts Analysis

1. Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Short-Term Construction Noise

Construction noise and vibration are temporary phenomena, with emission levels varying from hour to hour and day to day, depending on the equipment in use, the operations performed, and the distance between the source and receptor. Equipment that would be in use during construction would include, in part, graders, backhoes, rubber-tired dozers, loaders, cranes, forklifts, pavers, rollers, and air compressors. The typical maximum noise levels at a distance of 50 feet from various pieces of construction equipment and activities anticipated for use on the Proposed Project site are presented in Table 4.11-4. The equipment noise levels presented in Table 4.11-4 are maximum noise levels. Usually, construction equipment operates in alternating cycles of full power and low power, producing average noise levels over time that are less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 4.11-4. Typical Construction Equipment Maximum Noise Levels

Equipment Type	Typical Equipment (L_{max}, dBA at 50 Feet)
All other equipment greater than 5 horsepower	85
Backhoe	78
Compressor (air)	78
Crane	81
Dozer	82
Excavator	81
Flat bed truck	74
Front end loader	79
Generator	72
Grader	85
Man lift	75
Paver	77
Roller	80
Welder/torch	73

Source: DOT 2006.
Note: L_{max} = maximum sound level; dBA = A-weighted decibels.

Aggregate noise emission from Proposed Project construction activities, broken down by sequential phase, was calculated from the nearest position of the construction site boundary for each component to the nearest existing noise-sensitive receptor. Table 4.11-5 summarizes the distances from the boundary of each phase of building construction (Phases 1–6) to the closest noise-sensitive receptor (east of the University Towers East Component for Phase 1b; west of the Peninsula Component for Phases 1a and 2–6) during each of the 6 sequential construction phases. At the site boundaries, the analysis assumes that each piece of equipment of each listed type per phase would be involved in the construction activity for a 6- to 8-hour period at the nearest distance.

Table 4.11-5. Estimated Distances Between Construction Activities and the Nearest Noise-Sensitive Receptors

Construction Phase (and Equipment Types Involved)	Distance from Nearest Noise-Sensitive Receptor to Construction Site Boundary (Feet)						
	Peninsula Component						University Towers East Component
	Phase 1a	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Phase 1b
Demolition (excavator, tractor)	1,000	880	790	510	N/A	N/A	45
Site Preparation (dozer, tractor)	1,000	880	790	510	510	575	45
Grading (grader, excavator, dozer)	1,000	880	790	510	510	575	45
Trenching (excavator)	1,000	880	790	510	510	575	45
Building Construction (crane, man-lifts, generator, tractor, aerial lifts, concrete pump, welder/torch, auger drill rig)	1,000	880	790	510	510	575	45
Paving (paver, paving equipment, roller)	1,000	880	790	510	510	575	45
Architectural Coating (air compressor)	1,000	880	790	510	510	575	45

Note: N/A = not applicable.

A Microsoft Excel–based noise prediction model emulating and using reference data from the Federal Highway Administration Roadway Construction Noise Model (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Input variables for the predictive modeling consist of the equipment type and number of each (e.g., two dozers, three excavators, a backhoe), the duty cycle for each piece of equipment (i.e., percentage of time within a specific time period, such as an hour, when the equipment is expected to operate at full power or capacity and thus make noise at a level comparable to what is presented in Table 4.11-4), and the distance from the noise-sensitive receiver. The predictive model also considers how many hours that equipment may be on site and operating (or idling) within an established work shift. Conservatively, no topographical shielding was assumed in the modeling. The Roadway Construction Noise Model has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis, which is detailed in Appendix B, Construction Noise Modeling Input and Output, to the Noise Technical Report (Appendix H to the Draft EIR), and would result in the predicted noise levels displayed in Table 4.11-6.

Table 4.11-6. Predicted Construction Noise Levels per Activity Phase

Construction Phase (and Equipment Types Involved)	12-Hour L_{eq} at Nearest Noise-Sensitive Receptor to Construction Site Boundary (dBA)						
	Peninsula Component						University Towers East Component
	Phase 1a	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Phase 1b
Demolition (excavator, tractor)	51	52	53	58	N/A	N/A	83
Site Preparation (dozer, tractor)	51	52	53	58	58	57	83
Grading (grader, excavator, dozer)	51	53	53	61	61	60	83
Trenching (excavator)	46	48	49	54	54	53	79
Building Construction (crane, man-lifts, generator, tractor, aerial lifts, concrete pump, welder/torch, auger drill rig)	49	50	51	56	56	56	81
Paving (paver, paving equipment, roller)	44	46	47	52	52	51	76
Architectural Coating (air compressor)	40	41	42	46	46	45	72
Threshold Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**	**Yes**

Notes: L_{eq} = equivalent noise level; dBA = A-weighted decibels; N/A = not applicable.

As presented in Table 4.11-6, during Phases 1a and 2–6, representing the construction of the Peninsula Component, where distances from the Project site boundary to the nearest existing residences to the west range from 500 feet to 1,000 feet, construction noise levels would be up to 15 dBA higher than the measured ambient noise levels (see Exhibit 4.11A) at the nearest existing residences to the west, and are estimated to range from approximately 40 dBA L_{eq} to 61 dBA L_{eq}, which is less than the 75 dBA L_{eq} 12-hour threshold.

During Phase 1b, representing the construction of the University Towers East Component, the estimated construction noise levels are predicted to be as high as 83 dBA L_{eq} over a 12-hour period. This would be up to 30 dBA higher than the measured ambient noise levels (see Exhibit 4.11B) at the nearest existing residences (as close as 45 feet away) when grading activities take place near the eastern Project boundary of the University Towers East Component. While construction of Phase 1b is estimated to take approximately 68 weeks, this analysis assumes that, for those phases that would result in an exceedance of the acceptable noise levels, construction equipment would be operating at the closest distance to the nearest noise-sensitive receptor for 8 hours per day throughout the construction of Phase 1b. However, this is a worst-case scenario, and it is likely that construction activities would occur for less than 8 hours per day (or sporadically) for no more than 6 days at a time, and more likely that construction equipment would be operating further from the closest distance to the nearest noise-sensitive receptor (i.e., further than 45 feet).

To mitigate the identified potential significant impact, when operation of construction equipment is estimated to potentially cause activity noise levels to exceed 75 dBA L_{eq} during Phase 1b of Project construction, **Mitigation Measure (MM) NOI-1** is recommended, which would require the California State University/SDSU, or its designee, to implement certain noise reduction measures as site conditions warrant. Proper implementation of **MM-NOI-1** would reduce noise levels by up to 8 dB if a 9-foot-tall temporary construction noise barrier is implemented during

Phase 1b construction, which would correspondingly reduce the highest predicted estimated non-mitigated construction noise level from 83 to 75 dBA L_{eq} during the grading phase, which would be within the applicable 75 dBA threshold. Appendix B to the Noise Technical Report (Appendix H to the Draft EIR) includes a construction noise prediction worksheet that illustrates a sample scenario of what the anticipated and quantifiable noise reduction effect would be of adding a temporary 9-foot-tall noise barrier to reduce construction noise exposure at the nearest sensitive receptor.

In summary, Phase 1b construction activities during allowable daytime hours (between 7:00 a.m. and 7:00 p.m.) have the potential for noise to exceed the 75 dBA L_{eq} 12-hour threshold on occasion at the nearest residential receiver to the University Towers East Component. Therefore, incorporation of **MM-NOI-1** is recommended to reduce construction noise exposure levels to acceptable levels. Thus, under such conditions, temporary construction-related noise impacts would be **less than significant with mitigation incorporated**.

Long-Term Off-Site Traffic Noise Exposure

The Traffic Impact Assessment prepared for the Proposed Project by Linscott, Law, & Greenspan, Engineers determined that the Proposed Project would result in a net reduction of Project-attributed average daily traffic (ADT) volumes on both regional and local arterial roadways (i.e., Interstate 8, Remington Road, 55th Street, Montezuma Road, and Campanile Drive) of approximately 2,948 ADT (Draft EIR Appendix I). While the Proposed Project would result in a net increase of 4,468 student housing beds and, correspondingly, 4,468 students living on campus, parking at the Peninsula Component site would be extremely limited and, therefore, those students that do bring cars to campus would need to park in parking structures and lots to the east of the Peninsula Component site on the main campus. These lots and structures generally cannot be readily accessed via the local roads and, instead, would be accessed largely via 55th Street, Montezuma Road, and College Avenue. While non-freshmen students living on campus would have the opportunity to bring their vehicles to campus, the Project is expected to result in an overall decrease in parking demand due to the large decrease in commuter students driving and parking.

Therefore, the Project would result in a reduced number of SDSU students commuting and parking a vehicle while on campus. While the analysis recognizes that some students may park in the surrounding residential neighborhoods, such parking violates City of San Diego parking restrictions and would represent a relatively small number of the students living on the Peninsula Component site. Thus, by increasing on-campus student housing and enabling 4,468 more SDSU students to live on campus, the Proposed Project would result in fewer students driving to campus and an overall reduction in ADT relative to existing levels, thereby reducing traffic volumes and related traffic noise levels. Notwithstanding, even if there were increased ADT volumes attributed to the Project, the increase would not be sufficient to increase traffic noise levels by greater than 3 dBA CNEL over existing levels at adjacent noise-sensitive land uses, which is the threshold for significant impacts. Therefore, impacts associated with traffic noise would be **less than significant.**

Long-Term Operational Noise Exposure

Using DataKustik's CadnaA software, which models three-dimensional outdoor sound propagation based on International Organization for Standardization 9613-2 algorithms (ISO 1996) and relevant reference data, an operational scenario of the Proposed Project was modeled for purposes of this analysis. The modeled scenario included operating assumptions for the anticipated noise sources, specifically, heating, ventilation and air conditioning (HVAC) units representative of combined sound pressure level data for air-cooled chillers and air-handling units, placed on the rooftops of the eight modeled buildings. HVAC units associated with the buildings are expected to operate at any time up to 24 hours a day, 365 days a year. There would be no other stationary noise sources associated with Project operation.

For purposes of this analysis, the overall A-weighted levels appearing in Table 4.11-7 were used to define the individual Project sound sources.

Table 4.11-7. Sound Power Levels for the Modeled Individual Sources of Outdoor Noise Emission

Source	A-Weighted Sound Power Level per Octave Band Center Frequency (Hertz)								Overall Sound Power Level (dBA)
	63	*125*	*250*	*500*	*1k*	*2k*	*4k*	*8k*	
135-Ton Air-Cooled Chillers (9-Story Building)	74	82	84	91	89	95	84	81	98
135-Ton Air-Cooled Chillers (13-Story Building)	75	82	85	93	90	94	84	81	98
2,200 MBH Air Source Heat Pumps	97	91	94	93	94	87	85	78	97
Air-Cooled Chillers (Amenity Building) [a]	91	85	88	86	82	81	79	72	89
Air-Handling Units (Amenity Building) [b]	64	76	77	78	75	68	62	57	83

Notes: dBA = A-weighted decibels; k = thousand; MBH = 1000 British thermal units per hour.

[a] Reference sound pressure level data shown herein based upon "lo" value per Loren Cook Company 1999, pp. 59–60.

[b] Based on data from 1- to 5-minute range for "factories (general)" per Loren Cook Company 1999, p. 41.

The reference sound power levels in Table 4.11-7 were used to define area sources of sound emission in the CadnaA computer model with respect to the placement of the rendered Peninsula Component and University Towers East Component. In addition to the above sound source inputs, the following parameters are included in this CadnaA-supported stationary noise source assessment:

- Ground effect acoustical absorption coefficient equal to 1 for the rendered Peninsula Component, which represents acoustically absorptive "soft" vegetated ground cover, loose soils, and granular aggregate; an absorption coefficient equal to 0.25 for the rendered University Towers East Component, which represents the acoustically reflective roadway surfaces surrounding the site.
- Reflection order of 1, which allows for a single reflection of sound paths on encountered structural surfaces.
- Inclusion of georeferenced topography: the Project site, the canyon to the west, and the grade of the nearest residential community to the west reflect their true elevations above sea level.
- Calm meteorological conditions (i.e., no wind) with 68°F and 50% relative humidity.
- Eight total rendered buildings: the proposed Apartment Buildings 1–5, nine-story building, and Amenity Building (Peninsula Component), as well as University Towers East.

Predicted noise exposure levels attributable to concurrent operation of the Proposed Project on-site stationary sources (i.e., HVAC systems) as modeled appear in Table 4.11-8. As shown in the table, the predicted levels at the studied noise-sensitive receptor locations would not exceed the exterior noise level threshold for single-family residential land uses of 50 dBA hourly L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m.), 45 dBA hourly L_{eq} during evening hours (7:00 p.m. to 10:00 p.m.), or 40 dBA hourly L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.); therefore, potential noise impacts associated with Project operation would be **less than significant.**

Table 4.11-8. Project Operation Noise Prediction Model Results Summary

Modeled Receptor	Modeled Receptor Distance from Project Boundary	Predicted Operation Noise (dBA hourly L_{eq}) at Indicated Modeled Receptor
Peninsula Component		
R1	480 feet west	40
R2	470 feet west	40
R3	550 feet west	39
R4	680 feet southwest	39
University Towers East Component		
R5	45 feet east	40
R6	55 feet south	39
R7	45 feet south	39
R8	80 feet southwest	40

Notes: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level.
See Figure 4.11-1 for modeled "R#" receptor locations.

Figure 4.11-2, Predicted Stationary Source Operation Noise from the Peninsula Component, and Figure 4.11-3, Predicted Stationary Source Operation Noise from the University Towers East Component, correspondingly illustrate the predicted Project stationary equipment operation sound levels for the Peninsula Component and University Towers East Component across a horizontal plane approximately 5 feet above grade (i.e., a first-floor or pedestrian listening elevation) over the Project site and beyond into the surrounding vicinity.

Details of the CadnaA modeling input parameters (e.g., modeled sources) can be found in Appendix C, Operation Noise Prediction Model Inputs, to the Noise Technical Report (Appendix H to this Draft EIR). As illustrated, the model results show that the Proposed Project would be consistent with required noise level limits. Therefore, potential noise impacts associated with the operation of the Proposed Project would be **less than significant.**

2. Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration

Construction activities may expose persons to excessive ground-borne vibration or ground-borne noise, causing a potentially significant impact. Caltrans has collected ground-borne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a PPV of approximately 0.2 ips are considered annoying. For context, heavier pieces of construction equipment, such as a bulldozer that may be expected on the Project site, have peak particle velocities of approximately 0.089 ips or less at a reference distance of 25 feet (DOT 2006).

Groundborne vibration attenuates rapidly, even over short distances. The attenuation of ground-borne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance. For example, for a roller operating on site and as close as the eastern Project boundary of the University Towers East Component to the nearest occupied property (i.e., 45 feet) the estimated vibration velocity would be 0.09 ips per the equation as follows (FTA 2018):

$$PPV_{rcvr} = PPV_{ref} \times (25/D)^{1.5} = 0.09 = 0.21 \times (25/45)^{1.5}$$

In the above equation, PPV_{rcvr} is the predicted vibration velocity at the receiver position, PPV_{ref} is the reference value at 25 feet from the vibration source (the roller), and D is the actual horizontal distance to the receiver. Therefore, at this predicted PPV, the impact of vibration-induced annoyance to occupants of nearby existing homes would be less than significant. Furthermore, the nearest occupied property to the Peninsula Component is 510 feet.

Construction vibration, at sufficiently high levels, can also present a building damage risk. However, anticipated construction vibration associated with the Proposed Project would yield levels of 0.04 ips PPV, which would not surpass the guidance limit of 0.3 ips PPV for building damage risk to older residential structures under Caltrans guidelines (Caltrans 2020). Because the predicted vibration level at 45 feet is less than this guidance limit, the risk of vibration damage to nearby structures would be **less than significant.**

Once operational, the Proposed Project would not feature major producers of ground-borne vibration. Anticipated mechanical systems like HVAC units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. On this basis, potential vibration impacts due to Proposed Project operation would be **less than significant.**

3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The San Diego International Airport is located approximately 6.6 miles from the Project site, and Montgomery Field is located approximately 3.86 miles northwest of the Project site. The Project site is outside of the 60 dBA CNEL contour shown in the San Diego International Airport Land Use Compatibility Plan (SDCRAA 2014). The Project is not located within designated noise or safety impact areas defined by the Montgomery Field Airport Land Use Compatibility Plan (SDCRAA 2010). Therefore, construction workers and post-construction Project operational or maintenance staff on site would not be exposed to excessive noise levels, and there would be a **less-than-significant impact** associated with aviation noise levels.

4.11.5 Cumulative Analysis

While there are a number of completed and planned development projects, as listed in Table 3-1, Cumulative Projects, in Chapter 3, Cumulative Methods and Projects, in the vicinity of the Project, noise emission attributed to Proposed Project construction is typically site-specific and would not combine with other cumulative projects unless construction of cumulative projects is occurring at the same time as the Proposed Project and is sufficiently nearby to result in combined effects.

The Project's construction noise propagating towards the surrounding community is predicted to attenuate to sound exposure levels that are below 75 dBA L_{eq} during a 12-hour period between 7:00 a.m. and 7:00 p.m. Additionally, if there are two concurrent projects of similar noise intensity under construction, but the more distant project is at least four times farther away from a common receptor location, the Project would not contribute to a significant cumulative impact. Even if such a project is less than four times farther away, the cumulative project's construction noise would have to adhere to similar thresholds as the Proposed Project and would attenuate with distance and/or be obstructed by intervening terrain/structures and would therefore be unlikely to combine to create a significant cumulative effect. Furthermore, potential construction noise associated with one or more of these other projects from Table 3-1 would be temporary and, on that basis, correspondingly exhibit a low likelihood of combining to create a significant cumulative effect at a noise-sensitive receiving land use near the Project site. Additionally, such construction activities for these other projects in the vicinity, if and when they occur, would be held to applicable City of San Diego standards with respect to construction noise thresholds; like operation noise emanating from an active land use, such construction noise attenuates rapidly with distance and due to intervening natural or artificial topography and related effects.

For the above reasons, the Proposed Project's contribution to cumulative construction noise impacts would not be cumulatively considerable and, therefore, cumulative impacts related to construction noise would be **less than significant.**

Operation

While there are a number of existing and planned development projects, as listed in Table 3-1, in the shared vicinity of the Project site, aggregate noise from Project operation (e.g., HVAC systems) propagating toward the surrounding community is predicted to attenuate to a sound level that would not exceed an exterior noise level threshold for single-family residential land uses of 50 dBA hourly L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m.), 45 dBA hourly L_{eq} during evening hours (7:00 p.m. to 10:00 p.m.), or 40 dBA hourly L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.). Because operations noise from cumulative projects would similarly diminish with distance and other environmental effects (e.g., intervening terrain and/or structures, as well as acoustical absorption from porous ground surfaces and the atmosphere), the Proposed Project's contribution to cumulative operational noise impacts would not be cumulatively considerable and, therefore, cumulative impacts related to operational noise would be **less than significant.**

4.11.6 Summary of Impacts Prior to Mitigation

Short-Term Temporary Construction Noise

Phase 1b construction activities during daytime hours have the potential for noise to exceed the 75 dBA L_{eq} 12-hour threshold on occasion at the nearest residential receiver to the University Towers East Component. Thus, under such conditions, temporary construction-related noise would be a **potentially significant impact.**

Long-Term Off-Site Traffic Noise Exposure

Because the Proposed Project would reduce vehicle traffic and related ADT relative to existing conditions, the Project would not result in increased traffic noise levels. Notwithstanding, even if there were increased ADT volumes attributed to the Project, an increase in traffic noise levels by greater than 3 dBA CNEL at adjacent noise-sensitive land uses resulting in a significant impact would require a substantial increase in traffic levels over existing levels. Therefore, impacts associated with traffic noise would be **less than significant.**

Long-Term Operational Noise Exposure

Predicted noise exposure levels attributed to concurrent operation of Proposed Project on-site stationary sources at the studied noise-sensitive receptor locations would not exceed the exterior noise level threshold for single-family residential land uses of 50 dBA hourly L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m.), 45 dBA hourly L_{eq} during evening hours (7:00 p.m. to 10:00 p.m.), or 40 dBA hourly L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.). Therefore, potential noise impacts associated with Project operation would be **less than significant.**

Construction Vibration

Anticipated construction vibration associated with the Proposed Project would yield levels of 0.04 ips PPV, which do not surpass the guidance limit of 0.3 ips PPV for building damage risk to older residential structures under Caltrans guidelines (Caltrans 2020). Because the predicted vibration level at 45 feet is less than this guidance limit, the risk of vibration damage to nearby structures would be **less than significant.**

Additionally, because the Proposed Project is not expected to feature major producers of ground-borne vibration once operational, potential vibration impacts due to Proposed Project operation would be **less than significant.**

Aviation Noise

Construction workers and post-construction Project operational or maintenance staff on site would not be exposed to excessive noise levels, so there would be a **less-than-significant** impact associated with aviation noise levels.

4.11.7 Mitigation Measures

The following mitigation measure would apply during construction activities for the University Towers East Component (Phase 1b).

MM-NOI-1 **Temporary Construction Noise Reduction (University Towers East Component).** The California State University/San Diego State University, or its designee, shall implement one or more of the following noise reduction measures, as necessary, in order to achieve on-site noise control and sound abatement that, in the aggregate, would result in construction noise levels below the applicable threshold of 75 decibels (dB) at the closest noise-sensitive receptor during each phase of the construction of Phase 1b:

- ***Administrative controls*** (e.g., reduce operating time of equipment and/or prohibit usage of equipment type[s] within certain distances to a nearest receiving occupied off-site property).
- ***Engineering controls*** (change equipment operating parameters [e.g., speed, capacity] or install features or elements that otherwise reduce equipment noise emission [e.g., upgrade engine exhaust mufflers]).
- ***Install noise abatement*** on the site boundary fencing (or within, as practical and appropriate) in the form of sound blankets or comparable temporary solid barriers of at least 9 feet tall to occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.
  - For example, suspended sound blankets, field-erected plywood sheeting, or comparable temporary solid (or flexible but sufficiently massive) barriers (of minimum sound transmission class rating of 25, which per California Department of Transportation guidance indicates would permit up to 8 dB of expected barrier insertion loss) would occlude construction noise emission between the site (or specific equipment operation as the situation may define) and the noise-sensitive receptor(s) of concern.
  - Temporary barriers shall adhere to a minimum height standard of 9 feet to serve as an effective deterrent against noise pollution and shielding for adjoining off-site receptors.

Appendix B to the Noise Technical Report (which is Appendix H to this Draft EIR) includes a construction noise prediction worksheet that illustrates a sample scenario of what the anticipated and quantifiable noise reduction effect would be of adding a temporary 9-foot-tall noise barrier to reduce construction noise exposure at the nearest sensitive receptors. Such a wall should be strategically located on the Proposed Project boundary (focusing on the northern, eastern, and southern boundary) so as to reduce construction noise exposure at the nearest sensitive receptors.

4.11.8 Level of Significance After Mitigation

The results indicate that potential construction noise impacts during site preparation and grading phases for the University Towers East Component would be potentially significant but would be reduced to **less than significant with mitigation incorporated**. All other potential impacts related to noise and vibration for the construction and operation of the Proposed Project would be **less than significant**.

4.11.9 References

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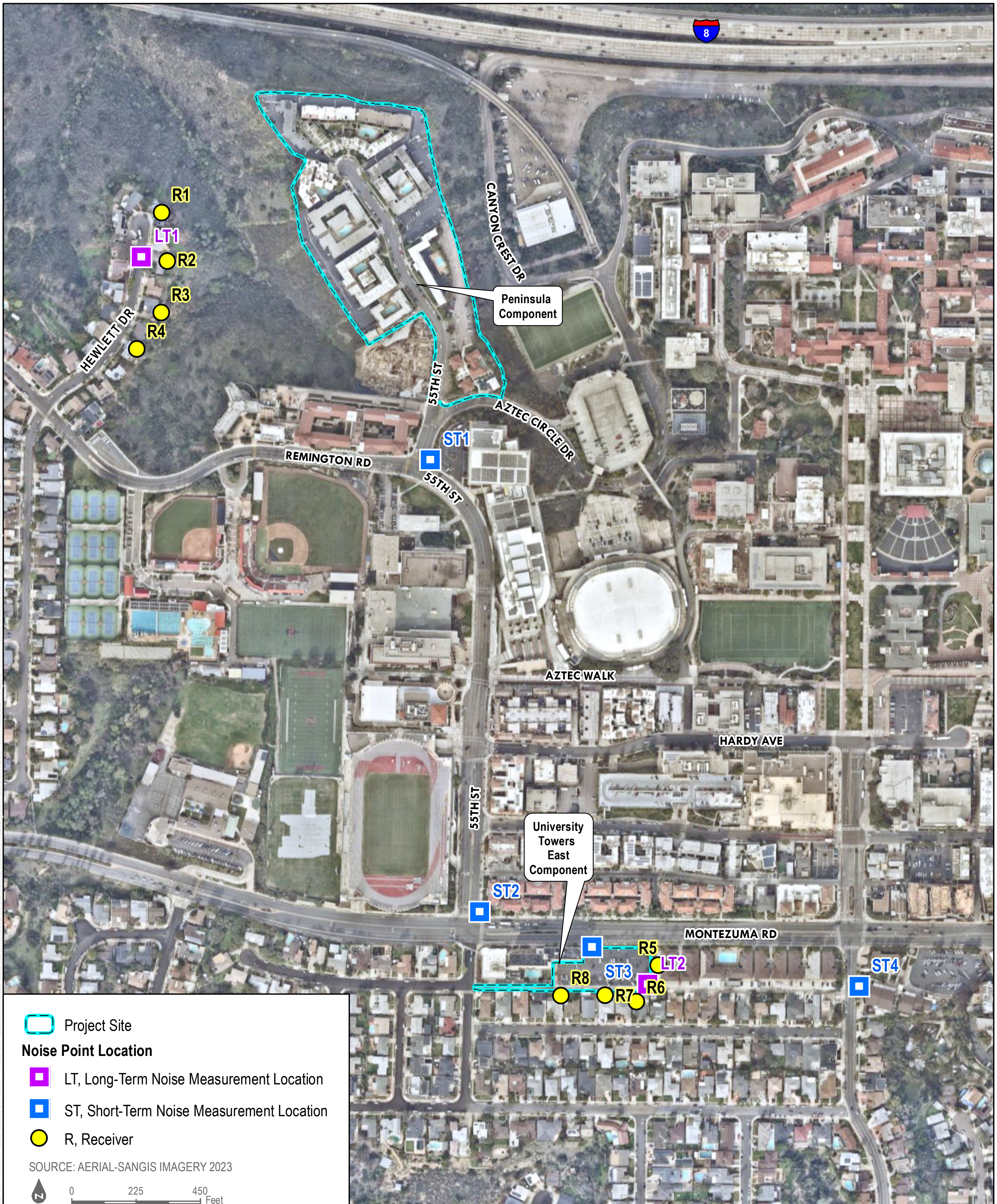

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

FIGURE 4.11-1
Noise Measurement and Modeling Locations

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SDSU Evolve Student Housing

San Diego State University

Figure 4.11-2
Predicted Stationary Source Operation Noise from Proposed Project (Peninsula Component)

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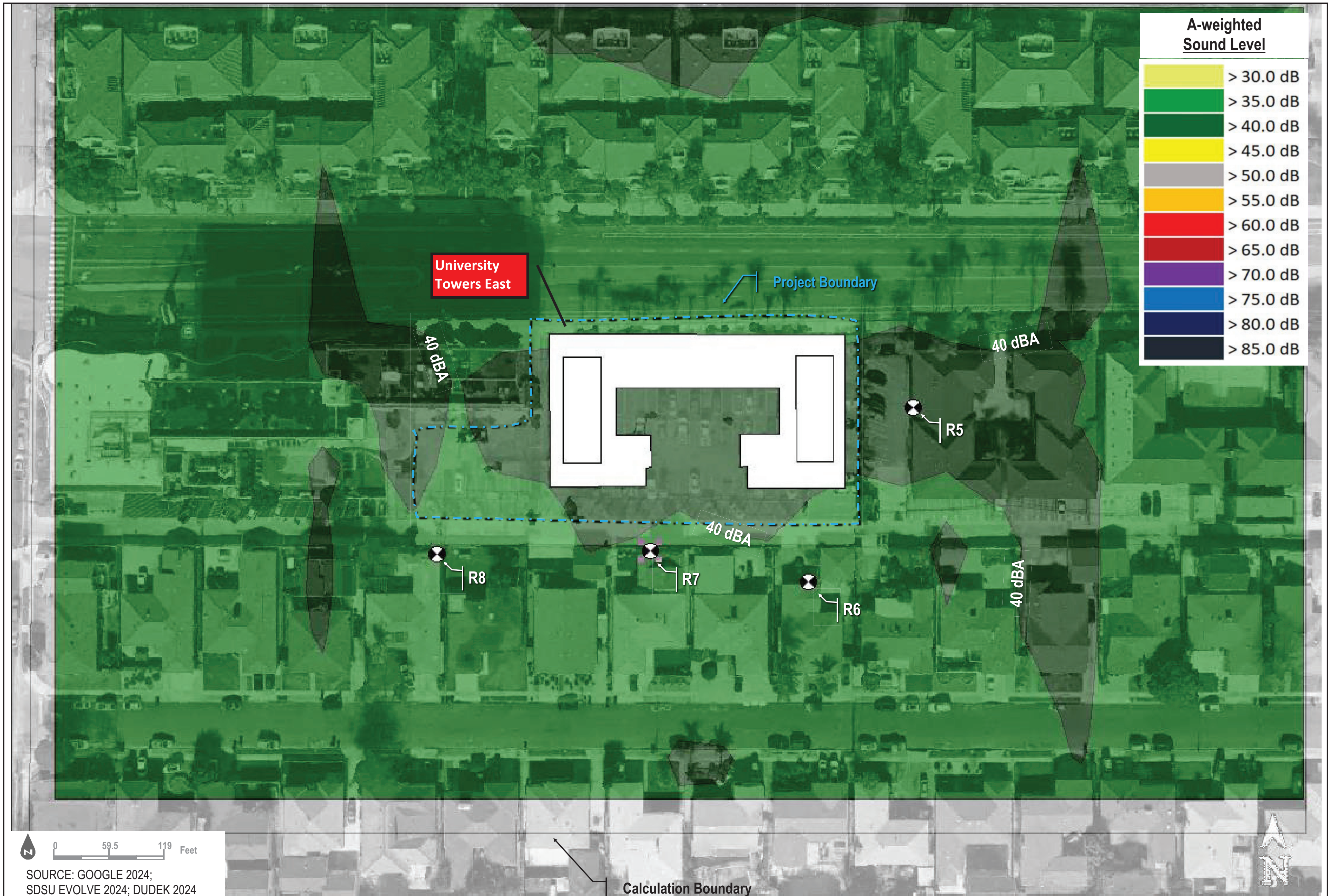

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.11-3
Predicted Stationary Source Operation Noise from the University Towers East Component

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4.12 Population and Housing

This section describes the existing population and housing conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criterion provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Population and Housing, and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to population and housing issues concerning a potential increase in student population, the types of students living at the proposed student housing, existing housing capacities, baseline student housing data, and the relationship of the Proposed Project to proposed housing planned at SDSU Mission Valley. The analysis presented below addresses each of these topics to the extent required under CEQA. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.12.1 Existing Conditions

4.12.1.1 Statewide Context

California is the most populous state in the nation (U.S. Census Bureau 2024a). As of 2023, the U.S. Census Bureau estimated the California population in 2022 to be 39,028,571; by 2030, California's population is projected to reach 39,430,871 (U.S. Census Bureau 2023).

In 2022, the State of California had 14,627,041 housing units, 1,076,455 (7.4%) of which were vacant (U.S. Census Bureau 2024b). In 2022, California had 13,550,586 occupied housing units; 7,565,502 (55.8%) units were owner occupied, while the remaining 44.2% of units were renter occupied (U.S. Census Bureau 2024c).

4.12.1.2 Regional Context

Population

San Diego Association of Governments (SANDAG) is the regional agency responsible for preparing population, housing, and employment projections for the San Diego region. Since 1972, SANDAG has produced long-range forecasts of population, housing, and employment for the San Diego region that are used as a resource for numerous purposes, including for planning. In April 2024, SANDAG adopted the Series 15 Regional Growth Forecast and is the most recent growth forecast published by SANDAG. The forecast represents an assessment of the changes that SANDAG anticipates for the San Diego region based on the best available information and computer modeling. The forecasts are based on the most recent planning assumptions, considering local general plans and other factors, per Senate Bill 375 (Government Code Section 65080[b][2][B]). For the purposes of discussion, regional (and local) population forecasts will be discussed in the context of SANDAG estimates and projections. Table 4.12-1 outlines SANDAG's regional growth forecast for the City of San Diego (City) and region, as provided by the Series 15 Regional Growth Forecast.

Table 4.12-1. SANDAG Regional Population Forecasts

Location	2022	2029	2040	2050	Increase (2022–2050)	
					Numeric	*Percent*
Region	3,287,306	3,334,675	3,432,211	3,400,250	112,944	3.4%
City of San Diego	1,374,790	1,413,768	1,448,810	1,441,149	66,359	4.8%

Sources: SANDAG 2024a, 2024b.

Between 2022 and 2050, it is anticipated that the population of the San Diego region will grow by approximately 3.4%, a gain of 112,944 residents. During this time period, the City is expected to grow by approximately 4.8%, a gain of 66,359 residents. As shown in Table 4.12-1, over half of the region's growth between 2022 and 2050 is anticipated to be located within the City of San Diego.

Housing

Table 4.12-2 shows existing housing units in 2022 and forecasted housing units for 2029, 2040, and 2050 for the region and the City. As indicated in Table 4.12-2, the region is forecast to grow its housing stock by approximately 202,819 units (16.4%) between 2022 and 2050, while the City's housing stock is forecast to grow by approximately 107,778 units (19.5%) during the same period.

Table 4.12-2. SANDAG Housing Unit Forecasts

Location	2022	2029	2040	2050	Increase (2022–2050)	
					Housing Units	*Percent*
City of San Diego	553,921	605,371	645,899	661,699	107,778	19.5%
Region	1,235,642	1,320,010	1,410,615	1,438,461	202,819	16.4%

Sources: SANDAG 2024a, 2024b.

SANDAG, as the San Diego metropolitan area's regional planning entity, prepares the Regional Housing Needs Assessment (RHNA) for San Diego County. The purpose of this assessment is to identify the existing and projected housing needs for the region's local jurisdictions. The RHNA defines existing housing opportunities and the need for more affordable options for all segments of the populations, especially lower incomes. Local jurisdictions use this information to prepare the housing elements of their general plans. The most recent assessment was accepted by the SANDAG Board of Directors on July 10, 2020, which covers an eight-year planning period (April 15, 2021, to April 15, 2029). The California Department of Housing and Community Development, in conjunction/coordination with regional entities, such as SANDAG, provides each region with its share of the anticipated statewide housing needs. The federal, state, and regional growth forecasts concluded that the San Diego region is projected to need approximately 171,685 new housing units by 2029 (SANDAG 2021).

Employment

As part of its Series 15 Regional Growth Forecast, SANDAG also provides estimates and projections for employment totals for the region. Table 4.12-3 outlines the existing and projected jobs in the region and the City.

Table 4.12-3. SANDAG Employment Forecasts

Location	2022	2029	2040	2050	Increase (2022–2050)	
					Numeric	*Percent*
San Diego	876,977	893,361	921,266	944,474	67,497	7.7%
Region	1,611,632	1,641,598	1,721,324	1,782,389	170,757	10.6%

Sources: SANDAG 2024a, 2024b.
Note: Employment numbers do not include non-wage and salary employment such as self-employment, freelance work, and gig work.

4.12.1.3 Local Context

Project Setting

The Project site is surrounded by the urban College Area Community Planning Area of the City of San Diego. The College Area Community Planning Area is composed of approximately 1,950 acres, most of which are developed as single-family residential uses (City of San Diego 2019). As of January 2022, SANDAG estimated that the total population of the College Area Community Planning Area was 26,591; this population was forecasted to increase to 29,092 by 2050 (SANDAG 2024c). Although the College Area Community Planning Area is dominated by single-family land uses, multifamily and commercial land uses are located adjacent to the major transportation corridors in the planning area, including Montezuma Road, College Avenue, and El Cajon Boulevard. Institutional land uses in the planning area are represented by SDSU and the Alvarado Medical Center, which is located south of Interstate 8 and east of the SDSU campus.

Because SDSU is a component of the California State University (CSU), which is a state agency, the Proposed Project is not subject to local government planning and land use plans, policies, or regulations. For informational purposes, the Project site is designated as Residential in the City's General Plan and zoned as RM-3-9 (Residential – Multiple Unit) (City of San Diego 2024a, 2024b).

Population

SANDAG estimated that the City had a population of 1,374,790 in 2022 (SANDAG 2024b). From 2022 to 2050, the City is forecasted to grow by 66,359 residents. This change between 2022 and 2050 constitutes a 4.8% increase in the City's population, as indicated in Table 4.12-4.

Table 4.12-4. SANDAG Local Population Forecasts

Locality	2022 Population (Most Recent)	2029 Population Forecast	2040 Population Forecast	2050 Population Forecast	Total Increase (2022 to 2050)	Total % Increase (2022 to 2050)
City of San Diego	1,374,790	1,413,768	1,448,810	1,441,149	66,359	4.8%
College Area Community	26,591	27,384	28,706	29,092	2,501	9.4%
Census Tract 28.01 (Peninsula Component)	5,770	7,074	7,741	7,737	1,967	34.1%

Table 4.12-4. SANDAG Local Population Forecasts

Locality	2022 Population (Most Recent)	2029 Population Forecast	2040 Population Forecast	2050 Population Forecast	Total Increase (2022 to 2050)	Total % Increase (2022 to 2050)
Census Tract 28.04 (University Towers East Component)	5,331	5,202	5,861	6,777	1,446	27.1%

Sources: SANDAG 2024b, 2024c, 2024d, 2024e.

As noted above, the Proposed Project is surrounded by the College Area Community Planning Area, which had a population of 26,591 in 2022. The Peninsula Component is located within census tract 28.01, which had a population of 5,770 in 2022. The University Towers East Component is located within census tract 28.04, which had a population of 5,331 in 2022. These census tracts are expected to grow at much higher rates than the City and College Area Community (34.1% and 27.1% between 2022 and 2050 versus 4.8% and 9.4%, respectively).

Upon approval of the 2007 Campus Master Plan Environmental Impact Report by the CSU Board of Trustees, SDSU submitted its approved increase of 10,000 full-time equivalent students to SANDAG to ensure that the regional planning agency incorporated SDSU's planned student growth in its regional planning forecasts for the coming years. As such, the growth forecasts shown in Table 4.12-4 reflect the anticipated growth of SDSU.

Not surprisingly, the College Area Community supports a disproportionately large percentage of 18- to 29-year-old residents (median age is 23.4 years old in 2022) (SANDAG 2024c), as does the 28.01 census tract, which is where the proposed Peninsula Component would be located (median age was 21.8 years old in 2022) (SANDAG 2024d).

Housing

The largest percentage of SDSU students are currently housed in the College Area Community. Changes in housing affordability and other popular amenities will not likely change the desirability of the College Area Community among the student population due to proximity to campus. Table 4.12-5 summarizes housing unit types predicted to be available by 2050 in the areas around the Project site.

Between 2022 and 2050, SANDAG's forecast anticipates a 61.1% increase in multifamily housing units within the College Area Community (SANDAG 2024c), and more specifically an 80.2% increase in multifamily housing units within census tract 28.01 and a 355.8% increase in multifamily housing units within census tract 28.04 (SANDAG 2024d, 2024e). Over the same time period, a 0.7% decrease is anticipated for single-family housing units in the College Area Community (SANDAG 2024c). More specifically, a 0.2% increase and 2.9% decrease is anticipated for single-family housing units in census tracts 28.01 and 28.04, respectively (SANDAG 2024d, 2024e).

Table 4.12-5. SANDAG Existing and Forecasted Housing Stock within the Project Area

	2022	2029	2040	2050	Total Change (2022 to 2050)	Percent Change (2022 to 2050)
College Area Community Planning Area						
Total Housing Units	**8,107**	**8,906**	**9,816**	**10,326**	**2,219**	**27.4%**
Single Family	4,421	4,443	4,401	4,389	-32	-0.7%
Multifamily	3,686	4,463	5,415	5,937	2,251	61.1%
Vacancy Rate	**11.2%**	**12.9%**	**12.9%**	**13.2%**	**2%**	**17.9%**
Persons per Household	**2.77**	**2.68**	**2.58**	**2.51**	**-0.26**	**-9.4%**
Census Tract 28.01 (Peninsula Component)						
Total Housing Units	**1,186**	**1,407**	**1,686**	**1,750**	**564**	**47.6%**
Single Family	484	485	485	485	1	0.2%
Multifamily	702	922	1,201	1,265	563	80.2%
Vacancy Rate	**32.3%**	**10.2%**	**9.7%**	**9.9%**	**-22.4%**	**-69.3%**
Persons per Household	**3.42**	**3.22**	**3.11**	**3.02**	**-0.40**	**-11.7%**
Census Tract 28.04 (University Towers East Component)						
Total Housing Units	**1,573**	**1,733**	**2,079**	**2,525**	**952**	**60.5%**
Single Family	1,295	1,309	1,270	1,258	-37	-2.9%
Multifamily	278	424	809	1,267	989	355.8%
Vacancy Rate	**9.2%**	**15.4%**	**14.1%**	**13.5%**	**4.3%**	**46.7%**
Persons per Household	**3.17**	**3.01**	**2.84**	**2.74**	**-0.43**	**-13.6**

Sources: SANDAG 2024c, 2024d, 2024e.

The data presented in Table 4.12-5 indicate that the College Area Community will continue to support a large percentage of students in the future because the City of San Diego has continued to plan for an increase in multifamily housing units, which are preferred by college-aged students. This is consistent with SANDAG's Regional Comprehensive Plan, which has identified the Proposed Project site and surrounding areas as a Smart Growth Opportunity Area in response to these demographic factors and projections.

In previous years, residents in the communities adjacent to SDSU have expressed concerns regarding an increase in the number of student rentals in surrounding single-family neighborhoods. These "nuisance rentals," or "mini-dorms," are single-family homes that have been modified to include additional bedrooms, living areas, and parking spaces in order to house groups of non-related individuals. These rentals are private development and not affiliated with SDSU. Nuisance rentals are popular with students because the rents are generally lower than at other nearby housing options.

Community concerns generally regard the compatibility of nuisance rentals with the surrounding single-family residences. Issues include noise from increased densities of students in residential communities, increased traffic and parking demands, and the general compatibility of student-versus-neighborhood land use demands.

The City, through local land use and zoning controls, has helped curb the flow of students utilizing single-family homes as nuisance rentals in the following ways:

- In July 2007, the City Council voted to amend the Land Development Code to restrict the number of bedrooms in single-family residential neighborhoods, limit the width of driveways, and clarify the requirements for garage conversions.
- On January 14, 2008, the City Council voted to approve the Residential High Occupancy Permit Ordinance, which requires an annual permit and fees for any single dwelling unit with six or more adult occupants (City of San Diego 2008a).
- On April 15, 2008, the City Council voted to approve the Rooming House Ordinance, which generally defines “rooming houses” as dwelling units with three or more bedrooms that are rented separately to tenants by the individual bedroom, and then prohibits rooming houses from locating in low-density residential zones (City of San Diego 2008b).
- On November 15, 2016, the City Council voted to approve the College Area Mini-Dorms Ordinance, which applies to properties within the College Area Community Plan, and limits the number of bedrooms a house can have and where parking spots can be located. The maximum number of bedrooms for housing built on lots smaller than 10,000 square feet was reduced from six to five, and the number of bedrooms on lots larger than 10,000 square feet will now be limited to six. Parking spots, except in driveways, have to be located at least 30 feet away from the front of a property.

In consideration of community concerns and other factors supporting an increase of on-campus housing, SDSU has, over the recent past, substantially increased its inventory of campus housing. Table 4.12-6 provides a summary of bed count for the existing campus housing units owned by SDSU.

Table 4.12-6. Existing Campus Student Housing Market Capacity

Facility	2024/2025 Capacity
Chapultepec	724
Maya	212
Huaxyacac	1,094
Olmeca	210
SCP- North	489
SCP- South	288
Tenochca	426
University Towers	536
Zura	804
Tacuba	375
Tepeyac	375
Sunset Plaza A	134
Sunset Plaza B	101
Sunset Plaza C	132
Toltec	124
Zapotec	130
Huaxtepec	106
Metepec	46
Mixquic	48

Table 4.12-6. Existing Campus Student Housing Market Capacity

Facility	2024/2025 Capacity
Zacatepec	192
Tarastec	74
Aztec Corner - A	192
Aztec Corner - B	176
Aztec Corner - C	188
Granada	258
M@College[1]	25
PDS	215
Villa Alvarado	130
Villa Alvarado Renovated	204
Viva	201
Total	**8,209**

Source: SDSU 2024a.
Note: All numbers are approximate as yearly housing capacity fluctuates.
[1] M@College is an affiliated property with SDSU used to balance students that SDSU could not accommodate in the current capacity.

As shown on Table 4.12-6, SDSU has an existing housing capacity of approximately 8,200 beds. Table 4.12-7 estimates the demand for on campus housing based on historical demand and year over year growth within SDSU's previously approved enrollment ceiling.

Table 4.12-7. Projected Campus Housing Demand

	Projected Campus Housing Demand (Fall Term)									
	Actual	*Projected*								
	2023/2024	*24/25*	*25/26*	*26/27*	*27/28*	*28/29*	*29/30*	*30/31*	*31/32*	*32/33*
Total	7,873	8,637	9,474	10,393	11,401	12,508	13,721	15,052	16,512	18,113
Year over Year Growth	N/A	9.7%	9.7%	9.7%	9.7%	9.7%	9.7%	9.7%	9.7%	9.7%

Source: SDSU 2024b.
Notes: N/A = not applicable.
Projections calculated based on historical growth and demand.

As shown on Table 4.12-7, SDSU projects that on-campus housing demand for the year 2032/2033 would be approximately 13,000 students, or a housing demand increase of approximately 5,000 beds over existing inventory (this is a 70% increase from 2023/2024).

4.12.2 Regulatory Framework

Federal

There are no federal statutes or regulations related to population and housing that apply to the Project.

State

There are no state statutes or regulations related to population and housing that apply directly to the Project.

Regional

SANDAG Regional Comprehensive Plan

The SANDAG Regional Comprehensive Plan, adopted in 2004, provides a long-term planning framework for the San Diego region. The Regional Comprehensive Plan identified smart growth and sustainable development as important strategies to direct the region's future growth toward compact, mixed-use development in urbanized communities that already have existing and planned infrastructure, and then connecting those communities with a variety of transportation choices.

In 2011, SANDAG approved the 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). This approval marked the first time SANDAG's RTP included an SCS, consistent with Senate Bill 375. This RTP/SCS provided a blueprint to improve mobility, preserve open space, and create communities, all with transportation choices to reduce GHG emissions and meet specific targets set by the California Air Resources Board (CARB) as required by Senate Bill 375. In 2010, CARB established targets for each region in California.

The state-mandated target, as set by CARB, is to reduce per-capita emissions of GHG emissions from cars and light-duty trucks by 19%, compared with a 2005 baseline, by 2035. To achieve the 2035 target, SANDAG and other Metropolitan Planning Organizations are required to develop an SCS as an element of its RTP. The SANDAG Sustainable Communities Strategy integrates land use and transportation plans to achieve reductions in GHG emissions and meet the CARB-required targets.

SANDAG is required by law to update its RTP every 4 years. In December 2021, SANDAG adopted the latest 2021 Regional Plan (Regional Plan), which combines the RTP, SCS, and Regional Comprehensive Plan. The Regional Plan is set to achieve a 20% reduction in per-capita emissions of GHG emissions from cars and light-duty trucks by 2035. The 2025 Regional Plan is in the "initial concept" phase and is estimated to be ready for public feedback in spring 2025.

The Regional Plan updates growth forecasts and is based on the most recent planning assumptions considering currently adopted land use plans, including the City's General Plan and other factors from the cities in the region and the County. SANDAG's Regional Plan will change in response to the ongoing land use planning of the City and other jurisdictions. For example, the City of San Diego General Plan and other cities' local General Plans , may change based on General Plan amendments initiated by the jurisdiction or landowner applicants. The General Plan amendments may result in increases in development densities by amending the regional category designations or zoning classifications. Accordingly, SANDAG's RTP/SCS latest forecasts of future development in the San Diego region, including location, must be coordinated closely with each jurisdiction's ongoing land use planning because that planning is not static, as recognized by the need for updates to SANDAG's RTP/SCS every 4 years.

Regional Housing Needs Assessment

An RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of general plans. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair share housing needs. The City of San Diego was allocated 108,036 RHNA units for the Sixth Housing Element Cycle (April 15, 2021, to April 15, 2029) (SANDAG 2021).

Local

Although the City does not have land use authority or jurisdiction over state-owned property such as SDSU, the following general plan, community plan, and housing guidelines are outlined in an effort to provide background on the City's vision for an increasingly dense College Area Community.

City of San Diego General Plan

Under the City's General Plan, the Project site is surrounded by Residential zones (City of San Diego 2024a). Residential density ranges are further refined and specified in the College Area Community Plan.

College Area Community Plan

Both Project components are surrounded by the College Area Community Plan Area. The College Area Community Plan, adopted in 1989, acts as a guide for the orderly growth of the community surrounding the SDSU campus.

City of San Diego Housing Inventory

The City released an annual report on housing inventory in 2020, which provides an overview of progress towards the goals outlined in the City's Housing Element, including progress toward RHNA requirements. In summary, while the City has been taking steps towards increasing housing production, the market is not keeping up with demand (City of San Diego 2020). The City's share of the RHNA target for the 2021–2029 Housing Element period is 108,036 housing units. To meet this target, approximately 13,500 units will need to be produced annually. With a current average of approximately 4,100 units produced in a year, annual housing production will need to triple to meet this RHNA target (City of San Diego 2020). With this housing need determined, the City has introduced strategies and initiatives to increase housing production in the City (City of San Diego 2020).

4.12.3 Significance Criteria

The criteria used to evaluate the Proposed Project's potential impacts relevant to population and housing are based on Appendix G of the CEQA Guidelines, Section XIV, Population and Housing. Based on these criteria, the Proposed Project would result in a significant impact related to population and housing if the Project would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Methodology

Substantial Unplanned Population Growth. As defined herein, "unplanned population growth" is an estimated population increase that is not included in population forecasts for a specified area or region, as set forth in local or regional planning documents. An increase in housing units would induce population growth in the region; therefore, an analysis of whether the Proposed Project would induce substantial unplanned population growth is demonstrated by comparing the proposed increase in housing units at SDSU with the existing housing supply and demand at SDSU.

Displacement. An impact related to the "displacement of housing or people" under CEQA is limited to the potential for displacement to result in adverse physical changes to the environment (e.g., necessitating the construction of housing elsewhere). This approach is consistent with Section 15382 of the CEQA Guidelines, which states that "[a]n economic or social change by itself shall not be considered a significant impact on the environment." As such, this section includes an analysis of the potential for the Project to result in displacement of people or housing, necessitating the construction of replacement housing elsewhere.

4.12.4 Impacts Analysis

1. Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The Proposed Project would include the expansion of on-campus student housing opportunities to accommodate both SDSU's existing student body and previously approved future student body to meet the increasing demand and desire by SDSU students to live on campus. The Project would not induce enrollment growth but rather would assist SDSU in meeting the demand for on-campus housing, as shown in Table 4.12-8.

Table 4.12-8. SDSU Housing Supply and Demand

Year	Demand[1] (Beds)	Supply (Beds)
2024/2025	7,873	8,209[2]
2032/2033 (without Project)	13,068	8,209[3]
2032/2033 (with Project)	13,068	12,677[4]

Notes:

1 Demand is from Table 4.12-7.
2 Existing supply for 2024/2025 represents the maximum housing capacity from Table 4.12-6.
3 Existing supply for 2032/2033 (without Project) assumes the existing housing capacity assuming no other proposed housing is constructed.
4 Existing supply for 2032/2033 (with Project) represents the existing housing capacity plus the Project buildout of approximately 4,468 student beds

As shown in Table 4.12-8, the Proposed Project would help SDSU better keep up with on-campus student housing demand.

The Project site is located in an area served by existing roads and infrastructure. The Project does not include the extension of utility infrastructure, such as sewer lines or roads, into previously undeveloped areas that may indirectly induce growth. Further, the employment requirements for the proposed amenity building would be met by the City's existing labor force and student population. Therefore, the Project would not indirectly result in substantial unplanned population growth in the area.

The Proposed Project would provide additional on-campus student housing. This increased housing would serve both existing and future campus populations given the Project's long-term horizon/buildout year. Any future increase in campus population would be limited to previously planned and approved enrollment. The proposed Project would not include an increase in the previously approved campus enrollment.

In 2007, the California State University Board of Trustees approved an increase in enrollment at SDSU from the previously established 25,000 full-time equivalent students to 35,000 full-time equivalent students. Following the Board's approval, SDSU notified SANDAG of the approved student population increase so SANDAG could factor this increase into its regional growth and housing projections. As such, growth within these limits is previously approved and planned population growth, and the Proposed Project would not induce substantial unplanned population growth within the College Area community.

Additionally, as previously mentioned in Section 4.12.2, the City would need to produce approximately 13,500 units annually to meet the RHNA target for the 2021–2029 Housing Element period. Currently, the City averages approximately 4,100 units produced in a year (City of San Diego 2020). As such, the Project would introduce approximately 4,468 beds and would assist in increasing the City's housing production, and reduce pressure on housing stock in areas where students currently reside off campus, in order to meet the progress towards the City's share of the RHNA target.

Thus, the Proposed Project would serve planned growth and assist in meeting existing and future demands placed on the local housing market by better accommodating the student population with on-campus housing options. Therefore, impacts would be **less than significant.** In order to ensure housing growth projections contained in the SANDAG forecasts remain accurate, the Proposed Project would implement **MM-POP-1,** which would require the CSU/SDSU to submit the relevant Project information to be incorporated into SANDAG's regional housing inventory. While the potential impact would be less than significant prior to mitigation, **MM-POP-1** would ensure continued consistency. As such, the Proposed Project would not induce substantial unplanned population growth either directly or indirectly, and impacts would be **less than significant prior to mitigation.**

2. Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Peninsula Component site currently contains eight, two-story apartment-style student residential buildings, a three-story apartment-style student residential building, the SDSU International Affairs complex, which consists of the International Student Center, the SDSU Passport Office, the SDSU Global Education Office, the SDSU Faculty International Engagement Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). The University Towers East Component site is currently utilized as a parking lot. Table 4.12-9 provides a summary of the existing student beds at the Peninsula Component site to be removed.

Table 4.12-9. Existing On-Campus Housing to be Removed

Housing Facility	Student Beds
Sophomore & Upper-Division Housing	
Huaxtepec	84
Metepec	52
Mixquic	62
Tarastec	84
Toltec	94
Zacatepec	206
Zapotec	120
Total	**702**

While demolition of the existing buildings within the Peninsula Component would result in the removal of 702 existing student beds, the construction of approximately 4,450 new student beds would result. This would result in a net increase of 3,748 additional student beds on the Peninsula Component site. The University Towers East Component would result in a new building with approximately 720 beds. In total, development of the Proposed Project would result in approximately 5,170 new student beds, which is a net increase of 4,468 student beds to the existing main campus inventory.

The Project would be developed in phases, as opposed to demolition of all buildings at once, which would allow for the maximum number of existing housing units to feasibly remain available for use while replacement housing is constructed. This phased development approach will enable SDSU to provide the maximum number of housing units throughout the eight-year construction schedule. Removal of existing buildings would occur phase by phase to accommodate construction of the proposed buildings. As described in Section 2.6, Phase 1A would include the removal of five existing buildings on the Peninsula Component site and the construction of the proposed 9-story housing building and the Amenity Building. Phase 1B would consist of the construction of the University Towers East Building. Phases 2 through 6 involve the construction of new buildings proposed at the Peninsula Component site.

Phase 1A of the Proposed Project would result in a temporary loss of approximately 84 student beds before the proposed buildings are complete. These student beds would be temporarily absorbed through available campus student housing options during this single year. Upon completion of this phase, there would be a net increase of student beds every year thereafter. Because this loss of housing units would be temporary in nature and would only last a single school year, this impact would be **less than significant.**

Once construction is complete, the Proposed Project would provide approximately 5,170 beds and a net increase of approximately 4,468 student beds. Therefore, the Proposed Project would not result in substantial displacement of people necessitating replacement housing elsewhere and impacts would be **less than significant.**

4.12.5 Cumulative Analysis

The Proposed Project, in combination with other reasonably foreseeable projects in the area, would result in beneficial cumulative impacts associated with housing in the San Diego region. Consistent with SANDAG's Regional Plan and the City's Strategic Framework Element, other multifamily residential unit housing projects are planned in the near and long term for the area. (See, e.g., Chapter 3, Cumulative Methods and Projects, Table 3-1, Cumulative Projects.) Future growth is expected to occur in areas identified in the Regional Plan and Strategic Framework Element as suitable for smart-growth projects, including in and around the SDSU campus.

Because the Project would not result in unplanned population growth, the Proposed Project would not contribute to cumulatively considerable impacts related to unplanned population growth; therefore, cumulative impacts would be **less than significant.**

4.12.6 Summary of Impacts Prior to Mitigation

While the Proposed Project would not result in potentially significant impacts, in order to ensure housing growth projections contained in the SANDAG forecasts include the housing units that would be provided by the Proposed Project and, therefore, remain accurate, the Proposed Project would implement **MM-POP-1**, which would require the CSU/SDSU to submit to SANDAG, the regional planning agency, the relevant Project information for incorporation into SANDAG's regional housing inventory. As such, the Proposed Project would not induce substantial unplanned population growth either directly or indirectly, and impacts would be **less than significant.**

Impacts related to substantial displacement of people necessitating replacement housing elsewhere resulting from the Proposed Project would be **less than significant.**

4.12.7 Mitigation Measures

To ensure that the housing growth projections contained in the SANDAG forecasts remain accurate, the following measure is included.

MM-POP-1 Following approval of the Proposed Project, the California State University/San Diego State University (SDSU) will promptly submit the following information to the San Diego Association of Governments (SANDAG) and the City of San Diego and request that the information be incorporated into SANDAG's regional housing inventory.

- The Evolve Student Housing Project would add approximately 4,468 beds to the existing SDSU housing inventory (3,748 within Census Tract 28.01 and 720 within Census Tract 28.04), thereby resulting in an increase in available housing units to the College Area Community.

SANDAG and the City of San Diego can and should consider this information in preparing the next update to SANDAG's regional forecasts, local housing elements, policies, land use designations, incentive programs and regulatory processes intended to accommodate future housing demand.

4.12.8 Level of Significance After Mitigation

Impacts related to inconsistency with regional housing growth projections would be **less than significant.**

4.12.9 References

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4.13 Public Services

This section describes the existing public services (fire protection, police protection, emergency medical services, schools, libraries, parks, and recreational facilities) that serve the Project site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Public Services and Recreation.

This section is based on a review of available studies, documents, and communications with local service providers, including staff of the City of San Diego (City) and SDSU. Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to public services and recreation concerning the purported need for a new fire station and the adequacy of existing recreational facilities to accommodate residents of the Proposed Project. The analysis presented below addresses these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.13.1 Existing Conditions

4.13.1.1 Fire Protection

The City of San Diego Fire–Rescue Department (Fire–Rescue Department) is the primary responder to fires on the SDSU campus. The Fire-Rescue Department operates 24 hours a day, 7 days a week and has a service area of 343 square miles, providing fire protection to a population of approximately 1,419,845 (City of San Diego Fire-Rescue Department 2024a). The Project site is currently developed with a mix of student housing, SDSU offices and surface parking and is served by the Fire-Rescue Department. In the event of an on-campus fire the San Diego State University Police Department (UPD) is the designated first responder for all incidents on campus. A campus police officer is dispatched to the scene to verify there is a fire emergency and the UPD calls the Fire–Rescue Department (SDSU 2024a). SDSU does not have an on-campus fire department. The campus police officer dispatched to the scene establishes Incident Command and manages the incident until Fire-Rescue Department personnel arrive wherein the agencies will establish Unified Command. If the fire is an imminent threat to life or structure, the SDSU Emergency Operations Center (EOC) will be activated. When a fire incident occurs, the president of SDSU (or their designee) will determine if the EOC needs to be activated. The EOC Director will determine the level of staffing of the EOC consistent with the needs of the incident and the Incident Command System.

Depending on the incident and available resources, the SDSU campus is served by four Fire–Rescue Department fire stations (Stations 10, 17, 31, and 26) located within the general vicinity of the Project site (see Table 4.13-1). Station 10 is the closest station to the campus and would provide an initial response to a reported fire; however, Stations 31, 17, and 26 would also be available to provide a secondary response, if needed. The Fire-Rescue Department operates out of 52 fire stations, employs 949 uniformed fire personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel (City of San Diego 2024a). Table 4.13-1 summarizes the station location, equipment, and proximity to the Proposed Project site. As shown on Table 4.13-1, there are four fire stations within 3.1 miles of the Project site.

Table 4.13-1. Fire-Rescue Department Stations Near the Project Site

Station	Location (Community)	Equipment	Driving Distance to Project Site [1]
Station 10	4605 62nd Street (Del Cerro)	One Engine Company One Truck One Brush Rig	1.7 mile southeast
Station 31	6002 Camino Rico (Rolando)	One Engine Company One Medic Company	2.4 miles northeast
Station 17	4206 Chamoune Avenue (City Heights)	One Engine Company One Medic Company	2.7 miles southwest
Station 26	2850 54th St, San Diego, CA 92105	One Engine Company One Medic Company	3.1 miles south

Source: City of San Diego Fire–Rescue Department 2024a.
Note: Driving distance provided is from the station to the furthest site location (Peninsula Component or University Towers East Component).

Stations 10 and 31 are both located within three miles of the Proposed Project site. Station 10 is equipped with both a fire engine and fire truck. According to the Fire–Rescue Department, fire trucks consist of an aerial apparatus or a telescopic ladder tower and a passenger-carrying platform. Stations 31, 17, and 26 are equipped with a fire engine and a paramedic unit and would respond to calls requesting medical service (City of San Diego Fire-Rescue Department 2024a).

The UPD receives all on-campus cellular and landline calls requesting 9-1-1 services. Calls requesting fire services (including medical aid) often require assistance from the Fire–Rescue Department. The UPD is responsible for notifying the Fire–Rescue Department if an on-campus fire is reported. When a call is received by the UPD requesting fire support, the campus police notify the Fire–Rescue Department through a direct phone line. The UPD is able to monitor the Fire–Rescue Department radio frequency and, when necessary, go on-air and direct Fire–Rescue Department personnel to the on-campus fire site. A UPD officer personally escorts the Fire–Rescue Department to an incident site (Stills 2024).

Based on citywide data collected by the Fire-Rescue Department, during 2023, the Fire-Rescue Department responded to 166,838 calls for service and had a 90% response time of 8:02 (City of San Diego Fire-Rescue Department 2024b). Additionally, in 2023, Station 10, the primary responding station for the Project site, responded to a total of 4,796 incidents with an approximate call volume of 13 calls per day. Table 4.13-2 lists the current average response times for each fire station within the vicinity of the Proposed Project.

Table 4.13-2. Fire–Rescue Department Station Response Times

Station	Average Response Time (minutes and seconds)
Station 10	7:49
Station 31	8:25
Station 17	7:29
Station 26	7:39

Source: Citygate Associates 2017.

Although the California State University (CSU)/SDSU is not subject to the City's General Plan, including the Public Facilities, Services, and Safety Element, the General Plan provides information relevant to the provision of public services to the campus, including response times for fire protection services (City of San Diego 2024b). The General Plan states that the City Council adopted response time objectives included in the 2017 Fire Service Standards of Response Coverage study (Citygate Associates 2017) as a framework to guide the Fire-Rescue Department's progress toward meeting the desired level of emergency service standards. This includes additional fire stations and service enhancements in underserved communities. Full implementation is anticipated to take multiple years and is dependent on identifying revenues for operating and capital costs.

According to the General Plan, a three-mile distance between fire stations typically is sufficient to achieve response time goals (City of San Diego 2024b). Three of the nearby fire stations (Stations 10, 31, and 26) are within three miles and one station (Station 17) is just over three miles from the Project site.

Fire service delivery depends on a number of factors, including the availability of adequate equipment and number of qualified personnel. A 2010 Regional Fire Services Deployment Study commissioned by the County of San Diego (County) Office of Emergency Services addressed levels of service and identified future facility needs, including additional fire stations (Citygate Associates 2010). The study identified 11 areas within the County's Southwest Quadrant, which encompasses central portions of the City, where additional fire stations are recommended, based on findings that travel times exceeded 5 minutes in those areas. The areas identified for additional fire stations did *not* include the SDSU campus or areas around the SDSU campus, which are well served by the existing fire stations. Additionally, neither the SDSU campus nor the Project site is located within any of the service coverage "gaps" identified in the Citygate study (Citygate Associates 2010).

In the February 2017 Standards of Response Coverage Review, Citygate Associates provided an updated analysis on the adequacy of the current fire station resource deployment system since their original 2010 study (Citygate Associates 2017). The 2017 review concluded that the City's fire and emergency medical services have not kept pace with population growth and still do not meet best practice outcome response times to all neighborhoods. Based on the study, another six stations would be needed to meet the City's response times (Citygate Associates 2017). The following four stations were in the planning stage at the time of the 2017 study: Black Mountain Ranch, North University City, University of California–San Diego, and Mid-City. Six additional new stations were recommended in northern Pacific Beach, University City, Torrey Pines, southeastern San Diego, northern Rancho Bernardo, and Sabre Springs. Similar to the 2010 study, the 2017 report did *not* identify a service area gap in the College Area Community or on the SDSU campus.

Since the 2017 Citygate study, the City has opened one new fire station, the Torrey Pines/University City Fire Station (Station 52). Construction of Station 52 began in Fall 2022 and recently began operations in October 2024. Additionally, the City is in the planning and design stage for two other fire stations. The Fairmount Avenue Fire Station, which would be located in the Mid-City/City Heights area and the Black Mountain Ranch Fire Station (Fire Station 48) anticipated to be operational in 2031 (City of San Diego 2024c). The Fairmount Fire Station is planned to be located approximately 3.8 miles south of the SDSU campus.

4.13.1.2 Police Protection

The UPD provides on-campus police services to the SDSU main campus and the planned Mission Valley Campus, which is located approximately two miles west of the main campus. The UPD operates 24 hours a day, 7 days a week, and includes a staff of 87 sworn personnel and 26 non-sworn support employees[1] (Stills 2024). UPD facilities ensure the safety and security of the on-campus environment via foot, vehicular, and bike patrols. The UPD is

[1] 46 of the sworn personnel and 2 of the non-sworn UPD personnel are classified as part time employees.

headquartered in the eastern portion of campus at 55th Street and Remington Road, which is in close proximity to the Project site (less than 0.50 miles south of the Peninsula Component and northwest of the University Towers East site).

The UPD is the designated first responder for all incidents on and immediately surrounding the campus, including the Project site. Campus patrol officers are graduates of the California Peace Officers Training Academy with full arrest powers throughout the state. Officers are armed and charged with the enforcement of state and local laws, traffic laws, the investigation of accidents and crimes, and response to medical and domestic emergencies. The UPD includes a K-9 unit which consists of K-9 teams trained in explosives detections. UPD police officers are responsible for reporting and responding to crimes, traffic accidents, and medical emergencies.

UPD Operations is organized into four distinct divisions: Patrol Operations, Administrative Operations, Special Events, and Investigations and Support Operations (UPD 2024a). Patrol Operations provides the more visible police detail, including foot, bicycle, and vehicle patrol. Administrative Operations includes services such as communications, records, evidence, property management, and special operations. Special Events Operations plans for and supports the many events (sporting, entertainment, renowned speakers, etc.) that occur on campus. The Auxiliary Division provides services such as SDSU employee key card issuance, parking ticket issuance, and operation of the Community Officer Program (Stills 2024).

The UPD has an administrative agreement with the City of San Diego Police Department (SDPD) to provide mutual assistance, as appropriate, at sites in the vicinity of the SDSU campus (SDSU 2024b). On average, the UPD fields approximately 3,0134 (average of 2022 and 2023) calls a year. The SDPD and UPD have a positive working relationship and often assist one another when one department is closer to the incident and/or is better equipped to respond. For example, special events or large-scale incidents like protests or demonstrations that could escalate into violence require collaborative resources and unified command between the UPD and the SDPD (Stills 2024).

The UPD Communications Center receives all landline 9-1-1, cellular 9-1-1, and duress calls made on-campus and from designated duress telephones. On average the UPD Communications Center processes approximately 6,900 9-1-1 calls and texts, and 53,000 non-emergency calls annually (SDSU 2023). UPD responds and handles all calls for service on SDSU-owned-and-operated property at the main campus.

The UPD received approximately 28,549 calls for service (including Priority 1, 2, and 3 calls) in 2022 and 31,719 calls for service in 2023 (UPD 2024b). According to SDSU's 2024 Annual Safety and Security Report, assigned on-campus calls (including residence halls) for services resulted in approximately 25 arrests (including for liquor law, drug, and weapons violations) and 2,086 disciplinary referrals in 2023 (SDSU 2024b). In 2023, burglary was the most prevalent major crime reported on campus, followed by motor vehicle theft (SDSU 2024b). According to the UPD's Crime Bulletin, in August 2024, larceny was the most prevalent major crime reported on campus followed by burglary and assault (UPD 2024b).

Priority 1 call data provided by the UPD is summarized below in Table 4.13-3. According to the data, in 2023, students housed on-campus generated approximately 0.18 annual calls per student.

According to 2023 UPD call data, the average response time for a Priority 1 call from dispatch to on-scene arrival of the UPD was approximately 4 minutes and 19 seconds, while the average response time for Priority 2 and Priority 3 calls was 4 minutes and 59 seconds, and 6 minutes and 48 seconds, respectively (Stills 2024).

Table 4.13-3. 2022/2023 Priority 1 Police Service Calls from On-Campus Residences

Call Origination	On-Campus Residential Population	Priority 1 Calls received[1]		Priority 1 Calls per student	
		2022	*2023*	*2022*	*2023*
Student Housing	8,200 students [2,3]	1,516	1,479	0.185	0.180

Sources:
1 Stills 2024.
2 SDSU 2024c.
Note:
3 SDSU has an existing housing capacity of approximately 8,200 students. This number is approximate as yearly housing capacity fluctuates

The Public Facilities, Services, and Safety Element of the City's General Plan contains goals and response time objectives for the SDPD. Although the UPD is not subject to these goals and response times, because the SDPD provides backup to support the UPD this information is provided. The College Area Community is located within the Eastern Division of the SDPD, which is headquartered at 9225 Aero Drive, approximately 4 miles northwest of the campus, and encompasses a 47.1-square-mile area. The following are the SDPD response time goals (City of San Diego 2024b):

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

4.13.1.3 Emergency Medical Services

Depending on the extent of the emergency, emergency medical response would be provided by the UPD and the Fire–Rescue Department as necessary. Goals and response time objectives for emergency medical response are included in the Public Facilities, Services, and Safety Element of the City's General Plan, and response time objectives are discussed above (see Section 4.13.1.1 for established response times that apply to emergency medical services). All on-campus 9-1-1 calls associated with injuries and illness are received by the UPD who can request additional services from the Fire–Rescue Department, if necessary.

The SDSU Student Health Services Department is responsible for on-campus student health and emergency medical needs. The Student Health Services Center, which is located at Calpulli Center, is staffed by fully licensed and certified healthcare professionals who provide healthcare to the SDSU academic community (students, faculty, and staff) (SDSU 2024d).

Basic services (such as outpatient evaluation and treatment of common medical ailments, preventive care, and health counseling) are available by appointment and are paid for through mandatory health fees paid for by registered students, faculty, and staff. Regular check-ups and appointments are accommodated in the 30-exam-room/3-procedure-room clinical wing. Minor surgery can be undertaken (by appointment) in one of the procedure rooms. Other services offered at the Calpulli Center include urgent care, a radiology suite equipped with state-of-the-art imaging equipment, laboratory services, immunization services, and a pharmacy (SDSU 2024d).

In addition to basic services and urgent care, several specialists in the fields of orthopedics, osteopathic medicine, optometry, and dermatology are available for appointments and consultations at various times throughout the week at the Calpulli Center. Additional fees apply for specialty care services (SDSU 2024d).

Three hospitals, to which the majority of SDSU-related emergencies are referred, are located in the general vicinity of the Project area. The closest facility, Alvarado Hospital, located at 6655 Alvarado Road, is a 306-bed facility located approximately 1.2 miles east and northeast of the Project site. In addition to Alvarado Hospital, Sharp Grossmont Hospital is located approximately 4 miles east of the SDSU Campus at 5555 Grossmont Center Drive in La Mesa, and Kaiser Permanente San Diego Medical Center/Kaiser Foundation Hospital is located approximately 2 miles northeast of the SDSU campus at 4647 Zion Road.

4.13.1.4 Schools

The College Area Community, which includes the SDSU campus, is served by the San Diego Unified School District (SDUSD). The SDUSD includes more than 226 educational facilities (including 117 elementary schools, 24 middle schools, 22 high schools, 49 charter schools, and 14 atypical/alternative schools), and serves over 121,000 students (SDUSD 2024). According to the City's General Plan Public Services, Facilities, and Safety Element (City of San Diego 2024b), the SDUSD applies the following enrollment limits to guide the planning of future school facilities:

- Maximum enrollment at elementary schools: 700
- Maximum enrollment at junior high/middle schools: 1,500
- Maximum enrollment at high schools: 2,000

Several SDUSD schools (including elementary, junior high, and high schools) are located in the general vicinity of the Proposed Project. Based on the City enrollment limits noted above, with the exception of Patrick Henry High School, none of the schools exceed their maximum enrollment limits. Table 4.13-4 identifies the schools located in the vicinity of the Proposed Project and their enrollment in 2014.

Table 4.13-4. Project Area Public Schools and Enrollment (2023-2024)

School	Location	Enrollment
Elementary		
Hardy Elementary (K–5)	5420 Montezuma Road	391
Hearst Elementary (K–5)	6230 Del Cerro Boulevard	530
The Language Academy (K–8)	4941 64th Street	981
Junior High/Middle School		
Lewis Middle School (6–8)	5170 Greenbriar Drive	963
Mann Middle School (6–8)	4345 54th Street	670
Senior High School		
Patrick Henry High School (9–12)	6702 Wandermere Drive	2,512
Crawford High School (9–12)	4191 Colts Way	1,276

Source: California Department of Education 2024.

4.13.1.5 Libraries

The University Library (main campus library) is centrally located on the SDSU campus and serves the campus population. The library is a five-story building that is open to the public. The library hours are Monday through Thursday, 7:00 a.m. to 10:00 p.m., Friday from 7:00 a.m. to 6:00 p.m., Saturday from 10:00 a.m. to 4:00 p.m., and Sunday from 12:00 p.m. to 10:00 p.m. (SDSU 2024e). Two branches of the San Diego Public Library are also located within the general vicinity of the Proposed Project site. The closest City branch library to the Project site is the College–Rolando Branch, located at 6600 Montezuma Road, east and southeast of the Project site. Table 4.13-5 lists the City library branches in the vicinity of the Proposed Project.

Table 4.13-5. City of San Diego Libraries in Vicinity of Project Site

City of San Diego Library Branch	Street Address	Proximity to Project Site
Allied Gardens/Benjamin	5188 Zion Avenue	1.6 miles north
College–Rolando	6600 Montezuma Road	1.3 miles east/southeast
Kensington–Normal Heights	4121 Adams Avenue	2.0 miles southwest

Source: City of San Diego 2024b.

4.13.1.6 Parks and Recreation

The City's Parks and Recreation Department is responsible for the operation and maintenance of approximately 42,000 acres of developed and undeveloped park land and open space within the city (City of San Diego 2021). According to the City's Parks Master Plan (2021), the number of park acres per capita is approximately six acres per 1,000 residents.

According to the College Area Community Plan, which includes the Project sites, most of the area was developed under the City's older park guidelines and, as a result, the area was considered deficient in useable parkland (City of San Diego 1989). The College Area Community Plan also states that only one park, Montezuma Park (1.7 acres), is included in the Community Plan boundary and is located approximately 0.65-mile southeast of the SDSU campus. According to the City's previous population-based park guidelines and 2020 San Diego Association of Governments' (SANDAG's) census population estimates for the College Area Community, the community should be served by approximately 70 acres of useable parkland (2.8 acres of parkland per 1,000 residents). However, due to the developed nature of the community, the acquisition of property for additional parkland to serve the growing residential population has historically been problematic for the City (City of San Diego 1989; SANDAG 2024).

Table 4.13-6 provides a summary of the park and recreation facilities on the SDSU campus. The table depicts the type of facility, the description of the facility, and the approximate park acreage.

Table 4.13-6. Existing SDSU Parks and Recreational Facilities

Facility	Description	Acres (approximate)
Aztec Center Green	Open lawn with seating areas and footpaths	1.0
Campanile Walk	Boulevard-style walk with turf parkway and plantings	3.0
Centennial Mall	Boulevard-style walk with turf parkway and plantings	1.1

Table 4.13-6. Existing SDSU Parks and Recreational Facilities

Facility	Description	Acres (approximate)
Viejas Arena Foreground	Mixed paved and turf terrace area	1.0
Cuicacalli Lawn	Residential complex dedicated turf area with seating and shade	0.3
Education Park	Quadrangle park with turf, benches, and shade trees	0.5
Main Quad	Informal garden with turf lawns, benches, walks, and shade trees	0.7
Individual Building Gardens	Occasional courtyards, gardens, and seating areas with benches and plantings	0.5
Library Quad	Paved area with bench-lined planters and large shade trees	3.8
Mediterranean Garden	Informal garden with water features, circulation walk, and benches	0.4
Olmeca/Maya Quad	Enclosed dedicated turf lawn with water features and occasional trees and benches	0.8
Scripps Park and Cottage	Hillside garden with water features and small meeting venue	1.7
Hostler Hall Terrace	Furnished outdoor relaxation area	0.3
Aztec Student Union Central Plaza and Terraces	Furnished outdoor lounges and casual study areas; full-time public access	0.02
Aztec Aquaplex Swimming Complex	Competition and recreation pools, lounge deck, locker rooms	1.7
Cuicacalli Residence Halls Pool	Recreation pool for residential use	0.1
Cuicacalli Sand Volleyball Court	Beach-style volleyball courts for residential use	0.1
Football Practice Field (PG 600)	Natural turf practice field for intercollegiate athletics	2.5
Cal Coast Credit Union Open Air Theatre	Greek-style outdoor amphitheater	2.5
ENS 700 Field	Natural turf multipurpose recreational field	2.0
Recreation Field 103	Multi-use artificial turf field	1.5
Recreational Field PG 610	Multi-use artificial turf field	1.5
Recreational Field PG 620	Multi-use artificial turf field	1.5
SDSU Softball Field Stadium	National Collegiate Athletic Association-(NCAA-) approved softball filed and stadium for practice and intercollegiate use	4.9
SDSU Sports Deck Soccer Field PG 660	NCAA-Approved turf soccer field	1.8
SDSU Sports Deck Track	Olympic track and field venue with grandstands and support facilities	0.9
Tennis Courts	Competition hard court tennis center for intercollegiate and recreational use	3.0
Tenochca Pool	Recreational pool for residents/students use	0.01
Tenochca Hart Park - Sand Volleyball Courts	Beach-style volleyball courts for residential/student use	0.02
Tony Gwynn Stadium	NCAA-approved baseball field and stadium for practice and intercollegiate use	3.8
University Center Children's Play Yards	Secure outdoor multipurpose play yards segregated by age groups	0.02

Table 4.13-6. Existing SDSU Parks and Recreational Facilities

Facility	Description	Acres (approximate)
Aztec Recreation Center	Indoor sports and fitness center	1.7
Conrad Prebys Aztec Student Union	Bowling lanes, billiards, table tennis, video games, outdoor patio, indoor lounges	1.1
Fowler Athletic Center	Fitness and weight training center with meeting venue and athletic offices	1.8
Viejas Arena	Multi-use indoor entertainment and sports venue	3.3
Native and Indigenous Healing Garden	Informal garden with circulation walks	.15
	Total	**39.42**
Scenic or Natural Areas		
Area adjacent to Lot 16	Existing wetlands habitat	1.2
Are adjacent to Lots 17A/B	Existing wetlands habitat	2.5
Mission Trails–Fortuna Mountain Research Reserve	Public access hiking and research area	500
	Total	**503.7**

Source: SDSU 2024f.

4.13.2 Regulatory Framework

The CSU system, which includes SDSU, is a state agency and subject to state requirements. The Project is not required to comply with local ordinances or requirements, including payment of local fees such as school impact fees or any other fee program set up by a local agency. A summary of relevant laws and regulations follows below.

Federal

There are no federal plans, policies, or ordinances relevant to public services that would apply to the Proposed Project.

State

California Fire Code

California Code of Regulations (CCR), Title 24, Part 9, incorporates adoption of the 2021 International Fire Code of the International Code Council with necessary California amendments. The California Fire Code (CFC) establishes minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The CFC applies to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure within the State of California (24 CCR Part 9).

Fire Hazard Severity Zones

Wildland fire protection in California is the responsibility of the state, local, or federal government. The California Department of Forestry and Fire Protection (CAL FIRE) adopted Fire Hazard Severity Zone maps for State Responsibility Areas in 2007 and recommended maps for Very High Fire Hazard Severity Zones in Local Responsibility Areas. Local Responsibility Areas include incorporated cities, cultivated agricultural lands, and portions of the desert. CAL FIRE recommendations are not the same as actual zones, which do not go into effect unless adopted by local agencies (CAL FIRE 2019).

The SDSU campus is located within a Local Responsibility Area. The Peninsula Component site is located in an area classified as Very High Fire Hazard Severity Zone, while the University Towers East Component site is located in a non-Very High Fire Hazard Severity Zone (CAL FIRE 2009). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as “No Designation,” “Moderate,” “High,” or “Very High.” See Figure 4.16-1, FHSZ Map, in Section 4.16, Wildfire, which shows the Very High Fire Hazard Zones in the Project area.

Local

As a state agency, SDSU is not subject to compliance with local planning documents or local ordinances or requirements. However, to the extent the City’s General Plan provides information relevant to the provision of public services to the campus, such General Plan policies and guidelines are provided below.

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the General Plan (City of San Diego 2024b) provides objectives, policies, and programs regarding public services and utilities. Because the Fire–Rescue Department provides fire protection services to the SDSU campus, relevant policies from the General Plan are provided.

Public Facilities, Services, and Safety Element

Policy PF-D.1: Locate, staff, and equip fire stations to meet established response times as follows.

a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minutes drive time in the most populated areas.

b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.

   - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.
   - This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.

Table PF-D.1. Deployment Measures to Address Future Growth by Population Density per Square Mile

	>1,000-people/sq. mi.	1,000 to 500 people/sq. mi.	500 t o50 people/sq. mi*	Permanent open space areas
1st Due Travel Time	5 minutes	12 minutes	20 minutes	10 minutes
Total Reflex* Time	7.5 minutes	14.5 minutes	22.5 minutes	12.5 minutes
1st Alarm Travel Time	8 minutes	16 minutes	24 minutes	15 minutes
1st Alarm Total Reflex*	10.5 minutes	18.5 minutes	26.5 minutes	17.5 minutes

Note: *Reflex time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units.

Policy PF-D.2: Determine fire station needs, location, crew size and timing of implementation as the community grows.

a. Use the fire unit development performance measures (based on population density per square mile) shown in Table PF-D.1 to plan for needed facilities. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different density types aggregates into a population cluster area, use the measures provided in Table PF-D.2.
b. Reflect needed fire-rescue facilities in community plans and associated facilities financing plans as a part of community plan updates and amendments.

Table PF-D.2 Deployment Measures to Address Future Growth by Population Clusters

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	> 200,000 people	4 minutes
Urban-Suburban	< 200,000 people	5 minutes
Rural	500 - 1,000 people	12 minutes
Remote	< 500 people	> 15 minutes

Policy PF-E.2: Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within seven minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes.
- Priority 4 Calls (minor requests for police service) within 90 minutes.

Fire Service Deployment

As previously discussed, the City conducted a fire services deployment planning study to (1) further refine the findings of the Regional Fire Service Deployment Study that was previously conducted for the County that pertained to Fire-Rescue deployment within the city; (2) analyze whether the Fire-Rescue performance measures are appropriate and achievable given the risks, topography, and special hazards in the city; and (3) review existing deployment and staffing models for efficiency and effectiveness and determine how and where alternative deployment and staffing models could be beneficial to address current and projected needs (Citygate Associates 2017). The study concluded that additional fire-rescue resources were needed, and in response, the Fire Department adopted the recommendations of the study and set new deployment standards.

The City's Fire-Rescue Department also responds to wildfires In order to confine wildland fires under 3 acres when notified promptly, and treat up to five medical patients at once, a multiple-unit response of at least 17 personnel should arrive within 10 and half minutes 90% of the time from the receipt of the 9-1-1 call. This equates to a 1-minute dispatch time, 1.5-minute company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas (Citygate Associates 2017).

The SDSU campus is served by the City's Fire-Rescue Department and is located in a high fire severity zone, as classified by CAL FIRE.

City of San Diego Fire Station Standards

To treat medical patients and control small fires, the City's established response time standards for fire service note that the first-due unit should arrive within 7.5 minutes 90% of the time from the receipt of the 911 call in fire dispatch. This equates to a 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas. Emergency response time target thresholds include travel time along with dispatch and turnout time, which can add two minutes to travel time (Citygate Associates 2017).

4.13.3 Significance Criteria

The significance criteria used to evaluate the project's potential impacts relative to public services and recreation are based on Appendix G of the CEQA Guidelines, Public Services and Recreation. According to Appendix G, a significant impact related to public services and recreation would occur if the Project would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
   a. Fire protection.
   b. Police protection.
   c. Schools.
   d. Parks.
   e. Other public facilities.

2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Methodology

Information contained in this section is based on a review of available studies, documents, and communications with local service providers and SDSU staff. Potential impacts to fire protection services were primarily assessed through information and analysis presented in the Fire Protection Plan prepared for the Proposed Project (Appendix J-1). Additionally, previous studies conducted for the Fire–Rescue Department service area, such as the 2017 Fire Service Standards of Response Coverage Study (Citygate Associates 2017), were also reviewed. Potential impacts to police protection services were assessed through discussions and data provided by the UPD staff relative to maintaining appropriate service levels (Stills 2024). To evaluate impacts to libraries and parks and recreational facilities, a review of the existing, on campus inventory of parks and recreational facilities and library facilities was evaluated.

4.13.4 Impacts Analysis

1. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?

The City's Fire-Rescue Department provides fire protection services to the SDSU campus including the Project site; therefore, the Fire-Rescue Department response times are relevant to the Project. Table 4.13-2 lists the current average response times for each station within the vicinity of the Proposed Project. As shown in the table, Station 17 response times are compliant with the City's General Plan response time objective to secure the deployment and arrival of the first responding engine company within 7:30 minutes 90% of the time (Citygate Associates 2017). While average response times at Stations 10, 31, and 26 slightly exceed the objectives, according to the City's General Plan, the proximity of each station to the campus (within 3 miles) typically is sufficient to achieve response time goals.

As described in the Fire Protection Plan prepared for the Proposed Project (included as Appendix J-1 to this Draft EIR), emergency call volumes related to typical projects, such as new residential and commercial developments, can be reliably estimated based on the historical per-capita call volume from a particular fire jurisdiction. The Fire–Rescue Department documented 166,838 total incidents in 2023 generated by a city-wide service area total population of approximately 1,419,845 persons across an approximately 343 square mile service area (City of San Diego Fire-Rescue Department 2024b, 2024c). Based on this data, the City's per capita annual call volume is approximately 118 calls per 1,000 persons. The resulting per capita call volume is 0.118.

As described in Chapter 2, Project Description, the Project site includes existing student housing that would be removed and replaced by the Project. Development of the Proposed Project would result in approximately 5,170 new student beds, a net increase of approximately 4,468 student beds to the main campus inventory due to demolition of all 13 existing buildings, which presently provide housing for 702 students in the Peninsula Component of the Proposed Project. Using the Fire–Rescue Department's estimated per capita call volume of 0.118 (118 annual calls per 1,000 population), the Proposed Project's estimated 4,468 beds (new residents) would generate up to 525 additional calls per year (approximately 1 to 2 calls per day). The type of calls expected would primarily be medical related and not fire related as is the case with most jurisdictions, including the Fire–Rescue Department where 73.5% of total calls in 2023 were non-life threatening, urgent, or life-threatening emergency medical responses (City of San Diego Fire-Rescue Department 2024b). The estimated incident call volume at Project completion is based on a conservative estimate of the maximum potential number of persons on-site at any given time (considered a “worst-case” scenario). Actual numbers would likely be less than projected, due to most students not living on campus year-round.

In 2023, Station 10, the first responding station to the SDSU campus, responded to a total of 4,796 incidents with an approximate call volume of 13 calls per day. Should Station 10 not be available to respond to a call, Stations 31, 17, and 26 are all located within approximately 3 miles of the Project site and could provide backup for Station 10, fulfilling some of the increased demand created by the Proposed Project. The increase of approximately 525 calls per year associated with the Proposed Project would be an approximately 11% increase to Station 10’s current workload, but as previously mentioned, some of this would likely be shared by other nearby City fire stations. Further, the addition of 525 calls per year (approximately 44 calls per month or one to two calls per day) would likely be lower as it is based on the average occupancy rate and calls per capita data used in this estimate and assumes the entire Project population is onsite year-round.

Buildings constructed as part of the Proposed Project would meet current CFC and California Building Code requirements and would be fully sprinklered facilities, which has been shown to slow the effect of a fire in the initial stages. The Project would be adequately served by the existing four fire stations located less than 4 miles from the Project site and would not result in the need for new or physically altered fire facilities to serve the increase in demand and meet adopted response times. The Proposed Project would result in **less-than-significant** impacts related to fire protection.

Emergency Medical Services

At buildout, the Proposed Project would result in an increase of approximately 4,468 students living on campus, as the Proposed Project would provide additional on-campus housing for both existing and future planned students. While a certain number of these students represent “existing” students, the Proposed Project would also accommodate future planned students not yet enrolled. However, the Proposed Project would not result in increase in full-time equivalent student (FTES) enrollment of 35,000.

Current and future students would continue to use medical services provided at the Calpulli Center on campus, whether they live on campus or not, as there are designated student health services available to all enrolled students. Students may also require the use of emergency medical services, which are provided by the Fire–Rescue Department, as described above, and by privately contracted emergency medical transport services through the City of San Diego that are coordinated with the Fire–Rescue Department and SDPD through the 911 call system. As discussed in the analysis of fire department services above, the Proposed Project would result in approximately 525 additional calls per year (including medical calls). This would represent an approximate 11% increase in calls for Station 10, the responding station, and some of these calls would be expected to be shared by other nearby City fire stations. This would not result in a significant increase to demand on emergency medical services and impacts would be **less than significant.**

Police protection?

The Proposed Project would generate additional demand for campus police services by adding 4,468 new student beds to the campus. Table 4.13-7 provides a projection of future calls to the UPD. Because the UPD currently responds to calls for service originating from the existing student housing at the Project site, only the net increase in student resident population (4,468) was used to calculate projected Priority 1 calls attributable to the proposed student housing. As shown in Table 4.13-7, the Proposed Project would generate approximately 818 additional annual calls to the UPD from on-campus residents.

Table 4.13-7. Projected Priority 1 Calls from On-Campus Residences

Call Origination	Average Annual Calls Per Student[1]	Project Population	Projected Additional Priority 1 Calls
Student Housing	0.183	4,468	818

Note:
1 See Table 4.13-3. To calculate average per student, the arithmetic mean of the 2022 and 2023 Priority 1 calls received were calculated.

As discussed previously in Section 4.13.1.2, the UPD, which is in close proximity to the Project site (less than 0.50 miles south of the Peninsula Component and northwest of the University Towers East Component site), currently responds to Priority 1 calls within 4 minutes and 30 seconds, Priority 2 calls within 5 minutes, and Priority 3 calls within 7 minutes. For reference, these current response times do not exceed the City's General Plan response time goals, which as previously noted, are 7 minutes, 12 minutes, 30 minutes, respectively. While the UPD is not subject to meeting the City's goals and response times, because the SDPD provides backup to support the UPD (and vice versa) response times of SDPD officers are relevant to the discussion.

The Project site is currently served by UPD and falls within the normal patrol and enforcement zone, the Proposed Project would continue to be served by the UPD, and would result in an incremental increase of approximately 4,4468 students on the Project site once full buildout is complete. These students would be within the previously approved enrollment of 35,000 FTES, and therefore would represent students living on campus, rather than only attending class on campus and otherwise living off campus. Consequently, UPD would then be primarily responsible for providing police protection to these students for a greater portion of day, if not all day, compared to existing conditions. Table 4.13-7 indicates that the Project would result in an approximate 55% increase in Priority 1 calls generated from on-campus residences. For these reasons, the Proposed Project has the potential to generate an increased demand on UPD and SDPD services.

To meet the anticipated demands of the Proposed Project, and to maintain existing response times, UPD has identified the need for additional personnel and equipment. Specifically, UPD estimates the need for four additional residential housing officers, two dispatchers, one detective, and one administrative support person. Additionally, UPD would require three more patrol vehicles, one detective vehicle, and the necessary safety equipment to outfit six additional officers (Stills 2024). SDSU would provide funding for the additional personnel, vehicles, and equipment as needed. UPD would use discretion to determine at what point the additional personnel, vehicles, and equipment are needed to support the Project over the course of its phased development.

In 2008, the UPD moved to their newly renovated campus building near the intersection of Remington Road and Aztec Circle Drive. The nearly $1-million renovation project created 15,000 square feet of administrative and public services space, which was designed to accommodate the police protection needs of 35,000 FTES and related uses.

UPD has communicated that they would not require additional space or upgraded facilities to support the Proposed Project. However, UPD clarified that they would require additional space at the time in which both the SDSU Mission Valley Campus and the Proposed Project are operational (Stills 2024). Impacts to public services, including police protection, in relation to the development of the Mission Valley Campus were analyzed in the SDSU Mission Valley Campus Master Plan EIR (SCH# 2019011042). The SDSU Mission Valley Campus Master Plan EIR assumed that a new UPD substation could be located on the SDSU Mission Valley campus to support the campus and maintain existing service levels for the surrounding community. The potential environmental impacts of constructing a UPD station on the Mission Valley Campus were addressed in the SDSU Mission Valley Campus Master Plan EIR. The planned substation is expected to meet the increased demands for police protection resulting from the buildout of the Mission Valley Campus. For this reason, UPD would not require additional space or facilities to support the Proposed Project beyond the available facilities at the UPD main campus building and the already planned substation that will be located at the Mission Valley Campus.

Therefore, the Proposed Project would be adequately served by the UPD with support from the SDPD and would not result in the need for new or physically altered police facilities to serve the increase in demand and for the SDPD to meet adopted response times. The Proposed Project would result in **less-than-significant** impacts related to police services, and no mitigation would be necessary

Schools?

Children (other than SDSU students under the age of 18) would not be permitted to live in the proposed student housing units. Therefore, the Proposed Project would not generate additional demand for elementary and secondary schools in the surrounding community. Similarly, the Proposed Project would not increase the approved enrollment on campus and would not result in the need to hire additional faculty or staff members over existing conditions. As such, no faculty or staff members, who may have school aged children, would be introduced as a result of the Proposed Project. The Proposed Project would result in **no impact** associated with maintaining acceptable school service ratios.

Parks?

Demands for parks and recreational facilities are directly related to local population levels. As previously stated, the College Area community, which includes the Project site, is deficient in usable parkland, with only 1.7 acres of parkland located in the planning area. However, SDSU provides several acres of community/neighborhood facilities within the campus (see Table 4.13-4). SDSU currently provides on-campus housing to approximately 8,209 students. The Proposed Project would provide on-campus housing for approximately 4,468 SDSU students and would not increase existing student enrollment. Assuming a projected on-campus student population of 12,677 (8,209 existing + 4,468 new = 12,677) and using the City park standards[2] as a guide (absent any CSU or SDSU park or recreation standards), SDSU should provide a total of 35.5 useable acres of population-based parks, to account for all students that live on campus (City of San Diego 2024d).

As shown in Table 4.13-6, SDSU students have access to over 39 acres of community/neighborhood park and recreation facilities and over 500 acres of scenic or natural areas. Therefore, based on the City's park standards, SDSU currently provides adequate community/neighborhood park and recreation facilities to serve both the existing and proposed on-campus resident population.

In addition to the existing campus resources, the Proposed Project includes several outdoor amenities and gathering areas, such as flexible turf areas, that would provide additional recreational opportunities for students. The potential environmental impacts associated with the construction and operation of the Project's proposed recreational fields and facilities are analyzed in the appropriate sections throughout this Draft EIR.

While the Proposed Project would increase the number of students living on campus, the Project would not increase the community population or total enrollment at SDSU. Rather, the Proposed Project would provide additional on-

2 The City uses a minimum ratio of 2.8 useable acres per 1,000 residents.

campus living options for SDSU students. By offering additional on-campus housing for students, the Proposed Project would decrease the demand for students seeking housing in the surrounding communities, which would decrease the overall demand for City park and recreation facilities and services. By providing campus housing for students closer to SDSU recreation facilities, students are more likely to use SDSU recreation facilities instead of City park and recreation facilities in the surrounding College Area Community. Therefore, the Proposed Project would result in **less-than-significant** impacts related to the need to construct new parks or expand existing parks in the College Area community.

Other public facilities?

Libraries

The residents of the Proposed Project would be SDSU students who would have access to the on-campus University Library for research and other library needs. While residents of the Proposed Project would have the opportunity to obtain a City library card (by virtue of being City residents) and use the resources of a nearby City library branch, due to the proximity of the University Library, it would be more likely for students to use on-campus library facilities rather than off-campus City facilities. The campus library has been designed to accommodate the research needs of the SDSU campus and, therefore, construction of new facilities would not be required as a result of the Proposed Project. Therefore, the Proposed Project would result in **less-than-significant** impacts related to the maintenance of acceptable library performance objectives.

2. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

3. Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Under these two significance criteria, an impact would occur if the Project would increase the use of existing park and recreational facilities to the point where substantial physical deterioration of such facilities would occur or be accelerated. Relatedly, an impact would occur if the Project would result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental park facilities, the construction of which could cause significant environmental impacts. As previously discussed above in Impact 1 relative to Parks, it is anticipated that by locating students on campus and closer to the existing and proposed SDSU recreation facilities, students are more likely to use SDSU recreation facilities instead of City park and recreation facilities in the surrounding College Area community. The existing SDSU facilities and those proposed by the Project provide sufficient park and recreational space. The potential impacts associated with construction and development of the Project’s proposed recreational facilities and spaces are analyzed throughout this Draft EIR and no additional off-site recreation facilities are required to serve the Proposed Project to meet the demand of adding new on-campus residents. As such, the Project would not result in an increased use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Further, impacts related to adverse physical effects on the environment resulting from construction of new recreational facilities and impacts related to the provision of new or physically altered parks and recreation, or the need for new or physically altered parks and recreation facilities would be **less than significant.**

4.13.5 Cumulative Analysis

The Proposed Project would introduce a net increase of approximately 4,468 student beds to the SDSU campus to accommodate the housing needs of the current student body which, as discussed above, could nominally increase the demand for fire protection and emergency services within the Fire–Rescue Department service area. Several of the cumulative projects in the community would result in additional demand for fire and emergency protection services due to an increase in residents of the service area. These projects would be required to offset the increase in demand caused by their respective project through the payment of appropriate development impact fees, which are collected by the City to fund the necessary facilities attributable to their increased demand. . Additionally, no service gaps were identified in the College Area Community area, which includes the Project site (Citygate Associates 2017). Thus, because each cumulative project within the City of San Diego would be responsible to mitigate its own impact, the Proposed Project would not contribute to a cumulative impact, and cumulative impacts related to the provision of fire service would **be less than significant.**

UPD primarily responds to calls for service on the SDSU main campus, the SDSU Mission Valley Campus and in the immediate surrounding area, which is jointly serviced by the SDPD. As such, the cumulative context for UPD services is limited to the SDSU campus, including the Mission Valley Campus, and the immediately surrounding response area. Several of the listed cumulative projects on the SDSU campus have the potential to result in an increased demand for UPD services. Specifically, the development of the SDSU Mission Valley Campus would result in the increased demand for UPD services. However, a new UPD substation is planned to be constructed on the Mission Valley Campus. The planned substation is expected to serve the Mission Valley Campus and surrounding community, maintaining existing service levels. The City's Police Department would provide police protection services to all other cumulative projects located outside of the SDSU campus and beyond UPD's jurisdiction. These projects would be required to offset the increase in demand caused by their respective project through the payment of appropriate development impact fees. Thus, because each cumulative project within the City of San Diego is responsible to mitigate its own impact, and UPD plans to expand their facilities at the SDSU Mission Valley Campus the Proposed Project would not contribute to a cumulative impact, and cumulative impacts related to the provision of police services would be **less than significant.**

The Proposed Project would create new campus housing, which could nominally increase demand for park and recreational facilities. However, the Project proposes several recreational and open spaces. Additionally, the SDSU campus has an existing surplus of recreational spaces available to students. Given the surplus, the Project is not expected to increase the demand for park and recreation facilities in the project area. All other residential projects that increase the demand for park and recreation needs in the City are required to provide park space and/or pay park in lieu-fees to ensure adequate recreational facilities are provided. Thus, the Proposed Project would not contribute to a cumulative impact and, therefore, cumulative impacts related to demand for park and recreation services would be **less than significant.**

The Proposed Project would not generate additional demand for elementary and secondary schools in the surrounding community. As such, cumulative impacts related to schools would be **less than significant.**

It is anticipated that residents of the Proposed Project would be adequately served by the on-campus library services due to proximity. Other population increasing cumulative projects outside of the SDSU campus would be required to pay library impact fees to offset the increase in demand caused by the project. Thus, because the Proposed Project would not contribute to a cumulative impact, the Project's cumulative impact related to the increase in demand for library services would **be less than significant.**

4.13.6 Summary of Impacts Prior to Mitigation

While a nominal increase in demand for fire protection and emergency response services would result from the Proposed Projects, demand would be met by existing facilities, and the Project would result in **less-than-significant** impacts substantial adverse physical impacts associated with the provision of new or physically altered Fire–Rescue Department facilities, or the need for new or physically altered Fire–Rescue Department facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives associated with fire protection.

The Proposed Project would result in a need for additional UPD officers and equipment to maintain service standards. However, there would not be a need for the development of additional facilities, the construction of which would result in substantial adverse physical impacts. Therefore, the impacts related to police protection would be **less than significant.**

The Proposed Project would not result in demand on school facilities. There would be **no impact** related substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives associated with schools.

The University Library would meet demand for library services resulting from the Proposed Project. Thus, impacts related to related substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives associated with libraries, would be **less than significant.**

The SDSU campus provides a surplus of recreational facilities; thus, the demand resulting from the Proposed Project would be met by the existing facilities. Impacts would be **less than significant** related to the physical deterioration, or substantial adverse physical effects to the environment due to construction or expansion of recreational facilities.

4.13.7 Mitigation Measures

No mitigation measures are required.

4.13.8 References

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4.14 Transportation

This section describes the existing transportation conditions of the Project site and vicinity; identifies associated regulatory requirements; and evaluates potential transportation impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Transportation. The analysis presented here is based on the technical report prepared by transportation engineers Linscott, Law & Greenspan (LLG), Transportation Study, San Diego State University Evolve, San Diego, California (December 2024). The Transportation Study is included in its entirety in Appendix I of this Draft Environmental Impact Report (EIR).

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received several comments related to transportation concerning parking and traffic generated by students and construction, as well as requests to improve bike, pedestrian, and transit facilities that would serve the area. The analysis presented below addresses each of these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.14.1 Existing Conditions

This section provides a summary of the existing circulation network, bicycle and pedestrian facilities, and transit service. As discussed in detail in Chapter 2 of this Draft EIR, the Proposed Project is comprised of two components -- the Peninsula Component, which would be located in the northwest portion of the main SDSU campus at the northern terminus of 55th Street, and the University Towers East Component, which would be located immediately east of the existing University Towers on Montezuma Road. For the purposes of the discussion of the existing conditions, the Project study area refers to both Project components and the surrounding transportation network.

Existing Street System

Interstate (I) 8 is an interstate freeway operated by the California Department of Transportation (Caltrans). I-8 is an east-west facility that extends from the San Diego area eastward to the California-Arizona border and beyond. I-8 provides five lanes eastbound and five lanes westbound within the SDSU campus area. I-8 provides access to the Fairmount Avenue, Waring Road, College Avenue, and Lake Murray/70th Street interchanges within the campus vicinity. The posted speed limit is 65 miles per hour (mph).

Campanile Drive is classified as a 2-lane collector in the College Area Community Plan. Campanile Drive is currently constructed as a 2–3 lane roadway north of Montezuma Road, and as a 2-lane undivided roadway south of Montezuma. Bike lanes are not provided along Campanile Drive. On-street parking is generally allowed south of Montezuma Road. The posted speed limit is 25 mph.

College Avenue is a north-south roadway classified as a 4-lane Major Street between Del Cerro Boulevard and I-8 in the Navajo Community Plan; as a 6-lane Major Street between Canyon Crest Drive and Montezuma Road; and as a 4-lane Major Street south of Montezuma Road in the College Area Community Plan. College Avenue is currently constructed as a four-lane, intermittently divided roadway between Del Cerro Boulevard and Montezuma Road. College Avenue is constructed as a 4-lane Collector between Montezuma Road and Cresita Drive. Class II bike lanes are provided along College Avenue between Zura Way and Montezuma Road. On-street parking is prohibited north of Montezuma Road but permitted south between Montezuma Road and El Cajon Boulevard. The posted speed limit is 40 mph between Del Cerro Boulevard and Zura Way, and 35 mph south of Zura Way.

Montezuma Road is an east-west roadway classified as a 4-lane Major Street between Fairmount Avenue and Reservoir Drive in the College Area Community Plan. Montezuma Road is currently constructed as a four-lane divided roadway between Fairmount Avenue and 55th Street; a four-lane undivided roadway between 55th Street and College Avenue; and as a four-lane undivided roadway with intermittent turn lanes east of College Avenue. Class II bike lanes are provided on Montezuma Road along the entire length of the roadway. On-street parking on Montezuma Road is prohibited. The posted speed limit is 50 mph from Fairmount Avenue to Collwood Boulevard, 40 mph eastbound and 45 mph westbound between Collwood Boulevard and 54th Street, and 35 mph elsewhere.

55th Street is a north-south roadway classified as a 2-lane Collector north of Hardy Avenue and a 4-lane Collector between Hardy Avenue and Montezuma Road in the College Area Community Plan. 55th Street is currently constructed as a four-lane undivided roadway north of Montezuma Road, and as a two-lane undivided roadway north of Canyon Crest Drive. Class II bike lanes are provided on 55th Street between 55th Street and Montezuma Road. On-street parking is prohibited except north of Canyon Crest Drive. The posted speed limit is 25 mph.

Remington Road is an east-west roadway classified as a 2-lane Collector in the College Area Community Plan. Remington Road is currently constructed as a two-lane undivided roadway west of 55th Street. Class II bike lanes are provided on both sides of the roadway between Hewlett Drive and 55th Street. On-street parking is prohibited. The posted speed limit is 25 mph.

Fairmount Avenue is a north-south roadway classified as a 6-lane Primary Arterial between Montezuma Road and I-8 in the College Area Community Plan. Fairmount Avenue is currently constructed as a six-lane divided expressway between Interstate 8 and Montezuma Road. Class II bike lanes are provided on both sides of the roadway. On-street parking on Fairmount Avenue is prohibited. The posted speed limit is 35 mph between the I-8 ramps, and 50 mph south of the I-8 ramps.

Canyon Crest Drive/East Campus Drive is an unclassified roadway in the College Area Community Plan. Canyon Crest Drive/East Campus Drive is currently constructed as a two-lane undivided roadway west of College Avenue, as a two-lane one-way roadway between College Avenue and Zura Way, and as a two-lane undivided roadway south of Zura Way. On-street parking is generally prohibited. Currently, no bicycle facilities exist on Canyon Crest Drive/East Campus Drive. The posted speed limit is 25 mph.

Bicycle Facilities

There are four different existing and planned bicycle facility classifications in the City of San Diego (City) – Class I, Class II, Class III, and Class IV.

Existing Bicycle Facilities

A bicycle network inventory was conducted along street segments within the Project study area. Table 4.14-1 summarizes the existing bicycle facilities in the Project vicinity. Table 4.14-1 lists the existing and planned bicycle facilities within the Project study area, on Montezuma Road, College Avenue, Remington Drive, 55th Street, 54th Street, and Collwood Boulevard.

Table 4.14-1. Existing and Planned Bicycle Facilities

Roadway	Bicycle Facilities	
	Existing	*Planned*
Montezuma Road	Class II Bike Lanes along entire length	None
College Avenue	Class II Bike Lanes between Zura Way and Montezuma Road	Class II Bike Lanes between I-8 and El Cajon Boulevard[a]
Remington Drive	Class II Bike Lanes between Hewlett Drive and 55th Street	Class III Bike Route between Dover Drive and Hewlett Drive[a]
55th Street	Class II Bike Lanes between Remington Drive and Montezuma Road	None
54th Street	None	Class III Bike Route between Montezuma Road and Collwood Boulevard[b]
Collwood Boulevard	Class II Bike Lanes between Montezuma Road and El Cajon Boulevard	None

Source: Appendix I.
Notes:
[a] City of San Diego 1989.
[b] City of San Diego 2013.

On the SDSU campus, SDSU provides bicycle routes/paths, along with bicycle racks, cages, and storage facilities. Students may obtain access to the bicycle cages and storage rooms by contacting the Office of Housing and Administration and registering their bicycle with the office at no cost. Bicycle storage is located near most residential halls. Additionally, bicycle racks are provided throughout the campus. A map of the locations of the bicycle racks is included in Appendix I.

Planned Bicycle Facilities

The Proposed Project would include dedicated bike racks and charging stations specifically designed for micromobility vehicles, such as electric scooters, e-bikes, and other small electric transportation options. These facilities will provide convenient, secure parking and easy access to charging.

Based on the City of San Diego Bicycle Master Plan (City of San Diego 2013) and the College Area Community Plan (City of San Diego 1989), Class II Bike Lanes are planned along College Avenue north of Zura Way and south of Montezuma Road. Additionally, Class III Bike Routes are planned along Remington Road west of Hewlett Drive and along 54th Street south of Montezuma Road.

Pedestrian Facility Conditions

This section describes the existing pedestrian network in the Project study area.

Existing Pedestrian Facilities

A pedestrian network inventory was conducted along those street segments located within the Project study area. Table 4.14-2 summarizes those segments with missing sidewalks, and Table 4.14-3 summarizes the pedestrian conditions at key intersections close to the Project sites.

Table 4.14-2. Pedestrian Conditions –Roadway Segments Missing Sidewalks

Roadway	Limits Missing Sidewalk
Montezuma Road	Collwood Boulevard to 54th Street
College Avenue	MTS Bus Way to Interstate 8 Off-Ramp
Alley fronting south side of University Towers Project	55th Street to Campanile Drive

Source: Appendix I.
Notes: MTS = San Diego Metropolitan Transit System

Table 4.14-3. Pedestrian Conditions - Intersections

Intersection	Traffic Control	Crosswalk Type	Curb Ramps		Countdown Ped Heads provided?
			Single/Dual	*Truncated Domes*	
55th Street/Aztec Circle Drive	MSSC[a]	High Visibility	Single	Yes[b]	No
55th Street/Remington Road	Signal	High Visibility	Single	Yes[b]	Yes
Montezuma Road/55th Street	Signal	High Visibility	Single	Yes	Yes
55th Street/Alley fronting south side of University Towers Project	MSSC[a]	Standard	Single	Yes[b]	No
Montezuma Road/Campanile Drive	Signal	High Visibility	Single	Yes	Yes

Source: Appendix I.
Notes:
[a] Minor Street Stop-Controlled
[b] Partially provided. Provided on 3 of 4 corners.

Planned Pedestrian Facilities

The City's College Area Community Plan recommends the completion of the missing portions of sidewalks along Montezuma Road between 54th Street and Collwood Boulevard, 63rd Street between El Cajon Boulevard and Catoctin Drive, and along Alvarado Road between College Avenue and Alvarado Court, which includes areas around the SDSU campus.

It is important to note that as a state entity, the California State University (CSU)/SDSU is not subject to local government planning policies and regulations, including the recommendations outlined in the City of San Diego Pedestrian Master Plan (City of San Diego 2015), City of San Diego Bicycle Master Plan (City of San Diego 2013), and the College Area Community Plan (City of San Diego 1989). The information provided here is in furtherance of an adequate description of the existing conditions in the Project study area.

Existing Transit System

Transit facilities within the Project study area include the SDSU Red & Black Safe Ride program, the San Diego Metropolitan Transit System (MTS) Trolley Green Line, and MTS bus service.

SDSU Red & Black Campus Shuttle

SDSU students, faculty and staff can use the Red & Black Safe Ride program to get around campus at designated pick-up and drop-off locations. The Red & Black Safe Ride program operates weekdays, from 7:00 p.m. to midnight. Relatedly, an ADA (Americans with Disabilities Act) van is available to accommodate SDSU-related passenger travel requests. Additionally, during weekdays, from 7:00 p.m. to midnight, riders can request an on-demand ride to and from designated locations using the SDSU Safe App. Designated pick-up and drop-off locations are illustrated in Appendix I.

Cart transportation service for academic-related reasons is available for students with permanent and temporary mobility limitations and who have appropriate documentation of disability.

MTS Trolley Green Line

Transit service within the City of San Diego is provided by MTS. The MTS Trolley Green Line connects Downtown San Diego to Santee. A total of 23 stops currently exist along the Green Line, with a dedicated SDSU Transit Center stop serving the campus. The Green Line provides service Monday to Friday from 4:45 a.m. to 12:00 a.m./Midnight with 15-minute headways. Services are provided on Saturday and Sunday from 5:00 a.m. to 12:00 a.m./Midnight with 30-minute headways. The SDSU Transit Center is a San Diego Trolley station and bus hub located on the main campus, south of the Conrad Prebys Aztec Student Union, with entrances between College Avenue and Campanile Drive.

MTS Bus Service

The SDSU Transit Center services Bus Routes 11, 14, 115, 215, 856, 936, and 955. A description of each of the routes that serve the Project study area is provided below.

Route 11 runs from the SDSU Transit Center to 1st Avenue and Broadway in Downtown San Diego. The route runs along 1st Avenue, University Avenue, Park Boulevard, Adams Avenue and Montezuma Road. Weekday service begins at 5:57 a.m. with 15-minute headways and ends at 10:22 p.m. Saturday service begins at 6:12 a.m. with 30-minute headways and ends at 9:52 p.m. Sunday service begins at 7:12 a.m. with 30-minute headways and ends at 7:52 p.m.

Route 14 runs from the Grantville Trolley Station to Baltimore Drive and Lake Murray Boulevard. The route runs along Camino Del Rio North, Friars Road, Zion Avenue, Waring Road, College Avenue, Montezuma Road, and Lake Murray Boulevard. Weekday service begins at 6:25 a.m. with 60-minute headways and ends at 6:22 p.m. This route does not provide weekend service.

Route 115 runs from SDSU Transit Center to the El Cajon Transit Center. The route runs along College Avenue, Navajo Road, Jackson Drive, Lake Murray Boulevard, Fletcher Parkway, and Marshall Avenue. Weekday service begins at 6:28 a.m. with 30-minute headways and ends at 9:57 p.m. Saturday service begins at 7:22 a.m. with 60-minute headways and ends at 8:25 p.m. Sunday service begins at 7:26 a.m. with 60-minute headways and ends at 6:23 p.m.

Route 215 runs from SDSU Transit Center to American Plaza Trolley Station in Downtown San Diego. The route runs along Broadway, Park Boulevard, El Cajon Boulevard and College Avenue. Weekday service begins at 4:33 a.m. with 10–15-minute headways and ends at 12:45 a.m. Saturday and Sunday service begins at 4:48 a.m. with approximately 12-minute headways and ends at 12:20 a.m.

Route 856 runs from SDSU Transit Center to Cuyamaca College. The route runs along College Avenue, Broadway, Sweetwater Road, Jamacha Boulevard, and Campo Road. Weekday service begins at 5:40 a.m. with 30-minute headways and ends at 9:10 p.m. Saturday service begins at 6:31 a.m. with 60-minute headways and ends at 9:32 p.m. Sunday service begins at 7:31 a.m. with 60-minute headways and ends at 6:32 p.m. Weekend service does not stop at the SDSU Transit Center or the College Avenue and El Cajon Boulevard transit stop.

Route 936 runs from SDSU Transit Center to Orville Street and Bruker Avenue. The route runs along College Avenue, Broadway, Skyline Drive, Jamacha Road, and Jamacha Boulevard. Weekday service begins at 5:54 a.m. with 30-minute headways and ends at 9:53 p.m. Saturday service begins at 6:08 a.m. with 60-minute headways and ends at 9:54 p.m. Sunday service begins at 6:08 a.m. with 30-to-60-minute headways and ends at 7:05 p.m.

Route 955 runs from SDSU Transit Center to the 8th Street Transit Center. The route runs along College Avenue, Collwood Boulevard, 54th Street, Euclid Avenue, 47th Street, 43th Street, and 8th Street. Weekday service begins at 5:26 a.m. with 15-minute headways and ends at 10:56 p.m. Saturday service begins at 5:37 a.m. with 20-to-30-minute headways and ends at 10:56 p.m. Sunday service begins at 6:37 a.m. with 30-minute headways and ends at 8:55 p.m.

4.14.2 Regulatory Framework

Federal

There are no federal plans, policies, or ordinances regarding transportation relevant to the Proposed Project.

State

California Department of Transportation

Caltrans is the public agency responsible for designing, building, operating, and maintaining California's state highway system, which consists of freeways, highways, expressways, toll roads. Caltrans is also responsible for permitting and regulating the use of state roadways. The Proposed Project would be constructed outside Caltrans' right-of-way.

Senate Bill 743/CEQA Guidelines

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the CEQA process for several categories of development projects, including the development of infill projects in transit priority areas, and to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit Oriented Infill Projects, to the CEQA Statute (California Public Resources Code, Section 21099). In addition to other provisions, Pub. Resources Code section 21099 mandates that alternative metrics for determining impacts relative to transportation be developed to replace the use of level of service (LOS) in CEQA documents.

In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using LOS. Mitigation for impacts on vehicular delay often involves increasing capacity, such as widening a roadway or increasing the size of an intersection, which in turn encourages more vehicular travel and greater pollutant emissions. Additionally, improvements to increase vehicular capacity can often discourage alternative forms of transportation such as biking and walking. SB 743 directed the Governor's Office of Planning and Research (OPR) to develop an alternative metric for analyzing transportation impacts in CEQA documents. The alternative shall promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of multimodal transportation system, and providing clean, efficient access to destinations. Under SB 743, it was anticipated that the focus of transportation analysis would shift from vehicle delay to VMT within transit priority areas (i.e., areas well served by transit).

Pursuant to SB 743, OPR released the draft revised CEQA Guidelines in November 2017, recommending the use of VMT for analyzing transportation impacts. Additionally, OPR released updates to the Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018), to provide guidance on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their particular jurisdiction. While OPR's Technical Advisory is not binding on public agencies, CEQA allows lead agencies to "consider thresholds of significance . . . recommended by other public agencies, provided the decision to adopt those thresholds is supported by substantial evidence" (14 CCR 15064.7[c]).

In December 2018, the CEQA Guidelines were updated to add new Section 15064.3, Determining the Significance of Transportation Impacts, which describes specific considerations for evaluating a project's transportation impacts using the VMT methodology. This new methodology is required to be used for all projects effective July 1, 2020.

CEQA Guidelines Section 15064.3(b) is divided into four subdivisions as follows:

1. **Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
2. **Transportation Projects.** Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
3. **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
4. **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.

Since the Proposed Project is categorized as a land use project, CEQA Guidelines Section 15064.3(b)(1) applies. The CSU is serving as the lead agency for purposes of conducting environmental studies for the proposed Project and will lead permitting and construction for the Proposed Project. The CSU has published a Transportation Impact Study Manual (CSU 2019) that describes the methodology for analyzing transportation-related impacts resulting from the implementation of campus master plans, new or modified land uses, and other land development projects and is consistent with both the CEQA Guidelines update and OPR's Technical Advisory.

Regional and Local

Because SDSU is a component of the CSU system, which is a state agency, the Proposed Project is not subject to local government planning and land use plans, policies, or regulations. The Proposed Project would be subject to state and federal agency planning documents described above but would not be subject to regional or local planning documents such as the City's General Plan, College Area Community Plan, or the City's municipal code or zoning requirements. The following plans have been provided for context but SDSU would not be subject to the requirements or recommendations, therein.

SANDAG San Diego Forward: The 2021 Regional Plan

The San Diego Association of Governments (SANDAG) San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) was adopted by the SANDAG Board of Directors on December 10, 2021. It includes the region's Regional Transportation Plan (RTP); Sustainable Community Strategy (SCS), as required by SB 375; and Regional Comprehensive Plan. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources (SANDAG 2021). The SCS describes coordinated transportation and land use planning that exceeds the state's target for reducing per capita GHG emissions set by the California Air Resources Board (CARB). The 2025 Regional Plan is currently under preparation the detailed Draft Plan and its Environmental Impact Report is anticipated to be ready for public feedback in spring 2025.

SANDAG also prepared a Regional Transportation Regional Plan (RTIP), a five-year investment plan that identifies projects and programs the San Diego region proposes to fund. The primary purpose of the RTIP is to incrementally implement the latest Regional Plan, which guides regional transportation investments for the next 20 years

City of San Diego General Plan Mobility Element

Blueprint SD is a refresh of the City's 2008 General Plan to address the City's recently updated Climate Action Plan and the 2021 Regional Plan. The goal of the Mobility Element is to achieve a balanced, multimodal transportation system network that allows people to move around safely, conveniently and enjoyable, and minimizes environmental and neighborhood impacts for people (City of San Diego 2024).

College Area Community Plan

The College Area Community Plan (City of San Diego 1989) was adopted in 1989 and amended subsequently by several resolutions and includes a plan element for SDSU in addition to a Transportation Element. The plan is currently being revised by the City but has not been adopted at the time of this writing. Therefore, this section refers to the adopted plan and elements applicable to the Proposed Project.

The basic objectives of the SDSU plan element included in the College Area Community Plan which includes the areas around the SDSU campus are as follows:

- Encourage creation of a community campus rather than a commuter campus at San Diego State University;
- Promote reduction of vehicular trips associated with the university, thereby helping to reduce local traffic congestion and improve air quality;
- Increase the availability of student residences and vehicular parking spaces in close proximity to the campus;
- Provide cohesive, unified development adjacent to the campus that is physically and functionally linked to the university; and
- Develop a strong pedestrian orientation between new residential and commercial development adjacent to the campus and the campus itself

City of San Diego Bicycle Master Plan

The 2013 City of San Diego Bicycle Master Plan presents a bicycle network, projects, policies, and programs for improving bicycling through 2030 and beyond, consistent with the City's 2008 General Plan mobility, sustainability, health, economic, and social goals. The goals of the Bicycle Master Plan are to create: a city where bicycling is a viable travel choice, particularly for trips of less than five miles; a safe and comprehensive local and regional bikeway network; and environmental quality, public health, recreation and mobility benefits through increased bicycling (City of San Diego 2013).

In addition, the plan recommends that all bike facilities should include approved signage; all new commercial or multifamily developments should provide bicycle-parking facilities; and parking facilities should be provided at the SDSU Transit Center. Specific suggestions are made for the SDSU campus to provide more bicycle racks, lockers, and improved signage. As a state entity, the CSU/SDSU is not subject to local planning regulations such as the City Bicycle or Pedestrian Master Plans; the information is provided here for background context purposes.

City of San Diego Pedestrian Master Plan

The City of San Diego has developed a Pedestrian Master Plan (City of San Diego 2015) that establishes a multi-year framework for planning pedestrian improvements within the public right-of way, thus fostering walkable communities consistent with the City's General Plan Mobility Element policies. The Master Plan helps the City enhance neighborhood quality and mobility options by facilitating pedestrian improvement projects and identifies and prioritizes improvement projects based on technical analysis and community input, as well as improve the City's ability to receive grant funding for implementation of pedestrian projects.

SDSU 2007 Campus Master Plan

The 2007 Campus Master Plan is the blueprint that guides the physical growth and development of the SDSU campus. The Campus Master Plan includes the development of classrooms, student and faculty/staff housing, and student support facilities throughout the SDSU campus (City of San Diego 2020). It documents existing planning, policies and conditions and proposes future planning and design guidelines that address vehicular circulation and parking, pedestrian and bicycle circulation, accessibility and barrier removal, and transit facilities for the SDSU campus.

California State University Transportation Impact Study Manual

The CSU Transportation Impact Study (TIS) Manual (CSU 2019) replaces the 2012 TIS Manual and provides guidance in the preparation of transportation impact assessments for projects on CSU campuses, including all lands owned by the CSU. The TIS Manual is consistent with the CEQA Guidelines update, which replaces the LOS metric with VMT to evaluate transportation impacts. The TIS Manual is to be followed for projects ranging from campus master plan updates to individual campus projects, and for public-private development.

4.14.3 Significance Criteria

The significance criteria used to evaluate the project impacts to transportation are based on Appendix G of the CEQA Guidelines, Transportation. According to Appendix G, a significant impact related to transportation would occur if the Project would:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. Result in inadequate emergency access.

Methodology

Pursuant to Senate Bill (SB) 743, vehicle miles traveled (VMT) was adopted as the new metric to evaluate the significance of transportation impacts replacing the former level of service (LOS) metric. The VMT metric and related thresholds apply to land use and transportation projects that are subject to CEQA analysis. Therefore, this section uses VMT as the basis for evaluating the transportation impacts related to the proposed Project under CEQA. The LLG Transportation Study, and this Draft EIR section, were prepared consistent with CEQA and its applicable Guidelines, the Technical Advisory on Evaluating Transportation Impacts in CEQA prepared by the State Office of Planning and Research (OPR 2018), and the California State University (CSU) Transportation Impact Study Manual (CSU 2019).

The analysis presented here is based on the technical report prepared by LLG, included in its entirety in Appendix I of this Draft EIR.

4.14.4 Impacts Analysis

1. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Consistency with Programs, Plans and Policies

The Proposed Project would be consistent with policies, plans, ordinances, and programs addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths, as described in Sections 4.14.1 and 4.14.2. The Proposed Project would facilitate the creation of a community campus rather than a commuter campus by adding student housing near and on campus and hence promoting the reduction of vehicular trips associated with the university.

SDSU 2007 Campus Master Plan

As noted in Appendix I, the Project does not propose any material changes to the campus circulation system, including transit, roadway, bicycle and pedestrian facilities, and therefore does not conflict with the SDSU Campus Master Plan, as outlined below.

- ***Vehicular Circulation and Parking***: As part of the Proposed Project, 3 accessible, 260 standard, and 15 van parking stalls (totaling 278 parking stalls) would be removed from the Peninsula Component site. Approximately 5 staff parking spaces, 5 short-term parking spaces, 5 ADA accessible stalls, parking spaces for several ZipCar (short-term rental cars), and two truck spaces would be constructed and provided at the planned drop off area along the southwestern portion of the Peninsula Component site entrance. A total of 5 accessible, 140 standard, and 1 van accessible parking stalls (totaling 146 parking stalls) would be removed from University Towers East Component site. The Project would include 5 staff parking spaces, 1 ADA accessible space, and several ZipCar spaces to be provided at the southwest corner of the Project site.
- ***Pedestrian and Bicycle Circulation***: The Proposed Project would increase pedestrian circulation. A perimeter road would circle the proposed development within the Peninsula Component site. This road would be designated for pedestrians, student micro-mobility devices, and utility/service and emergency vehicle access. On event days (such as move-in or move-out), the perimeter road would be open to limited vehicular use. In addition to providing site circulation, the perimeter road would double as a wellness and fitness path, accommodating a two-way bicycle/micro-mobility path, and a separate pedestrian path. The University Towers East Component site would be accessed by Montezuma Road to the immediate north and Mary Lane Alley to the immediate south.
- ***Transit Facilities***: The Proposed Project would not alter the physical elements of the existing campus or City transportation system and, as a result, would not affect the character and arrangement of the campus.

The Proposed Project would provide a net increase of approximately 4,468 student beds to the main campus inventory to accommodate student housing. This campus housing would reduce both vehicular and multimodal (i.e., bike, pedestrian, transit) commuter trips to the SDSU campus. This reduction stems from the shift of these students from off-campus residences to on-campus living, eliminating the need for daily commutes.

Based on 2024 SDSU Travel Demand Data (see Appendix I), 25% of non-resident/off-campus students commute to campus via multimodal uses. The Project would help reduce the need and demand for these uses within the context of commute trips to campus. As shown in Appendix I (see Tables 5-1 and 7-5), there would be approximately net decrease of 2,948 student trips and 2,234 fewer multimodal commuter trips as a result of the Proposed Project.

However, although off-campus multimodal commuter trips would be reduced, with more students living directly on campus, the volume of foot traffic and cycling activity would increase. Additionally, the concentration of student housing close to transit stops likely would increase public transit usage, offsetting the reduction in demand for commute trips to a certain extent. When residents live within easy walking distance of bus and shuttle services, they are more likely to take advantage of these options for longer commutes or off-campus activities.

Integrating student housing into a university campus not only promotes a lively and interactive environment but also enhances the existing bike, pedestrian, and transit facilities through increased usage and awareness. Having more students reside on campus provides an opportunity for SDSU to prioritize the existing bike and pedestrian infrastructure. With a larger population of students using these pathways, there is likely to be greater awareness of any safety or accessibility issues that arise.

The Proposed Project would be consistent with the state's overall goal to reduce vehicle trips in favor of increased alternative travel means, such as transit, bicycling, and walking.

In conclusion, the Proposed Project would not conflict with any applicable plan encouraging the increased use of bicycle, pedestrian, and transit facilities and further facilitates the state's overall goal of reduced vehicle traffic in favor of increased multimodal (i.e., non-vehicular) transportation.

The Proposed Project does not conflict, disrupt, or interfere with any planned or proposed circulation enhancements including those outlined in the documents summarized above. Therefore, the Project would not conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and the Project's impact would be **less than significant.**

2. Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

As noted above, CEQA Guidelines Section 15064.3(b) focuses on criteria of VMT adopted pursuant to SB 743 for determining the significance of transportation impacts. CEQA Guidelines Section 15064.3(b) is divided into four subdivisions: (1) Land Use Projects; (2) Transportation Projects; (3) Qualitative Analysis; and (4) Methodology. Because the Proposed Project is a land use project, CEQA Guidelines Section 15064.3(b)(1) applies.

VMT is defined as the "amount and distance of automobile travel attributable to a project," per CEQA Guidelines Section 15064.3. VMT is a measure of the use and efficiency of the transportation network as well as land uses in a region. VMT is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (roundtrip) travel and is estimated for a typical weekday for the purposes of measuring transportation impacts. The Project's VMT analysis herein, uses the guidelines contained within the CSU TIS Manual, in coordination with OPR's Technical Advisory, which provides the screening criteria and methodology for VMT analysis. Project screening is used to determine if a project will be required to conduct a detailed VMT analysis.

Project Level Screening Assessment

Based on the CSU TIS Manual, screening for a project-level assessment may be applicable to certain types/locations of projects on the basis that certain characteristics such as location are such that it can be assumed that such project types/locations would not result in significant VMT impacts. The following project types/locations and screening attributes have the potential to *decrease* the number of trips and/or the trip length around their development, further decreasing VMT:

- **Development in Transit Priority Areas (TPA).** TPAs are defined as those areas located within one-half mile of either an existing major transit stop (defined as a rail transit stop, ferry terminal served by either bus or rail transit, or the intersection of two or more major bus routes with 20-minute[1] or better headways during the peak commute periods) or a stop along an existing high quality transit corridor (defined as a fixed route bus service with headways of 15-minutes or better). TPAs should be identified by the transportation consultant for applicability in the area.

[1] Per AB 2553, passed in September 2024, has revised the definition of Major Transit Stop for CEQA purposes, to be an intersection of 2 or more major bus routes with a frequency of service interval of 20 minutes or less (compared to 15 minutes previously) during the morning and afternoon peak commute periods.

- **Development in a low-VMT generating area of the city, sub-region, or region.** Low-VMT generating areas of the city, sub-region, or region can be identified by the transportation consultant by reviewing the VMT per person for the traffic analysis zone (TAZ) for the referenced region. If the proposed land use is consistent with what is currently in the study area and the TAZ is identified as generating lower than existing VMT (compared to the city, sub-region, or regional VMT per person average), then the project can be screened from project level assessment.
- **On-campus housing serving students, faculty, and staff.**

These three project types/locations are applicable to the Proposed Project as discussed below.

Development in Transit Priority Areas

Based on the City's TPA interactive mapping service, the Proposed Project would be located within or immediately adjacent to a TPA, as shown in Figure 6-1 in Appendix I. The City's website describes Transit Priority Areas consistent with the CSU TIS Manual as areas within one-half mile of a major transit stop that is existing or planned. The website notes that a 'major transit stop' is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, per Section 21064.3 of the California Public Resources Code (PRC).

Figure 6-2 in Appendix I shows the walking distance between the Peninsula Component site and bus stops at the intersection of Montezuma Road/55th Street, which serve routes 11 and 955. The bus stops at this intersection serve two major bus routes with 15–20-minute headways during the peak commute periods and, therefore, is considered an existing major transit stop according to both the City and CSU TIS guidelines. As shown on Figure 6-2 in Appendix I, the site of the proposed Peninsula Component is located within one-half mile of the bus stops at the intersection of Montezuma Road/55th Street.

As also shown on Figure 6-2 in Appendix I, the University Towers East Component site also would be located within one-half mile of the Montezuma Road/55th Street intersection and, therefore, would be located within a TPA. In addition, the University Towers East Component site also would be located within one-half mile of the SDSU Transit Center, which serves Bus Routes 11, 14, 115, 215, 856, 936, and 955, as well as the MTS Green Line. Of those bus routes 955 and 815 are major bus routes with 15-20 minute headways during the peak commute periods and Route 215 has a 12 minute headway during the peak commute periods. Therefore, the SDSU Transit Center is considered an existing major transit stop. Further, as shown on Figure 6-3 in Appendix I, the University Towers East Component site is located within one-half mile of the Trolley/Bus Transit Center and, therefore, would be located within a TPA.

As illustrated above, the Proposed Project would be located within a TPA as that term is defined by the CSU TIS Manual, the City's TPA interactive mapping service, and PRC Section 21064.3. Therefore, based on CEQA and related study guides, the Proposed Project is presumed to result in a less-than-significant impact and, as a result, the Project is appropriately screened from conducting a project level VMT assessment. There are no extenuating factors or circumstances that would negate this conclusion. In fact, as proposed student housing, it is reasonable to conclude that the student residents generally would rely on public transportation at a greater rate than the general population due to fiscal/economic considerations.

Development in a Low-VMT Generating Area

The Proposed Project would be located in or immediately adjacent to census tract 28.01. Based on the SANDAG Series 14 ABM 2+ (Base Year 2016) screening map for residential projects, residents living within that census tract generate an average of 15.2 VMT per capita (i.e., 15.2 VMT per person per day), which is 80.1% of the regional average of 18.9 VMT per Capita. Figure 6-4 in Appendix I shows the location of the Project site on the SANDAG Series 14 ABM 2+ (Base Year 2016) screening map.

Based on the CSU TIS Manual, if the proposed land use (student housing) is consistent with the land uses currently in the study area (generally residential uses in this case), and the traffic analysis zone (TAZ) or census tract is identified as generating lower VMT/capita compared to the regional VMT per person average, then the project is presumed to generate the same VMT/capita and, as such, can be screened from project level assessment.

In this case, the Proposed Project land uses (student housing) would be consistent with the land uses currently in the Project study area (i.e., residential uses) and would be located within or immediately adjacent to a low-VMT generating area per the SANDAG Series 14 ABM 2+ (Base Year 2016) screening map. Therefore, the Proposed Project is presumed to generate the same VMT/capita as the current existing uses, which VMT is substantially below the regional average. As such, the Proposed Project would not result in significant project-level impacts and is screened from conducting a project level VMT assessment. There are no extenuating factors or circumstances that would negate this conclusion. The proposed student housing is, effectively, a residential use similar in most respects to the surrounding uses and, therefore, it is reasonable to conclude that the generated VMT per capita would be similar, if not lower than, that of the surrounding uses due primarily to fiscal/economic considerations.

On-Campus Housing

The Proposed Project is the development of on-campus student housing. The construction of additional housing on campus would enable a significant percentage of students who used to drive to campus to no longer drive, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in VMT. Therefore, the Proposed Project would result in a net reduction of VMT and, correspondingly, the Project would not result in significant Project-level VMT impacts.

Cumulative Level VMT Assessment

The CSU TIS guidelines note that although a proposed project may be screened from project level VMT assessment based on the project types/locations discussed above, the project would nevertheless need to be assessed for its consistency with the applicable Regional Transportation Plan (RTP). If the Proposed Project is not consistent with the RTP assumptions, then it would be necessary to conduct an assessment of the Project's effect upon the regional or city VMT (i.e., it would require a cumulative assessment). To assess the Project's consistency with the RTP, it is necessary to review the land use information and assumptions contained in the local or regional travel demand forecasting model.

The currently approved RTP for the San Diego Region is the San Diego Association of Governments (SANDAG) 2021 Regional Plan, which was originally adopted in December of 2021 and amended in October of 2023 (SANDAG 2021). The RTP used the SANDAG Series 14 ABM 2+ Regional Plan travel demand forecasting model. Within this model, the Peninsula Component site is located within TAZ 3098, the University Towers East Component is located within TAZ 3200, and the SDSU Main Campus is located within TAZ 3112, as shown on Figure 6-5 in Appendix I.

The RTP travel demand forecasting model assumes a continued increase in enrollment at SDSU and an increase in the development of student housing land uses in TAZ 3098 and TAZ 3200. Table 1 in Appendix M of Appendix I to this Draft EIR shows a comparison of some of the relevant assumptions used to develop the 2016 and 2050 RTP SANDAG models. As shown, an increase in population density and an increase in dwelling unit density, both indicators of increased student housing, occur between 2016 and 2050 in TAZs 3200 and 3098.Therefore, the development of student housing as proposed by the Project, is consistent with the RTP land-use type assumptions for the area.

In addition, and as previously discussed, the Proposed Project would result in an approximate net-increase of 4,468 student housing beds on campus. This increase in on-campus student housing would allow SDSU students the option to live on campus, thereby resulting in fewer students driving to campus and an overall reduction in average daily trips (ADT), as shown in Table 5-1 in Appendix I. Therefore, the Proposed Project would result in an overall reduction in trips and VMT and would not result in an increase in regional VMT.

Since the Proposed Project would be consistent with the assumptions used in the preparation of the current SANDAG RTP it is not necessary to conduct a detailed cumulative-level VMT assessment of the Proposed Project. The Proposed Project's cumulative VMT impacts would be less than significant.

To summarize, the Proposed Project would be located within a TPA and, therefore, students would have substantial public transportation options available to them; it would be located within an area that generates a low-VMT per capita, substantially below the regionwide average and, therefore, it is reasonable to conclude that Project VMT would be comparable; and the Proposed Project would provide on-campus student housing, which, by its nature, would both generate fewer trips and concurrently remove a large number of vehicle trips from the area roadways. Additionally, the Proposed Project would be consistent with the SANDAG RTP, as discussed above. Therefore, based on these locational and land-use type traits, and the fact that there are no extenuating factors or circumstances that would negate this conclusion, the Proposed Project would not result in significant Project-level or cumulative VMT impacts.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) and impacts would be **less than significant**.

3. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Access to the proposed Peninsula Component housing would be provided via 55th Street, which is connected to Canyon Crest Drive, Remington Road, and Montezuma Road. Vehicular access would terminate at the main entry arrival area at a turnaround for drop-offs, ridesharing, and pick-ups. A perimeter road would circle the proposed Peninsula Component which would be designated for pedestrians, student micro-mobility devices, and utility/service and emergency vehicle access. On event days (such as move-in or move-out), the perimeter road would be open to limited vehicular use. The perimeter road would be used as a wellness and fitness path, accommodating a two-way bicycle/micro-mobility path, and a separate pedestrian path. The proposed perimeter road would also serve as a 26-foot-wide fire access roadway. A proposed "Central Paseo" would be constructed as a pedestrian-only pathway connecting all residential buildings which would double as a 26-foot-wide fire access roadway and be used for limited vehicular access on special event days.

The proposed University Towers East Component would be accessed by Montezuma Road to the north and Mary Lane Alley to the south. There is an existing fire access lane between the existing University Towers building and the proposed building. The Project would also include a 26-foot minimum fire lane located along the alley situated south of the proposed building and an additional fire lane located along Montezuma Road, which would be within 15 to 30 feet of the proposed building.

The Project would not include new driveways or other roadway features that would alter the existing roadway network or vehicular circulation patterns. The Peninsula Component would be constructed in multiple phases and construction is not anticipated to require road closures in public rights-of-way and construction staging would be within the Project site. If temporary road closures are anticipated near the site, standard construction management practices such as a traffic control plan would be implemented to ensure adequate emergency access. The traffic control plan would include provisions for construction times and for allowance of cyclists, pedestrians, and bus access in the construction zone. The plan would also outline provisions for emergency vehicle movement at all times. Upon completion, both Project sites would continue to be accessible via 55th Street and Montezuma Road, respectively.

Therefore, the Proposed Project would not add any new hazards resulting from geometric design features or add incompatible uses. As such, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be **less than significant.**

4. Would the Project result in inadequate emergency access?

Development of the proposed Peninsula Component site would include one 9-story student residential building and five student residential buildings up to 13 stories in height that would contain a total of approximately 4,450 student beds. Access to the Peninsula Component site would continue to be via 55th Street.

Development of the proposed University Towers East Component site would include a new 9-story student-housing building that would accommodate approximately 720 beds. Access to the University Towers East Component site would continue to be via Montezuma Road.

The Project area is located within the service area of the San Diego Fire Rescue Department (SDFRD) and is located near two fire stations SDFRD Station 10 and 31. The Peninsula Component is located within a very high fire severity zone and the University Towers East Component is not within a fire hazard severity zone. The discussion related to emergency access and evacuation plans for the Project are described in detail in Section 4.16, Wildfire, and an analysis of response times is included in Section 4.13, Public Services and Recreation.

The Project would be designed and constructed to all applicable standards and comply with emergency access requirements of SDSU and the SDFRD. All of the access roads to the Proposed Project (i.e., Montezuma Road, 55th Street, and Remington Road), currently provide emergency access to the existing development along these roads. Emergency vehicles have the right-of-way and can always bypass traffic on a roadway or at an intersection. During Project operation emergency vehicles would negotiate traffic on area roadways just as under existing conditions, with non-emergency traffic yielding the right of way as required by law. Therefore, the Proposed Project would not cause a significant impact in terms of emergency access or anticipated response times. Construction or operation of the Proposed Project would not result in inadequate emergency access and impacts would be **less than significant.**

4.14.5 Other Considerations - Parking

In response to multiple comments submitted in response to the NOP regarding vehicle parking availability, traffic engineers LLG, in conjunction with SDSU staff, conducted an analysis of available parking on the SDSU campus. The analysis included an inventory of the total number of vehicle parking spaces located on campus, including both open lots and parking structures, and the occupancy/vacancy rates for each location. The full analysis and related results are presented in Section 8, Parking Assessment, of the LLG Transportation Study, included as Appendix I of this Draft EIR.

In summary, the data illustrates that the highest average peak hour demand for parking is at 2:00 p.m. when 51% of the parking lots and structures located on campus were occupied. Correspondingly, the data illustrates that a large number of parking spaces were available at all times.

The analysis further determined that while some of the students that would live in the Proposed Project housing would bring a vehicle to campus, the Proposed Project is expected to result in an overall decrease in parking demand due to the large decrease in students no longer commuting to campus and parking. This fact, coupled with the overall ample supply of parking on campus and increasing incentives to reduce vehicle traffic leads to the conclusion that the Proposed Project would not substantially affect available campus parking.

Additionally, NOP comments included concerns raised by the surrounding community that the increase in student residents will inevitably lead to increased student parking in the surrounding neighborhoods, often in violation of posted parking restrictions, specifically SDSU affiliates parking in non-“B” residential parking zones and walking to campus.

In this regard, SDSU has limited enforcement jurisdiction, extending primarily to university property. The “B” residential parking permit zone is owned, operated and enforced solely by the City of San Diego and that enforcement authority lies with the Parking Enforcement Officers of the City of San Diego Police Department. While SDSU funds extra enforcement from the City during major events, SDSU does not possess enforcement authority within “B” permit areas,

As a final note, because the Proposed Project would provide residential student housing, on an infill site located within a transit priority area, parking impacts for such projects “shall not be considered significant impacts on the environment” (California Public Resources Code, Section 21099[d]).

4.14.6 Cumulative Analysis

For project-generated VMT, a cumulative scenario analysis is not required if the project is screened out of VMT analysis. Further, if a project is consistent with the RTP/SCS, then the cumulative impacts shall be considered less than significant. As described under Impact 2, the Proposed Project would have a less-than-significant VMT impact for both Project VMT and cumulative VMT.

The analysis of a project’s consistency with applicable plans and policies is site-specific and would not combine with other cumulative projects to create an impact. The same is true for if the project would create a hazard due to a specific design or an incompatible use. Therefore, the Proposed Project would not result in related cumulative impacts.

Development of the Proposed Project in combination with the cumulative projects (see Table 3-1 in Chapter 3) would be required to comply with all applicable provisions related to the circulation system and emergency access. Adequate emergency access and compliance with emergency access and design standards would be ensured through review by the lead agency and responsible emergency service agencies.

Therefore, the Proposed Project would not contribute to cumulative impact and impacts would be **less than significant.**

4.14.7 Summary of Impacts Prior to Mitigation

Impacts related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would be **less than significant.**

Impacts related to a conflict or inconsistency with CEQA Guidelines section 15064.3(b) would be **less than significant.**

The Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be **less than significant.**

Construction or operation of the Proposed Project would not result in inadequate emergency access and impacts would be **less than significant.**

4.14.8 Mitigation Measures

No mitigation measures are required.

4.14.9 References

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4.15 Utilities and Service Systems

This section describes the existing utilities conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Utilities and Service Systems, and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

Following the issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to utilities and services system issues concerning sustainability plans, LEED ratings, sustainable landscaping, and infrastructure upgrades. The analysis presented below addresses these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of all comments received on the Notice of Preparation.

4.15.1 Existing Conditions

There are two components to the Proposed Project, the Peninsula Component and the University Towers East Component.

The Peninsula Component site is located at the northern terminus of 55th Street. The existing site consists of eight, two-story apartment-style student housing buildings, a three-story apartment-style student housing building, the SDSU International Center complex, the SDSU Passport Office, the SDSU Global Education Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.).

The University Towers East Component site is located east and immediately adjacent to the existing University Tower on the southern portion of campus. The existing site consists of a parking lot.

Peninsula Component

The Peninsula Component site location currently contains eight, two-story apartment-style student housing buildings, a three-story apartment-style student housing building, the International Student Center, the SDSU Passport Office, the SDSU Global Education Office, the SDSU Faculty International Engagement Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). The existing student housing buildings at the Peninsula Component site provide 702 student beds.

Surrounding uses include open space and residential housing to the west, open space, I-8, and residential housing to the north. Other university uses including parking, recreational fields, academic buildings, and student housing buildings are located to the east, south, and southwest of the Peninsula Component site.

As shown in Figure 2-7a, Concept Water Plan – Peninsula Component, the Peninsula Component currently includes an existing 12-inch AC Public Water Main, a Private 8-inch AC Water Main, and three existing fire hydrants. As shown in Figure 2-8a, Concept Sewer Plan – Peninsula Component, the site currently includes an existing 7-inch easement and an existing 12-inch VC Sanitary Sewer Main.

University Towers East Component

The University Towers East Component site is currently used as a parking lot for University Towers, which is located immediately east of the Project site. The existing parking lot provides 5 accessible, 140 standard, and 1 van accessible parking stalls (totaling 146 parking stalls). Surrounding uses include residential housing to the east, south and west. The site is bordered by Mary Lane Drive, which separates the site from the adjacent single-family residences. Montezuma Road and university uses, including student-housing and recreation fields, are located to the north of the University Towers East Component project site.

As shown in Figure 2-7b, Concept Water Plan – University Towers East Component, the University Towers East Component currently includes three existing fire hydrants and an existing 12-inch PVC Public Water Main. As shown in Figure 2-8b, Concept Sewer Plan – University Towers East Component, the site currently includes two existing manholes and an existing 8-inch VC Sanitary Sewer Main.

Sewer

The College Area Community, including the Project site, is served by the City of San Diego Metropolitan Wastewater Department. The Department is separated into two separate systems: the Metropolitan Sewerage System and the Municipal Wastewater Collection System.

The Metropolitan Sewerage System treats wastewater from the City of San Diego and 15 other cities and special districts in a 450-square-mile area (SanGIS 2024). Approximately 2.2 million residents live in this area. Planned improvements will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050. Nearly 340 million gallons of wastewater will be generated each day by that year.

The Municipal Wastewater Collection System collects and conveys waste from the portion of the City of San Diego not served by the Metropolitan Sewerage System and includes a service area of approximately 450 square miles and a residential population of approximately 2.2 million (SanGIS 2024). The Municipal Wastewater Collection System includes approximately 3,000 miles of sewer lines running beneath the service area (City of San Diego Public Utilities 2022).

The Metropolitan Sewerage System relies on 9 pump stations, while the Municipal Wastewater Collection System relies on 84 smaller pump stations to convey sewage to the City's main treatment facility in Point Loma (SanGIS 2024). At Point Loma, wastewater passes through screens, grit removal tanks, and sedimentation tanks before discharge into the Pacific Ocean via the Point Loma Ocean Outfall. The Point Loma Wastewater Treatment Plant (WWTP) treats approximately 175 million gallons of wastewater per day, but has capacity to treat up to 240 million gallons per day (MGD) (City of San Diego Public Utilities 2022).

For the Peninsula Component, the concept sewer plan includes an existing 7" easement and a 12" VC Sanitary Sewer Main. The Peninsula site is served by the existing infrastrucure, which conveys wastewater from the area to the City's larger wastewater system (Figure 2-8a).

For the University Towers East Component, the concept sewer plan includes two existing manholes and an 8" VC Sanitary Sewer Main. This infrastructure is also integrated into the broader sewer system that serves the campus and surrounding areas (Figue 2-8B, Concept Sewer Plan-University Towers East Component).

Potable Water

The City of San Diego Water Department treats and delivers more than 200,000 acre-feet per year (AFY) of water to more than 1.4 million people residing in a service area of over 330 square miles (City of San Diego Public Utilities 2022). Water supply consists of 1) water purchased from San Diego County Water Authority (SDCWA), 2) lcoal supplies including groundwater, capture of runoff to surface reservoirs, 3) recycled water for non-potable water use, and 4) the Pure Water Project (more on this below).

SDCWA-purchased water accounts for approximatley 97% of the City's total water supply in normal hydrologic years. The City maintains and operates over 50 water pump stations that deliver treated water from the water treatment plants to over 268,000 metered service connections in over 90 different pressure zones (City of San Diego Public Utilities 2022). The water system consists primarily of nine surface water reservoirs, three water treatment plants, and 32 treated water storage facilities and more than 3,460 miles of transmission and distribution lines. The City maintains and operates three water treatment plants with a combined total rated capacity of 297 Million Gallons Per Day (MPG). The City also maintains and operates 32 treated water storage facilities, including steel tanks, standpipes, concrete tanks, and rectangular concrete reservoirs, with capacities varying from less than one million gallons to 35 million gallons. The water system consists of approximately 3,460 miles of pipelines, including transmission lines up to 84 inches in diameter and distribution lines as small as four inches in diameter.

The City's three water treatment plants (Miramar, Alvarado, and Otay) have a total treated capacity of 297 MGD (City of San Diego Public Utilities 2022). The Alvarado Water Treatment Plant has a rated 2023 capacity of 120 MGD (City of San Diego Public Utilities 2022).

In addition to supplying water to more than 268,000 metered service connections within its own incorporated boundaries, the City Water maintains several emergency connections to and from neighboring water agencies (City of San Diego Public Utilities 2022).

The City of San Diego 2020 Urban Water Management Plan (described further under section 4.15.2 Regulatory Framework) provides information regarding the City's existing and projected water supply and demand through the year 2045. Table 4.15-1 details current and projected water supplies for the City's service area (City of San Diego 2021).

Table 4.15-1. Projected Water Supply

Supplies	Demand and Supplies (Acre Feet per Year)				
	2025	*2030*	*2035*	*2040*	*2045*
Total Current and Planned Local Supplies	53,088	69,888	129,248	129,248	129,248
Water Supply from SDCWA	149,778	140,660	87,907	94,350	98,816
Total Water Supplies with SDCWA	202, 866	210,548	217,155	223,598	228,064

Source: City of San Diego 2021.

Recycled Water

The City of San Diego maintains an active recycled water program in order to meet current and future water demands and to decrease dependence on imported water.

The City of San Diego operates two water reclamation plants—the North City Water Reclamation Plant and South Bay Water Reclamation Plant—to treat wastewater to a level that is approved for irrigation, manufacturing and other non-drinking, or non-potable purposes (City of San Diego Public Utilities 2022). The North City Plant provides reclaimed water to cities in northern San Diego and is capable of treating up to 30 MGD (buildout capacity of the plant is approximately 33 MGD). The South Bay Reclamation Plant provides reclaimed water to south bay communities, and has capacity to treat up to 15 MGD (City of San Diego Public Utilities 2022).

Recycled water currently is available in the Northern Service Area (an area generally north of Highway 52 including the University of California–San Diego, Torrey Pines, Mira Mesa, Scripps Ranch, and Sable Springs areas) and the Southern Service Area (via Otay Water District recycled water pipelines located within the Otay Water District service area in the city of Chula Vista). The City's recycled water distribution center consists of 66 miles of recycled water pipeline, a 9-million-gallon reservoir, and 2 pump stations (City of San Diego Public Utilities 2022). Recycled non-potable water is used for purposes such as irrigation, cooling, and construction, to reduce demand on potable water supply.

The Pure Water San Diego Program is the City's phased, multi-year program that will provide nearly half of San Diego's water supply locally by 2035 (City of San Diego Public Utilities 2022). The Pure Water Program will use proven water purification technology to clean recycled water to produce safe, high-quality potable water. Phase 1 will provide 30 MGD of drinking water to North City by 2025. Phase 2 will provide an additional 53 MGD to the City's Central Area. Between 2024 and 2045, the City's water demands are projected to increase by approximately 25,000 AFY (City of San Diego Public Utilities 2022).

Groundwater

The nearest groundwater basin to the Project site is the Mission Valley Groundwater Basin, located approximately 0.75 miles northwest of the Peninsula Component site (see Figure 4.9-4, Mission Valley Groundwater Basin, in Section 4.9, Hydrology and Water Quality). The Project site is outside of the groundwater basin footprint, as defined by the San Diego County Water Authority. Drained by the San Diego River, this basin underlies a west-southwest-trending valley and is bounded by lower-permeable San Diego, Poway, and Lindavista Formations. The aquifers within the Mission Valley Groundwater Aquifer, located within the Mission Valley Groundwater Basin, are summarized in Table 4.15-2.

Table 4.15-2. Mission Valley Groundwater Aquifer

Aquifer	Description	Thickness (Feet)
Shallow alluvium	Quaternary-age medium- to coarse-grained sand and gravel	Approximately 80–100
San Diego Formation	Thick accumulation of older, semi-consolidated alluvial sediments	Generally less than 100

Source: DWR 2004.

For further information regarding groundwater, see Chapter 4.9, Hydrology and Water Quality, of this EIR.

Solid Waste Disposal

SDSU implements a robust recycling program in collaboration with local recycler and hauler, EDCO, who has the capacity to recycle a wide range of products (SDSU n.d.). EDCO Disposal Corporation provides solid waste management services to the SDSU campus. Since 2007, SDSU has monitored its waste generation and diversion, as well as implemented programs increasing waste, food waste, and grass waste diversion programs. SDSU has an advanced system to measure recycling. Each time a recycling or landfill dumpster is emptied, the contents are weighed. During move-in 2016, 98.6% of all materials generated was recycled. For move-out in 2015, 70% of materials was either recycled or donated to the Disabled Veterans and the San Diego Food Bank.

Solid waste is collected in dumpsters located throughout the campus and then transported to one of three locations: (1) food and green waste is diverted to the Miramar Greenery located within the Miramar Landfill; (2) nonrecyclable solid waste is diverted to the Miramar Landfill; and (3) the remaining recyclable waste is diverted to the EDCO Recycling Facility in Lemon Grove.

The closest landfill to SDSU is the Miramar Landfill, which is located in Kearny Mesa and owned/operated by the City of San Diego Environmental Services Department. Approximately 910,000 tons of trash are disposed of at the landfill annually, although the actual tonnage of buried trash has been decreasing over the past few years due to recycling and diversion programs (City of San Diego, Miramar Landfill & Greenery n.d.). The approximate 1,500-acre Class III landfill has a maximum permitted capacity of 97,354,735 cubic yards and has a remaining capacity of 11,080,871 cubic yards (CalRecycle 2024). When the Miramar Landfill closes, Allied Waste would be responsible for disposing the solid waste generated by the proposed project at a landfill in the region with sufficient permitted capacity.

Stormwater Facilities

The City of San Diego Stormwater Department maintains the storm drain system in the City of San Diego including the Project site. The Stormwater Department inspects, clears, repairs and maintains storm drains and channels to enhance water quality and prevent flooding. The Peninsula Component site contains several 12- to 24-inch storm drains located on the west, northwest, north, and east portions of the site. The western storm drains exit the site via the canyon located west of the site (Figure 4.9-1) and all of the storm drains empty into existing City of San Diego (City) owned and maintained stormwater conveyance infrastructure. In the University Towers East Component area, a 12-inch storm drain located approximately 1,440 feet west of the Project site and an 18- to 24-inch storm drain located approximately 1,200 feet east of the site would serve the University Towers East Component.

Electric and Natural Gas Facilities

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the Project site. An existing natural gas cogeneration power plant also generates power for the SDSU campus. Certain portions of the campus are supplied by SDG&E while other portions are supplied by the cogeneration power plant. On the Peninsula Component Project site, the existing International Center complex facilities are served by the campus cogeneration power plant, and the existing student housing apartment buildings are served by SDG&E. The University Towers East Component Project site is served by SDG&E.

SDG&E is a regulated public utility that provides energy service to 3.7 million people through 1.5 million electric meters and 900,000 natural gas meters in San Diego and southern Orange counties. SDG&E and other utilities in the state are regulated by the California Public Utilities Commission (SDG&E 2024). As directed by the California Renewables Portfolio Standard in Senate Bill 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33% renewable energy mix by 2020 and 50% by 2030. Table 4.15-3 lists SDG&E's energy sources and data related to the power mix of those sources.

Table 4.15-3. SDG&E Energy Source and Mix

Energy Source	Power Mix (%)
Renewables	31
Biomass	2.1
Solar	17.9
Wind	11
Large Hydroelectric	1.7
Natural Gas	26.2
Nuclear	0.2
Unspecified Power	40.9

Source: SDG&E 2020.

Telecommunications

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Spectrum, and other private, independent cable companies. Facilities are located above and below ground within private easements.

4.15.2 Regulatory Framework

Federal

Clean Water Act

Section 303 of the Clean Water Act requires states to identify surface waters that have been impaired. Under Section 303(d), states, territories, and authorized tribes are required to develop a list of water quality segments that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology (33 USC 1251 et seq.). Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources.

State

California Fire Code

California Code of Regulations, Title 24, Part 9, incorporates adoption of the 2021 International Fire Code of the International Code Council with necessary California amendments. The California Fire Code establishes minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The California Fire Code applies to construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure within the State of California (24 CCR Part 9).

California Recycled Water Policy

On February 3, 2009, the State Water Resources Control Board (SWRCB) adopted a statewide recycled water policy aimed at increasing the use of recycled water sourced from municipal wastewater. The policy set ambitious goals, mandating an increase in the use of recycled water in California by 200,000 AFY by 2020 and an additional 300,000 AFY by 2030 (SWRCB 2023). The SWRCB recognizes the importance of utilizing recycled water as a critical component of California's water supply strategy to enhance water conservation efforts and resilience against drought conditions.

In January 2013, the SWRCB adopted an amendment to the Recycled Water Policy that established monitoring requirements for constituents of emerging concern in recycled municipal wastewater. Additionally, on December 11, 2018, the SWRCB adopted a further amendment to the policy that includes numeric goals for the use of recycled water, two narrative goals encouraging recycled water use in groundwater-overdrafted and coastal areas, and annual statewide reporting requirements for the volume of recycled water produced and used, as well as the volume of wastewater treated and discharged. The SWRCB continues to develop policies that promote the use of recycled water, stormwater, surface water, and groundwater to support California's water conservation goals (SWRCB 2023).

Assembly Bill 75

AB 75, enacted in 1999, promotes sustainability within California's state agencies. The act mandates that each state agency and large state facility develop an integrated waste management plan. Agencies must submit annual reports detailing their waste diversion efforts and progress. This legislation encourages the implementation of recycling programs and the use of recycled materials within state operations, contributing to California's broader environmental goals (CalRecycle 1999).

Assembly Bill 341

AB 341 is aimed at increasing statewide recycling and waste diversion. Passed in 2011, it sets a target to divert 75% of waste from landfills by promoting recycling in both commercial and multi-family residential properties. AB 341 requires businesses and public agencies to implement recycling programs and encourages environmental responsibility to reduce greenhouse gas emissions, conserve natural resources, and support sustainable waste management practices across the state.

CSU Sustainability Policy

The CSU stated policy is that all campuses, including SDSU, pursue cost effective water resource conservation. Specifically, "[a]ll CSU Campuses shall pursue cost effective water resource conservation to reduce consumption by ten percent by 2030, as compared to a 2019 baseline, consistent with AB 1668 (California Water Code Section 10609), including steps to develop sustainable, drought tolerant or native landscaping, reduce turf, install controls to optimize irrigation water use, reduce water usage in restrooms, showers, fountains and decorative water features, and promote the use of reclaimed/recycled water."

It also is noted that the CSU policy on energy conservation and utilties management requires that all CSU campuses take every necessary step to conserve water resources, including installing controls to optimize irrigation water, reducing water usage in restrooms and showers, and cooperating with state, city, and county governments to the greatest extent possible to effect additional water conservation.

CSU Sustainability Policy and Utilities Management

As part of the CSU system's broader sustainability efforts, all campuses, including SDSU, are committed to reducing resource consumption throuhg the adoption of cost-effective water, energy, and utility conservation practices. This commitment is reflected in policies set forth in the CSU Sustainability Policy and the CSU Energy and Utilities Management Policy.

- **Water Resource Conservation**: The CSU Sustainability Policy mandates that each campus, including SDSU, take steps to conserve water, aiming to reduce overall water consumption by 10% by the year 2030, compared to a 2019 baseline. This directive is aliged with AB 1668 (California Water Code, Section 10609), which governs water conservation efforts across the state of California. The key strategies for achieving this goal include:
  - **Sustainable Landscaping**: Campuses are encouraged to adopt sustainable, drought-tolerant, or native landscaping practices. This includes reducing the use of turf grass, which typically requires high water usage, and replacing it with plants that are adapted to local climate conditions, thereby reducing irrigation needs.
  - **Water-Efficient Irrigation Systems**: The installation of advanced irrigation controls that optimize water use is a core strategy in achieving these conservation goals. These systems can include technologies such as weather-based irrigation controllers, soil moisture sensors, and automated systems that adjust watering schedules based on actual weather conditions.
  - **Water Use in Facilities**: The policy also focuses on reducing water usage in facilities such as restrooms, showers, fountains, and decorative water features. By installing low-flow fixtures, automatic controls, and water-efficient systems, campuses can minimize water waste in these high-usage areas.
  - **Reclaimed and Recycled Water**: The use of reclaimed and recycled water for irrigation, cooling, and other non-potable uses is encouraged. This reduces the demand on potable water supplies, especially in drought-prone areas like Southern California.

These strategies not only comply with state requirements but also support the CSU's broader sustainability goals by fostering environmental stewardship and reducing operational costs.

Energy Conservation and Utility Management

The CSU Energy and Utilities Management Policy requires that campuses implement strategies to reduce energy consumption and greenhouse gas emissions.

Key components of this policy include:

- **Energy Efficiency**: CSU campuses are required to incorporate energy-efficient technologies in their new developments and retrofits. This includes high-efficiency HVAC systems, LED lighting, energy-efficient appliances, and smart energy management systems. These technologies are designed to reduce energy consumption across all campus buildings, including student housing and auxiliary spaces.

Renewable Energy: Campuses are encouraged to explore renewable energy solutions, including solar photovoltaic systems, wind energy, and the use of renewable energy certificates. SDSU, for example, has been involved in solar energy projects that contribute to reducing reliance on grid power.

Carbon Emission Reduction: Following state mandates and the CSU's climate goals, campuses are expected to develop and implement strategies that contribute to reducing carbon emissions. This includes promoting energy-saving behaviors among students and staff, adopting green building standards (such as LEED certification), and transitioning to electrified heating and cooling systems to reduce reliance on fossil fuels.

Collaboration with Local Utilities: Campuses are also encouraged to collaborate with local energy providers to enhance sustainability. This collaboration can include participating in energy-saving programs, using demand response initiatives to shift energy use during peak hours, and ensuring that new projects comply with local and state energy codes.

CSU Sustainability Reporting and Accountability: CSU campuses, including SDSU, are required to report on their sustainability efforts, including water and energy conservation, to the CSU Sustainability Office. This reporting includes annual updates on energy and water consumption, progress toward meeting sustainability goals, and any challenges faced in implementing energy or water-saving strategies. Additionally, the CSU system has established an Energy and Water Sustainability Scorecard to track performance and ensure compliance with state mandates and system-wide sustainability goals.

Local

Urban Water Management Plans

As part of the California Urban Water Management Planning Act (Act), an urban water supplier must prepare, adopt and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources (DWR) every five years. The UWMP must describe the water supplier's service area, water demands and supplies, water conservation activities, and assess the reliability of water sources over a 20-year planning time frame.

In 2021, the City of San Diego adopted the 2020 Urban Water Management Plan (UWMP), which identifies projected water supplies required to meet future water demands through the year 2035 (City of San Diego 2021). According to the City's 2020 UWMP, no water shortages are forecasted through 2040 because projected potable water demands would be met using a combination of recycled water, local surface supply, groundwater, and purchased water from the San Diego County Water Authority (SDCWA) (City of San Diego 2021).

Also in 2021, the SDCWA adopted its own 2020 UWMP (SDCWA 2021). The SDCWA's UWMP uses SANDAG's most recent regional growth forecast to calculate regional water demands. SANDAG's regional growth forecasts are based on population forecasts, projected housing forecasts, and other growth forecasts provided by the member cities. The SDCWA's 2020 UWMP is to be considered a supplemental reference to the City's 2020 UWMP.

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan consists of a Countywide Siting Element, a Countywide Summary Plan, and three elements (source reduction and recycling, household hazardous waste disposal, and non-disposal facility locations). The Siting Element requires that the County's landfills demonstrate remaining capacity of at least 15 years to serve all jurisdictions. The Summary Plan contains waste management policies and goals, and it summarizes the diversion programs at the County and local level implemented to meet and maintain the 50% diversion mandate required by AB 939 (County of San Diego 2005). The County publishes 5-year review reports for the Countywide Integrated Waste

Management Plan that provide updates to goals and relevant jurisdictional information. The most recent County of San Diego Countywide Five-Year Review Report was published in June 2022 and it provides jurisdictional demographic changes and waste generation rates through 2020 (County of San Diego 2022).

SDSU Waste Disposal Practices and Programs

In alignment with California's environmental initiatives, including the State Agency Waste Management Act (AB 75), SDSU has adopted extensive waste disposal practices to foster sustainability across campus. Enacted to reduce landfill dependency, AB 75 requires state agencies and institutions, including the CSU system, to divert at least 50% of their waste through recycling, composting, and alternative waste management practices.

To support AB 75's goals, the CSU system has launched the "Buy Recycled Campaign," encouraging sustainable procurement. SDSU actively participates by implementing the "SDSU Recycles" initiative, managed by the Business and Financial Affairs Department, which has installed numerous recycling bins across campus for materials like beverage containers, cardboard, and paper. This program further expands recycling efforts to include appliance, construction debris, green waste, metal scrap, and toner cartridges (SDSU Facilities Services 2021).

Additionally, SDSU has introduced initiatives to strengthen campus-wide sustainability. The Office of Energy and Sustainability works in collaboration with various departments to foster environmentally responsible practices. Recent projects include establishing the SDSU Sustainability Hub, which aims to embed sustainability into university operations, education, and community outreach (SDSU Facilities Services 2021). SDSU has also committed to recycling 100% of its electronic waste through partnerships with certified recyclers (SDSU Facilities Services 2021).

Relatedly, AB 341 is designed to help meet California's recycling goals by requiring all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. In response to AB 341's goals for increased waste diversion, SDSU is working closely with the City of San Diego to enhance solid waste management programs. Hazardous waste is managed through its Environmental Health and Safety department, which implements various protocols for waste disposal (SDSU Environmental Health and Safety 2023). Key practices include:

1. Hazardous Waste Pickup: Users can request pickups via BioRAFT, with a processing time of up to seven business days.
2. Satellite Accumulation Areas: Waste is stored at points of generation for up to nine months, with strict volume limits and labeling requirements.
3. Types of Waste: SDSU handles chemical, biohazardous, and universal waste, each with specific guidelines for storage and disposal.

4.15.3 Significance Criteria

The significance criteria used to evaluate the project impacts to utilities and service systems are based on Appendix G of the CEQA Guidelines. According to Appendix G, a significant impact related to utilities and service systems would occur if the project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
3. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Methodology

The analysis of utilities and service systems for the Proposed Project is based on site plans, conceptual utility designs, and coordination with local utility providers. Information from the following figures was used to assess water, wastewater, stormwater, and energy needs: Figure 2-7a, Figure 2-7b, Figure 2-8a, Figure 2-8b, Figure 2-9a (Concept Drainage Plan – Peninsula Component), and Figure 2-9b (Concept Drainage Plan – University Towers East Component). Additional data from utility providers and relevant regulatory standards were also considered to evaluate the increased demand from the proposed student housing and identify any necessary system upgrades or improvements. The Project complies with CEQA regulations and Project mitigation measures, such as infrastructure enhancements and conservation practices, are incorporated where required to ensure reliable utility service.

4.15.4 Impacts Analysis

1. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Treatment

As described above, potable water is provided at the Project site by the City of San Diego Water Department, which owns and operates water treatment, storage, and distribution facilities. The City's three water treatment plants (Miramar, Alvarado, and Otay) have a total treatment capacity of 294 million gallons per day (MGD). Water delivered to the SDSU campus, including the Project site is treated at the Alvarado Treatment Plant, which is located northeast of the campus adjacent to Lake Murray. The Alvardo Treatment Plant has a treatment capacity of 200 MGD. The projected water treatment needs of the Alvarado service area are based primarily on the number of existing and projected water department customers residing in the service area. Existing and projected customer data is based on land uses identified in local planning documents, including general plans and community plans.

Based on estimated capacity and accessory uses, water use projected for the Peninsula Component of the Proposed Project at full buildout would be approximately 550,000 gallons per day (GPD) for domestic use and 12,000 GPD for irrigation. Water use projected for the University Towers East Component of the Project at buildout would be approximately 50,000 GPD for domestic use. For landscaping purposes, the University Towers East Component would use approximately 6,000 GPD for irrigation use. A total of approximately 618,000 GPD potable water demand would result from full buildout of the Proposed Project.

The SDSU Campus Master Plan, which envisions growth from 25,000 to 35,000 full-time equivalent students by the 2024-2025 academic year, is the managing planning document for the Project site. The Proposed Project is consistent with the SDSU Campus Master Plan's long-term goals and programs by identifying needed buildings, facilities, improvements, and services to support campus growth and development from 25,000 full-time equivalent students to a new enrollment of 35,000 full-time equivalent students by the 2024-2025 academic year. The Proposed Project would not increase enrollment, it would house the existing and future planned student population with additional on-campus housing opportunities. Students who would have otherwise lived in off-campus housing in the wider college area would be housed in the proposed student housing buildings. Therefore, the Proposed Project would not increase the demand for regional water treatment facilities as these facilities are sized to accommodate densities envisioned by the Campus Master Plan, with which the Proposed Project is consistent, and other local planning documents. Furthermore, the water treatment infrastructure in place, including the Alvardo Treatment Plant, is designed to serve areas consistent with the projected growth in the SDSU Campus Master Plan. As such, it is anticipated that the water treatment facilities in place are adequate to meet the need of the project. Therefore, the project is not anticipated to require any expansion of the Alvarado Treatment Plant or other regional water treatment facilities, and impacts related to water treatment capacity would be **less than significant.**

Water Distribution

Three fire hydrants are located within the Project site, with two more along Remington Road. The water main along 55th Street was recently increased to a 12-inch polyvinyl chloride (PVC) pipeline. This existing water main functions as a combined public fire and domestic water main. An existing private 8-inch water main is located at the southern end of the Peninsula Component site. To support the Proposed Project, the water main would be adjusted to allow for the improvements and looped to provide a redundant supply to the high-rise buildings. The size of the main would be verified based on available water pressure and would be determined as part of the design process. Additional hydrants would be placed throughout the Peninsula Component site. Figure 2-7a shows locations of proposed water facility infrastructure.

Water service laterals, which draw from the water main to deliver water to individual buildings, would extend from the new, looped, water main system around the Peninsula Component site, to each proposed building. To install the looped water line around the site, easements would be obtained from the City of San Diego to access the public infrastructure that currently exists. Additionally, fire water and domestic water laterals to each proposed building would require backflow prevention devices and isolation valves for maintenance purposes.

Additionally, at the University Towers East Component, an existing 12-inch PVC water main located along the site frontage, on Montezuma Road, serves as a combined domestic water and fire water main, and is expected to handle the increased demand from the new development based on preliminary investigation. The Proposed Project would also tie into this main, and fire water and domestic water laterals would be provided for the new buildings, with backflow prevention devices and isolation valves installed for maintenance. Figure 2-7b shows locations of proposed water facility infrastructure.

As such, water main and water delivery lines would be altered and expanded to provide new points of connection for the Peninsula and University Towers East Components. Construction would entail ground disturbance including excavation of existing water main easements and excavation of new easements for trenching and installation of new water lines for domestic water and fire water connections within the Project site. Given that the Campus Master Plan's projected growth includes these new developments, and based on the general capacity of the existing infrastructure, the proposed upgrades and adjustments to the water main are expected to meet the increased demand from the Project without requiring substantial modifications to the overall water distribution system. Thus, while the overall system is adequate to meet the demand of the Campus Master Plan's projected growth, the Project would need to include construction of upgrades and adjustments, including new connections, within the Project site. Construction of water conveyance facility improvements and the potential physical impacts to the environment associated with this ground disturbance have been considered in this EIR as part of Proposed Project implementation and construction activities. In particular, environmental topic areas where construction impacts or emissions have been quantified, such as air quality and noise, assumed that construction activities would include necessary water conveyance improvements. Impacts associated with ground disturbance have been identified in this EIR and mitigation has been proposed to reduce impacts to less than significant. Impacts related to water conveyance infrastructure for the Proposed Project would be **less than significant.**

Sewer Facilities

Based on estimated equivalent dwelling units, the wastewater generation projected for the Proposed Project at the Peninsula Component would be 310,000 GPD. The University Towers East Component is expected to generate approximately 30,000 GPD of wastewater. The Point Loma Wastewater Treatment Plant (WWTP), the closest City of San Diego wastewater treatment facility to the Project site, treats approximately 175 million gallons of wastewater per day, but has capacity to treat up to 240 million gallons per day (MGD). Based on the anticipated capacity of the Point Loma WWTP and the total anticipated wastewater generation from the Proposed Project of 340,000 GPD, the Point Loma WWTP would have capacity for the expected wastewater and would not require relocation or construction of new wastewater treatment facilities. Impacts related to wastewater treatment for the Proposed Project would be **less than significant.**

Regarding wastewater collection infrastructure at the Peninsula Component, an existing 12-inch PVC wastewater pipe runs along 55th Street and drains from south to north. The 12-inch pipe then transitions into an 8-inch vitrified clay (VC) pipe within the cul-de-sac at the north end of the Project. The pipe slopes from south to north down the canyon. The portion of the pipe that runs through private property has a 7-foot-wide easement owned by the City of San Diego.

A capacity study will be completed as part of Citywide improvements projects, outlining the infrastructure along 55th Street and inflow of the system from the region. Regional inflow is anticipated to be based on a previous study that was used to facilitate the recent reconstruction of the main from 8-inches to 12-inches. An upgrade of the pipeline from 12-inches to a larger size is not required for the Peninsula Component, and there are no plans to upsize the existing 12-inch line. Instead, the existing infrastructure would be maintained with necessary improvements to accommodate the additional wastewater flow. The existing 8-inch line serving the area in the canyon adjacently west of the Peninsula Component site is not anticipated to be adjusted. Figure 2-8a shows the locations of proposed sewer facility infrastructure. As such, the Peninsula Component would utilize the existing 12-inch sewer pipeline infrastructure and would not require upsizing or relocation. Impacts related to sewer infrastructure for the Peninsula Component would be **less-than-significant.**

At the University Towers East Component, the project would connect to the existing 8-inch sanitary sewer main located within the alley to the south of the site. Figure 2-8b shows the locations of proposed sewer facility infrastructure. This main serves the existing University Towers building to the west of the proposed University Towers East Component, and no significant upgrades or changes are anticipated, as the regional infrastructure along Montezuma Road is assumed to have the capacity for the planned development based on current zoning. Impacts related to sewer infrastructure for the University Towers East Component would be **less than significant.**

Recycled Water

Recycled water is not available from the City of San Diego in the College Area Community. In addition, the City of San Diego does not currently have plans to extend recycled water infrastructure from either the northern or southern service area to the College Area Community (City of San Diego 2020). Therefore, the proposed Project would not use recycled water. Impacts related to recycled water would be **less than significant.**

Storm Drainage

The existing storm drain system that serves both the Peninsula Component and the University Towers East Component would not require any modifications as a result of the Proposed Project. All runoff from the new construction would be directed into the existing City-owned stormwater system. The current stormwater infrastructure has adequate capacity to handle the runoff from the new buildings, and no new stormwater drainage facilities would be needed. Impacts related to stormwater drainage would be **less than significant.**

Electric Power

As part of the Proposed Project, overhead electrical lines at both the Peninsula and University Towers East sites would be moved underground. Potential physical impacts to the environment could occur as a result of ground disturbance associated with this relocation. As the analysis of all environmental topics in this Draft EIR include construction activities and assume ground disturbance of the entire Peninsula Component and University Towers East Component sites. Undergrounding of the existing overhead electrical lines would not result in any construction impacts beyond those already assumed to occur during ground disturbing activities. Therefore, impacts associated with ground disturbance have been identified in this EIR, and mitigation has been proposed to reduce impacts to less than significant.

Based on estimated capacity and accessory uses, the proposed electrical energy needed to support the new buildings would be approximately 0.310 to 1.480 megawatts per year for each construction Phase (see Section 2.6, Project Construction and Phasing), totaling 2,440 Mw for the Proposed Project. Anticipated updates to the on-site electrical infrastructure are anticipated to accommodate the new buildings due to different size and location of the buildings compared to the existing structures. All updates to existing infrastructure would be coordinated with SDG&E.

As such, impacts related to the relocation of electrical lines and electrical energy demands for the Proposed Project would be **less than significant.**

Natural Gas

Natural gas for the student housing structures would not be used, and no natural gas infrastructure would be installed for the proposed student housing buildings at the Peninsula Component or University Towers East Component. However, natural gas lines would be needed to serve the proposed Amenities building at the Peninsula Component. A 3-inch high-pressure (HP) gas line is located beneath Remington Road along with a 2-inch high-pressure line branching towards the end of 55th Street. These high-pressure gas lines are adequately sized and would be extended to support the Proposed Project. Impacts associated with necessary extensions of the existing natural gas lines would be contained to within the Peninsula Component site and be generally similar to other construction impacts from ground disturbance. Impacts associated with extension of existing lines within the

Peninsula Component site are addressed as part of the overall impacts from Project construction. Impacts associated with natural gas demand for the Proposed Project would be **less-than-significant.**

Telecommunications

Telecommunication infrastructure is located within the Peninsula Component site. This infrastructure includes both overhead and underground utility lines, as well as poles, pedestals, and risers. Some of this infrastructure will need to be rerouted and placed underground based on the location of the proposed buildings.

Overhead telecommunication infrastructure is located approximately 50 feet south of the University Towers East Project site. Other infrastructure including overhead lines, poles, and risers are located west of the Project site, along 55th Street. Utility locating/survey will be required to verify all the existing telecommunication infrastructure within the Proposed Project limits. Impacts associated with telecommunications installation for the Proposed Project would be **less than significant.**

2. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Regional Supply and Demand Projections

According to the City of San Diego's 2020 Urban Water Management Plan (UWMP), SANDAG projects that the City's service area population will increase to approximately 1.76 million residents by 2045, representing a steady growth rate since 2020. The report calculates that, under normal weather conditions, the total water demand in 2045 will reach approximately 228,000 acre-feet per year (AFY) (City of San Diego 2021). Table 4.15-4 outlines the projected water demand forecast in five-year increments to the year 2045 for normal years. Table 4.15-5 outlines projected supply through 2045 for normal years. As shown, the UWMP assessment indicates demand would be met by projected supply in normal years. These projections assume the continuation of comprehensive water conservation measures throughout the forecasted period to align with state mandate and local conservation goals.

Table 4.15-4. Projected Total Water Demand or the City

Use	Water Demand (Acre Feet per Year)				
	2025	*2030*	*2035*	*2040*	*2045*
Retail Potable Water Consumption	160,556	167,547	173,560	179,423	183,488
Wholesale Potable Water Sales	11,518	11,518	11,518	11,518	11,518
Non-Revenue Water	17,018	17,710	18,304	18,884	19,286
Total Potable Water Production	**189,092**	**196,774**	**203,383**	**209,825**	**214,292**
Non-potable Recycled Water	13,773	13,773	13,773	13,773	13,773
Total Water Demand Forecast	**202,865**	**210,547**	**217,156**	**223,598**	**228,065**

Source: City of San Diego 2021.

Table 4.15-5. Projected Water Supply for the City

Supplies	Demand and Supplies (Acre Feet per Year)				
	2025	*2030*	*2035*	*2040*	*2045*
Total Current and Planned Local Supplies	53,088	69,888	129,248	129,248	129,248
Water Supply from SDCWA	149,778	140,660	87,907	94,350	98,816
Total Water Supplies with SDCWA	202, 866	210,548	217,155	223,598	228,064

Source: City of San Diego 2021.

Under dry-year conditions, the 2045 water demand is anticipated to increase slightly but remains manageable due to diversified supply sources and conservation initiatives (City of San Diego 2021). Table 4.15-6 shows projected demand and supply for single-dry year conditions (represented by water year 2014). Table 4.15-7 shows projected demand and supply for 5 years of a multiple-dry year scenario. As shown, the UMWP indicates water demand would be met with projected supply for all single-dry year and multiple-dry year scenarios.

Table 4.15-6. Single-Dry Year Demand vs. Supply for the City

Demand/Supplies	Demand and Supplies (Acre Feet per Year)				
	2025	*2030*	*2035*	*2040*	*2045*
Water Demand	210,169	218,128	224,973	231,648	236,274
Local Water Supplies	54,931	71,731	131,091	131,091	131,091
Water Supply from SDCWA (purchased water)	155,238	146,397	93,882	100,557	105,183
Total Water Supplies	210,169	218,128	224,973	231,648	236,274
Estimated Water Shortages	0	0	0	0	0

Source: City of San Diego 2021.

Table 4.15-7. Multiple-Dry Year Demand vs. Supply for the City

Demand/Supplies	Demand and Supplies (Acre Feet per Year)				
Dry Year 1	*2025*	*2030*	*2035*	*2040*	*2045*
Water Demand	202,865	210,547	217,156	223,598	228,065
Local Water Supplies	52,036	68,836	128,196	128,196	128,196
Water Supply from SDCWA (purchased water)	150,830	141,712	88,959	95,402	99,868
Total Water Supplies	**202,865**	**210,547**	**217,156**	**223,598**	**228,065**
Estimated Water Shortages	0	0	0	0	0
Dry Year 2	*2025*	*2030*	*2035*	*2040*	*2045*
Water Demand	210,169	218,128	224,973	231,648	236,274

Table 4.15-7. Multiple-Dry Year Demand vs. Supply for the City

Demand/Supplies	Demand and Supplies (Acre Feet per Year)				
Local Water Supplies	47,537	64,337	131,091	131,091	131,091
Water Supply from SDCWA (purchased water)	155,238	146,397	93,881	100,556	105,183
Total Water Supplies	**210,169**	**218,128**	**224,973**	**231,648**	**236,274**
Estimated Water Shortages	0	0	0	0	0
Dry Year 3	*2025*	*2030*	*2035*	*2040*	*2045*
Water Demand	210,169	218,128	224,973	231,648	236,274
Local Water Supplies	37,353	54,153	113,513	113,513	113,513
Water Supply from SDCWA (purchased water)	172,817	163,975	111,460	118,135	122,762
Total Water Supplies	**210,169**	**218,128**	**224,973**	**231,648**	**236,274**
Estimated Water Shortages	0	0	0	0	0
Dry Year 4	*2025*	*2030*	*2035*	*2040*	*2045*
Water Demand	207,735	215,601	222,367	228,964	233,538
Local Water Supplies	49,620	66,420	125,780	125,780	125,780
Water Supply from SDCWA (purchased water)	158,114	149,181	96,586	103,184	107,757
Total Water Supplies	**207,735**	**215,601**	**222,367**	**228,964**	**233,538**
Estimated Water Shortages	0	0	0	0	0
Dry Year 5	*2025*	*2030*	*2035*	*2040*	*2045*
Water Demand	207,735	215,601	222,367	228,964	233,538
Local Water Supplies	49,620	66,420	125,780	125,780	125,780
Water Supply from SDCWA (purchased water)	158,114	149,181	96,586	103,184	107,757
Total Water Supplies	**207,735**	**215,601**	**222,367**	**228,964**	**233,538**
Estimated Water Shortages	0	0	0	0	0

Source: City of San Diego 2021.

As previously noted, the Peninsula Component would require approximately 550,000 GPD of water for domestic use, and 12,000 GPD for landscaping. The University Towers East Component would require approximately 50,000 GPD for domestic use and 6,000 GPD for irrigation. A total of approximately 618,000 GPD potable water demand would result from full buildout of the Proposed Project.

The current UWMP (2020) has indicated adequate water supplies exist for the projected demand for future planned development within the San Diego region through 2035 (City of San Diego 2021). The current UWMP utilitized SANDAG's 2050 Regional Growth Forecast for water suppy planning purposes; these forecasts are based on the General and Community Plans of each of the San Diego region's 18 incorporated cities and unincorporated county areas, including the City of San Diego, and other local planning documentatoin, such as the Campus Master Plan (SANDAG 2023).

Because the Proposed Project does not include an increase in enrollment limits at SDSU beyond the previously approved enrollment, it would not conflict with the planning assumptions for the region. By relying on growth accounted for in applicable land use planning documents, the UWMP provides an accurate assessment of water supply in relation to planned development occuring within the various jurisdictions in the San Diego region. The Proposed Project is consistent with the student enrollment numbers assumed in the regional planning documents, and there would be sufficient water supplies available to serve the projected water demands of the Proposed Project based on the City's ability to meet City-wide demand to 2045 in normal, single-dry and multiple-dry years. While the regional impact will not increase, the water demand within the Peninsula Component will be higher than previously planned, as it will introduce new student housing and accessory uses. This increase in water demand for the Peninsula Component is accounted for in the water system's capacity planning process and is expected to be manageable within the existing capacity. Therefore, the potential impacts of the Proposed Project relative to water supply would be **less than significant.**

As previously discussed, the CSU policy on energy conservation and utilties management requires that all CSU campuses take every necessary step to conserve water resources, including installing controls to optimize irrigation water, reducing water usage in restrooms and showers, and cooperating with state, city, and county governments to the greatest extent possible to effect additional water conservation.

Consistent with CSU policy, SDSU also has required the installation of energy and water conserving fixtures, such as low-flow toilets and flush valve controls, in all new construction on campus. To conserve water used in landscape irrigation, SDSU utilizes irrigation controllers that are linked to weather service evapotranspiration data to deliver the irrigation water only when needed. Consistent with CSU policy, SDSU will continue to implement conservation measures to reduce the use of water and decrease wastewater flows.

As a result, the Proposed Project would have sufficient water supplies available to serve the project from existing entitlements and resources, and impacts would be **less than significant**.

3. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The projected wastewater generation for the Proposed Project is estimated at 310,000 GPD for the Peninsula Component and 30,000 GPD for the University Towers East Component. Collectively, this amounts to a total wastewater generation of approximately 340,000 gallons per day.

The City of San Diego has undertaken upgrades to its sewer infrastructure, transitioning from an 8-inch to a 12-inch sewer line along 55th Street. As part of the design phase, a capacity analysis will be conducted, which would verify that the existing 12-inch sewer line is adequate to accommodate the Proposed Project's wastewater output, and no upsizing of sewer lines would be necessary.

The wastewater generated by the Proposed Project would be conveyed through the collection system operated by the City of San Diego Metropolitan Wastewater Department, ultimately being treated at the Point Loma WWTP. Currently, the Point Loma WWTP processes approximately 175 million gallons of wastewater per day, with a maximum treatment capacity of 240 million gallons per day (City of San Diego Public Utilities 2022). The combined wastewater generation of the Proposed Project, representing approximately 0.19% of the plant's treatment capacity, would not significantly impact the plant's ability to accommodate both the Proposed Project's demand and its existing commitments.

According to the City of San Diego General Plan Public Facilities, Services, and Safety Element, the wastewater treatment system, which encompasses the Point Loma WWTP and two water reclamation plants, possesses sufficient capacity to meet the projected needs of the service area under the jurisdiction of the San Diego Metropolitan Wastewater Department. The minimal percentage of the City's total wastewater generation attributed to the Proposed Project indicates that the Proposed Project would not contribute to any capacity issues.

Therefore, the Proposed Project's wastewater demand would be adequately managed within the existing infrastructure capacities, leading to **less than significant** impacts.

4. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The Proposed Project is anticipated to generate solid waste in the form of demolition waste and construction debris during on-site demolition and clearing activities. SDSU would implement a construction waste management plan in accordance with Section 5.408 of the California Green Building Standards Code to reduce the potential impacts of this waste generation. This plan would aim for the recycling and/or salvaging of at least 65% of nonhazardous construction and demolition debris.

Furthermore, the Proposed Project would comply with the LEED v4 requirements for waste reduction during construction (USGBD 2021). This adherence not only promotes sustainable practices but also aligns with state and local solid waste reduction goals.

All solid waste generated during demolition and construction activities would be transported to the Miramar Landfill, which is located approximately 10 miles from the Proposed Project site. It is important to note that the Miramar Landfill is equipped to handle solid waste from various sources within the San Diego region and is regularly monitored for compliance with state and local regulations concerning waste capacity and management.

Given the implementation of the construction waste management plan and adherence to LEED standards, it is expected that the Proposed Project would not generate solid waste in excess of state or local standards or impair the attainment of local solid waste reduction goals. Additionally, as explained in the next section regarding solid waste reduction and compliance with applicable regulations, the Proposed Project's anticipated waste generation would remain within the operational capacity of local infrastructure, ensuring that impacts related to solid waste management would be **less than significant.**

5. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The Proposed Project would adhere to all applicable federal, state, and local statutes and regulations concerning solid waste management and reduction. This includes compliance with the California Integrated Waste Management Act, which mandates jurisdictions to achieve specific waste diversion goals, as well as Senate Bill 1383 (SB 1383), which requires the implementation of organics recycling programs.

Capacity

Solid waste generated by the Proposed Project would be managed by Allied Waste Services Inc., which would transport the waste to a nearby disposal facility, likely the Miramar Landfill or Sycamore Canyon Landfill. As of January 2020, the Miramar Landfill had approximately 11.08 million tons of remaining capacity and is projected to reach full capacity by January 2031 (CalRecycle 2019a). After the closure of the Miramar Landfill, Allied Waste would ensure that waste is disposed of at another regional landfill with adequate permitted capacity. For instance, the Sycamore Canyon Landfill, located in Santee, reported a remaining capacity of approximately 113.9 million tons as of December 2016, with an expected capacity exhaustion date of December 2042 (CalRecycle 2019b).

Current data indicate sufficient permitted capacity exists to accommodate the solid waste generated by the Proposed Project. The County's Five-Year Report (Countywide Integrated Waste Management Plan) confirms that existing landfills possess enough daily permitted disposal capacity for the next 17 years, thereby meeting state requirements that mandate the County maintain a minimum of 15 years of disposal capacity (County of San Diego 2012). Projections for regional waste disposal needs were developed utilizing General Plan growth data from various jurisdictions throughout the County.

The County's Siting Element (California Integrated Waste Management Plan) outlines strategies to enhance regional landfill capacity, including: (i) continuation of recycling diversion programs, (ii) improvements in landfill technology and space management, (iii) construction of enhanced recycling facilities, (iv) exporting waste out of the County, and (v) increasing maximum daily throughput rates at County landfills (County of San Diego 2005). Compliance with these strategies, along with SDSU's waste diversion programs, is essential for prolonging landfill operations.

The demolition of existing structures and subsequent construction activities associated with the Proposed Project will generate construction waste. Additionally, the operational phase of the Proposed Project would increase the demand for solid waste disposal services. Given the projected capacity of regional landfills, the anticipated increase in solid waste generation would be less than significant, ensuring that the Proposed Project is supported by landfills with sufficient permitted capacity.

Compliance with Solid Waste Regulations

SDSU has historically diverted over 50% of its on-campus solid waste to licensed recycling facilities. Solid waste generated from both construction and operation of the Proposed Project would be subject to the existing on-campus solid waste diversion program, which has consistently achieved a diversion rate exceeding 50%. This adherence to waste diversion standards would ensure compliance with Assembly Bill 75 (AB 75), which mandates that all large state facilities divert at least 50% of solid waste from landfills.

To further promote recycling, the Proposed Project would incorporate recycling bins within the new student housing facilities. Recyclable materials would be collected by a certified recycling materials collector and transported to a certified recycling facility at least once a week. This system would not impede the City's initiatives to promote and enforce recycling practices.

In summary, the Proposed Project would comply with all relevant federal, state, and local regulations regarding solid waste management and reduction. Therefore, the anticipated impacts related to solid waste would be **less than significant.**

4.15.5 Cumulative Impacts

The Proposed Project, when considered alongside other existing and anticipated developments in the region, is not expected to result in significant cumulative impacts. As outlined in the project analysis, the increase in the number of student beds on the Project site and corresponding demand for resources—such as water, wastewater treatment, and solid waste management—would be managed in accordance with established regional planning goals and policies. The City of San Diego's Long-Range Water Resources Plan and the Countywide Integrated Waste Management Plan indicate that adequate water supplies and waste disposal capacity are adequate to meet future demand, including that of the Proposed Project. Moreover, the implementation of stringent waste diversion strategies and adherence to state laws regarding recycling and waste management would ensure that the Proposed Project's contribution to any potential cumulative effects on landfill capacity and environmental resources would be less than significant.

Thus, while the Proposed Project would utilize available utilities and service systems, such use would be within available planned supplies and, as such, the Proposed Project's impacts relative to utilities and service systems would not be cumulatively considerable. Therefore, cumulative impacts would be **less than significant.**

4.15.6 Summary of Impacts Prior to Mitigation

Impacts related to utilities and services systems as a result of the Proposed Project would be less than significant.

4.15.7 Mitigation Measures

No significant impacts were identified and, therefore, mitigation measures are not required.

4.15.8 Level of Significance After Mitigation

Impacts to utilities and services systems would be less than significant without mitigation.

4.15.9 References

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4.16 Wildfire

This section describes the existing wildfire conditions of the Project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to implementation of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) based on the criteria provided in California Environmental Quality Act (CEQA) Guidelines Appendix G, Wildfire, and, as applicable, identifies mitigation measures to reduce identified potentially significant impacts to less than significant.

The section is based on a Fire Protection Plan (FPP) and a Wildfire Evacuation Study (WES) prepared for the Proposed Project, both of which are included as Appendix J-1 and Appendix J-2, respectively. Because there is no wildfire exposure to the University Towers East Component site as it is not located within a Fire Hazard Severity Zone (FHSZ) and is entirely surrounded by development with over 500 feet of distance to the nearest, isolated pocket of natural vegetation and approximately 0.25 miles to the nearest Very High FHSZ, this component of the Proposed Project was not addressed in the WES or FPP and is not further analyzed herein. As such, references to the “Proposed Project” or “Project Site” throughout this analysis are in reference to the Peninsula Component site unless stated otherwise. The analysis of the Peninsula Component site includes the immediate parcels surrounding and abutting the site that are owned by SDSU and/or the State of California, and this entire area is referred to herein as the “Study Area.” (Fire protection services for the Proposed Project are addressed in Section 4.13, Public Services and Recreation.)

Following issuance of the Notice of Preparation for the Proposed Project, SDSU received comments related to wildfire concerning the general wildfire hazard, fire safety, and the ability to evacuate the site of the Proposed Project. The analysis presented below addresses each of these topics. Please see Appendix A, Initial Study, Notice of Preparation, and Scoping Comments, for a complete compilation of comments received on the Notice of Preparation.

4.16.1 Existing Conditions

Regional

Wildfire is a continuous threat in Southern California and is particularly concerning in the wildland urban interface (WUI), a geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. The City of San Diego (City) within the County of San Diego (County) contains many WUI areas, where established development meets open space areas and canyons within urban and suburban areas. The region’s climate, severe dry periods, vegetative fuel composition, and steep and varied terrain make the region susceptible to both wildland and WUI fires. The County is known for its highly flammable chaparral and coastal sage scrub plant communities that can support intense, fast-moving fires. Adaptations to the local dry, Mediterranean climate include specialized roots, stems, and leaves. The latter two become important available fuels and contribute to wildfire intensity and spread.

Weather throughout Southern California is influenced by the Pacific Ocean and is frequently under the influence of a seasonal, migratory subtropical high pressure cell known as the “Pacific High.” Wet winters and dry summers with mild seasonal changes characterize the Southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. Santa Ana winds bring hot, dry desert air from the east into the region during late summer and fall, which increases wildland fire hazards during these seasons. Dry vegetation, low humidity, and high air temperature can combine to produce large-scale fire events. As Santa Ana winds blow westward toward denser development, fires driven by these winds have the potential to result in a greater risk to property and life.

Project Site

Because there is no wildfire exposure to the University Towers East Component site as it is not located within a FHSZ and is entirely surrounded by development with over 500 feet of distance to the nearest, isolated pocket of natural vegetation and approximately .25-mile to the nearest Very High FHSZ, this component of the Proposed Project was not addressed in the WES or FPP and is not further analyzed herein. As such, references to the "Proposed Project" or "Project Site" throughout this analysis are in reference to the Peninsula Component site unless stated otherwise.

The Project site consists of the proposed Peninsula Component, which would be located on an approximately 10.57-acre site in the northwest portion of the SDSU campus, just south of Interstate 8 and west of Canyon Crest Drive, as well as the proposed University Towers East Component, which would be developed on an approximately 1.1-acre site located immediately east of the existing University Towers Building, south of Montezuma Road. The Peninsula Component site currently contains eight, two-story apartment-style student residential buildings, a three-story apartment-style student residential building, the SDSU International Student Center complex, the SDSU Passport Office, the SDSU Global Education Office, the SDSU Faculty International Engagement Office, and associated amenities (i.e., parking spaces, sidewalks, landscaped areas, etc.). The University Towers East Component site is currently used as a parking lot adjacent to University Towers, which is located immediately east of the Project site.

As noted above, the University Towers East Component site was not included in the WES or FPP because there is no wildland exposure to this part of the Proposed Project. Therefore, references to the "Proposed Project" or "Project Site" in this section, are generally in reference to the Peninsula Component site unless stated otherwise.

Vegetation/Fuels

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, California sagebrush scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels.

It is important to consider the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes affects plant community succession. Succession of plant communities, most notably the gradual conversion of shrublands to grasslands with high-frequency fires and grasslands to shrublands with fire exclusion, is highly dependent on the fire regime. Further, biomass and associated fuel loading will increase over time if disturbance or fuel reduction efforts are not diligently implemented.

As discussed in Section 4.3, Biological Resources, and shown in Table 4.16-1, the majority of the Project site is considered developed since both the Peninsula Component and University Towers East Component are currently developed as well as the larger Study Area, which, as noted above, includes the immediate parcels surrounding and abutting the Peninsula Component site that are owned by SDSU and/or the State of California, The vegetation surrounding the Peninsula Component largely consists of disturbed coastal sage scrub, eucalyptus woodland, and ornamental plantings largely comprised of, but not limited to, bank catclaw (*Acacia redolens*), hottentot fig (*Carpobrotus edulis*), jade plant (*Crassula ovata*), Brazilian pepper tree (*Schinus terebinthifolius*), and ornamental pines (*Pinus* spp.). The distribution of vegetation communities and land cover types on the Project site is shown on Figure 4.3-1 in Section 4.3, Biological Resources.

Table 4.16-1. Vegetation Communities/Land Cover Types within the Project Components and Study Area

Habitat Types/Vegetation Communities	Acreages within the Proposed Project Study Area
Non-Native Vegetation Communities/Land Cover Types	
Urban/Developed (DEV)	16.73[1]
Ornamental Plantings (ORN)	3.10
Non-Native Riparian (NNR)	0.90
Eucalyptus Woodland (EW)	2.30
Disturbed Habitat (DH)	0.75
Unvegetated Channel (UVC)	0.03
Subtotal	*23.81*[2]
Native Vegetation Communities	
Diegan Coastal Sage Scrub (CSS) (disturbed)	12.97
Subtotal	*12.97*
Total	**36.78**[2]

Source: Appendix D.
Notes:
1 Does not include Aztec Circle Drive.
2 Acreages may not sum due to rounding.

Climate

The average high temperature for the Project area is approximately 74°F, with average highs peaking in July through September at approximately 81-83°F. The area is considered to be a semi-arid climate. Relative humidities average approximately between 45 and 60% year-round and are at their lowest between October and February. Daily minimum relative humidities average between 30 and 50% year-round and are lowest from November through January. Precipitation averages approximately 9.4 inches annually with approximately 6.9 inches of that total occurring between December and March on average (FEMS 2024).

The prevailing wind pattern is from the west (on-shore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west-southwest (sea), and at night winds are from the northeast (land). Wind speeds average approximately 5 to 7 miles per hour (mph) throughout the year. Hourly gust speeds average approximately 10-15 mph throughout the year, with monthly average highs of approximately 20-25 mph between November and April and between approximately 15 and 20 mph between May and October. The fastest gust ever recorded was 41 mph in February of 2017 and the fastest gust ever recorded during fire season was 33.5 mph during November of 2022 (FEMS 2024). The highest wind velocities are associated with downslope, canyon, and Santa Ana winds. The Peninsula Component site is located on a peninsular mesa with slopes on the west, north and east on the south side of Alvarado Canyon. Canyons adjacent to the Project site can funnel winds and if wind direction is aligned with -adjacent slopes, fire behavior can be amplified.

The Proposed Project would be located in the San Diego County Coastal Areas California Fire Zone 243 of the National Weather Service (NWS) and National Oceanic and Atmospheric Association's (NOAA's) zoning system. Since 2006, 51 Red Flag Warnings (RFW) have been issued within California Fire Zone 243. The NWS defines a RFW as environmental conditions where warm temperatures, very low humidities, and stronger winds are expected to combine to produce an increased risk of fire danger and Santa Ana winds often create such conditions. By looking at the historical frequency of RFWs for a given region, one can approximate how many of such events can be expected annually in the future. On average, approximately 3 RFW events can be expected to occur annually. However, this has ranged from as little as 0 to as many as 16, and individual events can vary in duration. Approximately 78% of the RFWs occurred between October and January (Iowa State University 2024). This emphasizes the temporally unique fire danger experienced during autumn months when dry fuels from the end of the seasonal drought coincide with the extreme wind events associated with RFW conditions.

Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep slopes result in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as canyons, canyon features (chimneys or chutes), or saddles on the landscape can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind.

As mentioned in Section 4.6, Geology and Soils, and Section 4.9, Hydrology and Water Quality, the Peninsula Project site is located on an elevated natural terrace to the south of Alvarado Canyon, between two relatively deep secondary canyons to the east and west. Several smaller secondary canyons have incised into this terrace, some of which have been filled in and built over during historic development in the area. Review of historic aerial images and topographic maps indicate that grades at the site were not changed significantly during initial development and no significant canyon in-fill was identified.

Steep slopes descend from the relatively flat-lying terrace into the canyons to the west, north, and east at gradients of 2:1 to 2.5:1 (horizontal to vertical units). Elevations on the Peninsula Component site range from approximately 380 feet above mean sea level (amsl) at the northwestern point to approximately 420 feet amsl at the southern end at the intersection of Aztec Circle Drive and 55th Street.

Fire Hazard Severity Zone Designation

The California Department of Forestry and Fire Protection's (CAL FIRE) Fire and Resource Assessment Program (FRAP) database includes data documenting areas of significant fire hazards throughout the state. These maps categorize geographic areas of the state into different fire hazard severity zones (FHSZs). The classifications include Moderate, High, and Very High FHSZs. CAL FIRE uses FHSZs to classify anticipated fire-related hazards for the entire state, and includes classifications for State Responsibility Areas (SRA), Local Responsibility Areas (LRA), and Federal Responsibility Areas. Fire hazard severity classifications take into account vegetation, topography, weather, crown fire production, and ember production and movement.

As shown in Figure 4.16-1, FHSZ Map, the Peninsula Component site lies within an area considered a Very High Fire Hazard Severity Zone (VHFHSZ) within the (LRA as designated by CAL FIRE and the San Diego Fire-Rescue Department (SDFD). However, the University Towers East Component site is not within a FHSZ. There is an expansive area of VHFHSZ within a SRA along Alvarado Canyon and Interstate 8 (CAL FIRE 2009). The VHFHSZ designation can be attributed to a variety of factors including close proximity to open space, highly flammable fuels, seasonal, strong winds, and a Mediterranean climate that results in vegetation drying during the months most likely to experience Santa Ana winds.

Fire History

Fire history data provides valuable information regarding fire spread, fire frequency, ignition sources, and vegetation/fuel mosaics across a given landscape. One important use for this information is as a tool for pre-planning. It is advantageous to know which areas may have burned recently and therefore may provide a tactical defense position, what type of fire burned on the site, and how a fire may spread.

Fire history uses CAL FIRE's FRAP database. FRAP summarizes fire perimeter data dating to the late 1800s, but it is incomplete due to the fact that it only includes fires over 10 acres in size and has incomplete perimeter data, especially for the first half of the 20th century (Syphard and Keeley 2016). However, the data does provide a summary of recorded fires in the Study Area and can be used to show where large fires have occurred which indicates an increased probability of future wildfires.

According to available data from CAL FIRE in the FRAP database,[1] 9 fires have burned within 5 miles of the Project sites since the beginning of the historical fire data record with the oldest fire occurring in 1989 and the most recent occurring in 2003 (Cedar Fire), which was also the largest of the nine at 270,686 acres. However, only a small portion of the 2003 Cedar Fire burned within the 5-mile buffer of the Proposed Project. Of the 9 fires, none have burned on site with the nearest being an unnamed 1944 fire that burned within approximately 90 feet of the Peninsula Component site and approximately 1,400 feet from the University Towers East Component site. Recorded wildfires within 5 miles range from approximately 107 acres to approximately 270,686 acres and the average fire size is approximately 31,878 acres or 2,027 acres if not including the Cedar Fire.

Emergency Response and Fire Protection

While the Office of the State Fire Marshal is the authority having jurisdiction over development within the SDSU campus, emergency response would be provided by the San Diego Fire-Rescue Department (SDFRD), which provides fire protection services on the SDSU campus and in the surrounding areas. Specifically, the site of the Proposed Project lies within the response area of Battalion 4 of the SDFRD. Therefore, the SDFRD would provide initial response for fire protection and emergency medical services.

Regionally, SDFRD provides fire, emergency medical, and rescue services from 51 stations. The Department serves nearly 1.5 million residents throughout a 343 square mile coverage area (SDFD n.d.). SDFRD Station 10 is nearest to the Project sites at approximately one and a half miles from the University Towers East Component site and approximately 2 miles from the Peninsula Component site. The response times discussed herein consider maximum travel and response time to the Peninsula Component site. for information regarding response times to the University Towers East Component, refer to Appendix J-1 (FPP). SDFD Station 10 could respond to all possible incidents as it is equipped with a Type I engine, a Type III engine, and an aerial ladder truck. In addition to SDFD Station 10, Stations 31, and 17 would have response times that both conform to the SDFRD's response time standard of arriving on scene within 7 minutes and 30 seconds 90% of the time for both sites according to two calculation methods (except when Stations 31 and 17 are responding to the most distant point of the Peninsula Component site, according to one of the calculation methods). However, Stations 31 and 17 would primarily be responsible for secondary response, and Station 10 would be capable of providing primary response as the first-in unit to all portions of the Proposed Project.

1 Based on polygon GIS data from CAL FIRE's FRAP, which includes data from CAL FIRE, USDA Forest Service Region 5, BLM, NPS, Contract Counties and other agencies. The data set is a comprehensive fire perimeter GIS layer for public and private lands throughout the state and covers fires 10 acres and greater between 1878–2023.

Within the area's emergency services system, fire and emergency medical services are also provided by other agencies. Generally, each agency is responsible for structural fire protection and wildland fire protection within their area of responsibility. However, mutual aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries. In the Study Area, fire agencies cooperate under a statewide master mutual aid agreement for wildland fires. There are also mutual aid agreements in place with neighboring fire agencies, including Heartland Fire & Rescue Department and San Miguel Fire Department, and typically these agreements include interdependencies that exist among the region's fire protection agencies for structural and medical responses, but are primarily associated with the peripheral "edges" of each agency's boundary. This was demonstrated most recently in the Montezuma Fire that occurred on October 31, 2024, in canyons southwest of the campus. CAL FIRE provided resources in the form of air support, dropping fire retardant to protect structures abutting the canyons, with additional support from San Diego Gas and Electric's Engine Companies from as far as Oceanside providing additional fire fighter support on the ground.

4.16.2 Regulatory Framework

The regulatory framework relative to the analysis of potential wildfire impacts is provided below. Additional discussion regarding specific regulatory requirements relating to design, construction, and operation of the Proposed Project is provided in Appendices J-1 and J-2.

Federal

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute (NFPA 2024). This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. National Fire Protection Association standards are recommended guidelines and nationally accepted good practices in fire protection but are not laws or codes unless adopted as such or referenced as such by the California Fire Code (CFC) or the local fire agency.

International Fire Code

Created by the International Code Council, the International Fire Code (IFC) addresses a wide array of conditions hazardous to life and property, including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The IFC places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the IFC uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often times these measures include construction standards and specialized equipment). The IFC uses a permit system (based on hazard classification) to ensure that required measures are instituted (International Code Council 2020a).

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995, and last updated in 2009 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. This ensures that the approach to wildland fire suppression is consistent during mutual aid responses with personnel spanning many jurisdictions (NWCG 2009).

International Wildland–Urban Interface Code

The International Wildland–Urban Interface Code is published by the International Code and is a model code addressing wildfire issues in low-density, rural residential areas or where residential areas abut open space (International Code Council 2020b). As of the time of this writing, California was in the process of consolidating all state codes applicable to the wildland-urban interface into its own Wildland-Urban Interface Code.

State

California Government Code

California Government Code Sections 51175 through 51189 provide guidance for classifying lands in California as fire hazard areas and requirements for management of property within those lands. CAL FIRE is responsible for classifying FHSZs based on statewide criteria, and makes the information available for public review. Further, local agencies must designate, by ordinance, Very High FHSZs within their jurisdiction based on the recommendations of CAL FIRE.

Section 51182 sets forth requirements for maintaining property within fire hazard areas, such as defensible space, vegetative fuels management, building materials and standards. Defensible space consists of 100 feet of fuel modification on each side of a structure, but not beyond the property line unless findings conclude that the clearing is necessary to significantly reduce the risk of structure ignition in the event of a wildfire.

California Code of Regulations

<u>Title 14 Natural Resources</u>

Title 14, Division 1.5, Chapter 7, Subchapter 3, Fire Hazard, also sets forth requirements for defensible space if the distances specified above cannot be met. For example, options that have similar practical effects include noncombustible block walls or fences, 5 feet of noncombustible material horizontally around the structure, installing hardscape landscaping or reducing exposed windows on the side of the structure with a less-than-30-foot setback, or additional structure hardening such as those required in the California Building Code (CBC), California Code of Regulations Title 24, Part 2, Chapter 7A.

<u>Title 24 California Building Standards Code</u>

<u>California Building Code</u>

Part 2 of Title 24 contains the California Building Code (CBC). Chapter 7A of the CBC regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a wildland–urban interface fire area. The purpose of this Chapter is to establish minimum standards for the protection of life and property by increasing the ability of a building located in a VHFHSZ LRA or any FHSZ within a SRA or a wildland–urban interface fire area to resist the intrusion of flames or burning embers projected by a vegetation fire, and to contribute to a systematic reduction in conflagration losses. New buildings located in such areas must comply with the ignition-resistant construction standards outlined in CBC Chapter 7A.

The VHFHSZ designation on the Project site would require buildings to implement ignition-resistive construction and provide up to 200-feet of defensible space (treated, maintained vegetation) between structures and open space areas. Since the entire Peninsula Component site is classified as VHFHSZ, the requirements of Chapter 7A of the 2019 CBC, or then current edition, would apply to all Project buildings.

California Fire Code

Part 9 of Title 24 contains the California Fire Code (CFC), which incorporates by adoption the International Fire Code with necessary California amendments. The purpose of this code is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas.

The CFC and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC is updated and published every 3 years by the California Building Standards Commission.

California Public Resources Code

California Public Resource Code (PRC) Section 4290 requires minimum fire safety standards related to defensible space that are applicable to residential, commercial and industrial building construction in SRA lands and lands classified and designated as Very High FHSZs. These regulations include road standards for fire apparatus access, standards for signs identifying roads and buildings, fuel breaks and green belts, and minimum water supply requirements.

PRC Section 4291 requires a reduction of fire hazards around buildings located adjacent to a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands or land that is covered in flammable material. A minimum 100 feet of vegetation management around all buildings is the primary mechanism for conducting fire prevention activities on private property within CAL FIRE jurisdiction.

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE is tasked with reducing wildfire-related impacts and enhancing California's resources. CAL FIRE responds to all types of emergencies including wildland fires and residential/commercial structure fires. In addition, CAL FIRE is responsible for the protection of approximately 31 million acres of private land within the state and, at the local level, is responsible for inspecting defensible space around private residences. CAL FIRE is responsible for enforcing State of California fire safety codes included in the California Code of Regulations (CCR) and California PRC. PRC Section 4291 states generally that any person operating any structure located on brush-covered lands or land covered with flammable material is required to maintain defensible space around the structure. CCR Title 14 Section 1254 identifies minimum clearance requirements required around utility poles.

Fire Hazard Severity Zone Mapping

As previously discussed, CAL FIRE's FRAP database provides data documenting areas of significant fire hazards throughout the state, based on fuel loading, slope, fire history, weather, and other relevant factors as directed by PRC Sections 4201–4204 and CCR Sections 51175–51189. FHSZs are ranked from Moderate to Very High, and are categorized for fire protection within a Federal Responsibility Area, State Responsibility Area, or Local Responsibility Area under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively. As noted above and depicted in Figure 4.16-1, the Peninsula Component site and surrounding area to the west is located within a Very High FHSZ.

California Strategic Fire Plan

The 2019 Strategic Plan is guided by CAL FIRE's mission to serve and safeguard the people and protect the property and resources of California as well as its vision to be the leader in providing fire prevention and protection, emergency response, and enhancement of natural resource systems. The Strategic Plan is organized into four goals. These goals include to improve core capabilities, enhance internal operations, ensure health and safety, and build an engaged, motivated and innovative workforce (CAL FIRE 2019).

Mutual Aid Agreements

The California Disaster and Civil Defense Master Mutual Aid Agreement, as provided by the California Emergency Services Act, provides statewide mutual aid between and among local jurisdictions and the state. The statewide mutual aid system exists to ensure that adequate resources, facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed. The SDFRD participates in these mutual aid, automatic aid and other agreements with surrounding fire departments.

California State Emergency Plan

The 2024 California State Emergency Plan (SEP) provides an overview of how the state prepares, mitigates, responds, and recovers from emergencies in California. The plan is a requirement of the California Emergency Services Act (ESA), and describes:

- California's hazards and vulnerabilities
- The state's emergency management organization
- Integrating considerations for people with Access and Functional Needs
- Resource mobilization
- Roles of government during an emergency
- Mitigation programs
- Emergency planning and preparedness
- Whole Community Planning
- Response operations
- Mutual aid
- Public information
- California Emergency Support Functions
- Recovery operations
- California Recovery Support Functions
- Continuity of government and essential functions
- Roles and responsibilities of state government agencies and departments during emergencies
- Plan development and maintenance

Local

Because SDSU is a component of the California State University, which is a state agency, the Proposed Project is not subject to local government planning and land use plans, policies, or regulations. As such, the 2022 CFC and CBC would be enforced from the authority of the California Office of the State Fire Marshal, per Title 24, Part 9, Chapter 1, Section 1.11.2.1.1. The Proposed Project would be subject to state and federal agency planning documents described above, but would not be subject to regional or local planning documents such as the City's General Plan, College Area Community Plan, or City municipal zoning code or ordinances. Notwithstanding, the Proposed Project's compliance with applicable state and federal regulations is equivalent to compliance with comparable SDFRD requirements, including, for example, vegetation clearance requirements under the City's Brush Management and Weed Abatement Policy and Landscape Standards.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2023) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. An important San Diego County Multi-Jurisdictional Hazard Mitigation Plan component is the Community Emergency Response Team (CERT), which educates community members about disaster preparedness and trains them in basic response skills, including fire safety.

San Diego County Emergency Operations Plan

The 2022 San Diego County Emergency Operations Plan (EOP) describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan – Evacuation Annex

The Evacuation Annex is intended to be used as a template for the development of jurisdictional evacuation plans and will support or supplement the evacuation plans prepared and maintained by each local jurisdiction. The annex outlines strategies, procedures, recommendations and organizational structures that can be used to implement a coordinated evacuation effort in the San Diego County Operational Area (OA).

County of SD Resilience Review Report: Wildland Fires

Prepared by the Chief Administrative Officer's Resilience Review Working Group, the Resilience Review Report: Wildland Fires (County provides recommendations for achieving community goals related to actively reducing risk of wildfire and improving efforts to respond and recover from wildfire events. The Working Group recommends 16 principal objectives divided among three focus areas: pre-fire, response, and recovery.

San Diego State University Emergency Operations Plan

The purpose of the SDSU Emergency Operations Plan (EOP) is to establish policy, procedures, guidelines, organizational structure and responsibilities for response during campus emergencies. The plan provides guidelines for an all-hazards approach to mitigate harmful effects from potential hazards whether they are natural, technological or human-caused. The SDSU Emergency Operations Plan works in conjunction with other plans throughout San Diego County and is consistent with state and federal emergency response systems.

4.16.3 Significance Criteria

The significance criteria used to evaluate the Project impacts to wildfire are based on Appendix G of the CEQA Guidelines, Wildfire. According to Appendix G, if the Proposed Project would be located in or near state responsibility areas or lands classified as very high fire hazard severity zones (VHFSZ), as the Peninsula Component of the Proposed Project would be, the Project would result in a significant impact related to wildfire if the Project would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Methodology

As only the Peninsula Component of the Proposed Project is located in a VHFHSZ, the analysis that follows focuses primarily on the Peninsula Component. The analysis of the Peninsula Component site includes the immediate parcels surrounding and abutting the site that are owned by SDSU and/or the State of California, and this entire area is referred to herein as the "Study Area." The analysis includes a review and assessment of the existing fire environment and site-specific characteristics, including the location, topography, geology, surrounding combustible vegetation (fuel types), climatic conditions, fire history, and the proposed change from the existing to the proposed conditions on site and how the Project may impair an existing emergency response plan or evacuation plan, exacerbate wildfire risks, or expose people or structures to post-fire slope instability. The analysis is based on field observations and vegetation, topography, and climate data from CAL FIRE's FRAP database and SDFD's website to conduct fire behavior modeling, evaluate existing emergency response capabilities, and assess of how fire risk will be mitigated through a system of fuel modification, structural ignition resistance enhancements, and fire protection delivery system upgrades. The following analysis is based, in part, on a Fire Protection Plan (FPP) and a Wildfire Evacuation Study (WES) that have been prepared for the Proposed Project, both of which are included as Appendix J-1 and Appendix J-2, respectively.

4.16.4 Impacts Analysis

1. Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project's potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is addressed in Section 4.8, Hazards and Hazardous Materials under Impact 6. As described under this impact, the Proposed Project would not remove or impair any evacuation routes that would be used by SDSU students or by occupants of any nearby land uses. For the purposes of evaluating this very similar threshold in this section, the focus is related to impairment of emergency response or evacuation as it specifically relates to wildfire hazards.

Depending on the scale of the emergency, response and recovery operations (e.g., mass care, evacuation, etc.) are conducted in accordance with the policies and procedures outlined in the SDSU Emergency Operations Plan (EOP) (SDSU 2019), City of San Diego Emergency Operations Procedures (City of San Diego 2018), and the County of San Diego Operations Area (OA) EOP (County of San Diego 2022). These various emergency operations plans are all prepared in accordance with the State Emergency Plan, the State of California's Standardized Emergency Management System and the National Incident Command System, which ensures as an emergency scales, there is an established framework for interagency coordination. The Wildfire Evacuation Study (WES), Appendix J-2 of this Draft Environmental Impact Report (EIR), was prepared for the Proposed Project based on the procedures and policies of the SDSU EOP, City of San Diego Emergency Operations Procedures, and San Diego County Emergency Operations Plan, including Annex Q – Evacuation.

Evacuations in the County are primarily a result of wildfire events. Due to the immediate threat that wildfire can present, current evacuation practice in the City and County of San Diego is targeted evacuation, which typically targets the scope of the evacuation to only the area in immediate danger and placing a larger area on standby for evacuation; and has replaced mass evacuation as the standard protocol for conducting evacuations. This practice allows for better evacuation operations, reduces gridlock, and reserves sufficient travel way for emergency vehicles. The SDSU campus, including the Peninsula Component site, is within evacuation zone SDC – 1905. The University Towers East Component site is in evacuation zone SDC - 1996.[2]

The Peninsula Component site is within a designated VHFHSZ in a local responsibility area (LRA), which are areas considered to have a high fire potential based on available fuels, topography and climate. As seen in both the 2019 Fairmount Fire and 2024 Montezuma Fire, the time between ignition and spread to developed areas would be short; however, San Diego Fire-Rescue Department (SDFRD) was able to capitalize on its mutual aid resources, ultimately preventing either fire from progressing into the adjacent neighborhoods and with minimal damage to structures. As required for all development within a VHFHSZ, the Proposed Project would implement a comprehensive layered fire protection system, as detailed in Appendix J-1, Fire Protection Plan, of this Draft EIR, to reduce flame lengths and fire spread adjacent to Project structures and allow for SDSU campus police (University Police Department [UPD]) and/or the City of San Diego Police Department (SDPD) the contingency option to shelter students on site. Further, there are multiple sites available on campus that can serve as assembly points or temporary shelter that can provide safe refuge.

An evacuation of the Peninsula Component site resulting from a fire that starts in the unmaintained fuels to the east and driven by Santa Ana winds (i.e., from the northeast) or a fire in the unmaintained fuels in the canyon to

2 https://protect.genasys.com/search?z=14.570532360577667&latlon=32.77219491397284%2C-117.07362871836989

the west from a fire driven by onshore wind (i.e., from the west) is possible. In the event of an evacuation, the Proposed Project would implement the procedures outlined in Appendix J-2, WES, which are consistent with the SDSU EOP, City of San Diego Evacuation Procedures, and the County of San Diego OA EOP; therefore, the Proposed Project would not conflict with an adopted emergency response plan or evacuation plan.

As explained in the WES, safely undertaking large-scale evacuations is a complicated process that involves many factors that cannot necessarily be determined in advance. The SDSU Evolve Student Housing Project would be located in an area that is described as an urban-wildland intermix, which is characterized by the higher-density urban development around the canyons and hillsides that are characteristic of the region. However, given the Project's urban setting, a large wildfire advancing through a vast bed of natural fuels towards the Project site is not possible. The closest wildland fuels are associated with the Mission Trails Regional Park, approximately 3 miles northeast of the Project site. The communities of San Carlos and Del Cerro, as well as Interstate 8 separate the Project site from these expansive fuel beds.

As discussed in the Project's FPP, fire risk in the canyon adjacent to the Project in post-Project conditions is considered low to moderate and, further, the relatively small size of the canyon does not provide sufficient natural cover to fuel a large wildfire advancing toward the Project. Further, due to the Peninsula Component site's designation of a VHFHSZ in an LRA, the Peninsula Component site would be required to comply with all CBC and CFC codes applicable to development in a VHFHSZ (i.e., CBC Chapter 7A and CFC Chapter 49), which includes requirements for ignition resistant construction, emergency access, and defensible space that have shown to reduce fire behavior and fire risk (Knapp et al. 2021; CBIA 2022). Additionally, these same features that protect the Project structures also help to reduce fire from spreading off site. Further, in the event structures in the northwest portion of campus (nearest the Peninsula Canyon site) are damaged and students are not able to return to the building, SDSU has sufficient capacity to shelter students on campus. As seen in previous fires in the area, UPD works closely with SDPD and SDFRD to support area evacuations and there have been no evacuations of campus related to wildfire.

As discussed above and detailed in Appendix J-2, WES, the Project would be consistent with the SDSU EOP, City of San Diego Emergency Operations Procedures, and the County OA EOP; would not eliminate any existing evacuation routes; and would provide a shelter in place alternative for Project residents as a result of compliance with fire safety features that meet the requirements of Chapter 7A of the CBC (e.g., ignition resistant construction, fuel modification). Further, the Proposed Project would implement **Mitigation Measure (MM) WLD-1** to educate students and support orderly evacuations. Considering these facts and others discussed herein, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and would not interfere with evacuation response planning or result in inadequate emergency access. The impact would be **less than significant with mitigation.**

2. Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Construction

Development of the Peninsula Component site would include demolition of all 13 existing buildings and the phased development of one 9-story student residential building and five 13-story student residential buildings in their place. Project construction would introduce potential ignition sources to the Project site, including the use of heavy machinery and the potential for sparks during welding activities or other hot work. As such, impacts during construction would be potentially significant. However, the Project would be required to comply with SDFRD, state, and Office of the State Fire Marshal (OSFM) requirements for construction activities in hazardous fire areas, including fire safety practices, to reduce the possibility of fires during construction activities. Additionally, **MM-WLD-2** is proposed, which requires that vegetation management be implemented at the commencement and throughout the construction phase, and vegetation management be implemented prior to combustible materials being brought on site. Adequate fuel breaks shall be created around all grading, site work, and other construction activities in areas where there is flammable vegetation, in accordance with the FPP. Combustible construction materials would not be brought on site without prior OSFM approval, or SDFRD approval should the OSFRM decide to delegate the responsibility. Also, ignition risk would be further reduced since all power lines would be buried. The pre-construction requirements outlined in **MM-WLD-2** would reduce the risk of wildfire ignition and spread during construction activities. Vegetation management would also reduce the risk of wildfire spreading from within the active construction areas to off-site fuel beds. Provided site improvements and vegetation management requirements are appropriately implemented and approved by OSFM, construction activities are not anticipated to exacerbate wildfire risk such that temporary construction workers or surrounding developed areas would be exposed to the uncontrolled spread of a wildfire or pollutant concentrations from a wildfire. Therefore, with implementation of **MM-WLD-2**, construction impacts would be **less than significant with mitigation incorporated.**

Operation

The Peninsula Component site is considered a VHFHSZ within an LRA (see Figure 4.16-1). The Peninsula Component site presently has established vegetation on the west, north, and east sides with no maintained fuel modification. Existing potential ignition sources include vehicles traveling on Interstate 8 to the north, the adjacent trolley tracks, or human activity in the nearby vegetated areas.

While the Peninsula Component of the Proposed Project would redevelop previously developed areas, research indicates that the type of dense developments, like the Project, are not associated with increased vegetation ignitions. Housing density directly influences susceptibility to fire because in higher density developments, there is one interface (the community perimeter) with the wildlands whereas lower density development creates more structural exposure to wildlands, due to less or no ongoing maintained landscapes (an intermix rather than interface), and consequently more difficulty for fire resources to protect structures. A study by Syphard et. al. (2013) states that “The WUI [wildland urban interface], where housing density is low to intermediate is an apparent influence in most ignition maps” further enforcing the conclusion that lower density housing poses a higher ignition risk than higher density communities. They also state that “Development of low-density, exurban housing may also lead to more homes being destroyed by fire” (Syphard et al. 2013). The Proposed Project does not include the type of development found to result in great wildfire risk in these studies.

Slope/Prevailing Winds

Slope can have a strong influence on fire behavior in the absence of wind. Without the influence of wind, fire will travel up-slope quickly as convective and radiant heat from the flames and smoke heat, cure, and ignite the vegetation up-slope from it. A fire burning downhill will have a slower rate of spread since the heat transfer to unburned vegetation is more reliant on radiant and conductive heating without as much heat transfer via convection. Topographical features such as box canyons and saddles can also amplify wind speeds. Prevailing winds in the Study Area can also influence wildfire behavior, in addition to the possibility of Santa Ana wind conditions that can result in extreme wildfire behavior.

The Peninsula Component site sits atop a landmass with hillsides descending to the west, north, and east with fully vegetated canyons to the west. These canyons could funnel winds and amplify local wind speeds and if winds were to align with slopes to drive a fire upslope, the rate of spread and intensity would be amplified. However, the proposed fuel modification zones would reduce fire behavior as it reaches the top of the slope, where fuel modification would shift. Explicit examples of changes in fire behavior, from the natural fuel beds to Zone B, and ultimately to Zone A, are shown in the results of fire behavior modeling prepared for the Proposed Project included within the FPP (Appendix J-1) in Appendix Y. Also, the Project includes a 20-foot-wide non-combustible fire road that would both heighten the effectiveness of the fuel management zones, as well as provide access to fire suppression personnel.

Vegetation Management and Setbacks

As shown in Table 4.16-1, while the Project sites are developed, there is Diegan Coastal Sage Scrub, ornamental plantings, and eucalyptus woodland adjacent to the site. The dominant vegetation, Diegan Coastal Sage Scrub, can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels.

As required by the California Fire Code, a fuel management zone is a strip of land where combustible vegetation has been removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire resistant plants in order to provide a reasonable level of protection to structures from wildland fire. In accordance with the 2022 California Fire Code (Section 4907 — Defensible Space), Government Code Section 51175 – 51189, and PRC Section 4291, a fuel management zone is required around every building that is designed primarily for human habitation or use within a VHFHSZ. A typical landscape/fuel modification installation per the California Fire Code consists of a 30-foot-wide irrigated zone (Zone A) and a 70-foot-wide irrigated zone (Zone B) for a total of 100 feet in width on the periphery of a site, beginning at the structure.

The Proposed Project, specifically as part of the Peninsula Component and as shown in Figure 4.16-2, Conceptual Fuel Modification Plan – Peninsula Component. Overall, the Peninsula Component of the Proposed Project would include code-exceeding irrigated Zone A widths that exceed the overall 100 feet of FMZ requirement in places, a thinned Zone B that extends from the edge of Zone A out to 100 feet from all structures in nearly all areas, and 5 feet of ember-resistant Zone 0 around all structures. More specifically, on-site FMZ Zone A widths vary between approximately 27 feet by the Amenity Building and up to 78 feet near Buildings 4 and 6. Furthermore, off-site FMZ Zone B widths vary between approximately 22 feet and up to 73 feet, totaling up to 100 feet of on- and- off-site combined FMZ. It should be noted that a total of 81 feet of combined on- and- off-site FMZ is achieved along the northern side of Building 3. If potential constraints due to the presence of biological resources do not allow the Project to implement a fully code-compliant FMZ, this could represent a potentially significant impact. However, **MM-WLD-3** would require if there are biological constraints that prevent the implementation of FMZs in certain areas, alternative materials and methods of construction shall be added to the FPP and submitted to SDFRD for review and approval in order to implement another method of fire hardening that meets or exceeds the intent of a full 100 feet of fuel modification, such as a concrete masonry unit (CMU) fire wall, higher rated fire resistant siding, dual paned tempered glass windows, or other code exceeding measures. Altogether, the planned fuel modification zone would provide the full 100 feet from the structures required by the Fire Code in nearly all areas, except north of Building 4. As outlined in **MM-WLD-4** and in accordance with FPP recommendations, the Proposed Project's managing entity would obtain an FMZ inspection and report from a qualified OSFM-approved 3rd party inspector in May/June of each year certifying that vegetation management activities throughout the Project Site have been performed. If the FMZ areas are not compliant, the Proposed Project's managing entity will have a specified period to correct any noted issues so that a re-inspection can occur and certification can be achieved.

Also, as outlined in **MM-WLD-5**, Zone A would extend beyond the typical 30-feet requirement, which would result in a code exceeding fuel modification zone. The Zone A fuel modification zone for the Proposed Project would be at least 27 feet wide near the Amenity Building structure and would extend to over 100 feet in width in other areas of the Project site, with most areas where Zone B is not present being 78 feet in width. Zone A conditions result in a greater reduction in fire behavior than Zone B conditions, which means that there would be greater reduction in fire behavior per foot of fuel modification compared to a traditional fuel modification zone (FMZ). This would aid in mitigating the area north of Building 4 where the FMZ would be deficient by approximately 15 feet. To additionally compensate for this deficiency, as outlined in **MM-WLD-6**, the first 4 floors starting from ground level of the portion of Building 4 of the Peninsula Component, which is within less than 100 feet of natural fuels beyond the fuel modification zone, to be dual pane with both panes tempered glass to mitigate for the reduced FMZ. The window upgrade also exceeds the requirements of Chapter 7A of the CBC and provides additional protection for the structure's most vulnerable, exterior side.

Building Materials and Other Factors

The Proposed Project would be developed in accordance with the 2022 California Fire Code. These codes include provisions for building materials, infrastructure, and defensible space, site access, and fire protection systems (e.g., water, fire flow, fire hydrants, interior fire sprinklers). Each of the proposed buildings would, at minimum, comply with the enhanced ignition-resistant construction standards of the 2022 California Building Code (Chapter 7A). These requirements address roofs, eaves, exterior walls, vents, appendages, windows, and doors and result in hardened structures that have been proven to perform at high levels (resist ignition) during the typically short duration of exposure to burning vegetation from wildfires. Additionally, the Project would use Type I-B construction which would exceed the standards of Chapter 7A which has already been shown to vastly increase ignition resistance compared to older, more vulnerable structures. Further, infrastructure, such as Project roads, water service, fire hydrants, and automatic fire sprinkler systems would be implemented in accordance OSFM standards, and nationally accepted fire protection standards.

Construction materials and methods can prevent or minimize ignitions. Similar case studies indicate that with nonflammable roofs and vegetation modification from roughly 32–60 feet in Southern California fires, 85%–95% of the homes survived (Howard et al. 1973; Foote and Gilless 1996). Similarly, in San Diego County, post fire assessments indicate strongly that the building codes are working in preventing structure loss: of 15,000 structures within the 2003 fire perimeter, 17% (1,050) were damaged or destroyed. However, of the 400 structures built to the 2001 codes (the most recent at the time), only 4% (16) were damaged or destroyed. Further, of the 8,300 homes that were within the 2007 fire perimeter, 17% were damaged or destroyed. A much smaller percentage (3%) of the 789 homes that were built to 2001 codes were impacted and an even smaller percentage (2%) of the 1,218 structures built to the 2004 Codes were impacted (IBHS 2008).

A vast wildland urban interface already exists in the areas adjacent to the development site, with some older, more fire-vulnerable structures, constructed before stringent fire code requirements were imposed on residential development, with varying levels of maintained fuel modification buffers in the area. This also includes the structures presently located on the Project sites which were constructed prior to Building Code updates that increased requirements to make structures more ignition-resistant. Under existing conditions, the structures are more receptive to ignition and therefore put students at a greater risk than the proposed new buildings which would have superior ignition resistance due to construction to modern building codes and the requirements of Type I-B construction.

Finally, while 100 feet of fuel modification is required by multiple state regulations as described above, the same state regulations allow for the provision of alternative materials and methods to meet the intention of the code as outlined in CFC Sections 104.9 - 104.10. To compensate for the described deficiency, the Proposed Project would require exterior glazing in windows (and sliding glass doors, garage doors, or decorative or leaded glass doors) on the first 4 floors starting from ground level of the portion of Building 4 which is within less than 100 feet of natural fuels beyond the fuel modification zone to be dual pane with both panes tempered glass (**MM-WLD-6**). When met by a fire, a single-pane glass window approximately deflects 70% of convective heat, transmits 10% and approximately absorbs 20% while reflecting 20% of radiant heat, transmitting 60%, and absorbing 20%. Dual-pane windows perform even better and last approximately twice as long as single-pane during fire exposure, but tempered glass is even more resistant to high heat and high impact (CSFS 2012). Quarles et al. (2010) provides strong endorsement for tempered glass performance. His research and tests conclude that multi-pane (2–3 panes) with at least one pane tempered is well suited for wildfire exposures. He indicates that tempered glass is at least four times stronger and much more resistant to thermal exposures than normal annealed glass. The use of dual pane, both panes tempered glass around the exterior of the structure provides several benefits, with thermal exposure performance the most important for this study. The characteristics of tempered glass make it an ideal use in this case due to the size of the windows on the exposed side of the structure. Larger windows, when not tempered, are more likely to drop cracked glass than smaller windows and allow convective heat and embers to enter the structure (CSFS 2012).

Summary

The lack of many fires having occurred near the Proposed Project site during the historical record, as discussed in Section 4.16.1 Existing Conditions, can be largely attributed to the presence of vast development that predates the dataset. Such development makes the spread of wildfire less likely due to the presence of infrastructure that is non-combustible or less likely to ignite than natural fuels. Further, the area’s development would have also meant emergency response to any ignition would have likely been faster with greater access to water than in a wildland setting. Given the large amount of development in the area, a large wildfire advancing through a vast bed of natural fuels towards the Project site, specifically the Peninsula Component site, is not a threat, as seen in the recent historical record. This leaves the adjacent canyons as the greatest threat to the Project from a wildland fire perspective. This area is limited in size and thus should any ignition occur, it would not have to spread very far to reach the Project at the top of the slope. However, while there is certain risk of wildland fire, available construction practice, including, but not limited to, fire-retardant materials and brush management requirements, that will be employed as part of the Proposed Project, would reduce the risk to those residing in the area.

Given the anticipated growing population of the County’s wildland urban interface areas, including in the City, and the region’s fire history, it can be anticipated that periodic wildfires will occur in the open space areas, even in isolated canyons such as the vegetated areas west, north, and east of the Peninsula Component site where there is little fire history. This was exemplified by the 2024 Montezuma Fire, which burned approximately three quarters of a mile away from the Project site in vegetation and terrain similar to that found adjacent to the Project site. However, unlike most of the structures directly exposed to the Montezuma Fire, the Proposed Project would include a comprehensive, layered fire protection system. The Proposed Project would introduce construction and an increased population and therefore additional potential ignition sources to the site; however, all new structures would be constructed to, at minimum, 2022 CBC Chapter 7A, and 2022 CFC standards. Buildings on the Peninsula Component site would also implement a fire hardened landscape, highly ignition resistant structures of Type I-B construction that exceed the requirements of Chapter 7A, and a 100-foot wide FMZ separating structures from wildland fuels (except north of Building 4, which would include 85 feet of FMZ). Fires from off site would not have continuous fuels across this site and would therefore be expected to burn around rather than within the site.

The Proposed Project would not result in the heightened fire hazard typically associated with the wildland urban interface, since the entirety of the Project is being converted to high density, ignition resistant structures and landscaping. As previously discussed, the fire hazard of wildland urban interface areas is more closely correlated to lower density residential areas that have combustible vegetation between homes that allow for fire spread. The ignition-resistant features of the Proposed Project would form a redundant system of protection to minimize the likelihood of exposing residents and visitors, as well as structures, to the uncontrolled spread of a wildfire. This same fire protection system would provide protections from an on-site fire spreading to off-site vegetation. As such, accidental fires within the maintained landscape or structures within the Proposed Project would have limited ability to spread. The Project, once developed, would not facilitate wildfire spread and would reduce fire intensity to levels that would be manageable by firefighting resources for protecting the site's structures, especially given the ignition resistance of the structures and the planned ongoing maintenance of the entire site landscape. Therefore, wildfire occurrence, frequency or size would not be significantly exacerbated by construction or operation of the Proposed Project. With adherence to all required building and fire codes, and with implementation of **MM-WLD-3** through **MM-WLD-6**, the Proposed Project would not exacerbate wildfire risks, due to slope, prevailing winds, and other factors, and thereby would not expose Project residents to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be **less than significant with mitigation incorporated.**

3. Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Proposed Project would include modifications to existing on-site infrastructure including roadways, connections to service utilities (e.g., water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services), water drainage and water quality improvements, and fuel breaks (e.g., fuel modification zones). The potential for each type of improvement to exacerbate fire risk is described below.

Fuel Modification Zones

In accordance with the OSFM's defensible space and fuel management zone standards, FMZs would be provided for those portions of the proposed development that are adjacent to open space areas. Development of the Peninsula Component, as shown in Figure 4.16-2, would include a nearly complete 100-feet of fuel modification between the vegetated hillsides to the east, north, and west and on-site structures. The FMZ specifications would be in compliance with the requirements described in the Vegetation Management and Setbacks sub-section in response to Threshold WLD-2. FMZs would be maintained on at least an annual basis or more often as needed to maintain the fuel modification buffer function. FMZs are designed to provide vegetation buffers that gradually reduce fire intensity and flame lengths from advancing fire, and would reduce, rather than exacerbate, wildfire risk. Per **MM-WLD-2,** adequate defensible space must be created before bringing any combustible materials on to the Project site, and vegetation management activities would occur prior to the start of construction and throughout the life of the Project. Consequently, the associated vegetation management activities would not exacerbate fire risk, provided that fuel modification and other vegetation management activities are implemented and enforced according to state requirements. The proposed vegetation management activities would reduce the fire risk by thinning or removing combustible vegetation and implementing a landscape plan with low-fuel-volume plants in accordance with OSFM plant selection guidelines in order to provide a reasonable level of protection to structures from wildland fire.

Roads

The Proposed Project would involve construction of an internal circulation network of access roads, as well as connections to the existing circulation system. The presence of increased human activity introduces new potential ignition sources to the Project area, but vehicular ignitions would be less likely as there would be less vehicle traffic anticipated in the area compared to current conditions due to a substantial reduction in the number of parking spaces at the Peninsula Component site (403 to 15) and a corresponding increased reliance on alternative means of transportation. (See Table 2-1, Existing Uses Summary, and Table 2-2, Proposed Evolve Student Housing Summary.) Further, vegetation management would be present along all roadways internal to the Project site.

Construction of Project roadways, including a 26-foot-wide looping perimeter access road surrounding the Peninsula Component site, and connections to existing roadways would provide increased accessibility for SDFRD. Further, site access, including road widths and connectivity, would comply with applicable emergency access standards that result in roads that can facilitate emergency vehicle access during Project construction and operation. Roadside fuel modification would consist of fuel modification Zone A, which would include irrigated, maintained fire-resistant plantings. Therefore, installation and maintenance of site access roads in accordance with all relevant development codes would not exacerbate wildfire risk.

Utilities

As discussed in Section 4.15, Utilities and Service Systems, new and existing electrical utility service lines would be relocated underground as part of the Proposed Project. There would be varying levels of change to utility service lines, including those for water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications services, as described in Section 4.15. Given that there would be some level of upgrades and work done to the existing utility infrastructure, they would require ground disturbance, and the use of heavy machinery associated with trenching. Thus, the installation of these utility service lines would introduce new potential sources of ignition to the site, such as the use of heavy machinery, welding, or other such work. Water supply and fire hydrants would be consistent with applicable Design Standards. Installation of water service and fire hydrants would ensure water availability for firefighting resources. SDSU would be responsible for long term funding and maintenance of private roads and fire protection systems, including fire sprinklers and private fire hydrants. Additionally, as previously discussed and outlined in **MM-WLD-2**, vegetation management requirements would be implemented at commencement and throughout the construction phase. Since electrical lines will be placed underground and fuel modification would be in place prior to all utility-related work, construction and operation of the utility infrastructure associated with the Proposed Project would not exacerbate wildfire risk.

Summary

Given that the activities involved with installation or maintenance of associated infrastructure would require ground disturbance and the use of heavy machinery associated with trenching, grading, site work, and other construction and maintenance activities, the installation of related infrastructure could potentially result in temporary or ongoing impacts to the environment. The installation and maintenance of roads, service utilities, drainage and water quality improvements, and vegetation management activities are part of the Proposed Project and analyzed throughout this Draft EIR. As such, any potential temporary or ongoing environmental impacts related to these components of the Proposed Project have been accounted for and analyzed in this Draft EIR as part of the impact assessment conducted for the entirety of the Proposed Project. Additionally, the Proposed Project would be required to comply with all regulatory requirements and mitigation measures outlined within this

Draft EIR for the purposes of mitigating impacts associated with trenching, grading, site work, and the use of heavy machinery. No adverse physical effects beyond those disclosed in this Draft EIR would occur as a result of implementation of the Proposed Project's associated infrastructure.

Installation and maintenance of Project roads, service utilities, fuel modification, drainage and water quality improvements, and other associated infrastructure would not exacerbate wildfire risks provided that the measures outlined in **MM-WLD-2** are implemented along with appropriate fire prevention, access, and vegetation management activities as required by the OSFM, and state requirements. Therefore, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those disclosed in this Draft EIR, and impacts would be **less than significant with mitigation incorporated.**

4. Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Vegetation plays a vital role in maintaining existing drainage patterns and the stability of soils. Plant roots stabilize the soil, and leaves, stems and branches intercept and slow water, allowing it to more effectively percolate into the soil. Removal of surface vegetation reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris or mud-flows. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases for areas recently burned by large wildfires (Moench and Fusaro 2012). However, as noted in Section 4.6, Geology and Soils, the formational soils on the site are dense and there is no regional groundwater within the upper 50 feet of the ground surface, which means the potential for liquefaction and associated secondary effects such as landslides is very low. Further, based on a review of all available data as well as borings drilled near the top of slopes, potential for overall slope instability was not observed.

Additionally, as discussed in Section 4.9, Hydrology and Water Quality, the Proposed Project sites are not located within a 100- or 500-year floodplain. The Proposed Project would be developed adjacent to slopes that feed Alvarado Canyon Creek. According to fire history records, no fires have burned on the slopes adjacent to the Project site since 1944, and conditions associated with post-fire slope instability are not currently present. Under existing conditions, if a fire were to occur in the area, vegetation that stabilizes soils on the Project Site-adjacent slopes could be burned and lead to increased erosion. As part of the Proposed Project, fuel modification zones would be installed on these slopes. While the thinning associated with Zone B of the fuel modification plan in this area would reduce some of the vegetation on the slopes adjacent to the Proposed Project, only 50% of vegetation would be removed. A fire burning through the area of thinned vegetation would burn at a lower intensity due to the reduced fuels available. This would result in a higher likelihood that root systems survive and continue to provide slope stabilization. A fire burning through untreated fuels would burn at a higher intensity and possibly result in no vegetative matter remaining which would increase erosion potential. However, given the fire protection features of the Proposed Project such as the water supply system, fire sprinklers, ignition resistant construction, fire access, and fuel modification, it is unlikely that any fire would spread from the Proposed Project to this area. Additionally, the Proposed Project would involve the installation of non-flammable impervious surfaces such as roadways that would divert stormwater and would include irrigated maintained, landscaping throughout the interior of the site that would inhibit erosion.

In summary, while a fire occurring on a landscape can increase erosion potential, the Proposed Project would be stabilized during the construction phase, include infrastructure for diverting stormwater, and would include thinning of fuels on the most prominent slope which would reduce fire intensity, giving existing plants the best chance to survive and continue to provide slope stabilization. Due to those factors, the Proposed Project would not expose people or structures to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be **less than significant.**

4.16.5 Cumulative Analysis

The cumulative context considered for the Proposed Project's potential wildfire impacts is San Diego County, and more specifically, the City of San Diego, since all nearby projects will have to conform to standards at least as stringent as the Proposed Project.

As discussed in section 4.16.1, CAL FIRE has mapped areas of fire hazards in the state based on fuels, terrain, weather, and other relevant factors. As described above, the Peninsula Component of the Project site is located in a Very High FHSZ. The Proposed Project, combined with other projects in the region, would increase the population and/or activities and potential ignition sources in the area, which may increase the potential of a wildfire and increase the number of people and structures exposed to risk of loss, injury, or death from wildfires. However, as mentioned earlier, given the density of the development that is planned, the risk is lower than it would be in a low-density wildland urban intermix. Individual projects located within SDFRD jurisdiction are required to comply with applicable City fire codes and their respective building codes, which have been increasingly strengthened as a result of severe wildfires that have occurred in the last two and a half decades. The fire and building codes include fire prevention and protection features that reduce the likelihood of a fire igniting on a construction project and spreading to off-site vegetated areas. These codes also protect projects from wildfires that may occur in the area through implementation of brush management and fuel management zones, ensuring adequate water supply, preparation of fire protection plans, and other measures. The effectiveness of these codes is proven by the statistics discussed in Threshold 2, which compare home losses during recent wildfires for homes built before and after recent code updates.

Suggestions that placing new residential projects in the County's wildland–urban interface would increase the risk of fire ignition are not consistent with available research. According to the available evidence, no large fires in Southern California since 1990 were determined to have been started within a high-density, ignition-resistant development. Syphard and Keeley (2015) summarized all wildfire ignitions included in the CAL FIRE FRAP database dating back over 100 years. They found that in San Diego County, equipment-caused fires were by far the most numerous, and these also accounted for most of the area burned; power-line fires were a close second. Ignitions classified as equipment-caused frequently resulted from exhaust or sparks from power saws or other equipment with gas or electrical motors, such as lawn mowers, trimmers, or tractors (Syphard and Keeley 2015). These ignition sources are typically associated with lower-density housing, not higher-density housing such as that proposed. In addition, electrical transmission lines would be undergrounded in the Project area, nullifying the risk from electrical transmission line vegetation ignitions.

Data indicates that lower-density housing poses greater ignition risk. In the Southern California study, ignitions were more likely to occur close to roads and structures, and at intermediate structure densities (Syphard and Keeley 2015). This is likely because lower-density housing creates a wildland–urban intermix rather than an interface. The intermix places housing among unmaintained fuels, whereas higher-density housing, such as the Proposed Project, converts all fuels within the footprint and provides a wide, managed fuel modification zone separating homes from unmaintained fuel. Syphard and Keeley (2015) determined that "[t]he WUI [wildland urban interface], where housing density is low to intermediate, is an apparent influence in most ignition maps." This further enforces the notion that lower-density housing is a larger ignition issue than higher-density communities. A different study found that “development of low-density, exurban housing may also lead to more homes being destroyed by fire” (Syphard et al. 2013). Neither of these studies considered the fire hazard and risk reduction associated with fire modification zones and ignition-resistant structures. In addition, another study found that frequent fires and lower-density housing growth may lead to the expansion of highly flammable exotic grasses that can further increase the probability of ignitions (Keeley 2012). This is not the case with the Proposed Project, where the landscapes would be managed and maintained to remove exotic fuels that may become established over time. The plant palette restrictions in accordance with OSFM guidelines, combined with maintenance by the responsible parties, would minimize the establishment and expansion of exotic plants, including grasses. Based on research of the relevant literature and extensive conversations with active and retired fire operations and prevention officers, there is no substantial evidence that new high-density developments built to the requirements of the 2022 California Building Code and modern building codes increase the risk of wildfire ignition. Rather, the data indicate that roadways, electrical distribution lines, and lower-density residential projects are the primary causes of increased wildfire ignition. The Proposed Project would provide roadside fuel modification throughout the Project site, and electrical lines would be subterranean.

Furthermore, other cumulatively considerable projects would be required to comply with San Diego Fire Code vegetation clearance requirements. The San Diego Fire Code, applicable building codes, and fire protection plan requirements, ensure that every project approved for construction includes adequate emergency access. The effectiveness of recent building code updates is evidenced by the statistics comparing home losses in recent fires for homes that were built before and after code updates provided in the impact analysis of Threshold 2. Roads for all cumulative projects are required to meet minimum widths, have all-weather surface, and be capable of supporting the imposed loads of responding emergency apparatus. All other future development projects in the service area would be subject to discretionary review by the SDFD and would be required to comply with the City Fire Code and other relevant code requirements and regulations related to fire safety, building construction, access, fire flow, and fuel modification. Therefore, because all cumulative projects are required to comply with these requirements, cumulative impacts related to increased wildfire hazards and emergency response and access would be **less than significant.**

4.16.6 Summary of Impacts Prior to Mitigation

Effects on Emergency Response/Evacuation Plan(s)

Overall, the Proposed Project would ensure Project residents would be able to evacuate to the designated assembly point in approximately 10 minutes from the Peninsula Component site and 7 minutes from the University Towers East Component site. The Proposed Project does not propose to eliminate any existing evacuation routes and would provide a shelter in place alternative for Project residents. Considering these facts and others discussed in the impact analysis, the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and would not interfere with evacuation response planning or result in inadequate emergency access. However, to ensure Project occupants are fully informed of potential wildfire hazards and proper evacuation procedures and, thereby reduce any potential significant impacts, mitigation is recommended requiring implementation of an appropriate program to inform residents of proper emergency response and evacuation procedures. As a result, impacts would be **potentially significant without mitigation incorporated.**

Occupant Wildfire Exposure

While the layered fire protection system of the Proposed Project described throughout this section and within Appendix J-1, Fire Protection Plan, would safeguard Project occupants, there would be a small area north of Building 4 where the Fuel Modification Zone would be 15 feet narrower than the required standard. As a result, absent mitigation, impacts would be **potentially significant without mitigation incorporated.**

Associated Infrastructure Fire Risks

Installation and maintenance of Project roads, service utilities, fuel modification, drainage and water quality improvements, and other associated infrastructure would require ground disturbance, and the use of heavy machinery associated with trenching, grading, site work, and other construction and maintenance activities. The installation of related infrastructure could potentially result in temporary or ongoing impacts to the environment including a temporarily elevated ignition risk. For this reason, absent mitigation the impacts of construction and operation of associated infrastructure of the Proposed Project would be **potentially significant without mitigation incorporated.**

Post-Fire Flooding/Landslides

The Proposed Project would be stabilized during the construction phase, include infrastructure for diverting stormwater, and would include thinning of fuels on the most prominent slope which would reduce fire intensity, giving existing plants the best chance to survive and continue to provide slope stabilization. Further, digital review of available information, as well as coring samples, indicate that there is no potential for slope instability and the site is not within a 100- or 500-year flood zone. Due to those factors, the post-fire flooding and landslide impacts of the Proposed Project would be **less than significant.**

4.16.7 Mitigation Measures

MM-WLD-1 Prior to occupancy of the first housing unit to be constructed as part of the Proposed Project, California State University (CSU)/San Diego State University (SDSU), or its designee shall implement a Wildfire Education Program (WEP). The Program would provide targeted outreach to residents living in a fire risk area in order to foster a community that has fire adaptive capacity. The educational program would cover a wide range of information such as residential evacuation planning, activities in a fire risk area, and more, all provided in easy-to-understand, graphically based materials. The educational program would be based on a layered approach to wildfire awareness that includes both passive and active features. The program would be ongoing in order to maintain high wildfire awareness even as the community grows and evolves. The program would feature bi-annual email and/or mailers, a custom website, including accessibility on the University's Office of Emergency Services website, webinars, and a new resident packet.

In addition, the University Office of Housing Administration would identify a Fire Safety Coordinator that is responsible for:

1. Preparing and distributing the annual reminder notice that shall be provided to each occupant encouraging them to review this WEP and be familiar with community evacuation protocols.

2. Coordination with local fire agencies to hold an annual fire safety and evacuation preparedness informational meeting for occupants. The meeting should be attended by representatives of appropriate fire agencies and important fire and evacuation information should be reviewed.
3. Maintaining fire safety information on the development's website, including the WEP and materials from the "Ready, Set, Go!" Program.

MM-WLD-2 Concurrent with commencement of construction activities, prior to the start of import of combustible construction materials, and continuing throughout construction, California State University (CSU)/San Diego State University (SDSU), or its designee, shall implement vegetation management requirements pursuant to the Fire Protection Plan (FPP) and Office of the State Fire Marshal's (OSFM). Adequate fuel breaks around all grading, site work, and other construction activities in areas where there is flammable vegetation and combustible construction materials shall not be brought on site without prior OSFM approval, or San Diego Fire Department approval should the OSFM decide to delegate the responsibility.

MM-WLD-3 If biological constraints prevent implementation of full code-compliant Fuel Modification Zones (FMZs), prior to the commencement of construction activities, CSU/SDSU, or its designee, shall revise the fire Protection Plan (FPP) to include alternative materials and methods (AM&Ms) of construction with justification of fire hardening that meets or exceeds the intent of a full 100 feet of fuel modification, such as a concrete masonry unit (CMU) fire wall, higher rated fire resistant siding, dual paned tempered glass windows, or other code exceeding measures. The updated FPP that describes the AM&Ms and justification shall be submitted to San Diego Fire and Rescue Department.

MM-WLD-4 Following completion of Project construction, CSU/SDSU, or its designee, shall obtain an FMZ inspection and report from a qualified inspector by May 31 of each year confirming that vegetation management activities throughout the Project Site have been performed. If the FMZ areas are not compliant, CSU/SDSU, or its designee, will have a specified period to correct any noted issues.

MM-WLD-5 The widths of the irrigated Zone A are proposed to be extended beyond the 30-foot-wide requirement. The Zone A fuel modification zone for the Proposed Project would be at least 35 feet wide and would be up to 100 feet in width. The Proposed Project's Zone A would consist of irrigated landscaping of fire-resistant, frequently maintained vegetation as well as non-combustible roads and walkways including the 26-foot-wide looping fire road. Zone A conditions result in a greater reduction in fire behavior than Zone B conditions, which means that there would be greater reduction in fire behavior per foot of fuel modification compared to a traditional FMZ.

MM-WLD-6 During construction of Peninsula Component Building 4, CSU/SDSU, or its designee, shall utilize dual pane windows on the first 4 floors starting from ground level which is within 100 feet of natural fuels. Both panes shall be tempered glass to mitigate for a reduced fuel modification zone.

4.16.8 Level of Significance After Mitigation

Potential Project impacts to current evacuation plans, wildfire exposure to Project occupants, and wildfire hazards created by associated infrastructure are potentially significant, but would be reduced to **less than significant with mitigation incorporated.** Other potential impacts related to wildfire for the construction and operation of the Proposed Project would be **less than significant.**

4.16.9 References

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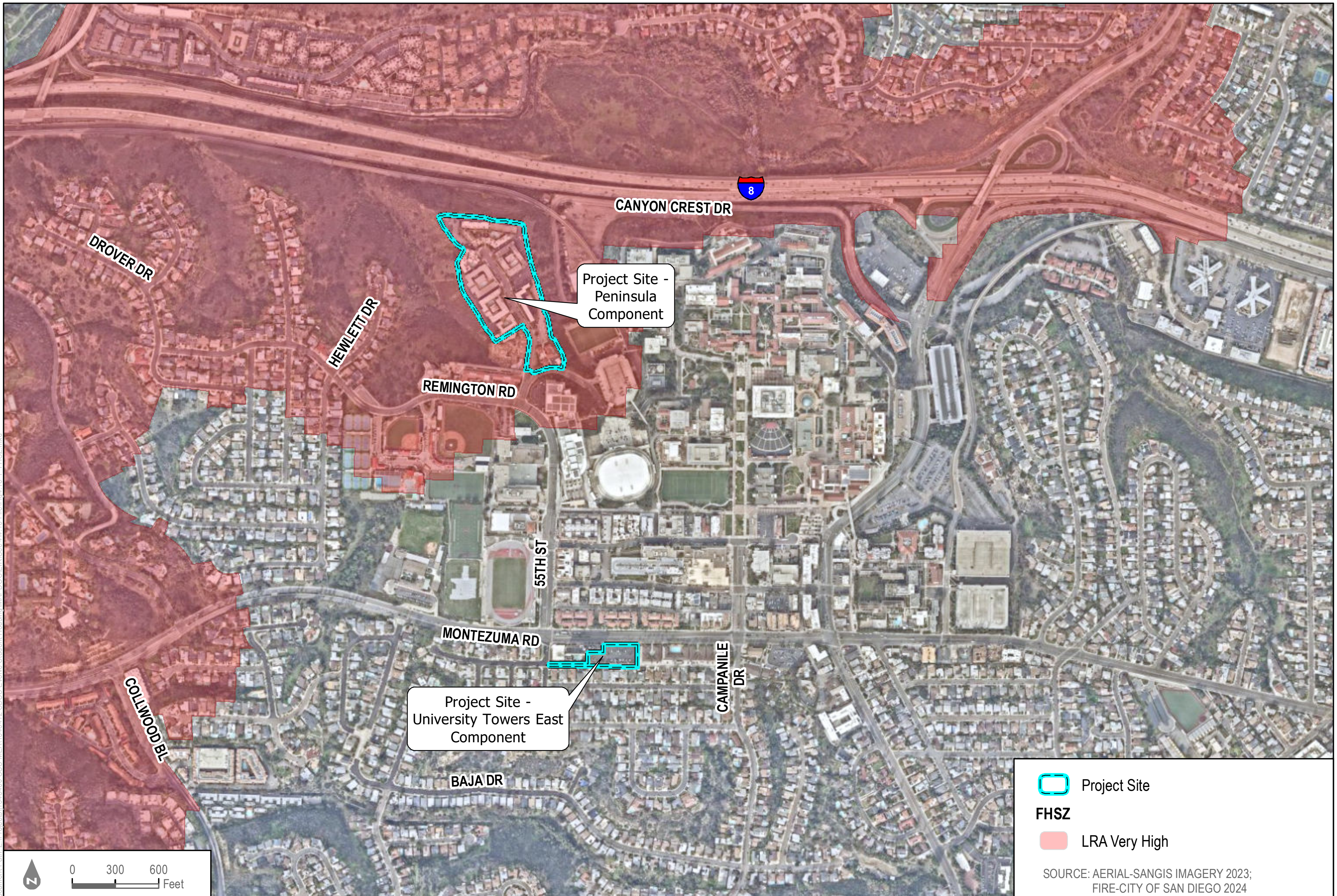

SDSU Evolve Student Housing

San Diego State University

Figure 4.16-1
FHSZ Map

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Project Boundary
Assessor's Parcels
Proposed Building
Proposed Access Roads
Project Impact
Fuel Modification Zones
FMZ Zone A (≥ 27 feet)
FMZ Zone B (100 feet)
FMZ Dimension

0 75 150 Feet

AERIAL-SANGIS IMAGERY 2023; PARCELS - SANGIS;
DEVELOPMENT - GENSLER 2024

SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 4.16-2
Conceptual Fuel Modification Plan - Peninsula Component

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5 Other CEQA Considerations

This chapter presents analysis of the potential growth-inducing impacts of the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project), summarizes the Project's effects found not to be significant, addresses the potential significant irreversible changes associated with the Proposed Project, and identifies the significant and unavoidable impacts that would result from Project implementation.

5.1 Growth Inducement

5.1.1 Purpose

California Environmental Quality Act (CEQA) Guidelines Section 15126(d) requires that an environmental impact report (EIR) discuss the growth-inducing impacts of a project. The CEQA Guidelines require the discussion to consider the ways in which a project "could foster economic or population growth, or the construction of additional housing either directly or indirectly, in the surrounding environment" (14 CCR 15126.2[d]). Generally speaking, a project is considered growth-inducing if it would remove obstacles to population growth (i.e., would remove obstacles to any growth beyond the population increase that would occur as a direct result of project implementation). The analysis of growth-inducing impacts as a separate consideration is required because increases in population beyond those resulting directly from a project may tax existing community service facilities and thereby require the construction of new facilities that could cause significant environmental effects not otherwise addressed in the EIR.

5.1.2 The Project's Growth-Inducing Potential

Background

As discussed in Section 4.12, Population and Housing, the City of San Diego (City) population is expected to increase by 66,359 (4.8%) by 2050; the population in the College Area, within which the SDSU campus is located, is expected to increase by 2,501 (9.4%) by 2050 (SANDAG 2024a, 2024b). In addition, rapid statewide population growth over the last several years has placed significant strains on the state's higher education facilities, including SDSU. Economic and population growth in the San Diego region is projected to continue at a steady rate through 2050. Thus, based on current forecasts, population growth in San Diego generally, and the College Area specifically, would result in substantial increased demand for housing in the area.

The Proposed Project would assist in reducing the strains placed on the local housing market by accommodating campus-specific growth in a sustainable manner. Specifically, the Proposed Project would provide student housing on campus to accommodate a net increase of approximately 4,468 beds for students who otherwise would live off campus. The Proposed Project would increase on-campus beds that would serve to accommodate both current students and future approved enrollment.

Induced Population Growth Analysis

Population growth is projected in regional growth forecasts that are the backbone of local General Plan Housing Elements, policies, land use designations, and regulatory processes used to accommodate increased housing demand. Induced population growth typically results from the construction of housing or infrastructure that potentially facilitates growth. The growth-inducing impacts of a project are the ways in which the proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The environmental impacts associated with development of the Proposed Project, including the potential impacts associated with a net increase of approximately 4,468 student beds to the main campus inventory, are addressed throughout Chapter 4, Environmental Analysis, of this Draft EIR. Portions of that analysis relevant to growth inducement are summarized below.

The housing to be constructed in this case is student housing, housing intended to serve the residents on a temporary basis, while the students are enrolled at SDSU. These same students would otherwise be living elsewhere in the area and commuting to school. Thus, the housing would not foster population growth, though it could potentially foster economic growth to the extent the students remain in the area to pursue careers following graduation. If these same students were to stay in the area and pursue careers, that potentially and indirectly could lead to the construction of additional housing in the surrounding environment at some time in the future. However, any such associated impacts would be speculative at this point. Moreover, these same students could have lived elsewhere while attending SDSU and pursued careers and indirectly caused additional housing construction in the area, whether or not the Project were built. As such, any link to such an outcome is tenuous.

As discussed in Section 4.12, within the College Area Community Plan and the San Diego Association of Governments Regional Plan, the Project site is designated for residential land use. The San Diego Association of Governments' growth projections for this area have accounted for the increase in housing units that would be developed as part of the Proposed Project. Additionally, the Project would provide campus housing to meet the needs of previously approved growth—currently enrolled students, as well as previously approved future SDSU students. Moreover, the Proposed Project would provide housing on campus, reducing the number of commuter students, and thus reducing pressure on the regional and local transportation networks.

Additionally, as discussed in Section 4.15, Utilities and Service Systems, while development of the Proposed Project would require new points of connection for the residence halls for domestic water, fire water, and sewer, these upgrades would be Project-centric, installed to ensure that utilities already existing within the campus area are adequate to serve the increased number of students living on campus. Upgrades would not extend utility facilities to any geographic areas that are not currently served by the public utilities. These upgrades would not facilitate future growth and would merely serve the student residents who would live in the Proposed Project housing.

In summary, because the Proposed Project would provide additional campus housing to accommodate the housing needs of a previously planned and approved student resident population, would be consistent with area plans and forecasted development, and would not remove any major obstacles to area population growth, the Proposed Project would not result in significant growth-inducing impacts.

5.2 Effects Found Not to Be Significant

5.2.1 Introduction

California Public Resources Code, Section 21100(c), requires that an EIR contain a statement briefly explaining the reasons why various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR. The CEQA Guidelines provide that the statement may be in the form of an attached copy of the Initial Study (14 CCR 15128).

In this case, an Initial Study (Environmental Checklist) was prepared for the Project and circulated with the Notice of Preparation for public review on August 23, 2024 (Appendix A, Initial Study, Notice of Preparation, and Scoping Comments). The Initial Study concluded that the Proposed Project would not result in potentially significant impacts relative to the following environmental topics:

- Agriculture and forestry resources
- Mineral resources

For the reasons provided in the Initial Study, these topics need not be addressed further in this EIR. For information purposes, the analysis from the Initial Study addressing agriculture and forestry resources and mineral resources is presented below.

5.2.2 Agricultural and Forestry Resources

According to the California Important Farmland Finder (California Department of Conservation 2024a), the Project site is designated as Urban and Built-Up Lands. The Project site does not include any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or land under a Williamson Act contract. Therefore, development of the Proposed Project would not convert agricultural land to non-agricultural uses.

No forest land, timberland, or timberland production areas (as defined in California Public Resources Code, Sections 12220[g], 4526, and 51104[g]) are within or adjacent to the Project site. Therefore, the Proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production areas or result in the loss or conversion of forest lands to non-forest uses, because none exist. The Proposed Project would be constructed on previously developed land that does not contain any agricultural land or forestry resources. Impacts to agricultural and forestry resources would not occur as a result of development of the Proposed Project; therefore, potential impacts to agricultural resources are not discussed further in this EIR.

5.2.3 Mineral Resources

The Project site is within Mineral Resource Zone 3, as shown on Figure CE-6, Generalized Mineral Land Classification, in the Conservation Element of City of San Diego General Plan (City of San Diego 2024). The Mineral Resource Zone 3 classification indicates areas of known or inferred mineral resources, the significance of which is undetermined based on available data (California Department of Conservation 2024b). Although the significance of mineral resources in the area has yet to be identified, the SDSU campus does not contain locally important resource recovery sites due to its lack of lowland valleys and washes, which tend to support mineral resource deposits, nor does the area underlying Montezuma Road and its environs in the area of the Project site. As such, the Project would not impact mineral resources, and this topic is not discussed further in this EIR.

5.3 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) requires that an EIR identify any significant, irreversible environmental changes associated with a proposed project. Such changes include, for example, the intensification of land use, the use of non-renewable resources during the initial and continued phases of a project, or irreversible damage from environmental accidents associated with a project. The potential for such environmental changes as it relates to the Proposed Project is discussed below.

5.3.1 Intensification of Land Use

Under the Proposed Project, the existing developed uses would be removed to permit the expansion of campus student housing facilities. Redevelopment of the Project site to accommodate more-intensive land uses would result in a long-term increase in housing and employment, as discussed in Section 4.12 and under Section 5.1, Growth Inducement. However, despite proposing a more-intense land use, the Project would improve the integration of existing uses within the campus by creating a functional use of space within and on the campus. As a result, the commitment of non-renewable resources is reasonable and justified under the circumstances and, with appropriate mitigation, impacts associated with intensification of land uses would be less than significant.

5.3.2 Non-Renewable Energy Consumption

Construction of the Project would result in the use of non-renewable resources and energy sources. In particular, Project construction would require fossil fuels, a non-renewable resource, to power construction, delivery, and employee vehicles. Construction equipment also would use electricity and natural gas. Use of these energy sources would be a permanent commitment of resources. In addition, a variety of resource materials would be used during the construction process, including steel, wood, concrete, and fabricated materials. The commitment of such materials and fuels would be irreversible.

Once operational, the Project would consume more energy on a daily basis than what is presently consumed by the existing development. Assuming at least a portion of the energy used during operations would be provided by non-renewable resources, the Project would result in the commitment of non-renewable energy resources during operation (see Section 4.5, Energy, for analysis of the Proposed Project's impacts related to energy consumption).

Although non-renewable resources would be used during the construction and operational phases of the Project, the commitment of these resources is reasonable and justified under the circumstances, particularly because the Proposed Project is designed to accommodate the existing and projected demand for student housing and, accordingly, would result in a decrease in greenhouse gas emissions relative to existing conditions due to the fact that the students that would live in the proposed housing would no longer need to commute to school, thereby resulting in reduced vehicle miles traveled. Further, the Project would obtain Leadership in Energy and Environmental Design (LEED) Silver rating by implementing a variety of water and energy efficiency features that would offset some of the impacts related to these resource areas. The California State University's and SDSU's commitment to achieving LEED Silver rating for the Project ensures that it would be designed and operated in an environmentally conscious and sustainable manner.

Because the Project would not consume an unusual amount of energy or materials and would implement design features to operate in a sustainable manner and reduce GHG emissions, potential impacts associated with non-renewable energy consumption would be less than significant.

5.3.3 Accidental Hazardous Release

The CEQA Guidelines also require a discussion of the potential for irreversible damage caused by an accidental release of hazards associated with a project into the environment. As described in Section 4.8, Hazards and Hazardous Materials, the Proposed Project has the potential to expose the public and the environment to hazards associated with on-site releases of hazardous materials, universal wastes, and other hazardous materials and wastes that may be present in the existing buildings to be demolished. Additionally, construction and demolition activities would require the use of hazardous materials and would likely result in the generation of hazardous wastes. These materials would be transported and handled in accordance with all federal, state, local, and SDSU guidelines and regulations applicable to the management, use, and storage of hazardous materials. Compliance with regulatory requirements and implementation of **Mitigation Measure (MM) HAZ-1**, Pre-Demolition Hazardous Materials Abatement, would reduce any potential for reasonably foreseeable upset or accident conditions to occur on site during demolition and construction activities, and impacts would be less than significant with mitigation incorporated.

Further, although the Proposed Project may result in an increase in routine transport, use, and disposal of hazardous materials and wastes generated by the additional campus buildings, all hazardous wastes would continue to be managed and handled in full compliance with SDSU environmental health and safety procedures, as well as federal and state law (see Section 4.8 for analysis of the Proposed Project's impacts related to hazardous waste and materials). Although accidental spills and unauthorized releases of hazardous materials during construction, including ground clearing and foundation excavation, potentially could result in soil contamination, as discussed in Section 4.8, these potentially significant impacts would be mitigated to less than significant.

In light of the multitude of federal, state, and local regulations governing the transport, use, and storage of hazardous substances, the Proposed Project would not involve activities that would damage the environment or pose a risk to public health; therefore, impacts associated with irreversible damage from environmental impacts associated with the Project would be less than significant.

5.3.4 Biological Resources

The Project site would be altered by building removal, grading, and development. Specifically, the Project would result in permanent direct impacts to 14.27 acres of vegetation communities/land cover types within the Project site. Of this, 13.71 acres of impacts would be to existing developed, ornamental, non-native vegetation communities, and disturbed habitat, which would be associated with the redevelopment in the Project site and in brush management zone 1 in the Peninsula Component site. The remaining 0.55 acres of disturbed Diegan coastal sage scrub (a sensitive natural community) and related impacts would occur within brush management zone 2 in the Peninsula Component site.

A complete list of potential impacts is provided in Section 4.3, Biological Resources. Potentially significant direct and indirect impacts to special-status plant and wildlife species, sensitive natural communities, and wildlife corridors would occur. Mitigation to reduce all impacts to less than significant would involve avoidance of breeding and nesting bird season or pre-construction surveys for nesting birds; biological monitoring during all grading, clearing, grubbing, and construction activities; installation of fencing around sensitive vegetation and species within or adjacent to the Project site; prohibition of invasive species in the final landscape plans; implementation of noise monitoring and reduction techniques; coastal California gnatcatcher (*Polioptila* *californica californica*) surveys; and habitat mitigation, if necessary. With implementation of the recommended mitigation measures identified in Section 4.3, all but one potentially significant impacts would be reduced to less than significant. One biological impact associated with construction-related noise would not be reduced to a less than significant, even with the implementation of mitigation. As a result, this impact would be significant and unavoidable.

5.3.5 Historical Resources

As discussed in Section 4.4, Cultural Resources and Tribal Cultural Resources, the Proposed Project would involve demolition of eight apartment buildings on the Peninsula Component site, which were constructed between 1958 and 1967. One of the buildings, Mixquic Hall at 5484 55th Street (Assessor's Parcel Number 462-180-01-00), is considered a historical resource for the purposes of CEQA, as defined by CEQA Guidelines Section 15064.5 (a)(2)–(3). Mixquic Hall meets National Register of Historic Places Criterion C and California Register of Historical Resources Criterion 3; therefore, its demolition would constitute a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. Demolition of this building would result in a significant and avoidable impact.

5.4 Significant Unavoidable Impacts

The Proposed Project would result in significant, unavoidable impacts to the following resources, as discussed in Sections 4.3 and 4.4 of this EIR:

- Cultural resources (historic resources)
- Biological resources (indirect impacts from construction-related noise)

Impacts would be mitigated, but not to a level of less than significant. No feasible mitigation measures exist within the control of the California State University that could reduce impacts to less than significant.

5.5 Mandatory Significance Findings

Section 15065(a)(1) of the CEQA Guidelines states that "a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: (1) substantially degrade the quality of the environment; (2) substantially reduce the habitat of a fish or wildlife species; (3) cause a fish or wildlife population to drop below self-sustaining levels; (4) threaten to eliminate a plant or animal community; (5) substantially reduce the number or restrict the range of an endangered, rare or threatened species; (6) or eliminate important examples of the major periods of California history or prehistory."

In response to condition (1) above, the substantial evidence presented in the Draft EIR supports the conclusion that the Project would not substantially degrade the quality of environment.

The Project would result in a significant unavoidable impact related to indirect impacts to special-status species (coastal California gnatcatcher) due to construction-related noise. As discussed in Section 4.3, of this Draft EIR, MM-BIO-7 would be implemented to reduce potential impacts; however, given the unknown factors that cannot be known until the time of construction, it cannot be ensured mitigation would be feasible, and therefore, would not reduce the impact to less than significant. The impact would be significant and unavoidable. Mitigation measures **MM-BIO-1** through **MM-BIO-8** would be implemented to reduce all other impacts to biological resources identified in Section 4.3 to less than significant. As such, the Project would not (2) substantially reduce the habitat of a fish or wildlife species; (3) cause a fish or wildlife population to drop below self-sustaining levels; (4) threaten to eliminate a plant or animal community; but the Project would have the potential to (5) substantially reduce the number or restrict the range of an endangered, rare or threatened species.

The Project would result in a significant unavoidable impact related to historical resource for the purposes of CEQA, as defined by CEQA Guidelines Section 15064.5 (a)(2)–(3). As described in Section 4.4, Mixquic Hall meets National Register of Historic Places Criterion C and California Register of Historical Resources Criterion 3. Therefore, its demolition would result in a significant impact to a historic resource. **MM-CUL-1** would be implemented to reduce impacts, but would not reduce the impact to below a significant level; this would therefore be a significant and unavoidable impact. This impact would constitute the condition found in number (6), elimination of important examples of the major periods of California history or prehistory.

5.6 References

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6 Alternatives

6.1 Introduction

The California Environmental Quality Act (CEQA) requires the lead agency, in this case the California State University (CSU) Board of Trustees, to consider a range of reasonable and feasible alternatives to the proposed San Diego State University (SDSU) Evolve Student Housing Project (Project or Proposed Project) and analyze the impacts of those alternatives relative to the Proposed Project. By comparing these alternatives to the Proposed Project, the advantages of each alternative can be analyzed and evaluated.

CEQA Guidelines Section 15126.6(a) requires that an environmental impact report (EIR) "describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives." Thus, the focus of this alternatives analysis is on those alternatives that can reduce the proposed project's significant impacts; alternatives that merely reduce the project's less-than-significant impacts receive less attention. Further, Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a range of reasonable alternatives; an EIR need not consider alternatives that are infeasible. "Feasible" is defined in the CEQA Guidelines Section 15364 to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Further, "feasibility" encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App 3d 410, 417). There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the "rule of reason." The "rule of reason" governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision making.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (California Public Resources Code Section 21002.1), the purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

In analyzing alternatives to the Proposed Project, it is important to set forth the Proposed Project objectives. The underlying purpose of the Proposed Project is to provide on-campus housing for more of the SDSU student population thereby enhancing student life on campus and reducing vehicle miles traveled and attendant GHG emissions. Specific Project objectives are as follows:

1. Expand the west campus student residential neighborhood in a manner similar to the student residential neighborhood on the east side of campus, to create housing that is inviting and safe, has a distinct identity, and provides students with supportive amenities such as a dining facility, community spaces, and study areas.
2. Provide food and support services in the immediate vicinity of the Proposed Project site for those students to be housed in the new housing complexes.

3. Increase on-campus student housing options to the maximum degree possible for students currently housed off campus, thereby reducing the demand for student housing in the adjacent off-campus neighborhoods.
4. Replace outdated, low-density, inefficient student housing with more modern, attractive, and energy-efficient facilities.
5. Provide additional student housing on campus in an area that has the capacity to accommodate a large number of student housing beds and associated amenities, unencumbered by other uses that are not easily demolished or relocated.
6. Reduce vehicle miles traveled and related greenhouse gas emissions and increase the walkability of the SDSU campus by providing on-campus housing that includes a variety of student-friendly amenities situated within walking distance of the academic, athletic, and social centers of campus.
7. Take advantage of the limited available buildable area on an urban, built-out campus by maximizing density and number of student beds within the Project site.

The analysis in this Draft EIR indicates that implementation of the Proposed Project would result in significant and unavoidable impacts related to Cultural Resources (historic; Mixquic Hall) and potentially significant and unavoidable impacts to Biological Resources (gnatcatcher, if present). All other potential impacts associated with the Proposed Project would be either less than significant or can be mitigated to less-than-significant levels with mitigation measures identified in this Draft EIR.

In addition to the No Project Alternative below, four Project alternatives were developed during the conceptual planning phase of the Proposed Project. These alternatives were selected in an effort to reduce the Proposed Project's identified significant impacts:

1. A “No Project Alternative,” under which the existing buildings at the Peninsula Component site and the existing parking lot at the University Towers East Component site would remain and no new student residential development would be built;
2. A “Historic Preservation Alternative” under which the eligible historic apartment building known as Mixquic Hall would be retained and the remainder of the Peninsula Component site would be developed with the Amenity Building, the 9-story building and five student residence towers, and the University Towers East Component would be developed as planned;
3. A “Gnatcatcher Avoidance Alternative” under which the Proposed Project buildings on the west side of the Peninsula Component within approximately 300 feet of the Gnatcatcher habitat would not be constructed;
4. A “Reduced Height Alternative” under which all Proposed Project buildings over 5 stories would be reduced by half; and
5. An “Alternative Site Location Alternative” under which the buildings of the Proposed Project would be built on various lots across the SDSU campus.

Analysis of the impacts of each of these alternatives relative to the Proposed Project is presented in this chapter.

6.2 Alternatives Considered but Rejected

A number of alternatives to the Proposed Project were initially considered, but as explained below, were rejected from further consideration due to infeasibility and their inability to meet most of the Project objectives:

1. **Existing Height Alternative.** Several comments received in response to the NOP expressed concern with the proposed building heights and recommended that new buildings be no taller than existing buildings. Under this alternative, the buildings proposed for the Peninsula Component site would be limited to 3 stories, which is the maximum height currently existing within that site. Thus, under this alternative, the Amenity Building, 9-story building, and the five student residence towers/apartment buildings would be built to a maximum of three stories. The University Towers East Component would be built to its proposed height of nine stories. This alternative would not reduce the significant and unavoidable impacts related to historic and biological resources that would occur under the Proposed Project. Further, with the limitation on building height on the Peninsula Component, this alternative would provide substantially fewer new student beds and would fail to meet most of the Project objectives. Therefore, an existing height alternative as described above is not considered further in this Draft EIR.
2. **Off Campus Alternative Locations** – Comments received during the scoping period in response to the NOP included questions whether new student housing could instead be located at an off-campus location. One location suggested was the SDSU Mission Valley site. SDSU Mission Valley is a medium-density, mixed-use, transit-oriented development that includes Snapdragon Stadium, an Innovation District, housing, a hotel, retail, and more than 80 acres of community parks and open space, including a 34-acre River Park. One of the Proposed Project's objectives is to provide on-campus housing for students currently living off campus. As the Mission Valley project is not located within the SDSU campus, locating student housing in Mission Valley would not meet project objectives. Further, campus planning efforts have intended the Mission Valley site to be an upper division and research-centric campus. Lower division and undergraduate students as presently served on the main campus will continue to be served on the main campus consistent with the vision for the development of the university. As for consideration of other off-campus locations, they would likewise not meet Project objectives for creating on-campus housing options and reducing the demand for student housing in adjacent neighborhoods. Therefore, off-site alternatives as described above are not considered further in this Draft EIR.

6.3 Project Alternatives

6.3.1 No Project Alternative

Under the No Project Alternative, the Proposed Project would not be built and the existing land uses would continue in operation on the Project sites. This alternative was selected for its potential to avoid the Proposed Project's potentially significant and unavoidable impacts on biological resources and historic resources; and the potentially significant impacts to geology and soils, hazards and hazardous materials, noise, and wildfire.

Aesthetics. Under the Proposed Project, impacts to scenic vista, trees, rock outcroppings, or historic buildings within a state scenic highway would be less than significant. Additionally, with certain project design features, the Proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Overall, the Proposed Project would have less-than-significant impacts related to aesthetics.

Under the No Project Alternative, because there would be no development of additional buildings, there would be no additional light and glare impacts compared to existing conditions. However, the existing buildings at the Peninsula Component were built over 60 years ago (Zacatepec Hall in 1962, Huaxtepec Hall in 1961, Tarastec Hall in 1962, Metepec Hall in 1959, Zapotec Hall in 1959, Toltec Hall in 1960, and Mixquic Hall in 1958) and are regarded as an eyesore by many neighbors. The Proposed Project would improve the aesthetics of the existing buildings at the Peninsula Component, while under the No Project Alternative, the existing outdated buildings would remain. Under the No Project Alternative, there would not be any new building lighting or lighting around the perimeter of the Peninsula Component site. Also, there would not be any additional lighting at the University Towers East Component site. Overall, impacts related to aesthetics under the No Project alternative would be less as compared to the Proposed Project.

Air Quality. Under the Proposed Project, construction activities would result in an increase in the emission of criteria pollutants. However, the Proposed Project would result in a net reduction in vehicle miles traveled over existing conditions and, correspondingly, a net reduction in vehicular and greenhouse gas emissions. Therefore, the Project would not result in potentially significant impacts to air quality and, instead, would result in a net decrease in certain emissions.

Under the No Project Alternative, because there would be no construction of additional buildings or change in existing uses, there would be no increase in emissions and no potentially significant impacts relating to air quality. However, under the No Project Alternative, the benefits from the reduction of certain emissions under the Proposed Project would not be achieved. Overall, impacts to air quality would be greater when compared to the Proposed Project.

Biological Resources. Under the Proposed Project, there would be potentially significant impacts relating to special status wildlife and plant species, sensitive habitat (coastal sage scrub), and migratory wildlife corridors related to development of the Peninsula Component. Mitigation is proposed to reduce most of the identified impacts to a less-than-significant level, but potential impacts related to noise impacts on special-status species would be significant and unavoidable.

Under the No Project Alternative, because there would be no development of additional buildings, there would be no potentially significant impacts to biological resources. Overall, impacts to biological resources would be less compared to the Proposed Project during the construction period.

Cultural Resources and Tribal Cultural Resources. Under the Proposed Project, impacts to historical resources, specifically Mixquic Hall, would be significant and unavoidable. As to cultural resources, including archaeological and tribal resources, although the Proposed Project sites are developed and disturbed, there is the potential to discover archaeological or paleontological resources during construction activities resulting in potentially significant impacts. However, any potential significant impacts would be mitigated to less than significant with implementation of recommended mitigation measures.

Under the No Project Alternative, the historically significant building, Mixquic Hall, would not be demolished and no significant historical resource impact would occur. Because there would be no development of additional buildings (i.e., no ground disturbance), there would be no potentially significant impacts to cultural, including tribal resources. Overall, impacts to cultural resources and tribal cultural resources would be less compared to the Proposed Project.

Energy. Under the Proposed Project, construction would result in a temporary use of electricity and petroleum due to the use of construction equipment, worker vehicles, vendor trucks, and hauling trucks. However, this increase in energy use would be temporary and result in a less-than-significant impact. Operational energy use would have less-than-significant impacts because this energy use would be minor compared to regional use. Additionally, the Proposed Project is designed to include at least 163 kW solar system, which would reduce SDSU's reliance on non-renewable energy sources.

Under the No Project Alternative, because there would be no construction or operation of additional buildings, there would be no potentially significant impacts from energy use. However, under this alternative SDSU would not reduce its reliance on non-renewable energy sources. Overall, impacts to energy would be less compared to the Proposed Project.

Geology and Soils. Under the Proposed Project, implementation of the recommendations of the Project-specific geotechnical reports, standard erosion control measures, Best Management Practices (BMPs), and proper drainage controls would reduce potentially significant geotechnical impacts to a less-than-significant level. Relatedly, mitigation is proposed that would reduce the Proposed Project's impacts to paleontological resources to less than significant.

Under the No Project Alternative, because there would be no development of additional buildings, there would be no potentially significant impacts to geotechnical conditions. Overall, impacts to geology and soils, including paleontological resources, would be less compared to the Proposed Project.

Greenhouse Gas Emissions. Under the Proposed Project, temporary construction activities would result in an increase in the emission of greenhouse gases. However, the emissions would be below significance threshold levels and, therefore, the Proposed Project would not result in potentially significant construction impacts from greenhouse gases. Operation of the Proposed Project would result in a reduction of greenhouse gases relative to existing conditions due to a decrease in the number of students commuting to school and the related reduction in vehicle miles traveled.

Under the No Project Alternative, because there would be no construction of additional buildings or change in existing uses, there would be no increase in emissions and no impacts relating to greenhouse gas emissions. However, under the No Project Alternative, students currently commuting to campus using motorized options would continue to do so. Therefore, regional motorized trips, and the associated vehicle miles traveled, would not be reduced under this alternative as they would be under the Proposed Project and, as a result, there would be no reduction in greenhouse gases relative to existing conditions. As such, greenhouse gas emissions under the No Project Alternative would be greater than under the Proposed Project.

Hazards and Hazardous Materials. Under the Proposed Project, hazardous materials-related impacts from activities typically associated with construction are anticipated. These potential impacts include use and generation of hazardous materials/wastes typically associated with building materials and construction activities. However, with implementation of recommended mitigation measures, impacts associated with the potential release of hazardous materials would be reduced to less than significant.

Under the No Project Alternative, because there would be no building development, there would be no potential to use, disturb or uncover potentially hazardous materials. Accordingly, there would be no potentially significant impacts associated with hazards and hazardous materials. Overall, impacts to hazards and hazardous materials would be less compared to the Proposed Project.

Hydrology and Water Quality. Under the Proposed Project, compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs would ensure that impacts associated with hydrology and water quality would be less than significant. The Proposed Project's landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

Under the No Project Alternative, because there would be no building development, there would be no potentially significant impacts associated with hydrology and water quality. However, under the No Project alternative, stormwater runoff would be conveyed to the adjacent canyon area in quantities greater than the Proposed Project, which, in turn, increases the potential for off-site erosive scour and siltation of the canyon drainages and Alvarado Creek. Overall, impacts related to hydrology and water quality would be greater than the Proposed Project.

Land Use and Planning. The Proposed Project includes an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the proposed Peninsula Component and University Towers East Component student housing and related facilities. As such, the Proposed Project would be consistent with the applicable land use plan. The land use plans and policies of the City, including the General Plan, College Area Community Plan, College Area Public Facilities Financing Plan, MSCP and MSCP Subarea Plan, and Municipal Code are not applicable to the CSU/SDSU as a state entity whether in an ownership or leasehold capacity. Therefore, under the Proposed Project, there would be no conflict or inconsistency with applicable plans and land use and planning impacts would be less than significant.

Under the No Project Alternative, there would be no new development and no revisions to the Campus Master Plan. As under the Proposed Project, there would be no conflict or inconsistency with applicable land use plans, policies, or regulations and, therefore, impacts under the No Project alternative would be comparable to those under the Proposed Project.

Noise. The Proposed Project would result in potentially significant short-term construction noise impacts at the University Towers East Component site. Mitigation is proposed that would reduce the identified impacts to below significant. The Proposed Project would not result in potentially significant construction-related noise impacts at the Peninsula Component site, nor would it result in potentially significant noise impacts once operational at either the Peninsula Component or University Towers East Component sites.

Under the No Project Alternative, because there would be no construction of additional buildings or change in existing uses, there would be no increase in noise levels and no potentially significant impacts relating to noise. Overall, impacts related to noise would be less compared to the Proposed Project.

Population and Housing. Under the Proposed Project, there would be no significant impacts relative to population and housing. The Proposed Project would assist in meeting existing and future housing demands by accommodating the housing needs of both the current student population and previously approved and planned for future students.

Under the No Project Alternative, the proposed student housing development would not be constructed and, therefore, this alternative would adversely affect efforts to meet existing and future student housing demand, although impacts specific to CEQA's Appendix G criterion would be similar to the Proposed Project.

Public Services and Recreation. Under the Proposed Project, on-campus police and fire services are adequate to maintain acceptable service times and standards and impacts would be less than significant. Under the Proposed Project, parks and recreation impacts also would be less than significant.

Under the No Project Alternative, because there would be no building development and no change in existing uses, there would be no impacts associated with public services and recreation. Overall, impacts related to public services and recreation would be less compared to the Proposed Project.

Transportation. Under the Proposed Project, a significant percentage of students (both current and future) who otherwise would need to drive to campus due to the distance between their residence and campus would no longer need to drive, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in VMT relative to existing conditions.

Under the No Project Alternative, there would be no change in existing uses on the Project sites (i.e., no development of student housing uses). As such, vehicular and multimodal commuter trips, as well as VMT and corresponding greenhouse gas emissions, would be greater compared to the Proposed Project.

Utilities and Service Systems. Under the Proposed Project, new points of connection would be required for the residence halls for domestic water, fire water, and sewer from the existing utility mains. These connections and upgrades are standard components of the new construction and would result in less-than-significant impacts.

The No Project Alternative would result in no development or operational activities; therefore, it would not require new points of utility connections. However, the No Project Alternative would have less water demand and solid waste generation than the Proposed Project. Overall, impacts related to utilities and service systems would be less compared to the Proposed Project.

Wildfire. The proposed Peninsula Component would introduce construction and an increased on-campus student population and therefore potential additional ignition sources to the undeveloped canyon site adjacent to the proposed Peninsula Component. However, the buildings that would be constructed under the Proposed Project would meet present day rigid construction standards relative to fire protection, thereby minimizing any increased risk related to wildland fire to the extent feasible. Any remaining potentially significant impacts would be reduced to less than significant with implementation of proposed mitigation measures and project design features.

The No Project Alternative would not alter the Project sites or result in any additional operational activities on the Project sites. However, the existing structures on the Peninsula Component site have not been constructed to meet present day fire safety and suppression standards and, therefore, would remain at greater risk than the structures to be constructed under the Proposed Project. Therefore, while the No Project Alternative would not introduce any new buildings to the Project sites, impacts associated with the existing structures would be greater compared to those to be constructed under the Proposed Project.

Relationship to Project Objectives

Under the No Project Alternative, no additional on-campus housing would be provided. Therefore, this alternative would adversely affect efforts to meet existing and future student housing demands. As such, this alternative would not meet Project Objectives 1, 3, 4, 5, and 6. This alternative would not substantially reduce vehicle miles traveled and would not achieve the associated reduction in greenhouse gas emissions as compared to those presently generated by the campus. As such, this alternative would not meet Objective 6. Further, by not building the Amenity Building, the No Project Alternative would not meet Objective 2, the objective of providing food and convenience services for students. As such, this alternative would not attain any of the objectives of the Proposed Project.

6.3.2 Historic Preservation Alternative

Under the Historic Preservation Alternative, the eligible historic apartment building known as Mixquic Hall would be retained and the remainder of the Peninsula Component site would be developed with the Amenity Building, the 9-story building, and four towers, and the University Towers East Component would be developed as planned (see Figure 6-1, Preservation Alternative). The perimeter fire access road that is proposed as part of the Proposed Project would not be constructed around the perimeter of the existing Mixquic Hall in this Alternative. Instead, the fire access road would traverse around Mixquic to the east, through the center of the Peninsula Component site to be able to provide sufficient fire access and two points of entry. As such, the site design of the four towers and Amenity Building would also shift and would differ from the Proposed Project site plan (see Figure 6-1). This alternative was selected to avoid the Proposed Project's significant and unavoidable impacts to historic resources, specifically Mixquic Hall. This alternative would retain the existing 62 student beds in Mixquic Hall and add a total of approximately 3,690 new student beds within the Peninsula Component as opposed to approximately 4,450 under the Proposed Project.

Aesthetics. Under the Proposed Project, impacts to scenic vista, trees, rock outcroppings, or historic buildings within a state scenic highway would be less than significant. Additionally, with mitigation and various project design features, the Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Overall, the Proposed Project would have less-than-significant impacts related to aesthetics.

Under the Historic Preservation Alternative, Mixquic Hall would not be demolished, and the remainder of the Peninsula Component site would be developed with the Amenity Building, the 9-story building, and four residential towers. The University Towers East Component would proceed as planned under the Proposed Project. Aesthetics impacts related to this alternative would be similar to those of the Proposed Project.

Air Quality. Under the Proposed Project, construction and operational activities, including increased vehicle trips, would result in an increase in the emission of criteria pollutants. However, the emissions would be below threshold levels and, therefore, the project would not result in potentially significant impacts to air quality. Additionally, under the Proposed Project, the substantial increase in on-campus housing would result in a corresponding decrease in VMT due to students no longer needing to commute to campus, which, in turn, would result in substantial decreases in vehicle-related emissions, including greenhouse gas emissions, as compared to existing conditions.

Under the Historic Preservation Alternative, the existing Mixquic Hall would not be demolished, and only the Amenity Building, the 9-story building, and four residential towers would be constructed at the Peninsula Component. The University Towers East Component would proceed as planned under the Proposed Project. Therefore, air quality impacts associated with demolition of Mixquic Hall and construction of an additional residential building would not occur under the Historic Preservation Alternative. While certain emissions related to construction and operation would be less than the Proposed Project, the reduction in VMT and related greenhouse gas emissions, also would be less than those achieved under the Proposed Project.

Biological Resources. Under the Proposed Project, there would be potentially significant impacts relating to special status wildlife and plant species, riparian habitat, and migratory wildlife corridors. Mitigation is proposed to reduce most of the identified impacts to a less-than-significant level, but potential impacts related to construction noise impacts on special-status species would be significant and unavoidable.

The Historic Preservation Alternative would result in similar impacts to biological resources as the Proposed Project. The Historic Preservation Alternative would not result in demolition and construction at the site of Mixquic Hall;

however, this site is currently developed, and biological resource impacts would not occur at this site. Biological impacts would occur as a result of brush management zones, which would remain under this alternative. Overall, impacts to biological resources would be similar compared to the Proposed Project.

Cultural Resources and Tribal Cultural Resources. Under the Proposed Project, impacts to historical resources, specifically Mixquic Hall, would be significant and unavoidable. As to cultural resources, including archaeological and tribal resources, although the Proposed Project sites are developed and disturbed, there is the potential to discover archaeological or paleontological resources during construction activities resulting in potential impacts. However, any potential significant impacts would be mitigated to less than significant with implementation of recommended mitigation measures.

Under the Historic Preservation Alternative, the historically significant building, Mixquic Hall, would not be demolished and no significant historical resource impact would occur. Other impacts to cultural resources, including impacts to archeological resources, human remains, and tribal cultural resources, would be similar to the Proposed Project and would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and tribal cultural resources would be reduced compared to the Proposed Project as no significant and unavoidable impact would occur.

Energy. Under the Proposed Project, construction would result in a temporary use of electricity and petroleum due to the use of construction equipment, worker vehicles, vendor trucks, and hauling trucks. However, this increase in energy use would be temporary and relatively limited and result in a less-than-significant impact. Operational energy use would have less-than-significant impacts because this energy use would be limited compared to regional use. Additionally, the Proposed Project is designed to include at least 163 kW solar system, which would reduce SDSU's reliance on traditional energy sources in favor of renewable energy sources.

Under the Historic Preservation Alternative, the existing Mixquic Hall would not be demolished, and only the Amenity Building, the 9-story building, and four residential towers would be constructed at the Peninsula Component. The University Towers East Component would proceed as planned under the Proposed Project. One less residential building would be constructed under this alternative, but Mixquic Hall would still be in use. Therefore, energy use of all the buildings would be similar to the Proposed Project. Overall, impacts to energy would be similar compared to the Proposed Project.

Geology and Soils. Under the Proposed Project, implementation of the recommendations of the Project-specific geotechnical reports, standard erosion control measures, BMPs, and proper drainage controls would reduce potentially significant geotechnical impacts to a less-than-significant level. Additionally, mitigation is proposed that would reduce the Proposed Project's potential impacts to paleontological resources to less than significant.

Under the Historic Preservation Alternative, earthwork and related development of the Peninsula Component site would be similar to development under the Proposed Project, with a slightly reduced footprint as Mixquic Hall would be retained. Earthwork and development of the University Towers Component site would be the same as the Proposed Project. As such, the Historic Preservation Alternative would implement the recommendations of the Project-specific geotechnical reports, standard erosion control measures, best management practices (BMPs), and proper drainage controls to reduce potentially significant geotechnical impacts to a less-than-significant level. Impacts under the Historic Preservation Alternative to geology and soils, including paleontological resources, would be similar compared to the Proposed Project.

Greenhouse Gas Emissions. Under the Proposed Project, temporary construction activities would result in an increase in the emission of greenhouse gases. However, the emissions would be below significance threshold levels and, therefore, the Proposed Project would not result in potentially significant construction impacts from greenhouse gases. Operation of the Proposed Project would result in a reduction of greenhouse gasses due to a decrease in students commuting to school and related decrease in VMT.

Under the Historic Preservation Alternative, greenhouse gas emission impacts associated with demolition of Mixquic Hall and construction of an additional residential building would not occur. However, the Historic Preservation Alternative would support less students living on campus and thereby increase the number of students commuting to campus compared to the Proposed Project. Overall, greenhouse gas emission impacts would be greater compared to the Proposed Project.

Hazards and Hazardous Materials. Under the Proposed Project, hazardous materials-related impacts from activities typically associated with construction are anticipated. These potential impacts include use and generation of hazardous materials/wastes typically associated with building materials and construction activities. However, with implementation of recommended mitigation measures, impacts associated with the potential release of hazardous materials would be reduced to less than significant.

The Historic Preservation Alternative would result in similar impacts related to hazardous materials-related impacts from activities typically associated with construction and operation of the Project, and the same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar under the Historic Preservation Alternative compared to the Proposed Project.

Hydrology and Water Quality. Under the Proposed Project, compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs would ensure that impacts associated with hydrology and water quality would be less than significant. The Proposed Project's landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

The Historic Preservation Alternative would result in similar impacts to the Proposed Project. Because demolition of Mixquic Hall and construction activities at that location would not occur, overall soil disturbance impacts may be reduced under this alternative; however, the remainder of the Project sites would be developed similar to the Proposed Project. The Historic Preservation Alternative would be subject to the same permit requirements and would have similar water quality treatment features as the Proposed Project. Overall, impacts to hydrology and water quality would be similar compared to the Proposed Project.

Land Use and Planning. The Proposed Project includes an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the Peninsula Component and University Towers East Component proposed student housing and related facilities. As such, the Proposed Project would be consistent with the applicable land use plan. Therefore, under the Proposed Project, development would be consistent with applicable land use plans, policies, or regulations and impacts would be less than significant.

The Historic Preservation Alternative would result in similar impacts to the Proposed Project as it would also require an amendment to the existing Campus Master Plan to include the proposed student housing and related facilities. Similar to the Proposed Project, the Historic Preservation Alternative impacts related to conflicts with applicable land use plans, policies, or regulations would be less than significant. Overall, impacts related to land use and planning under the Historic Preservation Alternative would be similar compared to the Proposed Project.

Noise. The Proposed Project would result in potentially significant short-term construction noise at the University Towers East Component site, while operational impacts at both Component sites would be less than significant. Mitigation is proposed that would reduce the identified temporary construction-related impacts to below significant.

The Historic Preservation Alternative would result in similar construction noise impacts. Operational noise impacts would be similar to the Proposed Project because it would develop similar land uses as the Proposed Project. Similar to the Proposed Project, short-term construction noise and vibration would be mitigated to less than significant and operational noise would be less than significant. Overall, impacts related to noise would be similar compared to the Proposed Project.

Population and Housing. Under the Proposed Project, there would be no significant impacts relative to population and housing. The Proposed Project would assist in meeting existing and future housing demands by accommodating anticipated growth and assisting in accommodating the housing needs of the current student population.

Under the Historic Preservation Alternative, approximately 3,690 new student beds within the Peninsula Component would be added as opposed to the approximately 4,450 under the Proposed Project. As such, this alternative would reduce by approximately 800 the number of additional on-campus student housing beds that would be provided and, thereby, adversely affect efforts to meet existing and future student on-campus housing demands. Impacts to population and housing under the Historic Preservation Alternative would be greater than the Proposed Project.

Public Services and Recreation. Under the Proposed Project, on-campus police and fire services are adequate to maintain acceptable service times and standards and impacts would be less than significant. Under the Proposed Project, parks and recreation impacts also would be less than significant.

The Historic Preservation Alternative would result in similar impacts as the Proposed Project because it would involve development of similar land uses and approximate intensities as the Proposed Project, except a reduction in the number of students living on campus. Overall, impacts would generally be similar compared to the Proposed Project.

Transportation. Under the Proposed Project, a significant percentage of students who used to drive to campus would no longer drive, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in VMT. The Proposed Project would reduce both vehicular and multimodal (i.e., bike, pedestrian, transit) commuter trips to the SDSU campus.

The Historic Preservation Alternative would result in a reduction in the number of students living on campus and thereby an increase in the number of students commuting to campus compared to the Proposed Project. Transportation impacts would be greater under the Historic Preservation Alternative relative to the Proposed Project.

Utilities and Service Systems. Under the Proposed Project, new points of connection would be required for the residence halls for domestic water, fire water, and sewer from the existing utility mains. These connections and upgrades are standard components of the new construction and would result in less-than-significant impacts.

The Historic Preservation Alternative would result in slightly reduced impacts to utilities and service systems as the Proposed Project because it would add a total of approximately 3,690 new student beds within the Peninsula Component as opposed to the approximate 4,450 under the Proposed Project. This reduced amount of additional on-campus students would result in reduced demands for sewer, water, solid waste, and electrical and natural gas service. This alternative would result in reduced impacts related to solid waste generation as the existing Mixquic Hall would not be demolished and materials from this demolition would not have to be removed from the Project site. Overall impacts would be less than the Proposed Project.

Wildfire. The Proposed Project would introduce construction and an increased on-campus student population and therefore additional potential ignition sources to the site. Potentially significant impacts would be reduced to less than significant with implementation of proposed mitigation measures and project design features.

The Historic Preservation Alternative would result in similar impacts compared to the Proposed Project because it would be located on the same Project site and develop similar land uses and intensities. However, if Mixquic Hall was not demolished for redevelopment of the site, the perimeter fire access road would not be built around the perimeter because there would not be enough space along the perimeter west of Mixquic Hall. In order to maintain access to the whole site for fire department responders, fire access would have to be designed through the center of the Peninsula Component site. This design would not provide the 26-foot-wide fire access road as vegetation management space on the west side of Mixquic Hall, and, therefore, would not reduce wildfire risk to the building to the same extent as the Proposed Project. Additionally, absent substantial improvements to the existing Mixquic structure to increase fire resistance, impacts related to the Historic Preservation Alternative would be greater than the Proposed Project.

Relationship to Project Objectives

As discussed above, this alternative would avoid the Proposed Project's significant and unavoidable impact related to historic resources. This alternative would retain the existing 62 student beds in Mixquic Hall and add a total of approximately 3,690 new student beds within the Peninsula Component as opposed to approximately 4,450 under the Proposed Project. While this alternative would meet most of the Project objectives, it would not do so to the same extent as the Proposed Project. Specifically, this alternative would not provide as many new student beds as the Proposed Project. With a reduced number of student beds, this alternative would not fully achieve the goal of providing increased on-campus housing in order to reduce the demand for housing in the surrounding residential neighborhoods, nor would it achieve the level of reduction in traffic VMT and corresponding greenhouse gas emissions reduction as the Proposed Project.

Additionally, given the age of Mixquic Hall and the lack of improvements to the building since its construction some 60 years ago, Mixquic Hall likely would require renovations to bring it up to current building standards, including fire prevention standards. Such renovations could be extremely costly and may not be possible given the age of the structure.

Specifically, this alternative would meet Objective 1, and Objective 2, because a west campus student residential neighborhood would still be developed, including food and support services. Objectives 3, 4 and 7 would only be partially met by this alternative, because housing options would not be increased to the maximum amount possible, and not all outdated student housing would be removed. Objective 5 would be met by this alternative because the Historic Preservation Alternative would provide student housing in an area that has the capacity to accommodate a large number of student beds, though a fewer number would be provided under this alternative. Lastly, this alternative would not fully meet Objective 6 because it would not achieve the level of reduction in traffic VMT and corresponding greenhouse gas emissions as the Proposed Project.

For the reasons discussed above, this alternative would not fully achieve the Project goals and objectives as described above in Section 6.1, Introduction.

6.3.3 Gnatcatcher Avoidance Alternative

Under the Gnatcatcher Avoidance Alternative, no construction activities would occur within 300 feet of the edge of any coastal sagebrush habitat. As shown in Figure 6-2, a 300-foot buffer from the edge of coastal sagebrush habitat would result in a buildable site of approximately 1.09 acres. Given the small size of this area, the only component of the Proposed Project that could be built on the Peninsula Component site would be the Amenity Building. However, the Amenity Building is intended to primarily serve the students that would reside in the proposed new housing and, therefore, it would not be built on the Peninsula absent construction of the other proposed buildings, Thus, under the Gnatcatcher Avoidance Alternative, a single residential building housing approximately 760 students would be constructed in place of the Amenity Building; development of the UTE Component site, as envisioned under the Proposed Project, would still occur. It is important to note that the UTE Component could not be increased in height/density to accommodate some of the beds that would be eliminated at the Peninsula site under this alternative because it is not consistent with SDSU/CSU policy to house first year students (who would be housed at the UTE Component site) with sophomores, juniors or seniors (who would be housed at the Peninsula Component site).. Thus, implementation of the Gnatcatcher Avoidance Alternative would allow for the development of approximately 760 additional student beds beyond existing conditions on the Peninsula Component site and development of the UTE Component .

Aesthetics. Under the Proposed Project, impacts to scenic vista, trees, rock outcroppings, or historic buildings within a state scenic highway would be less than significant. Additionally, with mitigation and various project design features, the Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Overall, the Proposed Project would have less-than-significant impacts related to aesthetics.

Under the Gnatcatcher Avoidance Alternative, the only construction activities that would take place within the Peninsula Component site would be the demolition of the SDSU Global Education Office, the International Student Center, the SDSU Passport Office, and the Faculty International Engagement Office and the subsequent construction of the single resident building. Within the Peninsula Component site, there would not be any additional lighting within the majority of the site, though new lighting would replace existing lighting as the new single resident building would replace the four existing buildings identified above. This alternative would also not remove the existing apartment buildings within the Peninsula Component site, which are generally regarded as an eyesore. Overall, impacts related to aesthetics under the Gnatcatcher Avoidance Alternative would be less as compared to the Proposed Project.

Air Quality. Under the Proposed Project, construction and operational activities, including increased vehicle trips, would result in an increase in the emission of criteria pollutants. However, the emissions would be below threshold levels and, therefore, the project would not result in potentially significant impacts to air quality. Additionally, under the Proposed Project, the substantial increase in on-campus housing would result in a corresponding decrease in VMT due to students no longer needing to commute to campus, which, in turn, would result in substantial decreases in vehicle-related emissions, including greenhouse gas emissions, as compared to existing conditions.

Under the Gnatcatcher Avoidance Alternative, the existing Mixquic Hall would not be demolished, a single residential building housing 760 students would be constructed on the site of the existing SDSU International Complex, and the UTE Component would be construction with a total of 720 student beds. . Therefore, air quality impacts associated with demolition of the existing apartment buildings and construction of new buildings within the Peninsula Component site would not occur under the Gnatcatcher Avoidance Alternative. While certain emissions related to construction and operation would be less than the Proposed Project, the reduction in VMT and related greenhouse gas emissions, also would be substantially less than those achieved under the Proposed Project. Overall, impacts to air quality would be greater when compared to the Proposed Project.

Biological Resources. Under the Proposed Project, there would be potentially significant impacts relating to special status wildlife and plant species, riparian habitat, and migratory wildlife corridors. Mitigation is proposed to reduce the identified impacts to a less-than-significant level, but potential impacts related to construction noise impacts on special-status species (i.e., gnatcatcher) would be significant and unavoidable.

Under the Gnatcatcher Avoidance Alternative, all Project construction activities would take place at least 300 feet from the edge of the coastal sagebrush habitat. This alternative would avoid the potentially significant and unavoidable construction noise impacts to special-status species, namely the California Coastal Gnatcatcher. Construction impacts to biological resources would be reduced compared to the Proposed Project as no significant and unavoidable impact would occur. Ongoing brush management to mitigate fire risks would continue to be required and would be even more critical to protect the existing wood frame structures. Overall, impacts to biological resources during construction would be less compared to the Proposed Project.

Cultural Resources and Tribal Cultural Resources. Under the Proposed Project, impacts to historical resources, specifically Mixquic Hall, would be significant and unavoidable. As to cultural resources, including archaeological and tribal resources, although the Proposed Project sites are developed and disturbed, there is the potential to discover archaeological or paleontological resources during construction activities resulting in potential impacts. However, any potential significant impacts would be mitigated to less than significant with implementation of recommended mitigation measures.

Under the Gnatcatcher Avoidance Alternative, the historically significant building, Mixquic Hall, would not be demolished and no significant historical resource impact would occur. Other impacts to cultural resources, including impacts to archeological resources, human remains, and tribal cultural resources, would be similar to the Proposed Project and would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and tribal cultural resources would be reduced compared to the Proposed Project as no significant and unavoidable impact would occur.

Energy. Under the Proposed Project, construction would result in a temporary use of electricity and petroleum due to the use of construction equipment, worker vehicles, vendor trucks, and hauling trucks. However, this increase in energy use would be temporary and relatively limited and result in a less-than-significant impact. Operational energy use would have less-than-significant impacts because this energy use would be limited compared to regional use. Additionally, the Proposed Project is designed to include at least 163 kW solar system, which would reduce SDSU's reliance on traditional energy sources in favor of renewable energy sources.

Under the Gnatcatcher Avoidance Alternative, the existing apartment buildings would not be demolished, and a single residential building would be constructed at the Peninsula Component on the site envisioned for the Amenity Building. The University Towers East Component would proceed as planned under the Proposed Project. Therefore, energy use of all the buildings would be less than the Proposed Project due to the substantial reduction in students that would be residing on the Peninsula component. Overall, impacts to energy would be less compared to the Proposed Project.

Geology and Soils. Under the Proposed Project, implementation of the recommendations of the Project-specific geotechnical reports, standard erosion control measures, BMPs, and proper drainage controls would reduce potentially significant geotechnical impacts to a less-than-significant level. Additionally, mitigation is proposed that would reduce the Proposed Project's potential impacts to paleontological resources to less than significant.

Under the Gnatcatcher Avoidance Alternative, earthwork and related development of the Peninsula Component site would be substantially reduced compared to development under the Proposed Project as only the Amenity Building/single residential building would be constructed. Earthwork and development of the University Towers Component site would be the same as the Proposed Project. As such, the Gnatcatcher Avoidance Alternative would implement the recommendations of the Project-specific geotechnical reports, standard erosion control measures, best management practices (BMPs), and proper drainage controls to reduce potentially significant geotechnical impacts to a less-than-significant level. Impacts under the Historic Preservation Alternative to geology and soils, including paleontological resources, would be somewhat less than the Proposed Project due to the reduced soil disturbance area.

***Greenhouse Gas Emissions*.** Under the Proposed Project, temporary construction activities would result in an increase in the emission of greenhouse gases. However, the emissions would be below significance threshold levels and, therefore, the Proposed Project would not result in potentially significant construction impacts from greenhouse gases. Operation of the Proposed Project would result in a reduction of greenhouse gasses due to a decrease in students commuting to school and related decrease in VMT.

Under the Gnatcatcher Avoidance Alternative, greenhouse gas emission impacts associated with demolition of the existing buildings within the Peninsula Component site and construction new buildings would be substantially reduced as compared to the Proposed Project. However, the Gnatcatcher Avoidance Alternative would support fewer students living on campus and thereby increase the number of students commuting to campus compared to the Proposed Project. Overall, greenhouse gas emission impacts would be greater compared to the Proposed Project.

Hazards and Hazardous Materials. Under the Proposed Project, hazardous materials-related impacts from activities typically associated with construction are anticipated. These potential impacts include use and generation of hazardous materials/wastes typically associated with building materials and construction activities. However, with implementation of recommended mitigation measures, impacts associated with the potential release of hazardous materials would be reduced to less than significant.

The Gnatcatcher Avoidance Alternative would result in similar impacts related to hazardous materials-related impacts from activities typically associated with construction and operation of the Project, and the same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar under this alternative compared to the Proposed Project.

Hydrology and Water Quality. Under the Proposed Project, compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs would ensure that impacts associated with hydrology and water quality would be less than significant. The Proposed Project's landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

The Gnatcatcher Avoidance Alternative would not include the demolition of the apartment buildings on the Peninsula Component site, though demolition of four small buildings and construction of a new residential building on the Amenity Building site would still occur. Because overall acreage of disturbance and construction would be lower than the Proposed Project, soil disturbance impacts may be reduced under this alternative. The Gnatcatcher Avoidance Alternative would be subject to the same permit requirements and would have similar water quality treatment features as the Proposed Project. Overall, impacts to hydrology and water quality would be similar compared to the Proposed Project.

Land Use and Planning. The Proposed Project includes an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the Peninsula Component and University Towers East Component proposed student housing and related facilities. As such, the Proposed Project would be consistent with the applicable land use plan. Therefore, under the Proposed Project, development would be consistent with applicable land use plans, policies, or regulations and impacts would be less than significant.

An amendment to the existing Campus Master Plan is proposed regardless of the Alternative, so this element of the project would not change under this alternative. Similar to the Proposed Project, the Gnatcatcher Avoidance Alternative impacts related to conflicts with applicable land use plans, policies, or regulations would be less than significant. Overall, impacts related to land use and planning under this alternative would be similar compared to the Proposed Project.

Noise. The Proposed Project would result in potentially significant short-term construction noise at the University Towers East Component site, while operational impacts at both Component sites would be less than significant. Mitigation is proposed that would reduce the identified temporary construction-related impacts to below significant.

The Gnatcatcher Avoidance Alternative would result in less construction noise impacts at the Peninsula Component site, but similar noise impacts at the UTE Component site. Operational noise impacts would be less than the Proposed Project because it would develop fewer buildings than the Proposed Project. Similar to the Proposed Project, short-term construction noise and vibration would be mitigated to less than significant and operational noise would be less than significant. Overall, impacts related to noise would be similar compared to the Proposed Project.

Population and Housing. Under the Proposed Project, there would be no significant impacts relative to population and housing. The Proposed Project would assist in meeting student housing demand.

Under the Gnatcatcher Avoidance Alternative, approximately 760 student beds would be added within the Peninsula Component as opposed to the approximately 4,468 under the Proposed Project. As such, this alternative would reduce the number of additional on-campus student housing beds that would be provided and, thereby, adversely affect efforts to meet on-campus housing demands. Impacts to population and housing under this alternative would be greater than the Proposed Project.

Public Services and Recreation. Under the Proposed Project, on-campus police and fire services are adequate to maintain acceptable service times and standards and impacts would be less than significant. Under the Proposed Project, parks and recreation impacts also would be less than significant.

Under this alternative, less building development would occur, and substantially fewer new beds would be added to the campus. However, there would still be an increase in demand for public services and recreation, albeit less than under the Proposed Project. Overall, impacts related to public services and recreation would be less compared to the Proposed Project.

Transportation. Under the Proposed Project, a significant percentage of students who used to drive to campus would no longer drive, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in

VMT. The Proposed Project would reduce both vehicular and multimodal (i.e., bike, pedestrian, and transit) commuter trips to the SDSU campus.

The Gnatcatcher Avoidance Alternative would result in a smaller increase in the number of on-campus student residents compared to the Proposed Project. Therefore, this alternative would result in more vehicular and multimodal (i.e., bike, pedestrian, and transit) commuter trips to the SDSU campus compared to the Proposed Project. Transportation impacts, therefore, would be greater than the Proposed Project.

Utilities and Service Systems. Under the Proposed Project, new points of connection would be required for the residence halls for domestic water, fire water, and sewer from the existing utility mains. These connections and upgrades are standard components of the new construction and would result in less-than-significant impacts.

The Gnatcatcher Avoidance Alternative would result in reduced impacts to utilities and service systems than the Proposed Project because it would add fewer student beds as compared to the Proposed Project. This reduced number of additional on-campus student residents would result in reduced demands for sewer, water, solid waste, and electrical and natural gas service compared to the Proposed project. Overall, therefore, impacts would be less than the Proposed Project.

Wildfire. The Proposed Project would introduce construction and an increased on-campus student population and therefore additional potential ignition sources to the site. Potentially significant impacts would be reduced to less than significant with implementation of proposed mitigation measures and project design features.

The Gnatcatcher Avoidance Alternative would not alter the existing apartment buildings within the Peninsula Component site but would demolish and replace the four small campus buildings at the southern end of the site. Because the existing residential structures on the Peninsula Component site have not been constructed to meet present day fire safety and suppression standards, the site would remain at greater risk than the structures to be constructed under the Proposed Project. Therefore, while this alternative would replace some small buildings and would introduce one new building to the site (i.e., a new residential building housing 760 students), impacts associated with the existing structures would be greater compared to those to be constructed under the Proposed Project.

Relationship to Project Objectives

As discussed above, this alternative would avoid the Proposed Project's potentially significant and unavoidable impact related to biological resources. This alternative would also avoid the Proposed Project's significant and unavoidable impact to historic resources. Overall, the Gnatcatcher Avoidance Alternative would add approximately 760 new student beds to the SDSU main campus, well short of the approximately 4,468 under the Proposed Project.

Because of the significantly reduced number of new student beds that would be added under this alternative, the Gnatcatcher Avoidance Alternative would not meet Objectives 1, 3, 5, and 7. This alternative would also not meet Objective 2 because it would not develop an Amenities Building if there are no student housing towers to be developed on the Peninsula site as envisioned in the Proposed Project. This alternative would not meet Objective 4, because it would not replace outdated student residential buildings with modern, efficient buildings. Lastly, this alternative would reduce VMT and related GHG emissions related to the 1,480 student beds that would be located on-campus and reduce a portion of student commuting, but it would not reduce VMT and GHG emissions as much as the Proposed Project would. Thus, the Gnatcatcher Avoidance Alternative would only partially meet Objective 6.

Overall, the Gnatcatcher Avoidance Alternative would partially meet 1 out of the 7 project objectives and would not meet 6 of the project objectives.

6.3.4 Reduced Height Alternative

Numerous comments received in response to the NOP stated the opinion that the buildings of the Peninsula Component would be too tall and suggested that building height be reduced. While the Draft EIR has not identified any potentially significant impacts due to building height, SDSU has included a Reduced Height Alternative under which all Proposed Project buildings over 5 stories would be reduced by half, resulting in building heights ranging between 5 and 7 stories.

Under the Reduced Height Alternative, the five towers on the Peninsula Component site would be reduced from the proposed height of up to 13 stories down to 7 stories, and the 9-story building would be reduced from the proposed height of up to 9 stories to 5 stories. With the reduced height, each of the five towers would provide for approximately 406 student beds instead of 760 under the Proposed Project. Therefore, the five towers on the Peninsula Component site would add a total of approximately 2,030 new student beds, instead of the approximately 3,800 under the Proposed Project. Under this alternative, the 9-story building would be reduced to 5 stories instead of 9 and would add approximately 360 new student beds instead of the 650 beds proposed by the Proposed Project. Therefore, under this alternative, the total amount of new student beds would be reduced to approximately 2,390 new student beds within the Peninsula Component, instead of the 4,450 under the Proposed Project. The number of beds proposed at the University Towers East Component would be unchanged at approximately 720.

Aesthetics. Under the Proposed Project, impacts to scenic vista, trees, rock outcroppings, or historic buildings within a state scenic highway would be less than significant. Additionally, with implementation of mitigation and various project design features, the Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Overall, the Proposed Project would have less-than-significant impacts related to aesthetics.

The Reduced Height Alternative would result in the development of the same sites as the Proposed Project, with reduced building heights. While the reduced scale of this alternative compared to the Proposed Project would appear to reduce visual impacts, impacts to aesthetics and visual quality would be comparable to the Proposed Project.

Air Quality. Under the Proposed Project, construction and operational activities would result in an increase in the emission of criteria pollutants. However, the emissions would be below threshold levels and, therefore, the project would not result in potentially significant impacts to air quality.

The Reduced Height Alternative would result in reduced construction-related air quality impacts due to a reduction in building size and associated construction duration. Operational emissions also would be reduced compared to the Proposed Project because there would be fewer daily trips as a result of less overall development compared to the Proposed Project. Overall, impacts related to air quality would be reduced compared to the Proposed Project.

Biological Resources. Under the Proposed Project, there would be potentially significant impacts relating to special status wildlife and plant species, riparian habitat, and migratory wildlife corridors. Mitigation is proposed that would reduce most of the identified impacts to a less-than-significant level, but potential impacts related to construction noise impacts on special-status species would be significant and unavoidable.

The Reduced Height Alternative would result in similar physical impacts to biological resources during construction as the Proposed Project, though at a reduced level. Temporary impacts during project construction would be reduced under this alternative because less overall construction would occur, resulting in a shorter construction duration. Operational impacts would be similar to those of the Proposed Project due to the comparable development footprint. Overall, however, impacts to biological resources would be similar to the Proposed Project because of the proximity of construction noise to special-status species.

Cultural Resources and Tribal Cultural Resources. Under the Proposed Project, impacts to historical resources, specifically Mixquic Hall, would be significant and unavoidable. As to cultural resources, including archaeological and tribal resources, although the Proposed Project sites are developed and disturbed, there is the potential to discover archaeological or tribal resources during construction activities resulting in potential impacts. However, any potential significant impacts would be mitigated to less than significant with implementation of recommended mitigation measures.

Under the Reduced Height Alternative, impacts to cultural resources, including impacts to historical resources, archeological resources, and tribal resources would be the same as the Proposed Project. Significant and unavoidable impacts to historical resources, specifically Mixquic Hall, would remain, and potential impacts to archeological and tribal resources would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and tribal cultural resources would be similar to the Proposed Project.

Energy. Under the Proposed Project, construction would result in the temporary use of electricity and petroleum products due to the use of construction equipment, worker vehicles, vendor trucks, and hauling trucks. However, this increase in energy use would be temporary and result in a less-than-significant impact. Operational energy use would have less-than-significant impacts because this energy use would be relatively limited compared to regional use.

Because the Reduced Height Alternative would result in less overall development than the Proposed Project, including less construction activity, energy usage would be less. Operational energy usage also would be reduced compared to the Proposed Project as the Reduced Height Alternative would have substantially fewer student beds than the Proposed Project. Overall, impacts related to energy would be less than the Proposed Project.

Geology and Soils. Under the Proposed Project, implementation of the recommendations of the Project-specific geotechnical reports, standard erosion control measures, BMPs, and proper drainage controls would reduce potentially significant geotechnical impacts to a less-than-significant level. Additionally, mitigation is proposed that would reduce the Proposed Project's impacts to paleontological resources to less than significant.

Under the Reduced Height Alternative, development of the same Project sites would occur and, therefore, impacts to geology and soils, including paleontological resources, would be similar to the Proposed Project.

Greenhouse Gas Emissions. Under the Proposed Project, temporary construction activities would result in an increase in the emission of greenhouse gases. However, the emissions would be below significance threshold levels and, therefore, the Proposed Project would not result in potentially significant construction impacts from greenhouse gases. Operation of the Proposed Project would result in a reduction of greenhouse gases due to a decrease in students commuting to school and a corresponding reduction in VMT relative to existing conditions.

Under the Reduced Height Alternative, greenhouse gas emission impacts associated with demolition of the existing buildings and construction of new buildings would occur. However, the Reduced Height Alternative would support less students living on campus and thereby would not result in as large a reduction of students commuting to campus compared to the Proposed Project. Overall, greenhouse gas emission impacts would be higher compared to the Proposed Project.

Hazards and Hazardous Materials. Under the Proposed Project, hazardous materials-related impacts from activities typically associated with construction are anticipated. These potential impacts include use and generation of hazardous materials/wastes typically associated with building materials and construction activities. However, with implementation of recommended mitigation measures, impacts associated with the potential release of hazardous materials would be reduced to less than significant.

The Reduced Height Alternative would result in similar hazardous materials-related impacts from activities typically associated with construction and operation of the Project, and the same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar to the Proposed Project.

Hydrology and Water Quality. Under the Proposed Project, compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs would ensure that impacts associated with hydrology and water quality would be less than significant. The Proposed Project's landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

The Reduced Height Alternative would result in similar impacts to the Proposed Project. Hydrology and water quality impacts are associated with the on the ground impacts including the size and location of the building footprint. The reduced height alternative would not result in any changes to the proposed building locations or footprint size on the proposed project sites, therefore there would be no difference in the type and scale of hydrology and water quality impacts as a result of this alternative relative to the Proposed Project.

Land Use and Planning. The Proposed Project includes an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the proposed Peninsula Component and University Towers East Component student housing and related facilities. As such, the Proposed Project would be consistent with the applicable land use plan. Therefore, under the Proposed Project, there would be no conflict or inconsistency and impacts related to conflicts with applicable land use plans, policies, or regulations would be less than significant.

The Reduced Height Alternative would result in similar impacts to the Proposed Project as it would also require an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the proposed Peninsula Component student housing and related facilities. Similar to the Proposed Project, impacts related to conflicts with applicable land use plans, policies, or regulations under the Reduced Height Alternative would be less than significant. Overall, impacts related to land use and planning would be similar to the Proposed Project.

Noise. The Proposed Project would result in potentially significant short-term construction noise at the University Towers East Component site. Mitigation is proposed that would reduce the identified impacts to below significant.

The Reduced Height Alternative would result in less construction noise impacts due to the reduced construction necessary. Operational noise impacts would be similar to the Proposed Project because the land uses proposed would be the same as the Proposed Project. Similar to the Proposed Project, short-term construction noise and vibration would be mitigated to less than significant and operational noise would be less than significant. However, the amount of noise and duration of construction activities would be less than the Proposed Project because smaller buildings would result in less construction compared to the proposed project. Overall, impacts related to noise would be less than the Proposed Project.

Population and Housing. Under the Proposed Project, there would be no significant impacts relative to population and housing. The Proposed Project would assist in meeting housing demand by accommodating the housing needs of the current student population.

The Reduced Height Alternative would substantially reduce the number of additional on-campus student housing beds that would be provided and, thereby, adversely affect efforts to meet student on-campus housing demands. Impacts to population and housing under this alternative would be greater than those of the Proposed Project.

Public Services and Recreation. Under the Proposed Project, on-campus police and fire services would be adequate to maintain acceptable service times and standards and impacts would be less than significant. Additionally, under the Proposed Project, parks and recreation impacts would be less than significant.

The Reduced Height Alternative would result in less impacts as the Proposed Project because it would involve adding less students to the on-campus resident population, which would reduce impacts on local police, fire, park and recreation resources. Overall, impacts under this alternative would be less than the Proposed Project.

Transportation. Under the Proposed Project, a significant percentage of students who currently live off campus and need to drive to campus would no longer need to drive, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in VMT relative to existing conditions. The Reduced Height Alternative would result in a smaller increase in the number of on-campus student residents compared to the Proposed Project. Therefore, the Reduced Height Alternative would result in more vehicular and multimodal (i.e., bike, pedestrian, transit) commuter trips to the SDSU campus compared to the Proposed Project. Transportation impacts, therefore, would be greater than the Proposed Project.

Utilities and Service Systems. Under the Proposed Project, new points of connection would be required for the residence halls for domestic water, fire water, and sewer from the existing utility mains. These connections and upgrades are standard components of new construction and would result in less-than-significant impacts.

The Reduced Height Alternative would result in reduced impacts to utilities and service systems than the Proposed Project because it would add less student beds as compared to the Proposed Project. This reduced amount of additional on-campus students would result in reduced demands for sewer, water, solid waste, and electrical and natural gas service. Overall, therefore, impacts would be less than the Proposed Project.

Wildfire. The Proposed Project would introduce construction and an increased on-campus student population and therefore would add additional potential ignition sources to the site. Potentially significant impacts, however, would be reduced to less than significant with implementation of proposed mitigation measures and project design features.

The Reduced Height Alternative would result in similar impacts compared to the Proposed Project because it would be located on the same project sites with similar land uses and intensities. However, like the Proposed Project, impacts related to wildfire under this alternative would be mitigated to less than significant and, therefore, impacts would be similar to the Proposed Project.

Relationship to Project Objectives

The Reduced Height Alternative would not avoid any of the significant and unavoidable impacts of the Proposed Project. This alternative has been included for analysis in response to comments received during the NOP scoping period requesting that the Project's building heights be reduced. Under the Reduced Height Alternative, the total amount of new student beds would be reduced to approximately 2,390 within the Peninsula Component, instead of the increase of approximately 4,450 under the Proposed Project. As such, this alternative would only partially meet Objectives 1, 3, 5, and 7, because it would not maximize the potential for providing additional student beds on the Peninsula Component site as would the Proposed Project. This alternative would meet Objective 2, because it would provide food and support services in the vicinity of the Proposed Project site. This alternative would meet Objective 4, because it would replace outdated student residential buildings with new buildings. Lastly, the alternative would reduce VMT and GHG emissions related to student commuting to and from campus, but not to the same extent as the Proposed Project; thus, the Reduced Height Alternative would partially meet Objective 6. Overall, this alternative would partially meet five of the project objectives and would fully meet two of the objectives.

6.3.5 Alternative On-Campus Locations Alternative

Under this alternative, the Proposed Project would be built on various lots across the SDSU campus as depicted in Figure 6-3, Alternative OnCampus Locations Alternative. In order to achieve the Project objectives to enable an increased number of SDSU students the opportunity to live on or immediately adjacent to the main SDSU campus, the proposed student residences would need to be built on a variety of sites around the campus, rather than two locations as the Proposed Project, in order to support the necessary increase in student beds. As shown on Figure 6-3, potential on-campus locations for additional student housing would be Lots 2, 2A, 15, 16, 17, and Adobe Falls. However, only Lot 2A has been planned as future student housing and the usable area of this site is limited due to existing infrastructure associated with the San Diego Trolley. Therefore, development of these sites as student housing would require that other locations on campus be identified for the uses that would be pre-empted by their conversion to student housing.

As shown on the current approved Campus Master Plan, Lot 2A is designated as Student Housing that would provide approximately 600 beds. The remaining planned future buildings all have other designated (i.e., planned uses) due in part to their physical locations (see Figure 2-4a and Figure 2-4b in Chapter 2, Project Description, of this Draft EIR). Lot 2 is designated as future building 107, College of Business, although like Lot 2A, development of the site is limited due to Trolley infrastructure. Lot 15 is designated as future building 115, Physical Plant/Corporation Yard. The Adobe Falls site, located north of I-8, is designated as future building 166 to provide housing for faculty and staff. Additionally, Lots 16 and 17 have substantial constraints related to floodplain concerns and redevelopment of these sites may worsen potential floodplain impacts. Lot 15 also has floodplain constraints and is further constrained by Caltrans right-of-way land and the Trolley.

Aesthetics. Under the Proposed Project, impacts to scenic vista, trees, rock outcroppings, or historic buildings within a state scenic highway would be less than significant. Additionally, with the implementation of specific project design features and recommended mitigation measures, the Proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Overall, the Proposed Project would have less-than-significant impacts related to aesthetics.

Under the Alternative Site Locations Alternative, a similar level of development would occur; however, it would be spread across various lots on the SDSU campus. As such, light and glare would be diffused over a larger area and reduced relative to the Proposed Project as the alternative locations would not introduce new light and glare to Alvarado canyon. Additionally, however, under the Alternative Site Locations Alternative, the existing buildings at the Peninsula Component site would remain, requiring extensive maintenance and related expenditures in order to continue their use as student residences. Therefore, while aesthetics and visual impacts would be less under the Alternative Site Locations Alternative compared to the Proposed Project, certain aspects associated with implementation of this Alternative make it infeasible.

Air Quality. Under the Proposed Project, construction and operational activities would result in an increase in the emission of criteria pollutants. However, the emissions would be below threshold levels and, therefore, the Project would not result in potentially significant impacts to air quality. Additionally, the reduced VMT relative to existing conditions associated with the Proposed Project would result in a net reduction in vehicular emissions.

Under the Alternative Site Location Alternative, a similar level of development would occur; however, it would be spread across various lots on the SDSU campus. The air quality impacts from construction and operation would be similar to those of the Proposed Project, as the Alternative Site Locations Alternative would involve building on-campus housing with comparable intensity and similar operational uses. Overall, air quality impacts would be similar under the Alternative Site Locations Alternative compared to the Proposed Project.

Biological Resources. Under the Proposed Project, there would be potentially significant impacts relating to special status wildlife and plant species, riparian habitat, and migratory wildlife corridors. Mitigation is proposed to reduce most of the identified impacts to a less-than-significant level, but potential impacts related to construction noise impacts on special-status species would be significant and unavoidable.

Each of the Alternative Site Locations would be located on previously disturbed land containing existing parking lots. Similar to the Proposed Project, these alternatives would involve brush management zones that would have direct and indirect impacts on biological resources. Specifically, Lot 15, 16, 17, and Adobe Falls are abutting canyons and would likely have direct or indirect impacts relating to special status wildlife and plant species, riparian habitat, and migratory wildlife corridors. Overall, impacts to biological resources would be similar compared to the Proposed Project.

Cultural Resources and Tribal Cultural Resources. Under the Proposed Project, impacts to historical resources, specifically Mixquic Hall, would be significant and unavoidable. As to cultural resources, including archaeological and tribal resources, although the Proposed Project sites are developed and disturbed, there is the potential to uncover archaeological or paleontological resources during construction activities resulting in potential impacts. However, any potential significant impacts would be mitigated to less than significant with implementation of recommended mitigation measures.

Under the Alternative Site Locations Alternative, the historically significant building, Mixquic Hall, would not be demolished and no significant historical resource impact would occur. Other impacts to cultural resources, including impacts to archeological resources, human remains, and tribal cultural resources, would be similar to the Proposed Project as construction activities could potentially uncover significant resources. Overall, impacts to cultural and tribal cultural resources would be similar to the Proposed Project, although preservation of Mixquic Hall would eliminate a significant and unavoidable impact.

Energy. Under the Proposed Project, construction would result in a temporary use of electricity and petroleum due to the use of construction equipment, worker vehicles, vendor trucks, and hauling trucks. However, this increase in energy use would be temporary and result in a less-than-significant impact. Operational energy use would have less-than-significant impacts because this energy use would be limited compared to regional use.

Under the Alternative Site Locations Alternative, a similar level of development would occur; however, it would be spread across various lots on the SDSU campus. The energy impacts from construction and operation would be similar to those of the Proposed Project, as the Alternative Site Locations Alternative would involve building on-campus housing with comparable intensity and similar operational uses. Overall, impacts to energy would be similar under the Alternative Site Locations Alternative compared to the Proposed Project.

Geology and Soils. Under the Proposed Project, implementation of the recommendations of the Project-specific geotechnical reports, standard erosion control measures, BMPs, and proper drainage controls would reduce potentially significant geotechnical impacts to a less-than-significant level. Mitigation is proposed that would reduce the Proposed Project's impacts to paleontological resources to less than significant.

Under the Alternative Site Locations Alternative, similar geotechnical BMPs would be necessary. However, because there would be less construction on steep hillsides, this alternative would likely result in less soil and erosion hazards compared to the Proposed Project. Impacts to paleontological resources would be similar to the Proposed Project and would be mitigated to less than significant. Overall, impacts to geology and soils would be slightly reduced compared to the Proposed Project.

Greenhouse Gas Emissions. Under the Proposed Project, temporary construction activities would result in an increase in the emission of greenhouse gases. However, the emissions would be below significance threshold levels and, therefore, the Proposed Project would not result in potentially significant construction impacts from greenhouse gases. Operation of the Proposed Project would result in a reduction of greenhouse gases relative to existing conditions due to a decrease in students commuting to school and the related reduction in VMT.

Under the Alternative Site Locations Alternative, a similar level of development would occur; however, it would be spread across various lots on the SDSU campus. The greenhouse gas emission impacts from construction and operation would be similar to those of the Proposed Project, as the Alternative Site Locations Alternative would involve building on-campus housing with comparable intensity and similar operational uses. Overall, air quality impacts would be similar under the Alternative Site Locations Alternative compared to the Proposed Project.

Hazards and Hazardous Materials. Under the Proposed Project, hazardous materials-related impacts from activities typically associated with construction are anticipated. These potential impacts include use and generation of hazardous materials/wastes typically associated with building materials and construction activities. However, with implementation of recommended mitigation measures, impacts associated with the potential release of hazardous materials would be reduced to less than significant.

The Alternative Site Locations Alternative would result in similar impacts related to hazardous materials-related impacts from activities typically associated with construction and operation of the Project, and the same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar compared to the Proposed Project.

Hydrology and Water Quality. Under the Proposed Project, compliance with applicable laws and regulations and the implementation of corresponding project design features and BMPs would ensure that impacts associated with hydrology and water quality would be less than significant. The Proposed Project's landscaping would contribute to reducing stormwater runoff rates, which in turn would reduce the potential for off-site erosive scour and siltation of adjacent canyon drainages and downstream Alvarado Creek.

The Alternative Site Locations Alternative would result in similar impacts at each site compared to the Proposed Project because it would result in a similar amount of site development and creation of impervious surface area and would implement the same water quality treatment measures and best management practices. However, construction of the Alternative Site Locations Alternative could result in additional impacts to hydrology and water quality compared to the Proposed Project due to increased flood risks at the Alternative On-Campus locations. According to FEMA's Flood Rate Insurance Map, the areas adjacent to lots 16, 17, and Adobe Falls are categorized as a floodway areas in zone AE, which should be kept free of encroachment so that the 1% annual chance of flood can be carried without substantial increases in flood heights (FEMA 2012). Under existing conditions, lots 15, 16, and 17 have substantial issues related to the floodplain and redevelopment of these sites may worsen floodplain impacts. The Alternative Site Locations sites would be subject to the same permit requirements as the Proposed Project to reduce impacts to less than significant. Overall, impacts to hydrology and water quality would be greater compared to the Proposed Project.

Land Use and Planning. The Proposed Project includes an amendment to the existing Campus Master Plan that would expand the campus master plan boundaries to include the proposed student housing and related facilities. As such, the Proposed Project would be consistent with the applicable land use plan. Therefore, under the Proposed Project, there would be no conflict or inconsistency and impacts related to conflicts with applicable land use plans, policies, or regulations would be less than significant.

The Alternative Site Location Alternative would result in similar impacts to the Proposed Project as it would also require an amendment to the existing Campus Master Plan, here, to change the planned uses of the Alternative Site Locations. As previously described, with the exception of future building 62, each of the locations that comprise this alternative are currently designated by the Master Plan for uses other than student housing and support facilities. As such, the existing Campus Master Plan would need to be amended to show the subject locations as future student housing and support buildings.

Overall, impacts related to land use and planning under this Alternative would be similar to the Proposed Project.

Noise. The Proposed Project would result in potentially significant short-term construction noise at the University Towers East Component site. Mitigation is proposed that would reduce the identified impacts to below significant.

The Alternative Site Locations Alternative would result in similar impacts as the Proposed Project because it would develop the same land uses and intensities as the Proposed Project. Similar to the Proposed Project, potential short-term construction noise and vibration impacts could be mitigated to less than significant and operational noise would be less than significant. Therefore, overall, impacts related to noise would be similar to the Proposed Project.

Population and Housing. Under the Proposed Project, there would be no significant impacts relative to population and housing. The Proposed Project would assist in meeting student housing demand.

The Alternative Site Locations Alternative would result in the same number of student beds as the Proposed Project. Therefore, Alternative Site Locations Alternative would also assist in meeting existing and future housing demands by accommodating anticipated growth and assisting in accommodating the housing needs of the current student population. Impacts to population and housing would be the similar to the Proposed Project.

Public Services and Recreation. Under the Proposed Project, on-campus police and fire services would be adequate to maintain acceptable service times and standards and impacts would be less than significant. Additionally, under the Proposed Project, impacts related to parks and recreation would be less than significant.

The Alternative Site Locations Alternative would result in similar impacts as the Proposed Project because it would involve development of similar land uses and intensities as the Proposed Project. Overall, impacts would be similar to the Proposed Project.

Transportation. Under the Proposed Project, a significant percentage of students who currently drive to campus would no longer need to drive as they would live on campus, thereby resulting in reduced vehicle trips generated and, correspondingly, a reduction in VMT.

The Alternative Site Locations Alternative would result in approximately the same number of students living on campus and would therefore have the same effect on the overall transportation network. Transportation impacts under this alternative would be similar to the Proposed Project.

Utilities and Service Systems. Under the Proposed Project, new points of connection would be required for the residence halls for domestic water, fire water, and sewer from the existing utility mains. These connections and upgrades are standard components of the new construction and would result in less-than-significant impacts.

The Alternative Site Locations Alternative would result in similar impacts to utilities and service systems as the Proposed Project because approximately the same number of students would be added to the on-campus resident population as compared to the Proposed Project. The same demands for sewer, water, solid waste, and electrical and natural gas service would occur under this alternative. Overall impacts would be the same as the Proposed Project.

Wildfire. The Proposed Project would introduce construction and an increased on-campus student population and therefore additional potential ignition sources to the site. The Peninsula Component of the Proposed Project is designated as Very High Fire Hazard Severity Zone (VHFHSZ) in Local Responsibility Area. However, potentially significant impacts would be reduced to less than significant with implementation of proposed mitigation measures and project design features.

Under the Alternative Site Locations Alternative, the project sites would be spread across various lots on the SDSU campus, rather than concentrated on two locations on campus. Impacts related to emergency response and emergency call volumes would be similar to the Proposed Project because approximately the same number of students would be added to the on-campus resident population as compared to the Proposed Project. Evacuation impacts would be slightly reduced as student populations would be more spread out around campus with more evacuation routes per project location. However, like the Peninsula Component, Lot 15 and land abutting Lots 16, 17, and Adobe Falls are designated as VHFHSZ (CAL FIRE 2009). As such, the Alternative Site Location Alternative would involve development of less land in a designated VHFHSZ and, therefore, wildfire related risks would be slightly reduced. Overall, impacts would be less than the Proposed Project.

Relationship to Project Objectives

While locating new student housing on the above-mentioned lots within the campus would potentially provide the same number of new student beds as the Proposed Project, these sites collectively would not meet the goal of expanding the west campus, or provide a student housing neighborhood with a distinct identity and supportive amenities such as a dining facility, community spaces, and study areas. As such, this Alternative would not meet Objectives 1 and 2. The Alternative Site Locations Alternative would attempt to maximize the usability of each on-campus location identified to provide the maximum number of student beds possible. and therefore would meet Objective 3. This alternative would not demolish the existing student residential buildings on the Peninsula Component,site and therefore would not meet Objective 4. This alternative would not develop large amounts of student housing in one location to accommodate a large amount of student beds as well as amenities for students, because it would be developing across several different smaller locations. Thus, this alternative does not meet Objective 5. The Alternative Site Locations Alternative would provide on-campus student beds for students who otherwise would live off-campus, thereby reducing VMT and GHG emissions associated with commuting, and would meet Objective 6. Lastly, this alternative would not take advantage of the Peninsula Component site and would therefore only partially meet Objective 7. Overall, this alternative would not meet four of the project objectives, would partially meet one of the project objectives, and would fully meet two of the project objectives.

6.4 Environmentally Superior Alternative

Table 6-1 provides a summary comparison of the significant impacts attributable to each of the Project alternatives relative to the Proposed Project. As explained in the table notes, down arrows indicate impacts under the alternative would be less than the Proposed Project, up arrows indicate impacts would be greater than the Proposed Project, and horizontal lines indicate impacts would be similar to the Proposed Project.

Table 6-1. Alternatives Matrix - Impacts Comparison

	No Project Alternative	Historic Preservation Alternative	Gnatcatcher Avoidance Alternative	Reduced Height Alternative	Alternative On-Campus Locations Alternative
Aesthetics	↓	=	↓	=	↓
Air Quality	↑	↓	↑	↓	=
Biological Resources	↓	=	↓	=	↓
Cultural Resources and Tribal Cultural Resources	↓	↓	↓	=	↓
Energy	↓	=	↓	↓	=
Geology and Soils	↓	=	↓	=	↓
Greenhouse Gas Emissions	↑	↑	↑	↑	=
Hazards and Hazardous Materials	↓	=	=	=	=
Hydrology and Water Quality	↑	=	=	=	↑
Land Use and Planning	=	=	=	=	=
Noise	↓	=	=	↓	=
Population and Housing	↑	↑	↑	↑	=
Public Services and Recreation	↓	=	↓	↓	=
Transportation	↑	↑	↑	↑	=

Table 6-1. Alternatives Matrix - Impacts Comparison

	No Project Alternative	Historic Preservation Alternative	Gnatcatcher Avoidance Alternative	Reduced Height Alternative	Alternative On-Campus Locations Alternative
Utilities and Service Systems	↓	↓	↓	↓	=
Wildfire	↑	↑	↑	=	↓

Notes:
↓= Less impacts than the Proposed Project
↑ = Greater impacts than the Proposed Project
= = Similar impacts to the Proposed Project

As shown in Table 6-1, the No Project Alternative generally would result in less impacts compared to the Proposed Project, though as to some environmental categories (i.e., population and housing and transportation), the No Project Alternative would have greater impacts. As discussed above, the No Project Alternative would not meet any of the Project objectives.

The Historic Preservation Alternative would have similar impacts as the Proposed Project but would reduce the significant and unavoidable impact on historic resources (Mixquic Hall) to a less-than-significant level. The Historic Preservation Alternative would have greater impacts related to Population and Housing compared to the Proposed Project. As discussed above, the Historic Preservation Alternative would meet most of the Project objectives, but would provide a lower number of new student beds compared to the Proposed Project.

The Gnatcatcher Avoidance Alternative would have similar impacts as the Proposed Project but would reduce the significant and unavoidable impacts on historic resources (Mixquic Hall) and potentially significant and unavoidable impacts to the gnatcatcher to less-than-significant levels. The Gnatcatcher Avoidance Alternative would have greater impacts related to Air Quality, GHG Emissions, Population and Housing, and Transportation as compared to the Proposed Project. As discussed above, the Gnatcatcher Avoidance Alternative would not meet most of the Project objectives.

The Reduced Height Alternative would result in fewer impacts in several areas compared to the Proposed Project but would have greater impacts related to Greenhouse Gas Emissions, Population and Housing, and Transportation. Accordingly, this alternative would have greater impacts than the Proposed Project and would not meet most of the Project objectives.

The Alternative Site Locations Alternative would generally have similar impacts as the Proposed Project, but would eliminate significant and unavoidable impacts to historic and biological resources. Additionally, this alternative would have greater impacts related to Hydrology and Water Quality as it would not provide upgrades to drainage on the Peninsula Component site.

While the No Project Alternative would result in no potentially significant impacts, it would not meet any of the Project objectives, nor would it result in reduced vehicle traffic and related air quality/greenhouse gas emission reductions. Of the other Project alternatives, the Gnatcatcher Avoidance Alternative is the environmentally superior alternative because it would eliminate significant and unavoidable impacts to historic and biological resources and would result in similar impacts to other resources compared to the Proposed Project. However, as discussed above, the Gnatcatcher Avoidance Alternative would not fully meet any of the Project Objectives.

6.5 References

CAL FIRE (California Department of Forestry and Fire Protection). 2009. Very High Fire Hazard Severity Zones in LRA: San Diego. Published June 11, 2009. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-4/san_diego.pdf.

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SOURCE: SDSU 10/25/2024

Figure 6-1
Preservation Alternative

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

Figure 6-2

300-Foot Buffer Extent of Diegan Coastal Sage Scrub - Peninsula Component

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SDSU Evolve Student Housing

SAN DIEGO STATE UNIVERSITY

FIGURE 6-3
Alternative On-Campus Location Alternative

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