

# SAN DIEGO STATE UNIVERSITY MISSION VALLEY CAMPUS MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT VOLUME I - COMMENT LETTERS

*Prepared for:*



SAN DIEGO STATE  
UNIVERSITY



5500 Campanile Drive  
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SCH. No. 2019011042

Prepared by

**DUDEK**

605 Third Street  
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January 2020





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Comment Letter A1

Received 08/12/19

U.S. Department of Homeland Security  
FEMA Region IX  
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Oakland, CA. 94607-4052



August 6, 2019

Laura Shinn, Director  
Facilities Planning, Design, and Construction; SDSU  
5500 Campanile Drive  
San Diego, California 92182-1624

Dear Ms. Shinn:

This is in response to your request for comments regarding the Notice of Availability, San Diego State University Mission Valley Campus Master Plan Draft Environmental Impact Report (State Clearinghouse #2019011042).

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of San Diego (Community Number 060284) and City of San Diego (Community Number 060295), Maps revised April 5, 2016. Please note that the City of San Diego, San Diego County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any **development** must not increase base flood elevation levels. **The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

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www.fema.gov

Laura Shinn, Director  
Page 2  
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- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

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**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community’s floodplain manager for more information on local floodplain management building requirements. The San Diego floodplain manager can be reached by calling Sean Torres, P.E., Senior Civil Engineer, at (858) 541-4348. The San Diego County floodplain manager can be reached by calling Sara Agahi, Flood Control District Manager, at (858) 694-2665.

A1-12

If you have any questions or concerns, please do not hesitate to call Brian Trushinski of the Mitigation staff at (510) 627-7183.

A1-13

Sincerely,



Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

cc:

Sean Torres, Senior Civil Engineer, Transportation and Storm Water Department, City of San Diego

Sara Agahi, Flood Control District Manager, San Diego County

Garret Tam Sing, State of California, Department of Water Resources, Southern Region Office

Brian Trushinski, NFIP Planner, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

[www.fema.gov](http://www.fema.gov)



Comment Letter A2



State of California – Natural Resources Agency  
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GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



October 2, 2019

Ms. Laura Shinn  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-1624  
lshinn@sdsu.edu

**Subject: Comments on the Availability of a Draft Environmental Impact Report for the San Diego State University Mission Valley Campus Master Plan Project, San Diego, CA (SCH# 2019011042)**

Dear Ms. Shinn:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the San Diego State University Mission Valley Campus Master Plan Project, dated August 2019. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. While we acknowledge that San Diego State University (SDSU) is not signatory to a NCCP, the City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

A2-1

The project site is located within the existing footprint of the San Diego County Credit Union Stadium property located south of Friars Road, west of Interstate 15, north of the San Diego River, and west of Murphy Canyon Creek. San Diego State University (SDSU) proposes to purchase the project area from the City, demolish the existing stadium, and develop a Mission Valley Campus. The Mission Valley Campus is composed of 1.6 million square feet (sf) of campus buildings, a new 35,000-seat collegiate stadium, 4,600 residences, a hotel, 95,000 sf of retail space, on- and off-site infrastructure, and approximately 86 acres of green space. The green space, located along the southern and easterly boundaries of the project area, would include active and passive parks, hiking/biking trails, recreational fields, and open space. The City would remain the owner the approximately 34-acre River Park after it is developed by SDSU, per San Diego Municipal Code Section 22.0908.

A2-2

The Department has identified biological resource issues that are of concern. Specifically, the Department is concerned for the potential direct and indirect impacts to the San Diego River and Murphy Canyon Creek, and potential impacts to wildlife corridor functionality and flora and fauna therein. We offer the following comments and recommendations to assist SDSU in avoiding or minimizing potential project impacts on biological resources.

A2-3

1. The DEIR states that recreational sports fields within the River Park will be "...located a minimum of 100 feet from the [City Multi Habitat Planning Area (MHPA)] in order to

A2-4

*Conserving California's Wildlife Since 1870*

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minimize indirect impacts such as noise" (page 4.3-32); however, the DEIR also states that River Park uses "...are conceptual and may be revised by more precise site planning conducted through the public outreach process" (page 2-17). The Department would like to reemphasize the importance of riparian buffers.

Based on the proximity of the San Diego River corridor, any redevelopment project should recognize the importance of adequately sized and appropriately managed buffers for protecting riparian habitat. Riparian buffers serve numerous functions for riparian habitat and the species they support, including: (a) expansion of the habitat's biological values (e.g., buffers are an integral part of the complex riparian ecosystems that provide food and habitat for the fish and wildlife they support); (b) protection from direct disturbance by humans and domestic animals; and (c) reduction of edge effects from, for example, artificial noise and light, line-of-sight disturbances, invasive species, and anthropogenic nutrients and sediments (streams should not be burdened by anthropogenic pollutants which often represent levels beyond their natural assimilative capacity). In determining the adequate buffer width, as measured from the outside edge of the riparian habitat, it is necessary to consider that edge effects can penetrate up to 650 feet into habitat. The Fish and Game Commission Policy on the Retention of Wetland Acreage and Habitat states, "Buffers should be of sufficient width and should be designed to eliminate potential disturbance of fish and wildlife resources from noise, human activity, feral animal intrusion, and any other potential sources of disturbance<sup>1</sup>."

The City's MSCP SAP identifies the San Diego River corridor as a habitat linkage (riparian habitat and adjacent upland vegetation communities in proximity to the redevelopment proposal are within the Multi-Habitat Planning Area [MHPA]). The City has previously acknowledged (e.g., Grantville Redevelopment Project [SCH# 2004071122]) that, "the San Diego River riparian habitat and adjacent Diegan coastal sage scrub are still areas of relatively high species diversity and abundance and provide a regional wildlife corridor" between Mission Trails Park and Mission Bay Park, and that, "...these habitats and linkages are crucial for wildlife species survival and reproduction within the Redevelopment Area and surrounding region." The above statements remain applicable for SDSU's project proposal, especially in light of the City's ownership of the Riverwalk parcel of the project site, and therefore the Department encourages SDSU to focus on protecting the biological resources associated with the San Diego River corridor by including design features that provide an enlarged biological buffer along the affected areas of the San Diego River<sup>2</sup>.

The Department recommends that the project include a minimum 100-foot wetland buffer in order to comply with the Biology Guidelines and the MSCP conditions of coverage for least Bell's vireo (*Vireo bellii pusillus*: vireo). Any proposal for the placement of public trails (if applicable) within the upland buffer should be kept to a

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<sup>1</sup> <http://www.fgc.ca.gov/policy/p4misc.aspx#WETLANDS>

<sup>2</sup> The Department has commented on development proposals along the San Diego River where it emphasized the importance of providing adequate wetland buffers in relation to the development footprint (e.g., Shawnee/CG7600 Master Plan, Grantville Redevelopment Project, Grantville Master Plan, Draft San Diego River Natural Resource Management Plan [NRMP], and San Diego River Park Master Plan) These comments are available upon request.

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minimum. Any buffer areas not already within the MHPA should be added to it and managed accordingly.

Although the Department may recommend a buffer greater than 100 feet for other, more sensitive areas along the River, we believe that 100 feet is a reasonable minimum for this portion of the San Diego River. We request confirmation that active and recreational uses will remain located at least 100 feet from the MHPA.

2. According to the Project Description, there are no planned improvements for Murphy Canyon Creek, which currently flows through a concrete box channel. Aerials taken before the construction of the current stadium (i.e., prior to 1966, see <http://historicaerials.com>) show the San Diego River occupying a considerable portion of the stadium property, sweeping north and then west through the area of the current stadium in a wide, braided system. Murphy Canyon Creek can be seen running in a southwesterly direction, entering the San Diego River west of the current confluence. In order to accommodate installation of the fill pad on which the current stadium and parking lot are located, Murphy Canyon Creek was relocated to the eastern property line, and the San Diego River was channelized and relocated to the southern edge of the property.

As in our letter to the City on July 20, 2015 (Stadium Reconstruction Project [SCH No. 2015061061]), the Department encourages SDSU to consider returning Murphy Canyon Creek to a more natural configuration as part of project activities, which will allow the San Diego River channel to occupy a greater area. If this is infeasible, consideration should be given that development associated with the project be located such that it does not preclude future restoration of Murphy Canyon Creek and the San Diego River to nearer their historic conditions. The development footprint should be outside the River Corridor Area, described in the San Diego Municipal Code as the 100-year floodway as mapped by the Federal Emergency Management Agency plus a 35-foot wide area on each side of the floodway<sup>3</sup>.

3. Mitigation Measure MM-BIO-13 describes permits necessary for temporary and permanent impacts to riparian habitats along with proposed mitigation ratios. The EIR should include a discussion of riparian impacts and mitigation ratios in relationship to the City's MHPA; if direct riparian impacts are to occur within the MHPA, appropriate mitigation per the City's MSCP SAP should also be included in the EIR. Beyond concern for general impacts to MHPA, the Department has concern that the project's riparian impacts may occur within a Streambed Alteration Agreement (SAA) mitigation area which is currently in its second-of-five-year creation/restoration plan (City of San Diego, Stadium Wetland Mitigation Project, SAA 1600-2014-0192-R5). The EIR should analyze if the project would directly or indirectly impact an existing mitigation site. The adequacy of mitigation ratios proposed within the DEIR will be evaluated on these and additional factors at the time the project applicant formally submits a streambed notification package to the Department's Lake and Streambed Alteration Program.

<sup>3</sup> San Diego Municipal Code; Chapter 15, Article 14, Division 3, pages 6 and 7: Planned Districts, §1514.0302 (a) and Diagram 1514-03A San Diego River Park Subdistrict Components.

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4. The Department acknowledges that mitigation measure MM-BIO-8 prohibits the planting of invasive plant species and those species that require excessive irrigation. The Department encourages SDSU to specifically include native plants in the landscaped areas adjacent to the MHPA/biological buffer. Use of native plants in landscaping not only minimizes the spread of invasive plant species, which are detrimental to adjacent open space, but also provides additional benefits such as the attraction of native pollinators and further reduced water consumption. The Department requests that the EIR include the plant palette which will be used for project landscaping.

A2-20

We appreciate the opportunity to comment on the DEIR for this project and to assist SDSU in further minimizing and mitigating project impacts to biological resources. We request that a written response to our comments be provided in the EIR, as required per CEQA Guidelines section 15088(d). If you have any questions or comments regarding this letter, please contact Jennifer Turner of the Department at (858) 467-2717 or [jennifer.turner@wildlife.ca.gov](mailto:jennifer.turner@wildlife.ca.gov).

A2-21

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

cc: Patrick Gower, U.S. Fish and Wildlife Service  
Scott Morgan, State Clearinghouse



Comment Letter A3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

**DEPARTMENT OF TRANSPORTATION**

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www.dot.ca.gov



October 3, 2019

11-SD-8, 15, 163, 805

PM VAR

San Diego State University Mission Valley Master Plan

DEIR/SCH#2019011042

Ms. Laura Shinn  
Director  
SDSU Facilities Planning, Design and Construction  
5500 Campanile Drive  
San Diego, CA 92182

Dear Ms. Shinn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the San Diego State University Mission Valley Master Plan located near Interstate 8, Interstate 15, Interstate 805, State Route 163 (I-8, I-15, I-805 and SR-163). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

A3-1

Caltrans reviewed the DEIR and appendices. The multi-modal access from the main campus, VMT reduction, reduction in parking, and mobility hubs were all not clearly demonstrated in the document. A project that reduces VMT should also see a reduction in direct traffic impacts, however, the project currently has multiple direct impacts to state highways and local roads.

A3-2

A3-3

Per State planning goals, Caltrans recommends that CSU include strategies to reduce VMT by strategically directing discretionary transportation investments in support of housing production near available jobs, and funding by CSU of transportation options that contribute to the overall health of Californians and reduce greenhouse gas emissions such as transit, walking, and biking.

A3-4

The SDSU Mission Valley Master Plan is an ideal project to establish van pools, mobility hubs, establish a transit center that is central to the project, create off-

A3-5

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site bike and pedestrian connectivity to SDSU Main Campus, and decrease single occupancy vehicle trips.

↑ A3-5  
Cont.

Coordination with the City of San Diego, Caltrans, San Diego Metropolitan Transit System (MTS), SANDAG and SDSU in a working group is recommended.

↑ A3-6

Caltrans has the following technical comments:

**Mitigation statements**

In the mitigation section pages 11555 ES-55 through ES-63, ES-65 to ES-66, ES-68 to ES-69, please delete each of the sentences identified with the state highway mitigation that provide:

"To the extent Caltrans seeks to pursue the improvements, CSU will support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements from the Legislature or other available funding sources. However, because CSU cannot guarantee that Caltrans will be able to obtain such funds, the improvement is considered infeasible."

↑ A3-7

As the lead agency, CSU has responsibility for discussing mitigation measures proposed for the project, including any needed improvements to the state transportation system. (14 C.F.R., section 15126.4) Further, consistent with section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. It would appear that CSU is making the erroneous assumption that off-site mitigation is solely the responsibility of Caltrans. CSU has the responsibility of mitigating CSU's effects of regional infrastructure, unless it can be shown that another agency has exclusive responsibility. (City of San Diego v. Board of Trustees of California State University (2015) 61 Cal. 4th 945, 957)

**Traffic Impact Study**

1. Traffic signal optimization or signal timing is performed on a continual basis by the Caltrans Signal Operations Branch, therefore, signal timing is not

↑ A3-8  
↓

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Page 3

- considered a mitigation measure. Adaptive Traffic Signal Controls can be utilized as a mitigation measure.
2. A direct impact was identified along Friars Rd /Interstate 15 (I-15) Interchange from the SDSU Mission Valley project. The draft TIA is assuming that a different developer (Quarry Falls Project) will be building some improvements at the mentioned interchange. The Quarry Falls Project has not moved forward and SDSU should analyze this interchange as is. The proposed improvements by Quarry Falls do not mitigate the SDSU's direct impacts. SDSU Mission Valley project should be considering the ultimate condition for the Friars Rd interchange/bridge to include standard lane widths, wide sidewalks, and class IV bike lanes.
  3. A direct impact was identified at the southbound (SB) I-15/Friars Rd ramps intersection for the AM & PM peak hour without event conditions. The SDSU Mission Valley Project is proposing to optimize the above-mentioned intersection's signal timings. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.
  4. A direct impact was identified at the northbound (NB) I-15/Friars Rd ramps intersection for the AM and PM peak hours without event conditions. The SDSU Mission Valley Project is proposing to optimize the above-mentioned intersection's signal timings. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please propose a valid mitigation measure.
  5. A possible mitigation measure in addition to bringing the Friars Rd interchange to design standard is to add adaptive signals along Friars Rd between I-15 and State Route 163 (SR-163).
  6. The horizon year (2037) identifies a direct impact at the SB & NB I-15 ramps/Friars Rd intersections for the AM and PM peak hours. The SDSU Mission Valley Project is proposing to partially add improvement beyond what the Quarry Falls development is required to if the development moves forward. However, it stops short in the proposal to widen the existing Friars Rd bridge to add wide sidewalks and bike lanes. The draft TIA states that "it is expected that pedestrian activity will be very low [through the bridge] given the limited surrounding uses and, therefore pedestrian calls will be very rare and were not included in the operation analysis." Caltrans disagrees with this statement, there are a lot of residences east of the I-15 that will most likely walk/bike towards the SDSU Mission Valley Project. The I-15/Friars Rd bridge needs to be widened to

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- accommodate capacity for bicycles and pedestrians for bike and pedestrian safety.
7. Caltrans disagrees with the statement "the adjacent ramp meter causes queuing through this intersection (NB & SB I-15/Friars Rd) and without improving ramp meter operations, the operations will remain above the threshold – therefore improvements are infeasible." Caltrans uses the ramp metering system as part of the Transportation Systems Management and Operations (ISM&O) to operate the highway system at full potential. By controlling the rate of the ramp meter, traffic entering the freeway main lanes, Caltrans can manage the demand at a level near freeway capacity and maximize flow efficiency on the freeway. Loop detectors and/or other detection technologies are placed on the freeway upstream of the ramp entrance to gather travel information necessary to monitor freeway performance and establishing optimal meter rates. By just increasing the ramp release without an evaluation of the whole system, more vehicles will merge into the main lanes, pushing the demand passing the critical operation threshold, creating an unstable, stop and go condition on both the main lanes and the ramp. This causes an increase in congestion, not a traffic mitigation. Consider other forms of mitigation at these locations.
  8. The horizon year (2037) identifies a direct impact at the SB SR-163 ramps/Friars Rd intersection for the PM peak hour. The SDSU Mission Valley Project is proposing to optimize the signal phasing as a mitigation measure for this impact. The proposed adjustment is not considered mitigation as this is continually performed by the Caltrans Signal Operations branch. Please proposed a valid mitigation measure.
  9. The intersection at westbound (WB) Interstate 8 (I-8) exit ramp at Fairmount Ave/Alvarado Canyon Rd/Camino del Rio North was not identified as having a direct impact for the horizon year (2037) in the draft TIA. However, based on the data shown, an increase of delay during the AM and PM peak hour increasing the queue length beyond the storage capacity of the exit ramp and into the main lanes. A mitigation measure should be proposed, including improvements to Fairmount Ave along with the existing adjacent bridges on I-8, squaring up the existing entrance and exit ramps, and providing improved pedestrian and bike facilities that would benefit the entire community.

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10. A detailed Traffic Management Plan should also be developed as part of the DEIR for event traffic handling. Stating event traffic impacts as significant and unavoidable is not adequate.
11. Table 1 of the Draft TIA concludes to have 14.4% to 14.7% of overall trip reductions. Please provide the data used to calculate these percentages.
12. There is an existing Metropolitan Transit System Rapid Bus Route 235 that currently travels from Downtown San Diego to Escondido. Approximately 35% of generated vehicular trips are arriving/departing from I-15, yet no plans on adding a transit stop within the SDSU Mission Valley Campus or Trolley are being proposed.
13. In order to encourage active transportation and public transit, and reduce VMT and Greenhouse Gas Emissions (GHG), we recommend that the Project consider a reduction in parking supply in compliance with City of San Diego recently adopted Ordinance 21057.
14. Page 4.15-9 identifies the Individual Reduction for Neighborhood Site Enhancements as 11.08%. Please provide the calculations, descriptions and supporting data for this and the remaining CAPCOA Category Transportation Demand Management (IDM) Trip Reductions in Table 4.15-1.

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Synchro:

15. Submitted Synchro files were not running and have major fatal geometry flaws. Please provide us with working electronic files and complete our analysis.
16. EB Friars Rd from Ulric Street to SR-163 NB exit ramp to Friars Road missing 2 lanes.
17. EB Friars Rd at the I-15 Interchange is incorrect, three through lanes going towards the bridge with only two lanes.
18. Traffic volumes for the SB Fairmount Ave to WB I-8 and the NB Fairmount Ave to WB I-8 entrance ramps.
19. Traffic volumes for the NB Fairmount Ave to EB I-8 entrance ramp.

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#### **Vehicle Miles of Travel (VMT) Analysis**

A VMT analysis is included in the DEIR appendices (Transportation Impact Analysis, 4.15-1) that contains a VMT analysis on pages 250-255.

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1. The analysis makes use of a "service population" denominator for a mixed-use development, rather than examining each use individually and comparing to recommended thresholds. Please refer to the use the Technical Advisory guidance and resources found at the webpage for the Governor's Office of Planning and Research.  
<http://www.opr.ca.gov/ceqa/updates/sb-743/>.
2. Using a per-service-population basis rather than an absolute VMT as recommended in the Technical Advisory does not properly reflect the impact of additional new VMT from the SDSU Mission Valley campus project. There is no way to choose a service population denominator that is not arbitrary.

A3-27  
Cont.

Caltrans does not agree with the findings of the VMT analysis. With the proposed addition of 4,500 new housing units, approximately 40,000-45,000 average daily trips can be expected to be generated by the SDSU Mission Valley campus project. A rational approach that accurately identifies and describes the Project VMT and related impacts should be provided.

A3-28

#### **Air Quality**

Caltrans recognizes the project may violate the Regional Air Quality Standards (RAQS) and State Implementation Plan (SIP) and may cause or contribute to exceedances of California Ambient Air Quality Standards and suggest that this be rectified in a recirculated DEIR or in the Final environmental document.

A3-29

#### **Hazardous Waste/Materials**

The project DEIR has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed development. It is recommended that a Phase II site assessment be performed prior to construction in order to understand the magnitude of any potential cost, scope or schedule impacts associated with contaminated from lead-based paint, asbestos, contaminated groundwater and any other constituents of concern identified in the DEIR.

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Caltrans shall be notified if any hazardous waste concerns that may impact Caltrans Right-of-Way (R/W) are known during project activities.

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**Noise**

This project is not eligible for federal aid participation in accordance with 23 CFR 772 and Caltrans is not responsible for existing or future traffic noise impacts associated with the adjacent freeways of I-8 and I-15.

A3-33

**Visual**

Comments on section 4.1 Aesthetic of the DEIR for visual impacts to freeway viewers and to require measures to reduce any adverse visual impacts.

A3-34

- Senate Bill 743 and Public Resources Code Section 21099:  
The Study contends that, "any aesthetics impact the proposed project may produce, including damage to scenic resources within a state highway, as measured under the Appendix G outlines, above cannot be considered a significant impact on the environment."

A3-35

Please discuss how the new stadium, the 20 to 24-story hotel and the residential tower(s) would be protected by Senate Bill 743 and Public Resources Code 21099.

The project proposes three (3) very large, double-sided illuminated pylon signs adjacent to Friars Road and the I-15 freeway. Please justify why this large-scale, illuminated signage should be protected from a significant impact finding.

A3-36

- Project Outdoor Advertising Signage

The I-15 freeway users are a sensitive viewer group, due to the volume of users and the close proximity of the proposed project. The impact of the proposed project sign pylon at the east perimeter has not been adequately addressed. (See Sign 3 in Appendix B of the Lighting Study).

A3-37

1. Please discuss the visual impacts of Sign #3 for freeway viewers.
2. Please describe Sign #3. Will it have moveable elements? Why will it have a brightness of 600 candelas per square meter? What will be displayed?

A3-38

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3. Please provide a Visual Sim to show the double-sided sign pylon with the 40-feet wide X 50-feet high sign panel on the 70-feet pole for freeway viewers.
4. Please discuss if outdoor advertising signage of this magnitude would be covered by Public Resources Code Section 21099, and if the sign could be considered a significant impact on the environment.
5. Please be advised that Caltrans has outdoor advertising permit requirements for signage adjacent to an interstate, which may limit the size, location and content of the proposed signage. Please refer to Caltrans Traffic Operations resources for statutes and regulations regarding outdoor advertising (<https://dot.ca.gov/programs/traffic-operations/oda/laws>).
6. Please add the pylon sign(s) to all affected Visual Sims.

Interstate 805 (I-805) Freeway Users, Viewpoint #9, NB I-805:

Viewpoint #9 does not adequately depict the potentially adverse visual impacts for the freeway user. This viewpoint appears to be above eye level and is located over the river. If the viewpoint is moved north of the river and lowered to eye level, the proposed project may potentially obstruct eastward scenic views to prominent peaks.

Please adjust the location of Viewpoint #9 to be north of the right and to be at eye-level.

Please adjust Visual Sim #8 to correspond to the Viewpoint location. Please re-assess the potential visual impacts to the freeway viewer.

Minor Comments:

Table 4.1-1, Viewpoint #4 Title – At View Direction and Location, change "I-5 On-Ramp" to "Friars Road SB On-Ramp to I-8".

Visual Sim #3: Existing conditions Title: change "I-5 On-Ramp" to "Friars Road SB On-Ramp to I-8".

Hydrology and Drainage Studies

1. Our review of the appendices section of the DEIR online document found that the preliminary and high-level study of the impacts to the floodplain

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- were centered on the impacts to the Project property and make no mention of the impacts to I-15 nor I-8. Also, the comparison between existing and proposed conditions is not appropriate. Caltrans requires more detailed studies that analyze the Project property's impacts to the floodplain and subsequent impacts to Caltrans' properties. These studies should include all interim conditions as separate models. Adverse impacts to Caltrans' properties for any phase of the Project will not be permitted.
2. Caltrans requests that all draft Floodplain studies be submitted to Caltrans for review and comment prior to approvals for all phases and stages of the Project.
  3. Post project drainage conditions for Caltrans' drainage facilities must remain unchanged from existing conditions.
  4. Please clarify if there will be any improvements or alterations to Murphy Canyon Creek.
  5. Caltrans must be notified in writing of floodplain impacts during Condition Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR) submittal process. State of California property does not appear on county property tax rolls.
  6. There should be no floodplain impacts to the trolley under I-15 to ensure no impediment of its service.

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#### Transit

1. Caltrans requests additional detail or plans be provided on the alignment, design, and physical connectivity of the green line trolley to the proposed purple line trolley, and green line trolley to rapid bus or local bus services.
2. Please substantiate, in detail with documentation, how the anticipated number of trolley and transit trips to and from the SDSU Mission Valley campus would be achieved. Include discussion and analyses of the number of trolleys, buses, and other transit modes, ridership, and frequency, to establish any claims of trip reductions or VMT reductions.
3. A discussion with substantiation, and a plan to provide transit services to the SDSU Mission Valley campus needs to be included as part of the DEIR to ensure that transit connectivity and adjacency is accommodated within the campus design, and is consistent with local and regional mobility plans and goals.
4. The SDSU Mission Valley project has a unique opportunity to highlight the State's goals for Transit Oriented Development.

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**Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and San Diego State University is encouraged.

A3-59

**Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

A3-60

San Diego State University should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges, as well as coordinate with Caltrans as campus development proceeds and funds become available to ensure that all modes of transportation are accounted for as part of the SDSU Mission Valley campus mitigations.

**Mitigation**

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

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Per CEQA, Caltrans requests CSU provide "fair share" funds for direct and cumulative impacts towards future improvements associated with I-8, I-15, I-805, and SR-163 corridors. Since the San Diego State University Mission Valley Master

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Plan Project's direct impacts are considered significant, feasible mitigation measures to State facilities should be identified in the IIS. Impacts that are significant and unmitigated/unavoidable need to have alternative mitigation identified in the DEIR and TIS. Recommended feasible mitigation measures include "fair share" contribution towards:

- Adaptive Traffic Signals along Friars Road from I-15 to SR-163
- City of San Diego SR-163/Friars Road Interchange Project Phase 2
- Bike/pedestrian improvements to Fairmount Avenue near I-8/Fairmount Avenue to Camino de la Reina between SDSU Main Campus and SDSU Mission Valley Campus
- I-15/Friars Road NB and SB on-ramps and off-ramps improvements
- I-15/Friars Road Bridge widening for bike and pedestrian safety improvements

Caltrans supports transit passes provided to event ticket holders to park at SDSU Main Campus and take the green line trolley to SDSU Mission Valley Stadium.

Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (<http://www.dot.ca.gov/trafficops/ice.html>).

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement, or Cooperative Agreement.

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**Right-of-Way**

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

A3-71

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov).

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Sincerely,



MAURICE EATON, Branch Chief  
Local Development and Intergovernmental Review

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Comment Letter A4



October 3, 2019

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

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF AVAILABILITY OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN DIEGO STATE  
UNIVERSITY MISSION VALLEY CAMPUS MASTER PLAN PROJECT (PROJECT)**

Dear Ms. Shinn:

The City of San Diego (City) appreciates the opportunity to work with San Diego State University (SDSU) on the Purchase and Sale Agreement for the Stadium Site in Mission Valley (PSA) in compliance with the Voter Initiative for SDSU West Mission Valley (Initiative). As you know, the City owns the property in Mission Valley commonly referred to as the Stadium Site, and the City and SDSU are negotiating the PSA for the City's potential sale of the Stadium Site to SDSU pursuant to the Initiative.

The City has thoroughly reviewed the Draft Environmental Impact Report (Draft EIR) for the SDSU Mission Valley Campus Master Plan (Project), and the analysis in the Draft EIR relates to the City Council's discretionary action that will be required for future approval of the PSA.

Based on the City's review, critical elements of the Draft EIR and the analysis contained therein appear to be inconsistent with City adopted plans, policies, environmental documentation, and the Initiative. These issues are summarized below. We have met with SDSU's executive team members and technical staff on numerous occasions in recent months, and are committed to continue meeting with them as frequently as necessary, to resolve these matters as expeditiously as possible. Additional focused comments, recommended edits, and clarifications have been provided as an attachment to this letter.

**General Project Comments**

The Draft EIR concludes that improvements with respect to off-site traffic mitigation are infeasible. The City has concerns with the underlying methodologies utilized in the Draft EIR for the traffic impact analysis and the approach in determining that mitigation is infeasible. Several provisions in the Initiative point out requirements, such as reaching fair-share agreements to mitigate off-site impacts (Measure G, section 4, SDMC section 22.0908(h)),

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and compliance with DIF requirements (Measure G, SDMC section 22.0908(l)), that may relate to required off-site improvements. Also, the Project should comply with the Street Design Manual. The Draft EIR notes that SDSU will complete certain transportation improvements if the City “grants authorization” to SDSU for that purpose. Therefore, the determination that mitigation is infeasible may not be appropriate, and additional analysis is required. The City can coordinate with SDSU to further discuss the underlying analysis and methodologies utilized with respect to traffic impacts, and the parties may be able to include provisions in the PSA to ensure the feasibility of off-site mitigation.

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The City assumes that any infrastructure improvements required or proposed by SDSU that would be located on the site depicted in the Initiative or connected to the Project directly or as analyzed within the Draft EIR, would be initiated and permitted under the sovereignty of land use authority typically exercised by CSU. As noted by SDSU, this land use authority is extended to all development related to and accessory to, a CSU project. This authority by CSU would include any subsequent environmental documentation as the Lead Agency, construction and development permitting, and resource agency permitting authority where necessary and applicable. These details should be incorporated into the Final EIR and/or the PSA where appropriate to clearly delineate authority and process for implementation of the proposed Project.

A4-3

SDSU has also stated that its Master Plan is governed by the Education Code. However, in addition to those requirements, San Diego Municipal Code section 22.0908(g) (adopted by the Initiative) requires SDSU to “use the content requirements of a Specific Plan, prepared pursuant to California Government Code section 65451, subdivision (a), in completing the SDSU Campus Master Plan revision . . . .” Those requirements include showing:

- (1) The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan;
- (2) The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan;
- (3) Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable; and
- (4) A program of implementation measures including regulations, programs, public works projects, and financing measures necessary to carry out paragraphs (1), (2), and (3).

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Therefore, the requirements to provide necessary public facilities, including drainage and mobility infrastructure, stem not just from CEQA, but from the requirements under the City's Municipal Code prior to the City approving any sale of the Project site to SDSU.

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**Murphy Canyon Creek & Storm Water Best Management Practices (BMPs)**

The Initiative does not include a metes-and-bounds survey of the Project site. However, the map contained in the Initiative illustrates the boundaries of the Project with a bold perimeter line. The map and the narrative description of the Project site in the Initiative confirm that the Project site encompasses the City-owned parcels south of Friars Road to the San Diego River, from the limits of the City parcels adjacent to private property ownership to the west, extending to the Caltrans I-15 freeway to the east. Therefore, the City believes the voters intended, in approving the Initiative, to include Murphy Canyon Creek within the site to be sold to SDSU.

The Project proposes to address surface hydrology and drainage issues through BMPs onsite within the Project parks and open space areas. While the City's MSCP allows for essential public infrastructure, such as roads and drainage conveyance infrastructure, the use of the proposed parkland or open space areas for surface hydrology (runoff) retention, water quality treatment, and/or detention could expose preserved areas to potential indirect effects. While the Draft EIR does include some analysis of this land area, the potential environmental effects of the Project on the drainage and hydrology, as well as the long-term maintenance and management of the drainage, must ensure that future hydrology, flooding, and water quality issues do not occur as a result of the development and operation of the Project. Impacts to hydrology and water quality within the Draft EIR are identified as less than significant.

The City has concerns with the less-than-significant conclusion contained within the Draft EIR for the reasons included above related to direct and indirect effects related to hydrology, water quality, and flooding. SDSU has informed the City that maintenance of all BMPs and mitigating improvements would be the responsibility of SDSU in perpetuity. It is assumed that the construction and permitting of all onsite infrastructure as shown in the Initiative, or where such infrastructure improvements are connected to the Project as analyzed within the Draft EIR, would also be permitted and implemented by SDSU under the sovereignty of land use exercised for projects related to a CSU project. These details should be incorporated, along with the methods proposed for the long-term maintenance by SDSU of the onsite BMPs, to ensure that impacts would be less than significant under CEQA. The City requires additional analysis of the Project's direct, indirect, and cumulative construction and operation/management impacts on the environment to substantiate and support a less-than-significant conclusion in the Final EIR.

**Circulation and Active Transportation Plan Consistency**

The City's recently adopted Mission Valley Community Plan and associated Final Program EIR clearly detail the necessity of the extension of Fenton Parkway, south to Camino del Rio North. This roadway is included in the prior and recently adopted Mission Valley Community Plan; is mitigation within the MVCPU Program EIR; and is included within the proposed update to the Mission Valley Impact Fee Study (IFS). The modeling and analysis conducted for the recently adopted Mission Valley Community Plan demonstrates that the extension of Fenton Parkway south continues to be necessary and required to (i) address circulation

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within the project study area; (ii) create an additional access necessary to mitigate for traffic congestion and greater vehicle miles traveled (VMT); and (iii) when otherwise not included in a development project proposal, mitigate for direct and/or cumulative impacts under the City's requirement for Traffic Impact Studies and the CEQA threshold for determining significance. The Draft EIR does not include the Fenton Parkway extension as either part of the Project or feasible mitigation for the Project. Based on analysis and information available to date, the City has determined that the Fenton Parkway extension is a feasible mitigation measure for roadway impacts, as well as freeway segment impacts. The City believes its construction and implementation is necessary to ensure consistency with previously certified environmental documentation.

The City provided this information to SDSU during the Notice of Preparation and throughout coordination meetings on the Draft EIR to ensure that the City can rely on the Final EIR for the City Council's discretionary actions related to approval of the PSA in compliance with CEQA. This requirement and analysis are consistent with the requirements the City would apply to any development project in comparable scope and size at this location. The analysis contained within the Draft EIR does not appear to be complete to support the City Council's discretionary actions related to approval of the PSA. The Final EIR should be updated to comprehensively analyze the potential impacts, feasible mitigation, and implementation of circulation improvements necessary for the proposed Project.

The Draft EIR also relies heavily on a Transportation Demand Management Plan (TDM Plan) for the assumptions that went into the traffic analysis in the Draft EIR and the conclusions that impacts would be less than significant and therefore not requiring the Fenton Parkway extension. The TDM Plan must establish a robust monitoring program, included in the Final EIR, to ensure that each of the assumptions that went into the analysis are enforceable. Without this, it is impossible for the City to conclude as part of its approval of the PSA that the impacts would be less than significant and would not require additional mitigation.

The proposed Project design is not adequately designed for the bicycle facility on Friars Road to be consistent with the Mission Valley Community Plan, which identifies a Class IV cycle track along Friars Road, including the segment that is adjacent to the northern boundary of the Project site. The design would directly impact the City's ability to complete essential bicycle infrastructure, separated from high-speed vehicular traffic, and is inconsistent with the Mission Valley Community Plan and the Climate Action Plan goals for shifting mode usage to reduce mobile source GHG emissions. This impact is not disclosed within the Land Use and Planning, GHG, or the Traffic and Circulation sections, all of which have thresholds for determining significance that include consistency with adopted plans and policies.

The Project does not appear to reflect the significant investment the region has made in providing the east-west Green Line Trolley through the Project site, paired with the future north-south Purple Line Trolley through the site. The Project design should reflect coordinated efforts with the City and SANDAG to incorporate the recommended trolley alignment into the Project to ensure that the site plan integrates the two trolley stations, provides for a bus transit center and mobility hubs, and access for bus, pedestrian, and bicycle travel throughout the site and beyond. SDSU is encouraged to work with SANDAG and

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MTS on the design and operation of the future transit facilities onsite. This should be updated in the revised Master Plan documentation and within the Final EIR to ensure a complete analysis of the Project, consistent with the Mission Valley Community Plan for mobility connections and access, and toward the goal of Strategy 3 of the Climate Action Plan.

#### Climate Action Plan Consistency

The City of San Diego adopted a Climate Action Plan in December 2015, and in 2016, the City updated the GHG Threshold to reflect a threshold for CEQA significance for a project to be consistent with the Climate Action Plan. This threshold was further supported with the City's adoption of the Climate Action Plan Consistency Checklist for Projects, securing the City with a Qualified Greenhouse Gas Emissions Reduction plan under CEQA Guidelines section 15183.5, providing for streamlining opportunities under CEQA for GHG emissions impacts.

At the time the Climate Action Plan was developed, and the baseline was determined, the Project site was a stadium with no accessory development onsite; the Project proposes significant new development on the stadium site that was not included the CAP's Citywide GHG emissions assumptions. SDSU did complete the CAP Checklist for the project, consistent with the City requirements, and included the documentation in the technical appendix to the Draft EIR. The Draft EIR prepared for the Project should clearly utilize the City's adopted threshold for determining significance to analyze potential impacts related to GHG emissions. Additionally, as discussed above, there is no TDM Plan included as part of the Draft EIR or the PSA to ensure that the assumptions that went into the GHG analysis of mobile source emissions would be achieved, and impacts related to GHG would be less than significant. The TDM Plan must include a detailed monitoring program to ensure that all assumptions that went into the analysis are enforceable. Without this, the analysis and conclusion that the impacts would be less than significant and would not require additional mitigation are incomplete and should be more clearly detailed with respect to performance standards, timing, and responsibility for implementation. The City requests that the analysis and details of the TDM Plan implementation be included in the Final EIR and that the TDM requirements also be included in the Design Guidelines document.

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The City notes that SDSU released the Draft EIR before the parties had completed their negotiations toward a PSA that will incorporate the provisions of the Initiative and SDSU's related campaign promises. The City anticipates the ongoing negotiations will culminate in a PSA that may include Project features and mitigation measures not currently reflected or analyzed in the Draft EIR. To serve its purpose as an informational document and to ensure an adequate, thorough, and consistent description of the Project, the Final EIR will need to reflect the Project design, mitigation measures, and development commitments contained in the fully-negotiated PSA and will need to include any associated environmental analysis.

The City looks forward to coordinating with SDSU further to improve the value of the Draft EIR as an informational document and to mitigate the Project's potential environmental impacts to the extent feasible. Given that the City Council will need to exercise its

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independent judgment as to whether the Final EIR is a sufficient informational document before considering approval of the PSA, the City reserves the right to insist upon necessary revisions to the Draft EIR.

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The City requests that upon receipt of this letter, and the comments attached, that working meetings be scheduled to resolve the analysis within the Draft EIR as necessary under CEQA in preparation of a Final EIR to be used by both SDSU and the City on the separate actions to approve the PSA. Please contact me directly if there are any questions regarding the contents of this letter or to arrange for coordination meetings of staff.

Respectfully submitted,



Mike Hansen  
Director  
Planning Department

MH/rm

Attachment: Detailed Comments on the Draft EIR

cc: Honorable Mayor Kevin L. Faulconer  
Honorable Council President Gómez and Members of the City Council  
Honorable City Attorney Mara Elliott  
Aimee Faucett, Chief of Staff  
Kris Michell, Chief Operating Officer  
Andrea Tevlin, Independent Budget Analyst  
Ronald H. Villa, Assistant Chief Operating Officer  
Erik Caldwell, Deputy Chief Operating Officer, Smart & Sustainable Communities  
Alia Khouri, Deputy Chief Operating Officer, General Services  
Johnnie Perkins, Deputy Chief Operating Officer, Public Works & Utilities  
Jeff Sturak, Deputy Chief Operating Officer, Internal Operations  
Robert Vacchi, Deputy Chief Operating Officer, Neighborhood Services  
Christina Chadwick, Senior Press Secretary, Office of the Mayor  
Kris McFadden, Director, Transportation & Stormwater Department  
Cybele Thompson, Director, Real Estate Assets Department  
Kevin Reisch, Chief Deputy City Attorney, Office of the City Attorney  
Melissa Ables, Deputy City Attorney, Office of the City Attorney  
Andrew Kleis, Deputy Director, Transportation & Stormwater Department  
Alyssa Muto, Deputy Director, Planning Department  
Reviewing Departments

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**ATTACHMENT A:  
CITY OF SAN DIEGO COMMENTS ON THE MISSION VALLEY CAMPUS MASTER PLAN  
PROJECT (PROJECT) DRAFT ENVIRONMENTAL IMPACT REPORT**

The City of San Diego (City) Planning Department has received the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) prepared by the Board of Trustees of the California State University and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft EIR and appreciates this opportunity to provide comments to the Board of Trustees. In response to this request for public comments, the City has the following comments on the Draft EIR for your consideration.

A4-17

The Mission Valley Community Plan Update (MVCPU) has retained the Fenton Parkway Extension from the currently adopted plan as a needed connection for circulation within Mission Valley. The DEIR should evaluate this connection as feasible partial mitigation for the Project's potential significant impacts to transportation by providing needed connectivity, expanded access to transit, and high-water crossing during flooding events.

A4-18

In Draft EIR Section 4.15.11 and associated tables, comparisons are made between *2037 No Project with Bridge* and *2037 Project with Bridge*. Since the bridge is not fully funded and programmed to be in place, the analysis should compare *2037 Project with No Bridge (i.e. the Project)* and *2037 Project with Bridge* to appropriately analyze the Fenton Parkway Extension as mitigation.

In Draft EIR Section 4.15.11.2 Traffic Redistribution with Bridge states, "*a new run of the SANDAG Series 13 Year 2035 travel demand model was performed with both a 2-lane and 4-lane Fenton Parkway bridge in place. The results of this new run were then compared to the previous run without the bridge to determine where traffic volumes would shift to with the new connection.*" Please clarify whether the new runs with the connection in place were simply network reassignment runs of the without connection scenario or complete model runs. The redistribution should be based on a full model run with the connection in place, then a reassignment to network without the bridge connection.

A4-19

With regard to Street 'A' (Mission City Street 'I' in MVCPU), please provide details on how this road will connect to Fenton Parkway including with the planned Fenton Parkway extension across the river. Additionally, in Section 14.4 of the Draft EIR, it appears that this street is used as an access point to the site in the analysis of emergency response times for responding fire stations. The Draft EIR should describe the configuration of the extension of Fenton Parkway and Street 'A' connection including interaction with the existing Green Line trolley and all bike and pedestrian connections, including grade separation alternatives. Please provide information related to California Public Utilities Commission (CPUC) acceptance of proposal.

A4-20

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Although the MVCPU and associated FEIR assumes that a refined circulation network would be defined in a Specific or Master Plan for the Stadium Site, the MVCPU still assumed a direct connection between San Diego Mission Road and Mission Village Drive. The proposed Project and Draft EIR assume a circulation network that removes this connection. It is unclear if or how this project addresses the potential re-routing of traffic with the proposed removal of the connection between San Diego Mission Road and Mission Village Drive. Currently, there is significant traffic during the peak periods that use this connection. Would the traffic now drive through the campus or use Friars Road as an alternate route?

A4-21

Section 4.15.7.6.2, Bicycle Facilities, states that the proposed project would not conflict with existing or planned bicycle facilities. However, the MVCPU envisions Class IV one-way cycle tracks on Friars Road along the frontage of the proposed project site. The SDSU Mission Valley Campus Master Plan (Project) does not provide for these cycle tracks and the Project proposal of an additional lane on the Friars EB ramp from Mission Village Drive will increase the level of stress for cyclists by having them cross two lanes of traffic. It is recommended that project include a Class IV cycle track as envisioned in the MVCPU for consistency and provide schematics of how a Class IV could be designed to address safety and operational concerns.

A4-22

The Draft EIR discloses impacts on several freeway segments but due to lack of jurisdiction proposes no mitigation aside from TDM. It is recommended that the Draft EIR look at additional mitigations that may reduce the impacts on these segments. Specifically, the Draft EIR should evaluate:

A4-23

1. Any identified projects in the San Diego Forward: The Regional Plan, 2015 (RP) such as managed lanes on all impacted freeways segments that may partially mitigate the Project's impacts.
2. Additional mitigation that would alleviate the impacts on the I-15 including the Fenton Parkway Extension and Santo Road connections. These needed local connections would relieve dependence on freeway travel for short distances which creates overcapacity/breakdown conditions substantially reducing freeway capacity.
3. Additional mitigation on the SR 163 that should include Phases 2 & 3 of the SR-163/Friars interchange. These phases are not currently funded.

A4-24

A4-25

Trails shown on Figure 2-9D *Concept Design – River Park Plan* and Figure 2-9E *Concept Design – Trails and Open Space Plan* show trails connecting to the Fenton Parkway Station, but do not include a connection to the western most edge of the project boundary. A contiguous SD River Trail is envisioned in the San Diego River Park Master Plan (SDRPMP). Trail connections to the RiverRun development to the west, and as part of a potential Mission City/Fenton Parkway Bridge connection, should be considered as an element of the project description and impacts/mitigation to both sensitive plant and animal species included in the Draft EIR.

A4-26

Revise the Draft EIR project description and impact analysis to include any necessary improvements to Murphy Canyon Creek to address flood risks or easements associated with

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the proposed storm drain system. The Draft EIR should assume that the Murphy Canyon Creek Channel and drainage responsibilities will be conveyed to SDSU as part of the project. The Draft EIR should also assume that all existing storm drain system assets in the Existing Stadium Site and River Park will be conveyed to SDSU, including requiring that SDSU design, permit, construct and maintain all necessary storm drain improvements (pipes, channels, engineered streams, headwalls, storm water treatment facilities, and any other associated structures).

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Section 2.3.2 of the Draft EIR references the Purchase and Sale Agreement, but no specifics are provided on improvements in Murphy Canyon Creek. Section 2.3.4.3 references River Park improvements but notes that the design is conceptual and maybe be revised by more precise site planning. Figure 2-10D showing proposed storm water facilities also does not show improvements in Murphy Canyon Creek. Figure 2-10E shows locations for proposed BMPs but does not include possible BMPs and flood control measures that could be necessary to locate in Murphy Canyon Creek.

In the Final EIR please include an analysis of environmental impacts associated with the following potential improvements in Murphy Canyon Creek and associated with the proposed Storm Drain System for the project:

1. Please include an analysis of the necessary improvements/expansions to Murphy Canyon Creek to bring the Creek to a condition that will adequately convey the appropriate flow and not flood the project site in accordance with the City's Drainage Design Manual. Measures that may be necessary to address flood risks could include realigning the creek. See Comments on Hydrology and Water Quality Section for more detail;
2. Address any access that may be necessary to maintain Murphy Canyon Creek as a flood control channel over the long-term;
3. Address the need for a flowage easement to Murphy Canyon Creek;
4. Storm Water Treatment Control Best Management Practices from the proposed project may not be located on City property. Address the relocation of BMPs noted in Figure 2-10E that may currently be proposed on City property in the DEIR;
5. Address easements that may be necessary for City storm drain facilities;
6. Address any other necessary improvements for proper drainage and water quality purposes.

A4-28

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**Planning Department, CEQA and Environmental Policy – Rebecca Malone, Senior Planner –**  
[rmalone@sandiego.gov](mailto:rmalone@sandiego.gov), 619-446-5371

1. In the Mitigation Monitoring and Reporting Program (MMRP) for the Mission Valley Community Plan Update (MVCPU) Program EIR, MM-AQ-2 requires that the specific plan for the stadium site include various measures to reduce construction emissions. The

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Planning Department acknowledges that MM-AQ-1 in the SDSU Mission Valley Campus Master Plan Draft EIR includes these measures.

2. In the MMRP for the MVCPU Program EIR, MM-NOS-1 requires that discretionary projects within the CPU area implement various measures to reduce construction noise. The Planning Department acknowledges that MM-NOI-1 through MM-NOI-5 in the SDSU Mission Valley Campus Master Plan Draft EIR include these measures.
3. The project includes athletic fields adjacent to the San Diego River and Murphy Creek. Would the athletic fields be lighted? Were the potential effects to sensitive species from noise or lighting from those fields analyzed?
4. The Draft EIR did not include information on the relocation of existing reoccurring events from SDCCU Stadium to another location. Will these reoccurring or intermittent special events be programmed at the future stadium? If not, where will these event be relocated to and would there be a significant impact related to the relocation or displacement of such events?
5. The Project proposes to address surface hydrology and drainage issues through BMPs onsite within the Project parks and open space areas. While the City's MSCP allows for essential public infrastructure, such as roads and drainage conveyance infrastructure, the use of the proposed parkland or open space areas for surface hydrology (runoff) retention, water quality treatment, and/or detention could expose preserved areas to potential indirect effects related to water quality, trash and contaminants, and non-native species that could impact native plant and animal species known to occur within the San Diego River corridor.

**Planning Department, Mobility Planning – Maureen Gardiner, Associate Traffic Engineer –**  
[MGardiner@sandiego.gov](mailto:MGardiner@sandiego.gov), 619-236-7065

**Consistency with Mission Valley CPU (MVCPU)**

1. Please revise Figure 11 of Appendix 4-15-1 Traffic Impact Analysis. Section 10 is shown as the Kinder-Morgan access road on the plan view (pg. 1 of 2) but as the EB Friars On-Ramp in the cross-section detail (pg. 2 of 2). Please provide cross-section of the Kinder-Morgan access road.
2. Mission Village Drive & Friars Road EB Ramps Intersection: The Project should define how this modified intersection functions. Specifically, how the access to the Kinder Morgan site would operate. Would trucks utilize the outside southbound left turn lane of the Friars Road Eastbound Ramps/Mission Village Drive intersection from Mission Village Drive to access the Kinder-Morgan site? Did the EIR evaluate if trucks would block access to the inside left turn lane?
3. It appears that minimal bicycle and pedestrian facilities are proposed on the Mission Village Drive access to the site. As the site will be a significant attractor with events and is planned for two rail stations, substantial pedestrian and bicycle/micro-mobility accommodations should be proposed to access the site.

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#### Impacts & Mitigations

1. Intersection Impacts: For impacted City signals, the DEIR generally recommends either optimizing the signal timing or striping changes based on a trigger of Dwelling Unit Equivalents (DUE). However, the DEIR also states that CSU/SDSU has no jurisdiction over these signals and it cannot guarantee the funding or implementation of the recommended mitigations and therefore, these mitigations are infeasible. It is recommended that CSU/SDSU work with the City to implement these mitigations as the project is developed to the identified DUE trigger for each mitigation. Furthermore, where alternative mitigation is identified they are also deemed infeasible, please recommend feasible alternative mitigations.
- a) MM-TRA-10 Intersection 32 Ward Road & Rancho Mission Road: Why is the signal installation infeasible if the Project's traffic at the defined threshold (3,950 DUEs) would warrant a signal at this location. The Project should ensure that adequate access is provided to its site.
2. I-15 & Friars Intersections (NB & SB): The DEIR identifies recommended mitigations for the I-15 and Friars based on vehicle delay and queuing. The MVCPU Final PEIR also identified impacts at these locations and recommends that a Project Study Report (PSR) be funded to identify the appropriate, more holistic improvements that would address all modes of travel. It is recommended that the DEIR include the PSR and resulting recommended improvements as partial mitigation toward project impacts.

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#### Other DEIR Comments

1. The DEIR and TIS should follow the guidelines of the City *Traffic Impact Study* Manual and the current *City of San Diego Significance Determination* Thresholds for transportation facilities, which includes the evaluation of the 2050 Horizon Year conditions, as requested by the City in its comment letter to the NOP for the Project.
2. Please clarify if the 2037 analysis assumes the Purple Line Phase 1 project in place. This is not currently funded and programmed, therefore analysis that does not include the Purple Line should be provided.
3. DEIR Table 4.15-1: It appears that Commute Trip Reductions are combined with the other trip reductions listed and then applied to all trips as shown in Table 4.15-10. Reductions applicable to commute trips should only be applied to commute trips.
4. DEIR Table 4.15-43 VMT Analysis: Please clarify the methodology used to obtain the VMT values in this table as they appear to be double the San Diego Forward: The Regional Plan, 2015 (RP) FEIR and other SANDAG reports on VMT we have reviewed. The DEIR indicates 158 million VMT in the 2012 Baseline, while in the RP FEIR, that also uses Series 13, indicates a regional VMT of 79 million VMT. Likewise, in 2037, the DEIR reports a VMT of 185 million VMT while the RP FEIR reports 90.5 million VMT (albeit for 2035).

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**Planning Department, Cultural Resources – Myra Herrmann, Senior  
Planner/Archaeologist/Tribal Liaison – [mherrmann@sanidiego.gov](mailto:mherrmann@sanidiego.gov), 619-446-5372**

**DEIR Comments – Chapter 4.4 – Cultural Resources**

- |  |   |
|--|---|
| <ol style="list-style-type: none"> <li>1. Page 4.4-3 – Cultural Context. Not all readers of the DEIR will also review the Cultural Resources Technical Report and as such, this very brief paragraph does not provide any real tribal context with respect to the Kumeyaay Nation. This only provides cultural complexes used for the purpose of classifying the archaeological assemblages into chronological timeframes. In order to support the technical analysis and environmental determination the tribal cultural context should be briefly expanded and include reference to the Aboriginal Territory of the Kumeyaay/Diegueño Nation that was adopted by State Assembly Joint Resolution No. 60 in 2001, and that the Kumeyaay are the identified Most Likely Descendants by the NAHC for all Native American human remains found in the City of San Diego's jurisdictional boundaries. This is especially important in the event that human remains are encountered during construction-related activities.</li> <li>2. Page 4.4-3 – Archaeological Inventory. 1st paragraph, please insert “cultural” before “resources” in line 6.</li> <li>3. Page 4.4-3, 2nd paragraph, please change “Mission of San Diego” to “Mission San Diego de Alcalá” and insert the village of “Nipawai” before “Nipaguay”. Both village names should be italicized and consistently referenced together as noted in the comments provided on the technical report and throughout this EIR chapter (e.g., Page 4.4-15).</li> <li>4. Please correct the site record reference for the SDCCU Stadium currently shown as P-37-000035; CA-SDI-35. This is incorrect. The correct Primary record number for the SDCCU Stadium is P-37-035171.</li> <li>5. Page 4.4-13, last paragraph, reference to the City's cultural resources regulations should be changed to read “Historical Resources Regulations”.</li> <li>6. Pages 4.4-14 and 4.4-15, please insert the word “Resources” in the last line of each paragraph describing the City's designation criterion.</li> <li>7. Page 4.4-16 under “Construction Impacts”, please insert “...with the Iipay Nation of Santa Ysabel” after “Clint Linton” and “representative of the” in lines 2 and 3.</li> <li>8. The City of San Diego concurs with the mitigation measures for archaeological and Native American Kumeyaay monitoring provided in the DEIR to address potential impacts on cultural resources, including sacred sites and human remains (MM-CUL-4 and MM-CUL-5). These measures will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture. In the event that such resources are discovered in proximity to City-owned land, notification to the City of San Diego would be requested to ensure that future efforts in those areas are being appropriately addressed in accordance with CEQA and the City's Historical Resources Regulations and associated Guidelines.</li> </ol> | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-44</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-45</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-46</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-47</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-48</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-49</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-50</p> <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> <p>A4-51</p> |
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9. With respect to Mitigation Measure MM-CUL-1, although the SDCCU Stadium Site will be transferred to SDSU for future development, the importance of the built-environment resource to the City is non-the-less important. As such, please include the City of San Diego, Historical Resources Section to the list of recipients to receive a copy of the HABS documentation for their records.
10. With respect to Mitigation Measure MM-CUL-2 regarding interpretive displays associated with the SDCCU Stadium. Please clarify whether the request by Clint Linton with the Iipay Nation of Santa Ysabel to commemorate Jack Murphy in some manner would be included in the interpretive displays under this measure, perhaps this can be accomplished as part of consultation with City Historical Resources staff.

A4-52

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**DEIR Comments – Chapter 4.6 – Geology and Soil**

1. Regarding the discussion of potential impacts to paleontological resources from the project on Page 4.6-18, only the County of San Diego guidance is referenced regarding resource sensitivity. While the City of San Diego does not disagree with the conclusions of the DEIR Chapter, it should be noted that we also provide guidance for analysis and significance determinations in our Paleontological Guidelines (2002), Significance Thresholds (2016) and recently adopted changes to San Diego Municipal Code Section 142.0151 – General Grading Guidelines for Paleontological Resources. These documents provide context for the purpose of analyzing potential impacts to Paleontological fossil resources within the City of San Diego's jurisdictional boundaries and should be incorporated into the Geology and Soils Section and References Cited sections of the DEIR.
2. The City of San Diego concurs with the mitigation measure provided (MM-GEO-3) to reduce potential impacts to paleontological resources during construction-related activities associated with implementation of the proposed project.

A4-54

A4-55

**DEIR Comments – Chapter 4.16 – Tribal Cultural Resources**

1. Page 4.16-2, last paragraph, please capitalize the first letters of the Tribal Historic Preservation Officer in line 1. This is an official title under State and Federal regulations.
2. Page 4.16-6, last paragraph, please revise the first sentence as follows to clarify that this impact statement is not referring to cultural (archaeological) resources: “No California Register of Historical Resources (CRHR) listed or eligible tribal cultural resources were identified through the South Coastal Information Center...”. Please also make this same revision to the 1<sup>st</sup> and 2<sup>nd</sup> paragraphs on Page 4.16-7.
3. Also in this paragraph on Page 4.16-6, the village of *Nipawai* should be italicized and *Nipaguay* should be added to the sentence. Please also make this same revision to the 3<sup>rd</sup> and 4<sup>th</sup> paragraphs on Page 4.16-7.
4. Page 4.16-7 under “Construction Impacts”, please insert “...with the Iipay Nation of Santa Ysabel” after “Clint Linton” and “representative of the” and insert the word “the” before “Kumeyaay trail...”.

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5. Page 4.16-8 under Subsection 4.16.5 – Summary of Impacts Prior to Mitigation, please insert the word “tribal” in the first sentence after “CRHR-eligible” and also in line 3 of the same paragraph.
6. The City of San Diego concurs that the mitigation measures for Native American Kumeyaay monitoring provided in the DEIR to address potential impacts on cultural resources, including sacred sites and human remains (MM-CUL-4 and MM-CUL-5) will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture.
7. Page 4.16-9, please insert “tribal” after “eligible” at the beginning and end of line 2 and in line 5 in the 1<sup>st</sup> paragraph. Please also revise the sentence for MM-CUL-4 as follows: “MM-CUL-4 outlines procedures for proper treatment of unanticipated archaeological discoveries, which are also often tribal cultural resources as defined in CEQA PRC Section 21074, that comply with the CEQA Guidelines. This edit will provide further consistency with the PRC section noted above.

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A4-62

**Draft Cultural Resources Technical Report Comments**

1. Several pages in the technical report (e.g., Page iii, Page 31) refer to the South Coastal Information Center (SCIC) site record for the SDCCU Stadium as P-37-000035; CA-SDI-35. This is incorrect. The correct Primary record number for the SDCCU Stadium is P-37-035171. This error should be corrected where noted above in the technical report, as well as in Chapter 4.4 – Cultural Resources of the DEIR, and anywhere else this may be referenced in the DEIR.
2. On Page 13, in the 3<sup>rd</sup> paragraph under Subsection 2.2 – Field Methods, the second sentence should read “...river, is located “within” the project site...”
3. On Page 19, 1<sup>st</sup> paragraph, line 1 under the City of San Diego, please revise the Historical Resources Guidelines date reference to 2001. This correction will then be consistent with the date shown in other sections of the technical report and in Chapter 8 – References Cited.
4. In the Cultural Context and Ethnohistoric discussion of the Kumeyaay territory, it should be noted that the Aboriginal Territory of the Kumeyaay/Diegueño Nation was adopted by State Assembly Joint Resolution No. 60 in 2001, and that the Kumeyaay are the identified Most Likely Descendants by the NAHC for all Native American human remains found in the City of San Diego’s jurisdictional boundaries. This is especially important in the event that human remains are encountered during construction-related activities. Please include this information in the Draft EIR Chapters 4.4 – Cultural Resources and Chapter 4.16 – Tribal Cultural Resources.
5. The ethnohistoric Kumeyaay village of *Nipawai* is referenced on Page 26, but no other information is provided to understand the relevance, significance, and association of this Native American village to the Mission San Diego de Alcalá. This context is also important when taking into consideration the requests made by representatives of the Kumeyaay Nation for monitoring during all ground disturbing activities. This additional

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context also serves to support the impact analysis provided in DEIR Chapters 4.4 – Cultural Resources and Chapter 4.16 – Tribal Cultural Resources. It should also be noted that the spelling of village site is also often shown as *Nipaguay* in historical records and as such, both spellings should be used consistently in the technical report and associated DEIR chapters. Additionally, reference to the village of Kosay should also include the other referenced spellings: *Kosaii/Cosoy/Kosa'aay*.

A4-67  
(Cont.)

6. On Page 26, 4<sup>th</sup> paragraph and Page 28, 1<sup>st</sup> paragraph, please change “Mission of San Diego” to “Mission San Diego de Alcalá”. This change should be made elsewhere in the technical report, Chapter 4.4–Cultural Resources, and in any other applicable chapter of the DEIR for consistency.

A4-68

7. Page 38, 2<sup>nd</sup> paragraph, please insert “...with the Iipay Nation of Santa Ysabel” after “Clint Linton” in line 2.

A4-69

8. On Page 39 under the impact question regarding the project affect to a resource listed or eligible for listing in the California Register of Historical Resources (CRHR), this discussion technically covers all historical resources, and as such should also consider including a brief reference to the NRHP, CRHR and City eligible SDCCU Stadium Site as further described in site form P-37-035171 and the Historical Resources Technical Report prepared for the project.

A4-70

9. The City of San Diego concurs with the mitigation measures for archaeological and Native American Kumeyaay monitoring provided in the technical report to address potential impacts on cultural resources, including sacred sites and human remains. These measures will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture. In the event that such resources are discovered in proximity to City-owned land, notification to the City of San Diego would be requested to ensure that future efforts in those areas are being appropriately addressed in accordance with CEQA and the City’s Historical Resources Regulations and associated Guidelines.

A4-71

#### **Paleontological Resources Inventory Report Comments**

1. The Paleontological Resources Inventory Report only references the County of San Diego guidance regarding resource sensitivity criteria. The City of San Diego also provides guidance for analysis and significance determinations in our Paleontological Guidelines (2002), Significance Thresholds (2016) and recently adopted changes to San Diego Municipal Code Section 142.0151 – General Grading Guidelines for Paleontological Resources. These documents provide context for the purpose of analyzing potential impacts to Paleontological fossil resources within the City of San Diego’s jurisdictional boundaries and should be incorporated into the technical report and References section.
2. The City of San Diego concurs with the mitigation measure provided to reduce potential impacts to paleontological resources during construction-related activities associated with implementation of the proposed project.

A4-72

A4-73

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**Planning Department, Long-Range Planning Division – Nancy Graham, Development  
Project Manager III – [nhgraham@sanidiego.gov](mailto:nhgraham@sanidiego.gov), 619-236-6891**

1. Executive Summary: The current Mission Valley Community Plan was originally adopted in 1985, not 1984 as stated in the EIR.
2. Chapter 2: Table 2-5. Parks, Recreation, and Open Space table needs to be more clear on what area is available to the public versus what is available only to people affiliated with SDSU (students/faculty and/or event ticket holders).
3. Chapter 2: The project should analyze the inclusion of a Community Rec Center, even if the proponents do not intend to construct the facility.
4. Chapter 2: The EIR should identify the possibility of a primary and or secondary school site (such as a charter school) on the campus as identified in the Mission Valley Community Plan.
5. Chapter 2: It is unclear how the connection to Fenton Parkway will be made from the site recognizing the rail crossing. A permit will likely be required by the CPUC, which is not included in their list of Requested Project Approvals. The illustrations make it look like this connection will be made, but Figure 2-11A shows a gap in the connection where the tracks are located, while also including a traffic signal at that location. These details are also completely missing from the Street Sections, but there is a visual simulation of the connection in Figure 4.1-17.
6. Chapter 3: The project list should include a proposed Community Park and Recreation Center on the pad they have identified in the site plan. These facilities are standardized enough throughout the City that enough information can be inferred on what will be there in the future.
7. Chapter 4.1: The current Mission Valley Community Plan calls for the protection of views of the existing stadium as a recognized landmark. This should be noted specifically in the analysis, along with the mitigation that may be necessary to address any significant impacts that would result with the demolition of this structure.

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**Planning Department, Park Planning – Scott Sandel, Parks Planner –  
[ssandel@sanidiego.gov](mailto:ssandel@sanidiego.gov), 619-235-5204**

1. Figures regarding the ownership of the southwestern area that include the park, are inconsistent within the Draft EIR; see Figures 2-1 and 2-9C. Please revise to be both consistent and reflective of the Initiative and PSA.
2. Section 2.2: More specificity should be given to the context and meaning of “shared parks and open space” as an objective. Does this mean something formal, along the lines of a public access agreement with the City of San Diego for the recreation areas outside of the 34-acre City River Park? Does this include an aquatics facility, as shown on the City’s Draft Mission Valley Community Plan Update?

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3. Section 2.3: Phasing/River Park: Discuss program for the park and inclusion of a recreation center and an aquatic center, per the City's draft Mission Valley Community Plan Update and the Public Facilities Financing Plan. Per Measure 'G': "8. The People of the COSD also desire the reservation and improvement of an additional minimum of 22 acres within the Existing Stadium Site as publicly-accessible active recreation space." (Note: emphasis added on active recreation.) These 22 acres are also referenced in SDMC 22.098.
4. Section 2.3.4: Community Recreation Center Site: Indicate in further detail this COSD-owned site on Table 2-5, on plan figure 2-9C and in narrative description, including acres, of the pad for the recreation and aquatic center. Describe how the design for this site would or would not be per Council Policy 600-33.
5. Section 4.1: Mission Valley Community Plan Update: Also please discuss the Public Facilities Financing Plan projects P-4 and P-5 that are applicable to this site per the Draft Mission Valley Community Plan Update. (Mistakenly omitted from discussion)
6. Section 4.10: City of San Diego Development Impact Fee program – Mission Valley, 3rd paragraph: It is stated that the Park fee "reflects the limited availability of parks and current shortage of park space in Mission Valley". This is incorrect. The fee does not reflect current shortages. Instead it is based on projected future needs, based on projected residential uses (not current parkland deficits) and current (not future) land and construction costs.
7. Section 4.10: City of San Diego Development Impact Fee program – Mission Valley, 4th paragraph: Required population-based COSD park acreage requirements are based on "useable" land, as defined in the COSD General Plan's Glossary. Please restate both narrative and proposed park acreages in terms of usable park acreages. See 4.14, Parks and Recreation, for language concerning the "useable" park acreage cited from the COSD General Plan Recreation Element.
8. Section 4.13-7: Table compares project parkland acreages in "apples to oranges" methodology. Mission Valley CPU uses "useable" park acreage, while Proposed Project uses gross acreage. (See discussion above in 4.10.) Restate in useable acreage.
9. Section 4.14: Park Development: EIR erroneously omits reporting the Aquatic facility.

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**Parks & Recreation Department – Andrew Field, Interim Director – Contact: Jeannette DeAngelis, Deputy Director – [JDeAngelis@sanidiego.gov](mailto:JDeAngelis@sanidiego.gov), 619-685-1323**

Thank you for the opportunity to comment on the Notice of Availability for the Draft EIR for the San Diego State University (SDSU) Mission Valley Campus Master Plan Project (Project). The City of San Diego (City) Parks and Recreation Department (Department) requests that the Draft Environmental Impact Report (DEIR) address the following impacts:

A4-83

A4-84

A4-85

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A4-90

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1. Design Guidelines in the SDRPMP include a 35-foot wide River Pathway corridor. The conformance evaluation with the SDRPMP should address conformance with Section 3.1.2 A. (Establish Appropriate Corridors for the River, Wildlife and People); and Section 3.1.3 (Create a Connected Continuum, with a Sequence of Unique Places and Experiences; Recommendation A. Create a continuous multi-use San Diego River Pathway from the Pacific Ocean to the City of Santee). In the DEIR under Land Use and Planning, *Project conformance with the San Diego River Park Master Plan*, Table 4.10- 3, *Key Points for Qualcomm Stadium Site*, the SDRPMP notes this is a “critical location for creating continuity in San Diego River Park and San Diego River Park pathway.” The DEIR states, “The proposed project includes a system of trails throughout the River Park” as substantiation for conformance. This conformance statement should be reevaluated given the vision of a contiguous trail corridor along the River pathway if the additional trail linkages to the west are not added to the project description.
2. Discussed in Section 1.6.2, page 1–16, *Development Features Contemplated by San Diego Municipal Code Section 22.0908*: the Draft EIR states, “As part of the purchase of the project site, SDMC Section 22.0908 requires that CSU (on behalf of SDSU) revitalize and restore the 34-acre River Park as identified in SDMC Section 22.0908, which will be retained and owned by the City in fee.” Please provide clarification as to which entity is anticipated to provide long-term maintenance and management of the 34-acre River Park. Please include a discussion
  - a. If SDSU, include discussion of maintenance standards expected to be used, within the active park areas and San Diego River buffer area.
  - b. If City of San Diego, Parks and Recreation Department, consideration may be needed for additional park access points for maintenance, equipment storage facilities and parking for maintenance staff. Please discuss and assess any impacts to the City General Fund, the reduction of park use areas, open space and/or population-based park acreage requirements.
3. The DEIR acknowledges potential impacts to sensitive vegetation and wildlife habitat under the Biological Resources Section 4.3, Page 4.3–21, “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 proposed project footprint, particularly if people go into the San Diego River or Murphy Canyon Creek.” Please provide mitigation measures to avoid and reduce unintentional edge effects and unwanted human activity in the San Diego River or Murphy Canyon Creek. The stated mitigation measure, *MM-BIO-10 INDIRECT EDGE EFFECTS*: “The proposed project shall be designed so that any sports or recreational fields and courts shall be set back a minimum of 100 feet from the floodway of the San Diego River to reduce noise and lighting impacts” does not address control measures such as fencing and signage to discourage park users from entering sensitive habitat areas.
4. Ensure that the any access required for the Swift Water Rescue team by the San Diego

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(Cont.)

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Fire-Rescue Department to Murphy Creek and the San Diego River from the site is included in the project description and that impacts/mitigation to both sensitive plant and animal species included in the PEIR.

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A4-93  
(Cont.)

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**Fire-Rescue Department, Swiftwater Rescue Team – John Sandmeyer, Marine Safety Captain – [jsandmeyer@san-diego.gov](mailto:jsandmeyer@san-diego.gov), 619-221-8833**

1. Over the past decade, there have been 10 to 15 serious incidents related to the rescue of people in or around the San Diego River and Murphy Creek riparian areas to the east and south of the current stadium parking lot. Incidents ranged from populated encampments that were surrounded by rising flood water to people trapped while searching for pedestrian routes across the river as well as vehicles trapped in the existing parking lot by the inundation of river water that breeched existing dirt or concrete levies.

The request of the Fire-Rescue Department Swiftwater Rescue Team (SRT) would be to maintain emergency vehicle access to the banks of Murphy Creek and the San Diego River from the area that is currently occupied by the stadium parking lot. It is not required of the SRT and other rescue groups to have hardscaped driveways, lane or ramps to the river edge. Rescue teams can access the river areas within a natural soft-scaped interface. Our preference would be to have acceptable access routes available, spread out at distances of not more than approximately 500 feet, that would enable a typical 4-wheel drive truck to approach the river bank and stage for purposes of coordinating swiftwater and flood rescues in the river plain.

Impediments to emergency access like fences, wires or walls should be clearly marked to provide directions to locations of best access. Any manmade culverts, pipes, tunnels or drainage collection areas should be constructed without creating added threats to life safety that would create additional hazards during periods of heavy precipitation and flooding. Steep culvert banks and low head dams are two features in urban infrastructure construction that have led to dangerous conditions to people trying to negotiate their way out of moving water drainage areas. We are eager to help provide input to future planning efforts related to river and flooding rescue threats in this area. Please feel free to contact me with any questions on this input.

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A4-94

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**Development Services Department – Ann French Gonsalves, Senior Traffic Engineer, Contact: Leo Alo, Associate Traffic Engineer – [Lalo@san-diego.gov](mailto:Lalo@san-diego.gov), 619-446-5033**

1. Page ES-3, Section ES.3.1: The DEIR should clearly state how the SDSU Mission Valley Campus Master Plan estimates being able to accommodate 15,000 full-time equivalent students (FTES) at buildout, especially with such a great magnitude of unmitigated traffic impacts.

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A4-95

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| 2. Pages ES-55 to ES-70: Table ES-2 should state whether impacts are “direct” versus “cumulative”. All impacts should be mitigated to the extent feasible to the satisfaction of the City Engineer and/or Caltrans.   | A4-96  |
| 3. Page ES-55, Table ES-2: Impact TR-1 is shown as Significant and Unavoidable. However, the impact can be mitigated to below a level of significance by limiting the number of events to the same or fewer than the existing SDCCU stadium.  | A4-97  |
| 4. Page ES-55, Table ES-2: Impact TR-2/28A is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.   | A4-98  |
| 5. Pages ES-56 to ES-7, Table ES-2: Impacts TR-3/28C and TR-4/28D are shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego to reduce the impacts to below a level of significance.   | A4-99  |
| 6. Pages ES-57 to ES-59, Table ES-2: Impact TR-5/28E is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as adding a second northbound right-turn lane and traffic signal improvements at the intersection of Northside Drive/Friars Road in coordination with the City of San Diego to reduce the impact to below a level of significance.  | A4-100 |
| 7. Pages ES-59 to ES-62, Table ES-2: Impacts TR-6/28H and TR-7/28I are shown as Significant and Unavoidable. The proposed mitigation to “support Caltrans in its effort to obtain the project’s proportionate share of funding for the recommended improvements...”; SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impacts to below a level of significance. | A4-101 |
| 8. Pages ES-62 to ES-63, Table ES-2: Impact TR-8/28J is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.   | A4-102 |
| 9. Pages ES-63 to ES-64, Table ES-2: Impacts TR-9/28L and TR-10/28M are shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as restriping and associated traffic signal improvements in coordination with the City of San Diego to reduce the impacts to below a level of significance.   | A4-103 |
| 10. Page ES-64, Table ES-2: Impact TR-11/28N is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as installation of a traffic signal at Ward Road/Rancho Mission Road in coordination with the City of San Diego to reduce the impact to below a level of significance.  | A4-104 |
| 11. Pages ES-64 to ES-65, Table ES-2: Impact TR-12/28O is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego to reduce the impact to below a level of significance.  | A4-105 |

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- the following paragraph calls the TDM program a “project design feature”. If the TDM is being used to reduce traffic impacts, it should be stated as required mitigation as opposed to a design feature. ↑ A4-114 (Cont.)
21. Page 4.15-7, Non-Stadium TDM 3: The DEIR should clarify that unbundled parking is only required for multi-family residential parking in “Parking Standards Transit Priority Areas” and not all “Transit Priority Areas”. | A4-115
  22. Page 4.15-7, Non-Stadium TDM 3: The project is proposing a limited parking supply to discourage use of single occupant vehicles. However, the DEIR should clearly demonstrate how providing limited parking will not negatively affect adjacent neighborhoods. | A4-116
  23. Page 4.15-7 to 4.15-8, Non-Stadium TDM 4: The project proposes TDM Program monitoring but should further state the frequency and type of monitoring and who the results of the monitoring will be reported to. | A4-117
  24. Page 4.15-8, Non-Stadium TDM 4: The project should also provide a free shuttle service to students and employees in addition to hotel shuttle services. | A4-118
  25. Page 4.15-14 to 4.15-15, Section 4.15.2 Methodology: The DEIR should address whether the project is consistent with the Mission Valley Community Plan Update. | A4-119
  26. Page 4.15-15, Section 4.15.2.1 Project Study Area: The DEIR incorrectly states that the transportation analysis evaluates operation at “4 existing intersections” instead of 40. This should be corrected. | A4-120
  27. Page 4.15-19, Section 4.15.2.2 Analysis Scenarios: The DEIR fails to analyze the Near-Term Opening Day Scenario which would account for any direct impacts caused by the project and other reasonably foreseeable cumulative projects in the area. | A4-121
  28. Page 4.15-19, Section 4.15.2.2 Analysis Scenarios: The DEIR fails to analyze the impact of the proposed project on Community Buildout Year 2050 Scenario. | A4-122
  29. Page 4.15-23, Section 4.15.2.9 Cumulative Projects: Per previous comment #27, the DEIR fails to account for reasonably foreseeable development projects expected to be open after the existing counts were taken but prior to the project’s opening day. | A4-123
  30. Page 4.15-30, Section 4.15.3.5: The DEIR incorrectly states that there are 41 existing study area intersections when there are 40. This should be corrected. | A4-124
  31. Page 4.15-36, Table 4.15-7: The Existing Conditions Freeway Segment Level of Service should include a footnote showing where the counts were obtained and when they were taken. | A4-125
  32. Page 4.15-47, Table 4.15-10: The Project Generated Weekday Trip Generation (Without Stadium Event) table should include information on how the rate of 4.4 daily trips per dwelling unit was developed for “Student Focused Housing”. | A4-126



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| 33. Page 4.15-48, Table 4.15-10: The Project Generated Weekday Trip Generation (Without Stadium Event) table should include information documenting the source of the existing stadium daily trips of 1,089 ADT.   | A4-127 |
| 34. Page 4.15-50, Section 4.15.5.1.1: The DEIR should also include projected peak hour trips for a 15,000-student campus in the section that discusses potential long-term lower trip generation if the entire project site were eventually converted to university uses only.   | A4-128 |
| 35. Pages 4.15-50 to 4.15-51, Section 4.15.5.1.2 and Table 4.15-11: The DEIR assumes a 10% mixed use reduction in the stadium event trip generation without providing substantial evidence on how this number was determined. The DEIR should provide documentation to support this assumption.  | A4-129 |
| 36. Page 4.15-53, Section 4.15.5.3: The DEIR incorrectly states that the total trip generation under a university project scenario is 21% less than the market project scenario analyzed. Per Section 4.15.5.1.1, the university only project scenario would be expected to generate 8% less than a market project scenario. This should be corrected. | A4-130 |
| 37. Page 4.15-53, Section 4.15.5.4: The project proposes to construct a traffic signal at the intersection of Friars Road & Stadium Way (Street A). The DEIR should address whether the proposed traffic signal would meet traffic signal warrants per MUTCD guidelines.   | A4-131 |
| 38. Page 4.15-54, Section 4.15.5.4: The DEIR should address whether the project's proposed roadway improvements as shown on Figures 4.15-10A and 4.15-10B are consistent with the Mission Valley Community Plan Update.  | A4-132 |
| 39. Page 4.15-54, Section 4.15.5.4: The Project Road Improvements shown on Figure 4.15-10B should be revised to meet current City standards which includes but is not limited to buffered bike lanes, wider parkways, non-contiguous sidewalks, and adequate street lighting.  | A4-133 |
| 40. Page 4.15-64, Table 4.15-14: The DEIR should explain why many of the study intersections are shown to experience a decrease in delay with the addition of project traffic to existing conditions.  | A4-134 |
| 41. Page 4.15-67, Table 4.15-15: The DEIR should explain why the "Requires Additional Analysis?" column in the Existing Plus Project Conditions Without Event Roadway Segment Level of Service table should not be titled "Significant Impact".  | A4-135 |
| 42. Page 4.15-77, Roadway Segments: The DEIR incorrectly states that "project traffic traversing the study area roadway segments was added to existing peak hour roadway volumes" for the results reported in Table 4.15-20. Table 4.15-20 is based on daily volumes (not peak hour volumes). This should be corrected.                                | A4-136 |
| 43. Page 4.15-100, Table 4.15-27: The Horizon Year (2037) No Project Conditions Ramp Metering Analysis should also include the max observed delays and max observed queues at each metered on-ramp to support the asterisked note to this table.   | A4-137 |
| 44. Page 4.15-138, Section 4.15.7.5.1: The Overall Parking Supply is proposed to total approximately 13,192 on-site parking spaces. The DEIR should also discuss what the  | A4-138 |

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parking requirement would be based on all proposed uses on-site using City minimum and maximum requirements.

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45. Page 4.15-140, Table 4.15-40: The Projected Share of Stadium Attendees by Mode table needs to be clear which modes go with the percent mode share. Footnotes 2 through 5 are not referred to. This should be corrected.

↑ A4-139

46. Page 4.15-175, Section 4.15.11: The DEIR incorrectly states that the Fenton Parkway Bridge is not required as mitigation for the proposed project's impacts. The analysis in Section 4.15 shows that project impacts such as the intersection impact at Northside Drive & Friars Road in the Horizon Year 2037 (Table 4.15-47) may be mitigated with construction of the bridge.

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**Public Utilities Department – Nicole McGinnis, Principal Water Resources Specialist -**  
[NMCGinnis@sandiego.gov](mailto:NMCGinnis@sandiego.gov), 619-533-4101

#### Executive Summary

1. In reference to the list of item No. 8, please identify what infrastructure is off-site (Page ES-3).
2. The FEMA Conditional Letter of Map Revision will dictate the elevation of building pads. The County of San Diego Flood Control Department is the start of the process. (Page ES-3, Table ES-1).
3. In reference to the statement, "Authority to connect existing City-owned infrastructure...", please revise to "confirm capacity in existing infrastructure?" The City may not have plans for such density. (Page ES-4, Table ES-1).
4. What impact, if any, might the removal or replacement of soils have on nearby phreatophytic vegetation which may depend on water infiltration and naturally occurring groundwater? (Impacts to Riparian Habitat, page ES-21, Table ES-2).
5. Water wells were installed at the stadium site at the turn of the century. It may be possible that certain project elements may remove the geologic layers, used historically by San Diego citizens. (Table ES-2, page ES-33).
6. Will this lead to groundwater contamination? (Page ES-36, Table ES-2, Impact HAZ-1).
7. Care should be exercised so that the removal of any soils does not interrupt the natural flow of groundwaters. The creation of any water flow discontinuities should be analyzed closely. (Page ES-36, Table ES-2).
8. What is the risk that explosion waves will physically damage the City's two (2) existing monitoring wells or Kinder Morgan's decommissioned and sealed wells? (Page ES-37, Table ES-2, Impact HAZ-2).
9. What is the risk that explosion waves will physically damage Kinder Morgan assets and lead to a subsurface leak? (Page ES-37, Table ES-2, Impact HAZ-2).

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| 10. Will excavation activities affect remaining pollutants? At this time, the site has reached a degree of equilibrium. Moving soils around might cause pollutants to dislodge and migrate. Explain how contamination pollutants will be prevented from spreading into the groundwater basin? (Page ES-37, Table ES-2, Impact HAZ-3).  | A4-150 |
| 11. The City does not recommend or support the removal/decommissioning of these monitoring wells. Ongoing monitoring of these wells provides information on the nature of the pollutants remaining on site in the groundwater basin. Additionally, relocation of wells would create a discontinuity in the water quality data. (Page ES-38, Table ES-2, Impact HAZ-4).   | A4-151 |
| 12. MM-HAZ-5: "A well decommissioning and destruction plan shall be prepared for the removal or abandonment of on-site environmental wells, groundwater monitoring wells, remediation wells, and associated piping.... The approved plan shall be followed and on-site wells would be removed, transferred, or abandoned prior to construction in accordance with applicable laws and regulations." Please identify what entity will be responsible for this plan. (Page ES-38, Table ES-2, Impact HAZ-4). | A4-152 |
| 13. MM-HAZ 5. How will the project impact wells which have been decommissioned? Per County and State regulation, well casings remain in place, and their holes are slurry-filled. The project has subsurface elements. Will the decommissioned wells be disturbed as part of this project? (Page ES-38, Table ES-2, Impact HAZ-4).   | A4-153 |
| 14. What impacts to air quality will be caused by "routing" the toxic vapors around the buildings? (Page ES-40, Table ES-2, MM-HAZ 7).   | A4-154 |
| 15. Has the impact of removing the basal gravels on groundwater recharge been analyzed? What about the natural movement of groundwater? The City has Pueblo Rights, and no discussion about the impact of groundwater storage was identified. (Page ES-45, Table ES-2).  | A4-155 |
| 16. Would the project conflict with or obstruct implementation of a water quality control plan or future sustainable groundwater management plan? The City may implement groundwater extraction and water treatment projects in the future, once groundwater basin contamination is removed. (Page ES-46, Table ES-2).   | A4-156 |
| 17. The analysis and evaluation of sufficient water must occur now. For any new project, refer to Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 prepared by California Department of Water Resources (DWR), 2003. A completed water supply assessment is required. (Page ES-71, Table ES-2, Impact UTL-1).   | A4-157 |
| 18. Please provide a full explanation as to why the relocation of existing wells is less than significant impact. (Page ES-71, Table ES-2).  | A4-158 |
| 19. An assessment of the cumulative effect on utilities and/or service system resources cannot be made until the WSA is completed. (Page ES-72, Table ES-2).   | A4-159 |

**Chapter 1 – Introduction and Existing Environmental Setting**

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1. The site is located in a flood plain and subject to flooding. What measures are being taken to make sure potential floods do not affect the project? (Page 1-6). A4-160
2. The runoff to the creek would likely change because the slope and landscaping is changing. These impacts must be evaluated (Page 1-8). A4-161
3. "The project does not propose any project facilities, improvements, or features in the existing creek, nor any other change to any aspect of the creek...." Please explain why? (Page 1-9). A4-162
4. Documents to add to table 1-3 (page 1-19): A4-163
  - a. City of San Diego: 2015 City of San Diego Urban Water Management Plan, June 2016. San Diego County Water Authority Final 2015 Urban Water Management Plan, June 2016.
  - b. State of California: DWR Bulletin 118 - Update 2003, Oct 01, 2003. DWR Bulletin 118 - Interim Update 2016, Dec 22, 2016. California Water Action Plan, prepared by the California Natural Resources Center, issued at the direction of Governor Brown in January 2014 and updated in 2016."

**Chapter 2 – Project Description**

1. Section: Mission Valley Terminal Facility. The City doesn't have a plan of "environmental remediation" of the existing site. In 1992, the California Regional Water Quality Control Board, San Diego Region issued a Cleanup and Abatement Order No. 92-01 and subsequently eight addendums to Kinder Morgan Energy Partners for unauthorized discharge of petroleum to the soil and groundwater adjacent to the stadium site. Please revise. (Page 2-6). A4-164
2. What water quality standards are referred to when discussing the River Park? (Page 2-17). A4-165
3. "There is sufficient capacity in the North Mission Valley Interceptor to accommodate the anticipated sewer flows generated from the proposed project." When will this connection occur? Were the City's planned Pure Water facilities considered with in the analysis for this project? (Page 2-21). A4-166

**Chapter 4.3 – Biological Resources**

1. Temporary impacts to native habitats in the San Diego River are identified in the Biological Resources section. Review of Figure 4.3-3 (Biological Resources – Off-Site Sewer and Storm Drain Connections) shows impacts to wetlands in the San Diego River. These impacts appear to be within a City of San Diego compensatory mitigation site. The Public Utilities Department owns and maintains over 55 acres of the San Diego River in a compensatory wetland mitigation site called the "Stadium Wetland Mitigation Site". This mitigation area is permitted for preservation and maintenance in perpetuity to support the native riparian habitat along the river. The mitigation site is considered permanently encumbered and no development is permissible within its boundaries. The A4-167

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credits from this mitigation site are used to satisfy compensatory habitat mitigation requirements for City of San Diego Essential Public Projects. The Stadium mitigation site is currently within year 2 of the 5 year maintenance and monitoring period. The Campus Plan must exclude all areas located within the City's Stadium Mitigation Site.

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A4-167  
(Cont.)

2. Please clarify the necessity to "Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing activities". If the species are listed under the U.S. or California Endangered Species Act flushing could be considered "harassment" and, therefore, a violation of these laws. Similarly, if an active nest is flushed during the bird nesting season, it could be considered a violation of the U.S. Migratory Bird Treaty Act. (Page 4.3-37)

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A4-168

#### Chapter 4.6 – Geology and Soils

1. The City disagrees with the inclusion of the proposed groundwater project from under the "land subsidence" section, under section 4.5 "land subsidence" in document 4.6-1 Site Development Geotech Report, and under section 4.6 "land subsidence" in document 4.6-2 Stadium Development Geotechnical Report. Groundwater production would be implemented sustainably, with close, regular monitoring. (Page 4.6-4).
2. Please elaborate on when levels were collected (month, season, rainy years vs dry years, etc.). (Page 4.6-13, Table 4.6-4).
3. Any recharging of dewatered groundwater needs to be permitted and comply with WQ standards for groundwater injection. (Page 4.6-13).
4. Provide locations, depths, excavation dimensions and approximate volumes of soils to be permanently removed from site and describe impacts to aquifer and the City's Pueblo rights. (Page 4.6-13).

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A4-169

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A4-171

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A4-172

#### Chapter 4.8 – Hazards and Hazardous Materials

1. "As a result of these investigations, more than 100 groundwater monitoring wells, extraction wells, and soil vapor monitoring probes have been installed at the project site." This number is around 400. Please revise. (Page 4.8-2).
2. "A copy of Addendum No. 8 to CAO 92-01 is provided as Appendix 4.8-6...." See CAO Amendment #8, page 2, No. 7: "In accordance with Addendum No. 5, Directive No. 4, .... Continued monitoring of sentinel wells (T-11, R-10, R-43AS-AD, R-79AS-AM-AD, and R-87AS) is necessary to evaluate hydraulic containment effectiveness near the property boundary." Please note that Sentinel well R-87AS was removed and it is not included in the Kinder Morgan Right of Entry Permit for destroying the wells, dated June 27, 2019. Also note that R-79AS-AM-AD is actually 3 different wells. (Page 4.8-3).

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#### Chapter 4.9 – Hydrology and Water Quality

1. City of San Diego has plans to use groundwater from the Mission Valley groundwater basin. Include the City's plans to use groundwater before table 4.9-3. Mission Valley Groundwater Feasibility Study 2018 Summary Report, prepared for the City of San Diego

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A4-175

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Public Utilities Department, prepared by Gillingham Water and CH2M, August 2018.  
concept Study Mission Valley Groundwater Desalting Project, prepared for the City of San  
Diego Water Department Water Policy and Planning Division, prepared by Dr. Michael  
Welch, March 2004.

↑ A4-175  
(Cont.)

2. Revised TMDL for Indicator Bacteria. What is the source for information in this section?  
By what standards is indicator bacteria a "common impairment for water bodies in the  
San Diego Region"? (Page 4.9-8).

↑ A4-176

3. "The analysis of potential impacts of construction activities, construction materials, and  
non-stormwater runoff on water quality during the demolition and construction phase  
focuses primarily on sediment (TSS and turbidity) and certain non-sediment-related  
pollutants." Because TDS and pollutants such as benzene are known to be contaminants  
leftover from the Kinder Morgan contamination, why are they not included? (Page 4.9-  
18).

↑ A4-177

4. "However, it is possible that groundwater could be encountered during excavations, due  
to seasonal variations in shallow groundwater levels, necessitating dewatering". This  
could especially occur if construction was in the winter months. Are the values in Table  
4.9-7 for dry weather? (Page 4.9-27).

↑ A4-178

5. "Would the project substantially decrease groundwater supplies or interfere with  
groundwater recharge such that the project may impede sustainable groundwater  
management of the basin?" A GSP may not be required by DWR at this time but that  
could change if groundwater use increases (for example). If any infrastructure is placed  
within the groundwater levels in the basin, it could potentially decrease the groundwater  
supply and storage capacity in the basin for groundwater users. (Page 4.9-32).

↑ A4-179

#### Chapter 4.17 – Utilities and Service Systems

1. This appendix does not consider the City's needed existing or future capacity in the sewer  
transmission mains where the SDSU Project proposes to send its wastewater flow.
2. Please change Metropolitan Wastewater Department to Public Utilities Department.
3. In Figure 4.17-1, the 54inch RCP line, shown as curving around the stadium, is  
abandoned and not part of the Existing Sewer System. The figure should be updated  
accordingly.
4. Do the statistics detailing the City's wastewater system consider the future when Pure  
Water is in place? As a known project, the impacts of the Pure Water project must be  
evaluated in this DEIR. (Page 4.17-2).
5. Where are the sources of the data under "Water Distribution"? (Page 4.17-5).
6. In Figure 4.17-2, the easternmost diagonal waterline has been abandoned and is no  
longer part of the Existing Water System. The figure should be updated accordingly.
7. Recommend moving "Pueblo Water Rights" Section to Section 4.9. (Page 4.17-11).
8. Is this project subject to City of San Diego drought policies? (Page 4.17-15).

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9. "Because the proposed project's potable water demand would be minimal as compared to the Alvarado Treatment Plant capacity, impacts would be less than significant." How much water capacity is already being used from the Alvarado WTP? Does the City already have plans for the extra water capacity? (Page 4.17-19). A4-188

10. This Project requires a separate Water Supply Assessment. (Page 4.17-28). A4-189

11. This Project requires a separate Water Supply Assessment. (Page 4.17-28). A4-190

**Appendix 4.9-1 - Water Quality Technical Report**

1. Page 23, Section 2.5, Paragraph 1:  
a. Confirm what author means by "the capacity of the San Diego River Valley groundwater basin..."  
b. The statement "groundwater resources are limited...because of high concentrations of total dissolved..." is not quite correct. Immediately usable groundwater resources are limited. There are groundwater resources which can be used after treatment. A4-191

2. Page 23, Section 2.5, Paragraph 2  
a. Disagree with "a portion of the project is located within the Mission Valley Groundwater Basin." The project is wholly sited within the MV GWB. Please revise.  
b. In response to "subsequent to 1939, the City has not utilized the groundwater," other organizations have used and continue to use Mission Valley groundwater. A4-192

3. Page 23, Section 2.5, Paragraph 4: Report does not mention lawsuit, only settlement agreement... A4-193

4. Page 24, Table 2-17  
a. Disagree with author's dismissal of three elevated TBA levels based on their belief that they "may not be representative." But, concur that additional sampling might be prudent.  
b. TOC values were a result of proper testing and sampling protocol. A4-194

5. Page 25, Section 2.5.2, Paragraph 1: The Project does not contain 100 to 150 monitoring wells. The proposed Project site does. These wells will be removed, and it is likely that they will not be sampled in the future. A4-195

6. Page 48, Section 4.2: Testing the quality of dewatered shallow groundwater may be prudent to ensure it is appropriately handled. If pollutants are present, water shall not be allowed to infiltrate back into aquifer. A4-196

7. Page 92, Section 7.7.2. Paragraph 3: Confirm that construction of any LID BMPs takes into account State requirements regarding clearance from wells. A4-197

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8. Page 92, Section 7.7.2, Paragraph 4: Need to understand what impacts, if any, the potential increased discharge to the San Diego River might have on subsurface flows, and on pollutant migration.
9. Page 93, Section 7.8.2: The removal of impervious parking lot surface, increased discharge to the San Diego River, and removal of existing soils might have an impact on existing groundwater flows, and flooding patterns. Suggest computer modeling is done to analyze these impacts.

A4-198

A4-199

**Appendix 4.8-5 - Limited Soil and Groundwater Investigations Along Fuel Pipeline**

1. Page 8, Section 5.2.1: Depth to groundwater different from groundwater elevation used in the Construction Excavation Impacts on Groundwater Storage.

A4-200

**Appendix 4.9-6 - SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage.**

1. Page 2, Table 1: The table indicates that the distance between measured groundwater level elevations and buildings is as little as 7 feet in certain "Opening Day" elements. Can the author confirm that this distance is acceptable? That is, will this cover prevent natural subsidence/expansion? Particularly, given the natural "ebb and flow" of groundwater due to seasonal changes, dry/wet years, and other weather variabilities. Would expansion/contraction of soils become an issue with this minimal cover between the buildings and the measured water level?
2. Page 2, Table 1, groundwater will be present STARTING at elevation with an average of 43 feet and continuing to deeper elevations. If the building is any deeper, then groundwater will still be present. Therefore, the building will be affecting the groundwater storage capacity of the basin. Any structure deeper than the groundwater depth is impacting the groundwater in the basin. Please explain? Are the measured groundwater elevations representative of the natural variability of groundwater conditions in the area, or are they "snapshot" measurements of groundwater levels at one location at one time?
3. Page 2, paragraph before Table 1, "Groundwater was measured below the Stadium site at elevations ranging from 37 to 49 feet." Comment is the date of when the groundwater was measured will have a big impact on how accurate the measurement is and this isn't provided. If measured during dry weather, this will be very different then wet weather measurements.

A4-201

A4-202

A4-203

**Appendix 4.17-1 - Sewer Study**

1. Study doesn't take into account any future flow the City may have planned for this area or that may be planned to flow into the existing 84/96 sewer? Also, the existing capacity of the 84/96 sewer isn't discussed.
2. What is meant by the proposed MV sewer system will be private?

A4-204

A4-205

**Appendix 4.17-5 - Water Study**

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1. Table 1 and Appendix B should both be verified in Water Supply Assessment. Also, why is residential demand (1,117,650) different from Table 1 (1,117,725) in Appendix-4-17-5-SDSU-Water-Use-Estimation-Tech-Memo? Same question about the Parks water demand in each? Both water demands should match, yes?
2. Where is the City's existing/future demands/usage evaluated or accounted for on the proposed public water system? It is stated as Conclusion No. 3, but couldn't find the discussion. For example, the City's 390 Pressure Zone, do the pipes have enough capacity currently and in the future to accommodate SDSU's demands? Also, for future/build out demands, what water conservation assumptions have been used?

A4-206

A4-207

**Appendix 4.17-5 – SDSU Water Use Estimation Memo**

1. There is no map to verify the quantities in Attachment A – where are these numbers coming from? Need to show in report?
2. Table A: Attachment B isn't readable, and it doesn't explain how the acreages were achieved that were used in the table – very confusing. Also, for footnote 4, why is this reduction assumed?
3. Page 4, first paragraph below Table 1, need to include details of which "completed developments in the City have been show to use less water than calculated...". Need backup.
4. Page 5, paragraph below Table 2, need documentation to prove "this methodology using the City's WSA water use factors is more accurate....."
5. Page 7, first paragraph, "30 percent overall decline in indoor water use since 2000" – questions regarding this statement: 1. I couldn't find this % in either of the two references cited at the end of the paragraph. Please explain. 2. References only extend through 2014. Much has happened to water conservation in the last five years. Please include the last five years in this %. 3. This % differs depending on the previous years' weather; i.e., droughts and wet weather would have a big impact. Is this taken into account? 4. This % makes a difference is the demand and need to verify the number.
6. References: What document from the SDCWA in 2018 was used for the reference on page 9 of 65 gpd?
7. page 8, last paragraph, the statement "It reflects the most recent and best water savings technologies that State and local municipalities have adopted." The Code and standards referenced were from 2014; the analysis should include what has happened in the last five years.
8. To confirm, in Appendix 4.17-2 Water Study for the water demand for the Project, a different method was used to calculate the water demand then the one used in this Appendix 4-17-5, for reasons that aren't clear. Why was this done? Where is this new demand (Table 3 Best available technology) used?

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**General Comments**

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1. Per DWR Bulletin 74, no wastewater lines shall be built within a certain distance of water wells (includes monitoring wells). Certain proposed sewer lines running south through the park might come too close to proposed wells.

A4-216

**Insufficient information provided relating to comments submitted on the Project's NOP/IS**

1. Impact to MV GWB: Additional information requested: The Mission Valley groundwater basin addressed on page 4.9-5 in document 4.9 Hydrology and Water Quality. Please provide additional details regarding what impact the additional flows into the SDR will have on the groundwater flow trends.
2. Pueblo Water Rights: Additional information requested: The City's Pueblo Water Right addressed on page 4.17-11 in document 4.17 Utilities and Service Systems. Certain Project elements and activities will impact groundwater flows, and this is an impact on the Pueblo Water Right. These impacts must be evaluated in the DEIR.
3. Construction Activities Impact to Groundwater Storage: Additional information requested: Impacts to Groundwater Storage addressed in document 4.9-6 SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage. Please identify the types of soils the project proposes to remove in its cut/fill activities? Will this removal diminish groundwater storage volume or the water's ability to infiltrate into the basin?
4. Impacts to the San Diego River Flows: Additional information requested: Impacts to the San Diego River addressed on page 5 in document 4.9-5 Hydraulic Analysis. The analysis concludes that flows into the SDR would be augmented, and that Murphy Canyon Creek is unable to contain the 100-year flows. This suggests that the project may exacerbate area flooding issues. How will the project handle the potentially increased flooding in the area? The alternatives in the DEIR are insufficient to address this impact.

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A4-218

A4-219

A4-220

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**Transportation & Storm Water Department, Storm Water Division – Mark Stephens,  
Associate Planner – [MGSStephens@sanidiego.gov](mailto:MGSStephens@sanidiego.gov), 858-541-4361**

**Executive Summary**

1. Pages ES-20 to ES-21, MM Bio-10, Indirect Edge Effects. This mitigation measure should include a setback of 100 feet from Murphy Canyon Creek in addition to the already-included 100-foot setback from the San Diego River.
2. ES – Biological Resources. Upon inclusion of any necessary Murphy Canyon Creek improvements, update this section to clearly document, disclose, and mitigate impacts to Murphy Canyon Creek.
3. Page ES-76, Table ES-2, Summary of Project Impacts. This table states that the project would not expose people or structures to significant risks, including flooding. If Murphy Canyon Creek does not have capacity to accommodate the 100-year flow rate (per page 1-8 of the Draft EIR), and no improvements are proposed to correct this, how was the conclusion

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A4-223

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reached that the proposed SDSU recreation field project would not expose people or structures to significant risks? What evidence substantiates this conclusion?

↑ A4-223  
(Cont.)

**Section 1: Introduction and Existing Environmental Setting**

1. Page 1-8, Murphy Canyon Creek. The last sentence on this page states that Murphy Canyon Creek does not have capacity to accommodate the 100-year flow rate, but SDSU is proposing to build in areas that will be affected by the overflow from Murphy Canyon Creek. Include any necessary modifications to Murphy Canyon Creek in order to safely convey the 100-year flow and bring it up to standard in consideration of the other project features that are being constructed on-site.

↑ A4-224

**Section 2: Project Description**

1. Page 2-6, Purchase Agreement. The EIR should assume that all existing storm drain system assets in the Existing Stadium Site and River Park, including the Murphy Canyon Creek Channel, will be conveyed to SDSU, including requiring that SDSU design, permit, construct and maintain all necessary storm drain improvements (pipes, channels, engineered streams, headwalls, storm water treatment facilities, and any other associated structures). Please revise and analyze these assets in the EIR as appropriate.

↑ A4-225

**Section 3: Cumulative Projects and Methods**

1. Page 3-5, Table 3-1 Cumulative Projects. Remove Murphy Canyon Creek Channel Master Storm Water System Maintenance Plan as this project/program was completed as of September 2018. No additional work is planned for the creek under the Master Storm Water System Maintenance Program (MMP). The MMP Program EIR expired in September 2018.

↑ A4-226

**Section 4.3: Biological Resources**

1. Page 4.3-41, paragraph following MM-BIO-15. This section states that "Mitigation consists of creation of new riparian habitat at a 1:1 ratio and enhancement of wetland habitat at a 2:2 ratio...." Correct this to be 2:1 as described earlier in the report (per Page 4.3-39, MM-BIO-13).
2. Page 4.3-41, same paragraph as above following MM-BIO-15. The following sentence states that, "SDSU is currently evaluating wetland creation opportunities on site, at the SDSU-owned Adobe Falls parcel approximately 3 miles east of the proposed project site, **within Murphy Canyon Creek**, or through purchase of credits...." Once Murphy Canyon Creek becomes a part of the project and the appropriate modifications are considered and become part of SDSU's inventory, restoration along the creek could be potentially used for mitigation. If Murphy Canyon Creek were to remain part of the City of San Diego's inventory, mitigation would not be allowed in or along the asset.
3. Page 4.3-55, Figure 4.3-6. Part of this figure showing impacts to Biological Resources – Off-Site Sewer and Storm Drain Connections appears to be missing. Please include/update this information so impacts are appropriately analyzed and disclosed.

↑ A4-227

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Ensure that there is no impact to the existing Stadium Mitigation Site which occurs in close proximity to this area.

↑ A4-229  
(Cont.)

**Section 4.9: Hydrology and Water Quality**

1. Page 4.9-1, Methods for Analysis. In the second paragraph under “Methods for Analysis” and elsewhere in the document, note the correct name of the **City of San Diego Storm Water Division**.
2. Page 4.9-5, 4.9.1.6, Water Quality. The second paragraph references a study period of approximately 14 years (2004-2018), but the following sentence refers to “the 11-year span.” Please reconcile this apparent discrepancy. Also, later in this paragraph, the term “San Diego River TWAS station” is used but does not appear to be explained. In the following paragraph, “Ttadium” is referenced, and “Stadium” was probably what was intended.
3. Page 4.9-28. Upon inclusion of any necessary Murphy Canyon Creek improvements, update this section to clearly document, disclose, and mitigate impacts to Murphy Canyon Creek.
  - a. To ensure compliance with water quality standards, as part of the design of the Murphy Canyon Creek channel, SDSU should design, construct and maintain a “stream restoration” channel with soft channel side slopes and bottom (i.e., not concrete lined).
    - i. The restored channel should be designed assuming a fully vegetated state with a corresponding roughness coefficient used in the sizing calculations;
    - ii. The restored channel should be designed not to accumulate sediment or cause in-stream erosion (i.e., sediment neutral) per the City’s Drainage Design Manual (DDM) Section 7.2.5;
    - iii. The restored channel should be realigned in a southwesterly direction to allow for a more efficient and less erosive transition into the San Diego River.
  - b. To mitigate drainage impacts, SDSU should expand the capacity of Murphy Canyon Creek channel to provide sufficient drainage of public water through the site to the San Diego River in accordance with the City’s DDM (e.g., convey the 100-year design capacity), and the San Diego Municipal Code (SDMC) Section 142.0610.
  - c. If any improvements are constructed within the 100-year floodplain, the improvements should be designed in accordance with federal floodplain regulations and SDMC Sections 143.0145 and 143.0146, and an indemnification agreement would be required.
4. Page 4.9-37, Figure 4.9-2. While page 4.9-29 describes runoff from the project being conveyed by four outfalls at the San Diego River and two outfalls at Murphy Canyon

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Creek, the figure fails to depict the outfalls at Murphy Canyon Creek. Please revise the figure accordingly so that project impacts may be analyzed and disclosed appropriately.

↑ A4-235  
| (Cont.)

5. Page 4.9-41, Figure 4.9-4. This figure depicts the locations of several proposed BMPs in an area that may be retained under City ownership. These BMPs should be located on SDSU property, outside of the 100-year Federal Emergency Management Agency (FEMA) floodplain, and maintained by SDSU.

| A4-236

#### Section 4.10: Land Use and Planning

1. Page 4.10-23. This section reports that modification or vacation of easements are beyond the scope of the EIR and not covered. If modification or vacation of easements are necessary to complete this project, how was the conclusion reached that this is beyond the scope of this EIR? If these are necessary components of the project, they should be identified and analyzed as appropriate in the EIR. The EIR should assume the conveyance of Murphy Canyon Creek to SDSU, which would require current easements to be vacated. SDSU would also be required to grant a flowage easement to the City for sufficient drainage of public water through the site to the San Diego River in accordance with the City's DDM (i.e., convey the 100-year drainage capacity) per SDMC Section 143.0146.a.4.

| A4-237

#### Section 4.17: Utilities and Service Systems

1. Page 4.17-6. This section reports that runoff from the project site is conveyed directly to the San Diego River via three existing underground storm drain systems. This section describes these three systems and gives the impression that these are the only storm drain discharges from the site. However, page 4.17-21 of this report also notes that some of the runoff from the project site goes to outfalls that discharge to Murphy Canyon Creek. Offsite runoff from the right of way seems to commingle with onsite runoff and drains to best management practices (BMPs) onsite. Offsite runoff should be managed according to Section 3.3.3 of the City's Storm Water Standards Manual (SWSM). Please revise accordingly so that project impacts may be analyzed and disclosed appropriately.
2. Page 4.17-21. The EIR should assume that all existing storm drain assets and associated drainage responsibilities would be conveyed to SDSU. A cleanout should be installed at the property line where pipe enters the stadium property per the City's DDM. SDSU will be required to grant a flowage easement to the City for sufficient drainage of public water through the site to the San Diego River in accordance with the City's DDM (e.g., convey the 100-year design capacity) per SDMC Section 143.0146.a.4.
3. Page 4.17-21. If any storm drain improvements are constructed within the River Park, the assets should be designed and constructed in accordance with the City's DDM and an Encroachment Maintenance and Removal Agreement will be required, per SDMC 129.0710.b.
4. Figure 4.17-3 Existing Storm Drain System. This figure only shows the systems that discharge to San Diego River and does not show the existing systems that discharge to

| A4-238

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Murphy Canyon Creek. Please revise and include these systems to appropriately analyze the project's impacts.

↑ A4-241  
I (Cont.)

**Appendix 4.9-1: Water Quality Technical Report**

1. Page 47 of 161

- a. The City Offsite Storm Water Alternative Compliance Program is currently in development; however, credits would only be traded within City jurisdiction under the Phase I MS4 Permit. The SDSU site is under the Phase II Small MS4 Permit. SDSU will need to develop its own alternative compliance program.

A4-242

2. Page 60 of 161

- a. Depending on the proposed project boundary, the project may be partially located in the FEMA floodplain in the proposed condition. Please consider this during the design and comply with applicable environmental regulations (i.e. City SWSM, FEMA, DDM).

A4-243

3. Section 8.4

- a. Benchmark water quality objectives are mentioned throughout the report. It isn't terminology used in the San Diego Region Basin Plan. Please verify that this is the correct terminology for the region.

A4-244

4. All BMPs should be appropriately sized for pollutant and hydromodification controls and designed according to specifics in the City's SWSM.

A4-245

5. Ensure that the onsite biofiltration with partial retention BMPs are sized and designed appropriately. Refer to the City's SWSM Section 5.5.2 for additional information.

A4-246

6. Ensure that the onsite biofiltration BMPs are sized and designed appropriately. Refer to the City's SWSM Section 5.5.3 for additional information.

A4-247

**Appendix 4.9-4: Water Quality Report for SDSU Mission Valley Campus**

1. Comments related to requirements in the City's Storm Water Standards Manual:

- a. Rows 20 and 21 from Worksheet B.5-1 are missing on sizing calculations spreadsheet. Add these to show best management practices (BMPs) meet minimum footprint requirement.
  - i. The footprint of some BMPs is below the minimum required footprint (0.03 x area draining to BMP x adjusted runoff factor). Fill out Worksheet B.5-4 to show that BMP will not clog or increase BMP footprint.
- b. Please provide volume retention worksheets for BMPs that are less than 3% of effective drainage area, including the modular wetland system.

A4-248

A4-249

2. See table on page B-46 in Appendix B of the City's SWSM for guidance.

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Comment Letter A5



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Ms. Laura Shinn, AIA, AICP  
Director  
Facilities Planning, Design, and Construction  
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5500 Campanile Drive  
San Diego, CA 92182-1624  
(via e-mail to [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu))

Dear Ms. Shinn:

SUBJECT: COMMENTS ON THE SAN DIEGO STATE UNIVERSITY MISSION VALLEY CAMPUS  
DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to provide comment on the San Diego State University (SDSU) Mission Valley Campus Draft Environmental Impact Report (DEIR). As central San Diego County's transit service provider, a development of this scale within our service area provides a great number of opportunities as well as challenges. We're looking forward to working closely with you and your staff to further develop a new campus that can be easily and efficiently connected to the rest of our region.

Our comments on the DEIR are as follows:

**Purple Line**

MTS would not be supportive of SDSU's proposed Purple Line alignment adjacent to Interstate 15 for several reasons:

- A new interchange station with the Green Line would be as far away from the site development intensity as possible, next to the Interstate 8/Interstate 15 junction, and on the opposite corner from the stadium. This would limit the convenience, utility, attractiveness, and ridership on the Green and Purple Lines for campus and stadium users.
- The new station would be too close to the Mission San Diego Station. Consolidating that station into a new interchange station would also reduce convenience and ridership from the Mission San Diego Road area.
- The Green Line Stadium Station cannot simply be shifted to the east because there is a third storage track in between the eastbound and westbound tracks that where extra trains for special



Metropolitan Transit System (MTS) is a California public agency and is comprised of San Diego Transit Corporation and San Diego Trolley, Inc. nonprofit public benefit corporations, in cooperation with Chula Vista Transit and National City Transit. MTS is the taxicab administrator for eight cities and the owner of the San Diego and Arizona Eastern Railway Company. MTS member agencies include: City of Chula Vista, City of Coronado, City of El Cajon, City of Imperial Beach, City of La Mesa, City of Lemon Grove, City of National City, City of Poway, City of San Diego, City of Santee, and the County of San Diego.

A5-1

A5-2

- events are staged. It's anticipated that these storage tracks would still be needed to add capacity for stadium and campus events.
- Trackway and station infrastructure would largely end up in areas shown as parkland, creating potential Section 4(f) conflicts with future Purple Line development.

MTS also wants to ensure that the Mission Village Drive Extension ("Aztec Way" or "Street D") is designed with the necessary parameters required for a future elevated transit guideway. (We assume an at-grade alignment won't be desirable or feasible, due to California Public Utilities Commission restrictions on grade crossings.) Accommodating a future elevated guideway would include:

- Ensuring appropriate width that allows a full two-way light rail guideway and the necessary and desired buffers from adjacent structures. Consider building setbacks that avoid aerial structure very close to building windows.
- Placing utilities where they would not need to be relocated for future guideway foundations.
- Planning land uses sensitive to noise, vibration, and views (residential, hotel, laboratories, etc.) away from a future elevated transit guideway, to reduce impacts and required mitigation for a future project.
- Locating facilities, laboratories, and equipment susceptible to electromagnetic interference from light rail infrastructure at a sufficient distance away from current and potential future rail alignments and supportive electrical installations.
- Incorporating the possibility that a future Purple Line project may consider a station near the middle or northern side of the site, closer to the stadium. The station box requirements would be larger and wider than the guideway, and would need ground-level space to accommodate elevator and stairwell landings.

The "SANDAG Planned Purple Line Alignment" shown in Figure 2-11E of the DEIR conceptually shows a Purple Line station location just north of the current Green Line station. It's not clear how or where the Purple Line station or the Purple Line curve would be accommodated within the available footprint at the south end of Aztec Way.

Buildings 518, 519, and 531 shown in Figure 2-8 may be within the envelope of the Purple Line alignment as shown in SANDAG's 2017 Final Purple Line Conceptual Planning Study. If the Campus Master Plan builds structures in this alignment, SDSU should show that a Purple Line alignment could still be accommodated in the remaining clear envelope.

#### Green Line

The DEIR prominently features the Green Line as a primary means of ingress and egress to campus students, employees, residents, and visitors, which MTS welcomes. However, MTS is interested in understanding more about the interactions between the Mission Valley Campus and SDSU's Main Campus, and to what extent SDSU anticipates intercampus travel. MTS has the ability to provide added capacity on the Green Line between campuses, as we have proven regularly with special service for SDSU sporting events at the current stadium site, but regular provision of new service may require additional consideration from SDSU for financing ongoing operations.

#### MTS Bus Service

Rail transit service would be expected to handle large numbers of riders to and from the SDSU West. However, the Green Line offers primarily east-west connections, and the Purple Line could be decades

↑ A5-2  
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A5-3

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away from carrying riders to the site. Like any large university campus, MTS anticipates that buses will be needed to handle a sizable portion of transit ridership. MTS is concerned that there is little or no bus infrastructure planned for the site, which will make it difficult for us to meet demand, increase accessibility, and help reduce the traffic burden. At a minimum, MTS requests consideration of the following:

- A bus transfer facility located at the Green Line Stadium station, designed and sized in coordination with MTS staff to meet the future transit needs of the campus and community.
- Consideration of bus priority measures along main campus roadways, such as Street D. This could include transit lanes, queue jump lanes, signal priority measures, and/or space allocated for a bus guideway along a future Purple Line alignment.
- Bus stop infrastructure at key intersections in the project. MTS can assist with the placement and design specifications.

A5-7  
(Cont.)

#### Roadway Connections

An interconnected roadway network is important to providing the most flexibility in the routing of bus services, and for creating the most direct active transportation connections to high quality transit stations.

- The DEIR does not contemplate the extension of Fenton Parkway south across the San Diego River, but MTS would support this extension to add to the utility of the Fenton Parkway Green Line station, and to allow potential north-south bus connections serving the SDSU West campus. There is no other access to the site from the south for buses, bicycles, or pedestrians between Fairmount Ave. and Texas Street due to the San Diego River and Interstate 8.
- The western end of Rancho Mission Road, entering the southeastern corner of the site, is proposed to connect to a Street 'I' which would parallel Interstate 15 and connect into the project's street grid at the northeastern corner. A more direct connection of Rancho Mission Road into the eastern end of Street '3' would provide better access for potential future bus routes, as it would more directly connect with the Stadium Trolley station.

A5-8

Thank you again for the opportunity to provide comment on the Mission Valley Campus Master Plan project. Please contact me at [denis.desmond@sdmts.com](mailto:denis.desmond@sdmts.com) if you have any further questions.

A5-9

Sincerely,



Denis Desmond  
Director of Planning

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Cc: Sharon Cooney, Heather Furey, Tim Allison, Peter Casellini

Comment Letter A6



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October 3, 2019

File Number 3300300

Laura Shinn  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182  
mvcomments@sdsu.edu

Dear Ms. Shinn:

**Subject:** San Diego State University Mission Valley Campus Master Plan  
Project Draft Environmental Impact Report

Thank you for the opportunity to comment on San Diego State University's (SDSU) Mission Valley Campus Master Plan Project Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan).

State law requires the 2015 Regional Plan to reduce Vehicle Miles Traveled (VMT) and meet greenhouse gas emission (GHG) reduction targets as determined by the California Air Resources Board. The Regional Plan Sustainable Communities Strategy integrates land use and transportation plans to show how future investments will reduce GHG to meet the targets.

The SDSU Mission Valley Campus development will have an impact on the entire region. Future transit stations and bikeways will be necessary to fully incorporate the project into the regional transportation network. SDSU must include every feasible mitigation measure, including paying its fair share for traffic mitigation projects, to reduce VMT and GHGs in compliance with the Regional Plan.

The SANDAG update to the 2015 Regional Plan will focus on complete corridors, mobility hubs, flexible fleets, and improved transit while incorporating the latest technology to make transit competitive with driving. The SDSU Mission Valley Campus Master Plan should be on the forefront of each of those transit improvements.

While SANDAG offers the following comments on the EIR, we encourage SDSU to work with our staff, the City of San Diego, Caltrans, and the Metropolitan Transit System (MTS) to ensure the transportation infrastructure is designed in a way that maximizes ridership and efficiency.

MEMBER AGENCIES

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Mexico

A6-1

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A6-4



## Transportation

### Trolley

The MTS Trolley Purple Line will provide a key transit link from the Mexican Border to North County. The alignment of the Purple Line through the center of the project should be incorporated into the design and construction of the site, and the existing Green Line Trolley infrastructure should be preserved.

A6-5

On page 2.23, the main road identified as a future alignment for the trolley varies from a two-lane collector to a four-lane major. The median width needed to accommodate the trolley must be defined, and if additional right-of-way is needed to construct the line, it should also be shown in the cross section.

A6-6

The site plan identifies SDSU's "preferred alignment" for the Purple Line trolley. This alignment does not provide easy access to residents living on the site and riders transferring to or from the existing Green Line Station. The alignment could potentially replace park space currently included in the plan. If this alignment is used in the project, the park space must be replaced.

A6-7

On page 2-4, this sentence should be amended to state the following:

"Enhance transit ridership through pedestrian and bicycle improvements, and transit connections to the existing Metropolitan Transit System (MTS) Trolley Station and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line as determined by SANDAG."

A6-8

As part of event day parking management plans, MTS should be notified in advance of the plans for parking mitigation and impacts to the trolley and local bus routes serving the site. SDSU must identify the off-site lots near trolley stations that could be used as parking during events. Existing lots can quickly reach capacity, and spill over parking is a constant issue for surrounding neighborhoods and shopping centers during game days.

A6-9

### Parking

Parking is being provided at 1.23 spaces per unit. The City and SDSU should reduce this parking requirement to be below one and incorporate mobility hub features like shuttles, shared bikes and scooters, and accessible walkways to ensure future residents can live on the site without a car. SDSU should provide free transit passes for students and faculty, similar to the University of California San Diego's UPASS program.

A6-10

### Bus Service

The EIR does not address local bus services or include any discussion of local bus service. Over half of the trips occurring at this site will come from either north or south and may not be able to access the trolley. The project must include the identification of a transit stop or station with appropriate way finding.

A6-11

*Bicycle Infrastructure*

Bicycle connections are important at this site, as they can provide access to other regional bikeways in each direction. The active transportation connections on all connecting streets leading to the site should be improved. Internal roads should be wide enough to accommodate bikes and pedestrians, and SDSU should use best practices of complete street design.

A6-12

SANDAG recognizes the plan includes the San Diego River Trail connection east and west along the north bank of the river. This is a key component of the San Diego River Trail regional bikeway. The width of the bikeway should be no less than 16'.

A6-13

SANDAG has recently completed the SR-15 Commuter Bikeway linking Mission Valley to the Mid-City Neighborhoods. The terminus of this bikeway is less than a half mile south of the SDSU site. An active transportation connection across the San Diego River and I-8 Freeway is needed to connect this project to SR-15 Commuter Bikeway. To the north, a bikeway connection to the Murphy Canyon trail should be included.

A6-14

The SDSU West Campus is only 2.5 miles west of the main SDSU campus, which is a perfect distance for students, faculty, and visitors to travel by bike. The project must include major active transportation improvements along Montezuma Road, Fairmount Avenue, Mission Gorge Road, and Camino Del Rio North, and/or Mission San Diego Road to provide this connection.

A6-15

Thank you again for the opportunity to comment on this project. SANDAG would be willing to directly work with SDSU to develop better transportation connections throughout the site. Please contact our staff to begin this process.

A6-16

Sincerely,



COLEEN CLEMENTSON  
Director of Land Use and Transportation Planning

SLI/jla

Comment Letter A7



San Diego Regional Water Quality Control Board

October 3, 2019

Ms. Laura Shinn, Director  
Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive,  
San Diego, CA92182

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OCT - 3 2019

Facilities Planning, Design  
and Construction

**Subject: Comments on the Draft San Diego State University Mission Valley  
Campus Master Plan Environmental Impact Report (dated August 2019)**

Ms. Shinn:

The San Diego Regional Water Quality Control Board (San Diego Water Board) appreciates the opportunity to review the Draft San Diego State University (SDSU) Mission Valley Campus Master Plan Environmental Impact Report (DEIR), dated August 2019. Thank you for your consideration of these comments under the California Environmental Quality Act (CEQA) process for the DEIR.

A7-1

The DEIR evaluates likely environmental impacts and recommended mitigation measures for the proposed SDSU Mission Valley Campus Master Plan Project (proposed Project) which entails the acquisition, construction, and operation of an SDSU Mission Valley campus, stadium, parks, recreation, and innovation area to support SDSU's education, research, entrepreneurial, technology, and athletics programs. The proposed Project is situated in the northeast portion of the Mission Valley Community within the City of San Diego at 9449 Friars Road, San Diego, California 92008, which is commonly known as the San Diego County Credit Union (SDCCU) Stadium (formerly, "Qualcomm Stadium").

A7-2

The Project includes redeveloping a total of about 200 acres of existing impervious ground surfaces, including those of the SDCCU Stadium and its associated parking lot, and off-site roadways, into a mixed land-use neighborhood with enhanced drainages, including the SDSU Mission Valley campus, multi-residential areas, parks, recreational areas, open space, and green street roadway improvements. In accordance with requirements of CEQA, the DEIR was prepared to evaluate potential significant

HENRY ABARBANEL, Ph.D., CHAIR | DAVID GIBSON, EXECUTIVE OFFICER

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environmental impacts of the Project on various aspects of the environment, including but not limited to, hydrology and water quality, biological resources, air quality, geology and soils. The San Diego Water Board has focused review of the DEIR on Hazards and Hazardous Materials (Section 4.8) and Hydrology and Water Quality (Section 4.9), and provides the following general and specific comments:

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(Cont.)  
↓ A7-3

***"What Their Future Will Look Like"***

At the San Diego Water Board Meeting on August 14, 2019, Chairman Dr. Henry Abarbanel identified that an opportunity exists with the proposed Project to build a campus that will instruct students on "what their future should look like..." (emphasis added). Indeed, there has never been a more significant redevelopment opportunity in San Diego like the one presented by the proposed Project. It is the expectation of the San Diego Water Board that SDSU will consider every opportunity to go beyond the bare minimum measures to restore and protect water quality by including onsite stormwater capture and use, maximized onsite solar power generation, green roofs and balconies, enhanced hydrology to improve flood resiliency, and other climate change adaptation measures. SDSU should, for example, consider some of the approaches for stormwater and strategic energy resiliency being incorporated into the operations and expansion at San Diego International Airport<sup>1</sup>. Silver LEED certification is the least acceptable standard for a redevelopment opportunity like the proposed Project. SDSU should frankly aim much higher and demonstrate that "Leadership Starts Here" in environmental stewardship given this once-in-a-generation opportunity.

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↓ A7-5  
↓ A7-6  
↓ A7-7

**Section 4.8 Hazards and Hazardous Materials:**

**General Comments:**

1. Section 4.8.1.1: the DEIR did not fully identify the issues associated with the existing groundwater and vapor monitoring well network and piping conveyance system located on the stadium property. For example, the DEIR (on Page 4.8-2) states, "[M]ore than 100 groundwater monitoring wells, extraction wells, and soil vapor monitoring probes have been installed at the project site." A more accurate statement is "more than 300 wells have been installed at the project site including well boxes, concrete vault boxes, and over 3,000 feet of PVC underground piping that connect wells located near the San Diego River, up to the north western portion of the stadium property, to the Mission Valley Terminal."

↓ A7-8

The DEIR states, "The Regional Water Quality Control Board (RWQCB) has approved decommissioning some of the monitoring and extraction wells and soil vapor monitoring probes, and these wells are reportedly scheduled to be

↓ A7-9

<sup>1</sup> San Diego International Airport Environmental Affairs Sustainability Management Planning - <https://www.san.org/Airport-Projects/Environmental-Affairs/EntryId/2787>

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decommissioned in late 2019 or early 2020." Pursuant to Cleanup and Abatement Order (CAO) No. 92-01, the San Diego Water Board directed Kinder Morgan Energy Partners (Kinder Morgan) to perform investigations and remediation of the groundwater at and around SDCCU Stadium with oversight by the Board. Addendum No. 8 to the CAO directed Kinder Morgan to destroy all wells (with the exception of 5 sentinel wells), piping, and concrete vaults on the stadium property. However, to date, the City of San Diego has not granted Kinder Morgan access to the stadium property to complete this work. The San Diego Water Board understands that the City of San Diego and Kinder Morgan have been unable to reach an agreement that allows removal of the wells, piping, and vaults for the past three years. Therefore, the DEIR needs to recognize the likelihood that the wells, piping, and concrete vaults may still be present on the project site for an unknown period of time.

A7-9  
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If this work is not completed and the wells are not properly destroyed in accordance with State and County regulations before the property transfer, the San Diego Water Board may take action against any potentially responsible parties under the Water Code to resolve this matter and protect water quality in affected areas. SDSU could assume responsible party status once property ownership is transferred to the university.

2. Section 4.8.6: the existing groundwater and vapor monitoring networks on the stadium property pose a continuing threat to water quality resulting from all current activities allowed by the City of San Diego (car/RV sale shows, swap meets, and other activities) and the future construction at this property. Any pre-demolition, demolition, or implosion activities conducted prior to complete removal of the wells, piping, and well vaults from the SDCCU Stadium property pose a significant threat to water quality

A7-10

As described in section 4.8.1.4, in the last 14 years, three gasoline tanker truck rollovers have occurred at the corner of Mission Village Drive and San Diego Mission Road that released thousands of gallons of gasoline products onto the stadium property. The DEIR does not mention any mitigation measures or permanent road improvements on this intersection for the protection of future buildings from future gasoline truck tanker spills

A7-11

#### **Section 4.9 Hydrology and Water Quality:**

##### **General Comments:**

3. DEIR section 4.9 and associated appendices are prepared under the assumption that the existing well network, including wells, piping, and concrete vaults, located on the SDCCU Stadium property has been removed. Section 4.9 concludes that the proposed project will have less than significant impacts on hydrology and water quality, and hence no mitigation measure is required, based on the following considerations:

A7-12



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- i. The Project is designed to meet the Low Impact Development (LID) standards as required in the Phase II Small Municipal Separate Storm Sewer System (MS4) Permit as well as requirements for structural and non-structural best management practices (BMPs) as contained in the California Construction General Permit (CGP) to prevent any significant impacts on surface water quality during the construction and post construction phases;
- ii. For pollutants with available data (e.g., total suspended solids and particular metal compounds such as copper, lead and zinc), a water quality model is used to demonstrate that pollutant concentrations in post-construction stormwater effluent from the proposed redevelopment areas meet corresponding water quality standards as contained in the San Diego Water Board's Basin Plan and/or the California Toxic Rule; and
- iii. For pollutants with insufficient data (e.g., turbidity, pathogens, pesticides, and petroleum hydrocarbons), qualitative analysis based on literature information and professional judgement is performed to show less than significant impacts to water quality.

A7-12  
(Cont.)

The San Diego Water Board generally agrees with the evaluation methodologies presented in the DEIR and does not anticipate significant impacts on receiving water quality from the proposed Project. The Board's acceptance of the findings of the evaluation methodologies is based on the understanding that the Project will be designed and operated in accordance with applicable Statewide (e.g., Phase II Small MS4 permit and Construction General Permit) and Regional (e.g., San Diego Water Board's General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region) permit requirements and that the existing well networks will be destroyed appropriately (see comments above). However, the San Diego Water Board finds that the proposed project does not adequately include design features that are effective and efficient to adapt to climate change and improve water quality. Additionally, the DEIR lacks clarity and thoroughness in the discussion of the Project's potential impacts on water quality, especially with respect to the construction phase. Some of the information provided in the DEIR are incomplete and out of date. Detailed comments are discussed below.

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A7-14

A7-15

4. Design of the Project should consider and address effects of climate change. In particular, adaptive measures to address the increased probability of flooding as a result of increased rainfall intensity in extreme events, which has been predicted for the San Diego Region due to climate change, need to be thoroughly evaluated and incorporated in the Project as appropriate.

A7-16

For example, the on-site sewer collection system should be designed and maintained to be waterproof and impermeable to prevent leakage of wastewater into underlying groundwater as well as infiltration of flood water into the sewer

A7-17



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collection system. Similarly, manhole rims should be placed at appropriate elevations to prevent flood water from flowing into the sewer collection system. Furthermore, in addition to bio-infiltration basins, all forms of Low Impact Development (LID) design options (e.g., green roof and porous pavement), should be fully explored and employed to minimize the impacts associated with flooding of the Project site.

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(Cont.)

A7-18

5. The Project should consider stream restoration opportunities in both Murphy Canyon Creek and the San Diego River. Restoration activities could include stream re-establishment, earthen berm removal to re-establish flood plain, and removal of hardened surfaces like concrete within these streams. These activities not only improve the biological habitat and water quality in Murphy Canyon Creek and the San Diego River, but also increase the resilience of the Project given future effects of climate change.

A7-19

6. The Project should evaluate if and how post-construction operation may affect implementation of the existing bacteria Total Maximum Daily Load (TMDL) for the Lower San Diego River and the San Diego River Watershed Management Area Water Quality Improvement Plan (WQIP). In particular, the Project should address potential sources of human fecal waste material discharges from transient homeless persons or homeless encampments to storm drains and receiving waters.

A7-20

It has been observed that parks, open spaces, and commercial land uses tend to attract more homeless population than other types of land uses, e.g., industrial or residential. Potential impacts from the homeless population to receiving water quality in terms of pathogen discharges were not discussed in the DEIR and associated appendix (Section 7.2.2 of Appendix 4.9-1). Additionally, in Table 5-1<sup>2</sup> and Section 7.2.2<sup>3</sup> of Appendix 4.9-1, no specific source control measures are identified to reduce pathogen and fecal indicator bacteria discharges to the environment.

A7-21

Further, effectively prohibiting non-stormwater discharges is one of the key strategies identified in the San Diego River Watershed Water Quality Improvement Plan (WQIP) to comply with the bacteria TMDL. In addition to structural BMPs such as bio-infiltration basins, water conservation measures such as the elimination of over-irrigation and other non-structural BMPs (e.g., public education program) are important means to fulfil the strategy of eliminating non-stormwater discharges. These measures should be fully discussed in the DEIR including appendices.

A7-22

<sup>2</sup> Table 5-1 of Appendix 4.9-1 summarizes small MS4 permit source control BMP requirements and corresponding project BMPs.

<sup>3</sup> Section 7.2.2 of Appendix 4.9-1 discusses potential post development impacts of the proposed project on pathogen levels in receiving waters.

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**Specific Comments:**

7. The DEIR assumes that the existing well network, piping, and concrete vaults located on the stadium property have been removed. Be advised that if this work is not completed before the property transfer, the San Diego Water Board will take action against any party potentially liable under the Water Code to resolve this matter and protect water quality. These activities may affect the proposed Project schedules. A7-23
8. Source control measures of preventing illicit discharges into the MS4 and stormwater stenciling or signage, are currently contained in Table 5-2 of Appendix 4.9-1 of the DEIR and are described as the measures required under the MS4 Phase I permit. These measures should also be included in Table 5-1 and identified as source control measures of the Small MS4 Phase II permit. In fact, the Small MS4 Phase II permit requires the enrolled permittees, including SDSU, to develop an Illicit Discharge Detection and Elimination (IDDE) program to detect, investigate, and eliminate illicit discharges (Section E.9. of the Small MS4 Phase II permit). These requirements should be acknowledged. A7-24
9. SDSU should discuss what actions will be taken to address potential trash and debris pollution of the environment, especially during the post-construction operation phase. Whereas DEIR section 7.2.6 of Appx. 4.9-1, discusses in detail what steps the City of San Diego has taken or planned to address the trash problem, no discussion is provided on what actions SDSU will take in terms of the non-structural BMPs to address trash and debris on an ongoing basis. A7-25
10. In DEIR section 2.4, *Existing Surface Water Quality*, of Appx. 4.9-1, the evaluation of surface water quality in the vicinity of the Project site appears to have excluded data from an important monitoring station, the mass loading station located at Fashion Valley (SDR-MLS, with GPS coordinates of 32.765240, -117.168617) where long-term receiving water monitoring for a suite of parameters including bacteria, chemistry, toxicity, and general field parameters has been conducted under the Phase I MS4 program since at least 2008. The data is maintained by Phase I San Diego River Copermitees and available at the Project Clean Water website (<http://www.projectcleanwater.org/san-diego-river-wma/>). DEIR section 2.4. and other applicable sections in Appx.4.9-1 should be updated with data from SDR-MLS. Further, Table 2-7 through 2-16 currently only present the minimum, average, and maximum concentrations of pollutants observed in receiving waters, these tables should also be updated with the percentage of exceedance (i.e. compared with corresponding water quality objectives) information to demonstrate the severity, or lack thereof, of pollution in receiving waters for each pollutant. A7-26
11. Adequate supporting information, including stormwater flow directions, should be added on Figure 2-10E of the DEIR, and references to the volume reduction capacity of street trees should be provided to facilitate the review of the on-site A7-27
12. Adequate supporting information, including stormwater flow directions, should be added on Figure 2-10E of the DEIR, and references to the volume reduction capacity of street trees should be provided to facilitate the review of the on-site A7-28

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BMP design. Additionally, the Project should mitigate for the design capture volume not reliably retained by BMP2 for the Drainage Management Area 2 (DMA2).

In Appx 4.9-4<sup>4</sup> of the DEIR, biofiltration BMP sizing calculations were conducted in accordance with the sizing requirements for Priority Development Projects (PDP) described in Phase I MS4 permit, section E.3.c.(a).(i). The calculation results show that two biofiltration BMPs, BMPs 4 and 5B, do not meet the calculated sizing requirements. For these two BMPs, it is proposed that sizing volume reduction gained by implementing street trees in their respective drainage areas will be used to satisfy the design volume requirements. It is also stated on page 4.9-23 of the DEIR that excess treatment volume provided by BMP 5C will be used to offset the remaining required volume for BMP 5B. For DMA2, a proprietary compact biofiltration is proposed due to limited space.

Be advised that only if BMP 5C is located hydraulically downgradient from BMP 5B, and hence able to capture overflows from 5B, can BMP 5C provide offset of the design volume for 5B. Without stormwater flow information depicted, the appropriateness of BMP design cannot be evaluated appropriately. Similarly, the DEIR should provide adequate references for the calculation of volume reduction capacities of street trees to facilitate the BMP design evaluation. Finally, pursuant to the PDP design requirements contained in Phase I MS4 permit section E.3.c.(a)(ii), the design capture volume not reliably retained by BMP2 should be mitigated in accordance with section E.3.c.(1).(b).

12. Clarifications are needed for the surface water quality modeling results contained in DEIR section 7 of Appendix 4.9-1:

- a) Whereas a 33 percent reduction of impervious surface areas (from 90% to 57%) has been claimed (Table A-7), the modeled average annual runoff volume reduction is relatively small, from 134 to 104 acre-ft. No supporting calculation is provided to enable verifying such calculations;
- b) Tables 7-1 and 7-2 show modeling results of the reductions in concentrations and loads of pollutants in the proposed project compared with in existing conditions. The 95% confidence intervals from the distributions of Monte Carlo simulations should be provided for those modeled results to evaluate the confidence of predicted reductions;
- c) The modeling approach does not include model validation or sensitivity analysis to thoroughly evaluate the appropriateness of the modeling results; and
- d) For pollutants where both San Diego region data and Los Angeles region data are available, both datasets should be evaluated separately, and results compared, to demonstrate the applicability of using Los Angeles region data for the proposed Project.

<sup>4</sup> Water Quality Report for SDSU Mission Valley Campus (Onsite Improvements) prepared by Rick Engineering, 2019.

A7-28  
(Cont.)  
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Ms. Laura Shinn, SDSU

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October 3, 2019

13. The DEIR does not appropriately evaluate potential impacts from the stadium demolition phase of the Project. In particular, the DEIR (on Page 4.9-28) credits the removal of impervious cover during the demolition phase as promoting "immediate infiltration effects" of on-site soil. The DEIR then credits the installation of impervious cover at the construction phase as promoting "stabilization of soils to reduce the amount of erosion", without thoroughly evaluating all aspects of impacts associated with demolition and post-demolition construction activities.

A7-38

14. Section 2.5 of Appendix 4.9-1 did not accurately describe the Kinder Morgan Energy Partners investigation and remediation of the SDCC Stadium property (off-Terminal area) or the San Diego Water Board compliance determination with Cleanup and Abatement (CAO) No. 92-01. The historical summary on page 23 should include the details of the investigation and remediation performed by Kinder Morgan in the SDCCU Stadium property. Additionally, section 2.5 does not discuss that the San Diego Water Board determined that Kinder Morgan complied with CAO No. 92-01, Addendum No. 5, Directive Nos. 2 and 3 in the off-Terminal area. The San Diego Water Board determination was based on information in numerous compliance evaluations, monitoring reports, and consideration of comments by the City of San Diego.

A7-39

15. Section 7.2.7 of Appendix 4.9-1 evaluates the impacts on benthic communities with the Index of Biotic Integrity (IBI) score. Be advised that biological assessment has advanced, and the currently preferred methodology is the California Stream Condition Index (CSCI) which has been developed, scientifically published, and widely accepted. The San Diego Water Board has proposed to use CSCI as a numeric measure of the water quality objective for biological conditions in inland surface waters of the San Diego Region<sup>5</sup>.

A7-40

Should you have any questions about the above comments, please contact Helen Yu at (619)521-5893 or via email at [Helen.Yu@waterboards.ca.gov](mailto:Helen.Yu@waterboards.ca.gov).

A7-41

Sincerely,



David Gibson  
Executive Officer  
San Diego Regional Water Quality Control Board

<sup>5</sup> Additional information about the San Diego Water Board's proposed Biological Objectives can be found here: [https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/basin\\_plan/bio\\_objectives/](https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/bio_objectives/)

Ms. Laura Shinn, SDSU

- 9 -

October 3, 2019

cc: (via email only)

Andrew Kleis, City of San Diego, [akleis@sandiego.gov](mailto:akleis@sandiego.gov)

Tech Staff Info & Use	
PIN ID for San Diego State University	825701



Comment Letter A8



Facilities Planning and Construction

Paul Garcia-Craivanu  
Office: (619)-913-2999  
pgarcia-craivanu@sandi.net

October 2, 2019

Laura Shinn, Director - Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624  
Submitted via email to: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)

Subject: San Diego Unified School District Comments on the San Diego State University  
Mission Valley Campus Master Plan Project Draft Environmental Impact Report

Dear Ms. Shinn,

The San Diego Unified School District (District or SDUSD) Facilities Planning and Construction Department (FPC) and Instructional Facilities and Planning Department (IFPD) has received the Draft Environmental Impact Report (DEIR) prepared by San Diego State University (SDSU) for the San Diego State University Mission Valley Campus Master Plan Project (Proposed Project) and distributed it to applicable District departments for review and comment. The District has reviewed the Proposed Project DEIR and appreciates the opportunity to provide comments to SDSU. In response to this request for public comments, the District has the following comments on the Draft EIR for your consideration.

A8-1

**Existing Conditions Section 4.14.1 – Schools 4.14.1.3**

The Proposed Project DEIR relies on outdated information from Section 4.11 of the Mission Valley Community Plan Update Draft EIR (Community Plan Update DEIR). On May 7, 2019, the District provided a letter sent via e-mail to SDSU consultants and staff with up to date student enrollment, capacity, and generation data to be incorporated into the EIR. This letter is attached again for reference.

A8-2

For example, in the Proposed Project DEIR, Table 4.14-3, on page 4.14-5, there are many schools listed in the general vicinity of the Proposed Project site with identified enrollments and capacity. This table is largely duplicated from a table in the Community Plan Update DEIR (Table 4.11-1, on page 4.11-6). A few schools that were in the Community Plan Update DEIR table are not included in the Proposed Project EIR table. This becomes important later in the Impacts Analysis section.

Additionally, the enrollment information from the Community Plan Update DEIR is from the 2016-17 school year and is not consistent with Proposed Project DEIR baseline. The district did not provide capacity information to the City of San Diego for the Community Plan Update DEIR so we cannot verify the accuracy of the capacity data referenced in the Proposed Project DEIR. The Proposed Project DEIR references section lists two SDUSD documents, neither of which would have contained capacity information.

A8-3



Letter to Ms. Laura Shinn  
Page 2

Additionally, there are errors in Table 4.14-3 in the Proposed Project DEIR:

- Grant is listed as an elementary school but it is a K-8 school.
- The enrollment and capacity listed for Henry High is incorrect. Kearny's information appears to be duplicated in the Henry High School row. This error skews the data for the entire table and the analysis in the Proposed Project DEIR.

A8-4

A8-5

The District requests that Section 4.14.1.3, specifically Table 4.41-3 be updated by the Proposed Project EIR preparers to include current enrollment and capacity information and correct errors. The District also requests that the Proposed Project EIR be revised to incorporate the more relevant and up to date information provided by the District to SDSU in May of 2019.

A8-6

A8-7

#### Impacts Analysis Section 4.14.4 – Schools 4.14.4.3

The impact analysis section of the Proposed Project DEIR does appear to use the student generation rates provided by the District in May 2019. However, the analysis is confusing. In September 2018, the District provided the City of San Diego student generation rates for the Mission Valley Community Plan update using 2012-13 data because that was the baseline year for the update. The May 2019 letter provided to SDSU included current 2018-19 school year student generation rates. These 2018-19 student generation rates are used in the Proposed Project DEIR in Table 4.14.8, on page 4.14-23. However, the analysis associated with the table incorrectly describes the rates as coming from the Community Plan Update. The data in the table is correct; the impact discussion is incorrect.

A8-8

Additionally, there are significant errors in Tables 4.14-9 and 4.14-13, which compares excess capacity to projected students generated as a result of the Proposed Project, and concludes there is excess capacity available to accommodate students. However, the totals are wrong. As noted above, the existing conditions table in the Proposed Project DEIR 4.14-3 did not include all of the schools from the Community Plan Update table, so the totals were different. However, table 4.14-9 is using the totals directly from the Community Plan Update table totals, which is not appropriate because it includes schools not included in the Proposed Project DEIR analysis. Additionally, the potential students generated shown in Table 4.14-13 does not match student figures provided by the District. Furthermore, Table 4.14-9 and 4.14-13 overestimates available capacity by including other school clusters that do not, and are not projected to, serve the project area. Table 4.14-10 more accurately represents the impacts on schools associated with the Proposed Project analyzed in the DEIR.

A8-9

A8-10

A8-11

A8-12

Generally, we disagree with the Proposed Project DEIR characterization that there is sufficient capacity in schools surrounding the project site to accommodate K-12 students generated by the Proposed Project and that impacts are less-than-significant. **This is not consistent with the May 2019 letter provided to SDSU from IFPD** which indicated that the cumulative potential increase in students in the area, when considering other projects, could impact District Schools at all levels to the point of reaching capacity. **This scenario would require additional planning for sufficient facilities.** We do agree with the conclusion in

A8-13

A8-14

Letter to Ms. Laura Shinn  
Page 3

Section 4.14.4.6.3 that the impact of the Proposed Project on schools would be cumulatively considerable. Cumulative impacts may require the construction of new school facilities, the development of new bus schedules or routes should attendance boundaries be changed, and may result in changes in traffic patterns associated with increased student enrollment at affected school sites. These impacts, and all feasible mitigation measures, should be analyzed and identified in the Proposed Project DEIR. The reliance on property tax revenues, or other funding sources such as developer fees, is not an adequate means to reduce impacts to less-than-significant without the identification of all project related impacts and all-feasible mitigation measures related to school facilities.

↑  
A8-14  
(Cont.)

↑  
A8-15

We appreciate the opportunity to comment on the Proposed Project DEIR. Please do not hesitate to reach out to FPC or IFPD to discuss these comments.

↑  
A8-16

Sincerely,



Paul Garcia-Craivanu  
Civil/Environmental Engineering Coordinator

cc: Regina Rega, Manager, SDUSD Instructional Facilities Planning Department

Attachments: May 7, 2019 letter to Gina Jacobs Re: SDUSD Mission Valley Campus Master Plan Project (3 pages)

[END of DOCUMENT]



Office of Operations Support Officer  
Instructional Facilities Planning Department  
Sarah Hudson/Demographer  
TEL.: (619) 725-7369  
FAX: (619) 293-8320  
[shudson@sandi.net](mailto:shudson@sandi.net)

May 7, 2019

Ms. Gina Jacobs  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182

Submitted via email to: [gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu), [skilkenny@dudek.com](mailto:skilkenny@dudek.com), [iharrison@dudek.com](mailto:iharrison@dudek.com)

Subject: SDSU MISSION VALLEY CAMPUS MASTER PLAN PROJECT  
Site currently occupied by Qualcomm Stadium and adjacent parking lots  
9449 Friars Road, San Diego, CA 92108  
Planned Development to include: 4,600 apartment units in addition to parks, open space, mixed use campus, stadium, and hotel.

Dear Ms. Jacobs:

We are in receipt of your April 11, 2019 letter requesting school information for the above referenced project. In this letter we address your questions and provide requested information.

1. Please provide a list of schools that would likely serve the project site as well as school capacity and current enrollment for each.

The following schools currently serve the project site. **Attendance boundaries are reviewed annually and subject to change.** In addition, the district is planning an elementary school within Civita, an existing development approximately 2 miles west of this project site. It is unknown at this time whether the new elementary school will serve this project.

School	Address	Estimated Capacity	2017-18 Enrollment	2018-19 Enrollment	2019-20 Enrollment Projection
Juarez Elementary	2633 Melbourne Drive San Diego, CA 92123	328	272	274	272
Taft Middle	9191 Gramercy Drive San Diego, CA 92123	718	422	462	457
Kearny High Complex	1954 Komet Way San Diego, CA 92111	1,737	1,533	1,456	1,433

2. Student Generation Rates: We are currently using the student generation numbers from the City of San Diego Mission Valley Community Plan Update EIR. If these are not representative of the factors SDUSD anticipates from the SDSU Mission Valley Campus Master Plan project, please provide the student generation numbers to be utilized in analysis.

Student generation rates were provided by this office to the City of San Diego for the Mission Valley Community Plan Update in September 2018. The rates utilized 2012-13 student data because the base year for the Community Plan Update was 2012.

**In this letter we provide updated rates based on 2018-19 student data and 2018 housing data.**

Student generation rates vary based on the type of project, number of units, bedroom mix, affordable or senior housing components, proximity to schools and other amenities, neighborhood, and other factors. There are not district standard or school-specific rates.

The information available indicates this project will include **4,600 apartment units**; information on the type (affordable, age-restricted, market-rate, etc.) and bedroom mix is not available at this time. Once this information is available, generation rates and estimated student numbers may be updated.

TABLE 2. Student Generation Rates from Existing Housing Units in Mission Valley CPA			
Housing Type	Number of Existing Units (2018)*	2018-19 students (K-5, 6-8, 9-12, and K-12)	Student Generation Rates
Multi Family and Single Family – Attached/Multiple Unit	12,247	K-5: 468 6-8: 154 9-12: 200 K-12: 822	K-5: 0.038 6-8: 0.013 9-12: 0.016 K-12: 0.067

\*Source: SANDAG annual estimates, January 1, 2018.

Based on the above information in Table 2, estimated student generation rates for the project that is the subject of this letter, SDSU Mission Valley Campus Master Plan, are shown in Table 3. The student generation rates are the average from existing development, with a low and high range.

TABLE 3. Estimated Generation Rates				
Development Name	Address	Number of Units	Estimated Student Generation Rates	Estimated Number of Students
SDSU Mission Valley Campus Master Plan	9449 Friars Road San Diego, CA 92108	4,600	K-5: 0.038-0.076 6-8: 0.013-0.026 9-12: 0.016-0.032 K-12: 0.067-0.134	K-5: 175-350 6-8: 60-120 9-12: 74-148 K-12: 309-618

A key assumption for this analysis is future housing units will generate students at a rate similar to current housing units. If future units are significantly more attractive to families than current housing is, the number of students could be higher than estimated. Conversely, if the future units are less attractive to families, or do not permit the residence of school-age children (such as senior housing or college dormitories), the number of students could be less than estimated.

**Based on the above information, the number of students generated by the proposed project is likely to result in the need to adjust attendance boundaries or for additional school facilities at the elementary level.** When considered in combination with ongoing development at Civita, as well as other proposed and under-development projects throughout Mission Valley, the cumulative potential increase in students in the area could impact district schools at all levels to the point of reaching capacity. This scenario would require additional planning for sufficient facilities.

Please keep this office appraised of revisions to the development plan as new information may result in changes to the information stated in this letter. Thank you.

Sincerely,



Sarah Hudson  
Demographer

M:\VFPD - 5494A\Demographics\New Housing and Redev\Mission Valley\SDSU Mission Valley Campus project.docx

Comment Letter A9



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

October 4, 2019

Laura Shinn  
California State University, San Diego  
5500 Campanile Drive  
San Diego, CA 92182

Subject: San Diego State University Mission Valley Campus Master Plan  
SCH#: 2019011042

Dear Laura Shinn:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 10/3/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

**Check the CEQA database for submitted comments for use in preparing your final environmental document:** <https://ceqa.net.opr.ca.gov/2019011042/2>. Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Resources Agency

RECEIVED

OCT 10 2019

Facilities Planning, Design  
and Construction

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

A9-1



Comment Letter A10

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500  
LOS ANGELES, CA 90013



October 9, 2019

Laura Shinn  
SDSU Facility Planning, Design and Construction  
5500 Campanile Drive  
San Diego, CA 92182

**Re: San Diego State University Mission Valley Campus Master Plan  
SCH 2019011042 - Draft environmental impact Report**

Dear Ms. Shinn:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the Draft Environmental Impact Report (DEIR) for the proposed San Diego State University Mission Valley Campus Master Plan (Project). San Diego State University, San Diego is the lead agency.

A10-1

The project entails development of a Mission Valley Campus for SDSU, including facilities for educational, research, technology, and support programs within a mixed-use campus village and research park. The project would develop a new 35,000-seat multipurpose stadium; approx. 4,600 residential units; 2 hotels with approx. 400 hotels; approx. 95000 square feet of commercial/retail stores; and approx. 84 acres of park and open space.

A10-2

We recently became aware of the draft Environmental Impact Report for the SDSU Mission Valley Campus Master Plan. CPUC has jurisdiction over rail transit safety. There are existing rail transit tracks within the proposed project area, and the project has proposed construction and modification of rail crossings.

A10-3

CPUC was not identified on the list of "Reviewing Agencies" for this project. **Please ensure that CPUC is included on future notices regarding the environmental review documents.**

A10-4

In addition, construction or modification of public crossings requires authorization from the Commission. RCEB representatives are available to discuss any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: <http://www.cpuc.ca.gov/crossings>.

A10-5

If you have any questions, please contact Kevin Schumacher at (415) 310-9807, or [kevin.schumacher@cpuc.ca.gov](mailto:kevin.schumacher@cpuc.ca.gov).

A10-6

Sincerely,

Kevin Schumacher  
Senior Utilities Engineer  
Rail Crossings Engineering Branch  
Safety and Enforcement Division

CC: State Clearinghouse, [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Comment Letter T1

From: **Ray Teran** <[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)>  
 Date: Tue, Aug 6, 2019 at 1:38 PM  
 Subject: [mvcomments] SDSU Mission Valley Campus M/P  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

The Viejas Band of Kumeyaay Indians (“Viejas”) has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas.

T1-1

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

T1-2

Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314 or email, [rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov) or [epingleton@viejas-nsn.gov](mailto:epingleton@viejas-nsn.gov) , for scheduling. Thank you.

T1-3

*Ray Teran*

**Viejas Tribal Government**

**Grant Writer / Administrator**

**619-659-2312**

[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)



Comment Letter T2



## Campo Band of Mission Indians

Chairman Harry P. Cuero Jr.  
Vice-Chairwoman Kerm Shipp  
Secretary Mary Johnson  
Treasurer Marcus Cuero  
Committee Brian Connolly  
Committee Steven M. Cuero  
Committee Benjamin Dyche

August 20, 2019

Laura Shinn

Director

Facilities Planning, Design, and Construction

SDSU

5500 Campanile Drive

San Diego, CA 92182-1624

Dear Ms. Shinn

Subject: San Diego State University Mission Valley Campus Master Plan Draft Environmental Impact Report

After review of the San Diego State University Mission Valley Campus Master Plan Draft Environmental Impact Report, Campo Band of Mission Indians concludes this area has a rich history for the Kumeyaay people. There were many villages and ceremonial areas throughout the Kumeyaay territory. The Kosaa'ii area (Mission Valley) is one that hold a lot of importance. Kosaa'ii was one of the last Kumeyaay villages in the San Diego area.

Given the sensitivity of the area, Campo Band of Mission Indians would like to request that cultural resources effected by the project be handled in a respectful manner. Campo Band of Mission Indians would also like to request that a Kumeyaay cultural monitor from Campo present for ground disturbing activities, to ensure Kumeyaay cultural resources are not overlooked. In addition to monitoring, Campo would like to see some form of mitigation for the

T2-1  
T2-2  
T2-3  
T2-4

36190 Church Rd., Suite 1

Campo, CA 91906

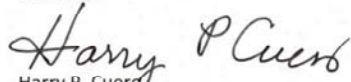
Phone: (619) 478-9046

Fax: (619) 478-5818

disturbing of our ancestors. When our ancestral remains are disturbed, and we take them back there is a lot that we do to take care of them. If our ancestral remains are found, we would like to see some financial mitigation for the project disturbing and displacing those ancestral remains. If you have questions or concerns, please feel free to contact Marcus Cuero at [marcuscuero@campo-nsn.gov](mailto:marcuscuero@campo-nsn.gov) or by phone (619) 478-9046.

↑ T2-4  
Cont.  
↓ T2-5

Sincerely,

  
Harry P. Cuero

Chairman

Campo Band of Mission Indians

Comment Letter T3



**Manzanita Band of the Kumeyaay Nation**

October 3, 2019

Ms. Laura Shinn, Director  
Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624  
[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)

RE: Comments of the Manzanita Band - Draft EIR for SDSU Mission Valley Project

Dear Ms. Shinn:

The Manzanita Band of the Kumeyaay Nation, also known as the Manzanita Band of Diegueno Mission Indians, is a federally recognized Self-Governance Indian Tribe that operates pursuant to its Constitution and Bylaws adopted on July 12, 1975 pursuant to the Indian Reorganization Act and approved by the Commissioner of Indian Affairs on January 9, 1976, and possesses inherent powers of self-governance with duties, rights, responsibilities, and with power and authority over the lands within the exterior boundaries of the Manzanita Indian Reservation.

T3-1

The Manzanita Band submitted comments on February 19, 2019 for the scoping of SDSU Mission Valley Mission Valley Campus Master Plan Project and they are incorporated herein for reference. Although the Manzanita Band has taken the time and effort to review the project and provide comments, we are deeply disappointed that our comments have not been addressed in the Draft EIR or through government-to-government consultation. The Manzanita Band has not had any communication with SDSU or Dudek since the submittal of our comments. The Manzanita Band has not received the copies of the all the record searches and confidential site records as requested.

T3-2

T3-3

T3-4

T3-5

These comments are not inclusive of all of the concerns of the Manzanita Band and only highlight our most egregious concerns. The Manzanita Band requests a meeting with SDSU to resolve the full extent of our concerns with the woefully inadequate Draft EIR.

T3-6

As noted in our previous comments, attending the Kumeyaay Diegueño Land Conservancy (KDLCC) and the Kumeyaay Heritage Preservation Committee (KHPC) Board of Directors meetings on Monday, February 11, 2019 hosted by the Jamul Indian Village. The venue provided an excellent opportunity to present the project to the Kumeyaay Nation without replacing the formal government-to-government consultation process or AB 52 consultation requirements of the California Environmental Quality Act (CEQA).

T3-7

**PO Box 1302 Boulevard California 91905 Phone (619) 766-4930 Fax (619) 766-4957**

The Manzanita Band is concerned that the Native American Heritage Commission (NAHC) advised Dudek to contact two Kumeyaay Bands by name in addition to the NAHC contact list. Government-to-government consultation should be conducted on a fair and equitable basis with all the Kumeyaay Bands.

T3-8

The Manzanita Band is also concerned about the selected reference to Mr. Clint Linton's comments on behalf of the Kumeyaay Cultural Repatriation Committee (KCRC) to "remove opposition" to the project. Mr. Linton has a clear conflict of interest as his company, Redtail Monitoring, works for Dudek on many different projects and should be recused from commenting on projects conducted by Dudek. In addition, Mr. Linton, does not have the authority to identify only four Kumeyaay Bands to conduct monitoring. Mr. Linton's conflict is specifically demonstrated in his offer for his company to coordinate the project monitors.

T3-9

The Draft EIR states that SDSU as a state agency is not subject to local government planning and land use use plans, policies, or regulations. However, SDSU is required to follow state laws and the state policies on tribal consultation.

T3-10

The Draft EIR does not adequately address Tribal Cultural Resources and the potential and substantial adverse impact to cultural resources. The Draft EIR includes a Cultural Resource Technical report but does not include a Tribal Cultural Resource Technical Report. The Draft EIR references only 10,000 years of Kumeyaay presence in the region while current science has demonstrated Kumeyaay presence over 12,000 years and a potential of over 130,000 years in the region. The mitigation for Tribal Cultural Resources is limited to monitoring only during the initial construction phase which is inadequate and does not reduce the potential for impacts on cultural resources. The Draft EIR places greater emphasis on the protection of historical resources rather than Tribal Cultural Resources. The record searches did not include contacting the local tribal record centers on each reservation.

T3-11

T3-12

T3-13

T3-14

T3-15

The Draft EIR repeatedly references the "intensive pedestrian survey" conducted by Dudek with Manzanita representatives. The use of the term "intensive" is misleading. The pedestrian survey was merely a walk of the perimeter paved areas. The southwest corner that appears undisturbed could not be surveyed due to the dense brush and should require additional survey work with a Qualified Kumeyaay Monitor.

T3-16

Although the Draft EIR references the development of interpretive displays that describe the history and significance of cultural resources, it does not include interpretive displays of the rich Kumeyaay history or development of displays in conjunction with the Kumeyaay Nation. The Draft EIR mentions only the City's Historical Resource staff.

T3-17

Should you have any questions, please contact Lisa Haws, Tribal Administrator, 619-766-4030 (office), 619-733-7697 (cell) or email: lisahaws@msn.com. Thank you.

T3-18

Sincerely,

Ms. Angela Elliott Santos  
Chairwoman





## Manzanita Band of the Kumeyaay Nation

February 19, 2019

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

Sent Via Email: mvcomments@sdsu.edu

RE: Comments of the Manzanita Band on the Scoping of SDSU Mission Valley Mission Valley Campus Master Plan Project

Dear Ms. Shinn:

The Manzanita Band of the Kumeyaay Nation, also known as the Manzanita Band of Diegueno Mission Indians, is a federally recognized Self-Governance Indian Tribe that operates pursuant to its Constitution and Bylaws adopted on July 12, 1975 pursuant to the Indian Reorganization Act and approved by the Commissioner of Indian Affairs on January 9, 1976, and possesses inherent powers of self-governance with duties, rights, responsibilities, and with power and authority over the lands within the exterior boundaries of the Manzanita Indian Reservation.

The Manzanita Band is one of twelve Bands of the Kumeyaay Nation whose aboriginal territory is from the Pacific Ocean to the desert and approximately 75 miles north and south of the international border and as far as the Colorado River adopted by the State of California through Assembly Joint Resolution No. 60 on the 29th day of August 2002. The Manzanita Band of the Kumeyaay Nation is also traditionally and culturally affiliated with cultural resources now submerged in the Pacific Ocean from 3 to 17 kilometers further westward than today's coastline and as far as the Kumeyaay could travel to harvest marine resources. The Manzanita Band strives to protect known and unknown cultural resources throughout the Kumeyaay aboriginal territory.

First, the Manzanita Band applauds the SDSU Facilities, Planning, Design, Construction, Community and Outreach team for attending the Kumeyaay Diegueño Land Conservancy (KDL) and the Kumeyaay Heritage Preservation Committee (KHPC) Board of Directors meetings on Monday, February 11, 2019 hosted by the Jamul Indian Village. The venue provided an excellent opportunity to present the project to the Kumeyaay Nation without replacing the formal government-to-government consultation process or AB 52 consultation requirements of the California Environmental Quality Act (CEQA).

**PO Box 1302 Boulevard California 91905 Phone (619) 766-4930 Fax (619) 766-4957**

T3-19

T3-20

Second, The Manzanita Band has reviewed the Notice of Preparation of the Draft Environmental Impact Report and Initial Study; the Notice of Public Information/Scoping Meetings; and, the San Diego State University (SDSU) Mission Valley Campus Master Plan Project. The following information is provided to improve the project scoping and Environmental Impact Review.

T3-21

### Stadium Site Construction History

The Manzanita Band is concerned there is no reference to the date of construction of the Stadium now called Qualcomm, which opened in August 1967. This is a significant oversight as the Initial Study describes the project areas as “previously disturbed” (page 8); “demolition of the existing Stadium” (page 19); “heavily disturbed during the grading for and construction of the existing Stadium” (page 20); and “proposed project site spans areas previously developed” (page 30). The environmental evaluations are heavily based on the project occurring within a disturbed area.

What is not clear is that during previous development and disturbance of the project area, the site was not required to undergo the strenuous environmental regulations of today. The California Environmental Quality Act (CEQA) was passed in 1970 to institute a statewide policy of environmental protection, shortly after the United States federal government passed the National Environmental Policy Act (NEPA) on January 1, 1970. The previously disturbed areas were not subject to either CEQA or NEPA analysis due to timing of construction before the laws were in place. Therefore, there is little known about what has been disturbed and significantly increases the probable that Kumeyaay cultural items, including human remains, funerary objects, sacred objects, objects of cultural patrimony, cultural resources and tribal cultural resources will be uncovered throughout the entire construction process.

T3-22

### Description of the Project

The project is anticipated to require, “...approximately 913,000 cubic yards (CY) of cut and 1,062,000 CY of fill, which would require off-site import to balance the grading quantities” (Page 4). The Draft EIR should clearly document the source of known old fill and new imported fill and the process to evaluate cultural resources occurring in either source.

T3-23

### Land Tenure

In order to fully understand the pre-contact and historic context of the project area, a thorough land tenure study of the project area and adjacent lands must be completed. It is especially important to understand the relationship that individuals and groups hold with respect to land and land-resources, such as water, trees, plants, rock outcroppings, scenic vistas, ceremonial sites, raw material gathering and processing sites.

The Stadium is located a mere 2.6 miles from the historic Kumeyaay Village of Nipaguay situated on a bend in what is now called the San Diego River. Nipaguay was occupied for over 12,000 years with an estimated population of several hundred or more at the time of contact. In 1774, the Mission San Diego de Alcala was established adjacent to Nipaguay. Therefore, there is a high probability that the boundaries of Nipaguay extend beyond the boundaries of the Stadium project to adjoining lands.

T3-24

The Kumeyaay have lived along the San Diego River since the beginning of time. There are many known village sites, traditional use areas, and known Kumeyaay ancestors that have lived in Mission Valley. Although many known sites in the river bed may have been covered by silt and sand as the river flowed, the level changed, erosion occurred and the river carved through the landscape. The San Diego River was a major trail for the Kumeyaay from the ocean to the deserts and from far away. Many Kumeyaay artifacts have been found in the sand and gravel and will continue to be found throughout the previously disturbed areas. The San Diego River and its tributaries and streams are a cultural resource, a tribal cultural resource and a scenic viewshed.

T3-24  
Cont.

### Selecting the Right Consultants

The environmental consultants contracted by SDSU must have the respect of their colleagues and the Kumeyaay Nation. Artifacts are the witnesses of the past and document how an area was used by the Kumeyaay throughout time and the concentration of the use of an area. Contemporary archeologists apply unempirical standards that are in direct opposition to Kumeyaay interpretation based on centuries of knowledge passed on by the ancestors. For example, archeologists use definition such as cultural resources and isolates. Frequently isolates or groups of isolates are discounted and listed as unassociated artifacts. An archeologist is studying only the immediate project areas rather than the totality of the landscape. Prior to beginning any field work, SDSU should seek consensus from the Kumeyaay Nation on the definitions of cultural resources, sites, isolates and other terminology in order consultants to adequately analyze impacts and cumulative effects. This is increasingly common in areas where artifacts may have been relocated by the river flow or previous construction activities.

T3-25

Prior to beginning any site specific research, SDSU and their consultants should meet with the Kumeyaay Nation and establish a preferred project protocol and consensus for site and record evaluation including technical terms; field survey protocol; standards for recordation during field surveys; information sharing; impacts to resources; avoidance standards; project alternatives; and, development of mitigation measures. In addition, a program for Kumeyaay participation throughout the project should be established to ensure Kumeyaay active participation during all field work when an archeologist is in the field.

### Qualified Kumeyaay Cultural Monitors

The Draft EIR should require that a “Qualified Kumeyaay Cultural Monitor” be used rather than a “Native American Monitor.” “Native American Monitor” is a generic term for all tribes across the United States. Within the State of California, it is further defined as “California Native American.” For projects occurring within the Kumeyaay Nation and the aboriginal territory occupied by the Kumeyaay people for thousands of years and recognized by the California Legislature Assembly Joint Resolution No. 60 adopted on the 29<sup>th</sup> day of August, 2002, it is more accurate and respectful to clarify a “Kumeyaay Cultural Monitor.”

T3-26

A “Qualified Kumeyaay Cultural Monitor” is defined as an individual who is culturally affiliated with the area, has a vested interest, and trusted by tribal leaders. Therefore, the term “qualified” refers not only to the skills, expertise, and training of an individual, but also to the formal recognition by the elected leadership of the individual’s tribal association; the leadership

acknowledges the individuals skills; and, approves the individual acting on their behalf as a Kumeyaay Cultural Monitor. Tribal officials are ultimately responsible for vetting the qualifications of the Cultural Monitors whom they choose to represent their tribe. Cultural Monitors are intended to be trusted tribal representatives who will have firsthand exposure to field activities so that they may make recommendations to the archaeologist onsite, as well as directly report their observations to their tribal leadership and/or community. The use of “Native American Monitor” allows any individual claiming native status to pursue monitoring work in the Kumeyaay Territory. The selection and scheduling of Kumeyaay Monitors should be rotated among the interested Kumeyaay Bands with monitoring programs.

T3-26  
Cont.

### Tribal Cultural Resources

The initial study states that,

“...CSU will conduct a cultural resources record search, make a request to the Native American Heritage Commission for a “Sacred Lands” file, and contact all Native American tribes known to have occupied or used lands within the project area. Once these resources are understood, CSU will authorize field surveys of the project site to conduct surveys for such resources. The Draft EIR will determine whether potential significant impacts could occur to tribal cultural resources, **based on the above data** (Page 34 - emphasis added).”

The above discussion is clearly insufficient to establish tribal cultural resource and shows a lack of understanding of cultural and tribal resources. According to CEQA, the importance of tribal cultural resources is the value of the resources to Native American tribes culturally affiliated with the Project site. Based on the original Stadium construction date, a cultural resource or sacred site record search is unlikely to yield sufficient results. Records maintained by the Native American Heritage Commission (NAHC) and Cultural Historical Resources Information System (CHRIS) are not exhaustive, and a negative response to these searches does not preclude the existence of tribal cultural resources. Many of the Kumeyaay Bands maintain their own registry of known sites so local tribal record offices should also be contacted. Often times a tribe may be the only source of information regarding the existence of a tribal cultural resource. In addition, the records of the Catholic Church and Missions should be reviewed and any studies conducted by the Church or its agents should be included in the technical report.

T3-27

The discretionary determination of impacts to tribal cultural resources by CSU, SDSU, or their consultants does not honor the purported Tribal Cultural Resources was added to CEQA as a separate category from Cultural Resources. The Tribal Cultural Resource analysis should be prepared by the Kumeyaay Nation with the assistance of CSU, SDSU, or their consultant. Otherwise Tribal Cultural Resources is merely a sterile application and interpretation of academics. The Tribal Cultural Resource section of the Draft EIR should also include a description and analysis of Kumeyaay plants and animals native to the project site and their pre-contact and post-contact use by the Kumeyaay.

T3-28

### Cultural and Tribal Cultural Resource Protection

T3-29

The Manzanita Band requests the Draft EIR include a plan for the long-term curation and collection management for all Cultural and Tribal Cultural Resources recovered from the project site. The plan should prioritize the curation and collection management within the boundaries of the County of San Diego and preferably within the project site with Kumeyaay participation.

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T3-29  
Cont.

#### **Hazards and Hazardous Materials**

The Initial Study identifies the proximity of the project site to the Kinder Morgan Energy Partners Mission Valley Terminal and adjacent Interstate 15. The project site is also adjacent to Interstate 8 which was not included in the discussion. All three facilities may result in the risk of exposing receptors to potentially hazardous materials which will be analyzed in the Draft EIR.

↑  
T3-30

The Draft EIR should also include (1) a discussion of the hazardous material impacts to Kumeyaay plants, the gathering of plants and their processing by the Kumeyaay; (2) a discussion of hazardous materials impacts during inadvertent discovery of Kumeyaay cultural items, including human remains, funerary objects, sacred objects, objects of cultural patrimony, cultural resources and tribal cultural resources potentially uncovered throughout the entire construction process; and, (3) the risk to individuals involved in the handling of any of the above.

↑  
T3-31

#### **Kumeyaay Culture and Heritage Interpretive Program**

The SDSU Master Plan includes the development of River Park, Open Spaces and Trails. Each of these elements as well as the built environment offer an unique opportunity to develop a wide range of Kumeyaay Culture and Heritage Interpretive elements to compliment the SDSU educational programs and the importance of the San Diego River as the lifeline for the Kumeyaay. During the initial planning and design phases are many opportunities to consider incorporating Kumeyaay designs into construction elements such as buildings, the stadium, sidewalks and intersection.

↑  
T3-32

The Manzanita Band recommends SDSU and their consultants consider the Immediate Use Program for the Former CalTrans Building in Old Town State Historic Park as an example of positive collaboration between a state agency and the Kumeyaay Nation to develop an interpretive program specific to a location.

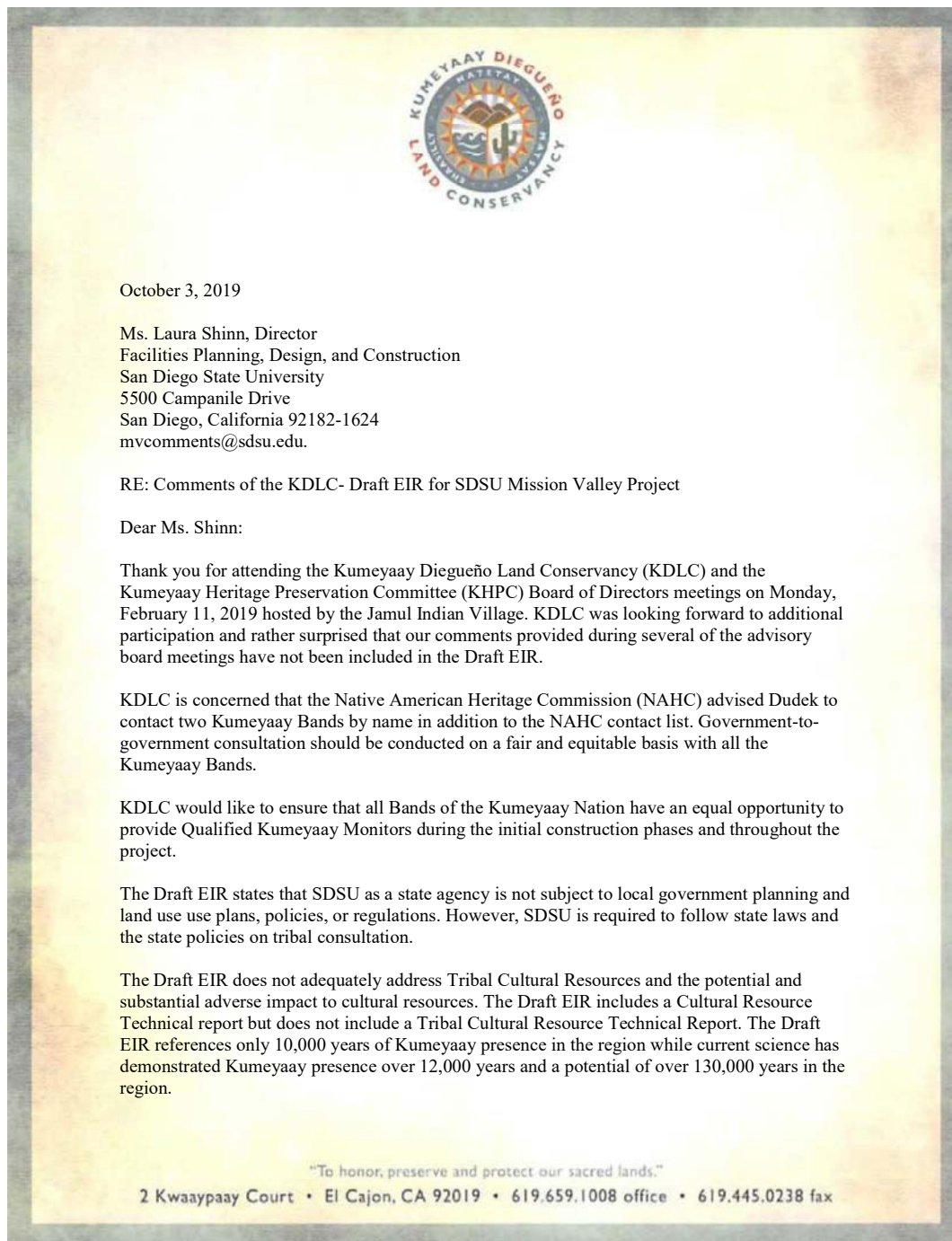
The Manzanita Band looks for to continued involvement in the preparation of the Draft EIR and clarification of the above referenced concerns as well as others. The Manzanita Band also requests copies of all record searches and confidential site records as the studies progress. Should you have any questions, please contact Lisa Haws, Tribal Administrator, 619-766-4030 (office), 619-733-7697 (cell) or email: lisahaws@msn.com. Thank you.

↑  
T3-33

Sincerely,

Ms. Angela Elliott Santos  
Chairwoman

Comment Letter T4



T4-1

T4-2

T4-3

T4-4

T4-5



Although the Draft EIR references the development of interpretive displays that describe the history and significance of cultural resources, it does not include interpretive displays of the rich Kumeyaay history or development of displays in conjunction with the Kumeyaay Nation. The Draft EIR mentions only the City's Historical Resource staff.

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T4-6  
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Should you have any questions, please contact Lisa Haws, Executive Director, 619-733-7697 (cell) or email: [lisahaws@msn.com](mailto:lisahaws@msn.com). Thank you.

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T4-7  
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Sincerely,

Mr. John EagleSpirit Elliott, Chairman  
KDLB Board of Director

Comment Letter O1



August 12<sup>th</sup>, 2019

Laura Shinn, Director  
Facilities Planning, Design, and Construction  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-1624  
[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)

**Re: Comments on SDSU Mission Valley Campus Master Plan**

Dear Laura Shinn:

Thanks for the opportunity to comment on The SDSU Mission Valley Campus Master Plan (CMP). San Diego Audubon Society (SDAS) is a non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. SDAS advocates on behalf of wildlife and the environment. There are four main points that we are emphasizing as important issues for the CMP: 1) Wildlife habitat protection and restoration, 2) anti-bird strike methods, 3) Murphy Creek Canyon Wildlife Corridor protection, and 4) energy efficient campus using green building and LEED methods. The following will discuss more broadly on these topics.

The CMP is in an urban area of San Diego and has long been an attraction for its residents for sports entertainment and concerts. But it is also located in an active area for numerous species of wildlife, illustrated by the San Diego River, Murphy Canyon Wildlife Corridor and other connections to local tributary canyons. Wildlife habitat protection and restoration needs to be a priority. The [San Diego Tracking Team](#) has found sign of numerous species, including raccoon, bobcat, coyote, opossum and cottontail rabbit. Some native plant species were also observed: Broom Baccharis, Coast Goldenbush, Cottonwood, Sycamore, San Diego Sunflower, and Lemonade Berry. Native plants should be used in all landscaping, as this would greatly reduce opportunistic invasive species moving into restored habitat along the San Diego River and Murphy Canyon Wildlife Corridor. There are opportunities for interpretive and informational signage, to educate the public about how the floodplain functioned prior to development. Photos from pre-development can speak volumes for the visually inclined about the regional history. Portions of this River Park could be a living laboratory for SDSU students who could learn about land use, ecology, habitat restoration, invasive plant removal, wildlife movement, etc.

The Murphy Canyon Wildlife Corridor, containing Murphy Creek, is the only corridor between the River and the surrounding landscape in this area and is a vital linkage from the tributary canyons north and northeast of the project site to the San Diego River Watershed. There has been literature about restoration of the San Diego River, but the Murphy Canyon

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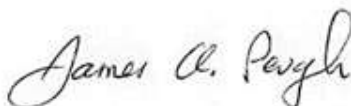
Wildlife Corridor has been set aside. The River and Murphy Creek are one in the same. They are of the same water arterial ecosystem in this area and restoring the River beckons restoring the Corridor. It's important to keep these habitats open, wild, and secured to protect genetic diversity by preventing species isolation. This keeps wildlife populations healthier and resilient. There is great potential to widen this corridor, improve it with more native plants and ramps to allow wildlife to escape the flood control channel during floods, and other wildlife mitigation strategies. The San Diego Audubon Society has been looking at this area and has put together an informative presentation that provides information on these issues. The planners for the CMP should consult with [Megan Jennings](#) with the Lewison Lab and Cara Lacey with the Nature Conservancy ([cara.lacey@tnc.org](mailto:cara.lacey@tnc.org)) can provide how these protected wildlife areas and corridors connect to the wider efforts to support wildlife species and their movements throughout the region.

SDSU, being the leading educational institution in the region, has the responsibility to be a leader. Audubon and others have provided information about the protection of migratory birds, and it's included in the CMP literature. The use of anti-bird strike methods used on all building and structures needs to be a requirement. This should be a shining example for the university to promote to others in the state and across the country. Working with Jim Peugh at the San Diego Audubon Society and SDSU River Park Advisory Committee will provide proper consultation to implement this most important cause.

CMP should also be the leader for others in the region by using green technology and LEED methods (Platinum Level) throughout the project. Working with SDSU Sustainability Group ([sustainable@sdsu.edu](mailto:sustainable@sdsu.edu)) will allow concerned faculty and students to be involved in their campus. This will help the City (and the County) meet their [Climate Action Plan](#) goals of reducing greenhouse gas emissions. This can be achieved by creating energy and water efficient buildings, creating housing nearby public transit, installing solar panels where appropriate, encouraging non-motorized travel via bicycles, and creating student communities which support green lifestyle choices (i.e. public transit use, community gardens, composting/waste diversion programs, etc.).

These are exciting times for SDSU and engaged residents because of the Mission Valley Campus. Protecting wildlife habitat within the project footprint, along the vital San Diego River and connecting to Murphy Canyon Wildlife Corridor; taking measures to prevent unnecessary bird strikes by using best design practices; and a visionary, forward thinking, energy-conscious campus will allow us all to be proud of the newest addition to Mission Valley.

Sincerely,



James A. Peugh  
Conservation Chair  
San Diego Audubon Society

O1-7  
Cont.

O1-8

O1-9

O1-10

O1-11

Comment Letter O2

From: 'Shain Haug' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)> Date: Mon, Aug 19, 2019 at 11:11 AM  
 Subject: [mvcomments] DEIR Project Study Area Roadway Traffic  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: Steve Dahms <[sdahms100@yahoo.com](mailto:sdahms100@yahoo.com)>, John Kunkel <[jkunkel3002@cox.net](mailto:jkunkel3002@cox.net)>, Marilyn Reed <[bioteach\\_75@yahoo.com](mailto:bioteach_75@yahoo.com)>, Julie Stollenwerk <[hikerjoolz@cox.net](mailto:hikerjoolz@cox.net)>, Barry Price <[bprice189@gmail.com](mailto:bprice189@gmail.com)>, Annie Keeney <[akeeney@sdsu.edu](mailto:akeeney@sdsu.edu)>, Sophia Frost <[sfrost@tiee.org](mailto:sfrost@tiee.org)>, David Peterson <[az4huskers@msn.com](mailto:az4huskers@msn.com)>, Kim Morris <[kmorr008@gmail.com](mailto:kmorr008@gmail.com)>, Charles Cadwalader <[chuck.cadwalader@homestreet.com](mailto:chuck.cadwalader@homestreet.com)>, Shain Haug <[shainh\\_2000@yahoo.com](mailto:shainh_2000@yahoo.com)>, Marianne Lindsay <[marianne\\_lindsay@hotmail.com](mailto:marianne_lindsay@hotmail.com)>

Re: SDSU Stadium Area Development Draft Environmental Impact Report

As I understand the DEIR Section 4.15.2.1, Project Study Area, the analysis of roadway traffic does not extend to the east of Mission Gorge Road. Conspicuously absent from the analysis are:

Zion Avenue between Mission Gorge Road and Waring Road

Twain Avenue/50<sup>th</sup> Street/Orcutt Avenue between Mission Gorge Road and Waring Road

Mission Gorge Place between Mission Gorge Road and Alvarado Canyon Road  
 Alvarado Canyon Road/Adobe Falls Road between Mission Gorge Road and Waring Road

The traffic from activities in the project area does not and will not somehow evaporate at Mission Gorge Road. Zion Avenue and Twain Avenue are heavily trafficked, both east and west, during morning and evening commutes and more so after stadium events. Twain Avenue is heavily impacted before and after stadium events by drivers seeking to by-pass congested areas. Mission Gorge Place and Alvarado Canyon Road/Adobe Falls Road are typically heavily trafficked on stadium days as folks look for alternate routes to the freeway.

The residents of Allied Gardens will be adversely affected by the SDSU development. Please include discussion of this omission, the reasons for the omission, and any reasons why the analysis cannot or will not be extended as an agenda item of the September 12, 2019 and September 24, 2019 informational sessions.

Thank you,  
 Shain Haug  
 President, Allied Gardens/Grantville Community Council

O2-1

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O2-7

Comment Letter O3

## Serra Mesa Planning Group

A Recognized San Diego City Planning Group - Serving the Citizens of Serra Mesa

Post Office Box 23315 San Diego, CA 92193  
smpg@serramesa.org

September 19, 2019

RE: Draft San Diego State University Mission Valley Campus Master Plan Environmental Impact Report

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

Dear Ms. Shinn:

The Serra Mesa Planning Group (SMPG) discussed the Draft SDSU Mission Valley Campus Master Plan Environmental Impact Report at our September 19, 2019 meeting and passed a motion to approve this letter. This letter is the result of a careful review of the EIR and recognition of the permanence and far reaching impacts of the stadium redevelopment on Serra Mesa.

O3-1

Listed below are specific questions and comments organized by topics.

### Noise

The study determined that during a Stadium event the ambient sound level of 7 db at the Broadview residential site, located in Serra Mesa, would be “clearly noticeable and therefore a potentially significant impact.” (p. 4.12-21) Also, it’s stated that, “Accordingly, impacts at these locations during the indicated times of day, evening, and night are considered potentially significant with respect to the City’s noise ordinance hourly limits. (Impact NOI-6).” (p. 4.12-20) “Locations” refers to five sites, including the Broadview site.

O3-2

- *What is the duration of the events?*
- *What are the indirect impacts? For example, if a property owner sells their property, are they required to divulge the noise impacts?*
- *There weren’t any mitigations (e.g., sound attenuation improvements) suggested or discussed for these locations. Why weren’t mitigations considered? What are mitigations that would minimize the noise impacts?*

O3-3

O3-4

O3-5

### Parking

When the Chargers were located at the stadium many people parked in the residential community along and off of Mission Village Road during stadium events, a “no cost” area.

O3-6

- *What will be the parking impact on the Mission Village Road area on stadium event days?*

O3-7

SDSU Mission Valley Campus Master Plan EIR  
September 19, 2019  
Page 2

- *What will be the parking impact on the Mission Village Road area on non-stadium days (since there will be a limited amount of free parking)?*
- *What mitigations can be implemented to reduce any impacts on the Mission Village area on*
  - *Stadium days?*
  - *Non-stadium days?*

O3-8

O3-9

Park and Ride Facility for Stadium Trolley Stop – Serra Mesa residents access the park and ride facility via personal vehicles (no bus service available).

- *Will a park and ride facility be available to the general public?*
- *Will there be a charge for parking at the facility? If Yes, what will be the impacts of charging on trolley usage?*

O3-10

Severely limited parking on the SDSU Mission Valley campus will encourage the use of alternate transportation such as the trolley, city buses, bicycles, and ride sharing for students, staff, and attendees at stadium events.

O3-11

- *Why are no “park and ride” locations on Aero Drive planned with shuttles operated by SDSU traveling through Serra Mesa to and from the Mission Valley campus for students and staff that don’t live near mass transit?*
- *Will “park and ride” locations operated by SDSU be implemented to mitigate increased traffic on Serra Mesa streets as much as possible?*

O3-12

O3-13

Spillover parking on nearby Serra Mesa residential streets will result from the SDSU Mission Valley campus regardless of how much or how little on-site parking is available.

O3-14

- *Why is there no plan to protect parking for Serra Mesa residents who reside in homes and apartments on streets near the planned SDSU Mission Valley campus?*
- *Why has SDSU not formulated a plan to have the City of San Diego establish a residential parking permit district for certain Serra Mesa streets to avoid the problem of spillover parking arising from the Mission Valley campus?*

O3-15

O3-16

A Residential Parking Permit plan for Serra Mesa should not wait until the problem arises, and should include Saturdays and Sundays since stadium events will likely occur on the weekends.

Residential parking permit districts are currently in effect in –

Hillcrest	Monday through Friday from 7 a.m. to 7 p.m.
SDSU/College Area	Monday through Friday from 8 a.m. to 7 p.m.
Logan Heights	Monday through Friday from 8 a.m. to 6 p.m.
Mesa College	Monday through Friday from 7 a.m. to 7 p.m.
El Cortez/Downtown	Monday through Saturday from 8 a.m. to 6 p.m.

O3-17

- *Will SDSU take the lead and negotiate with the City to establish a residential parking permit district for Serra Mesa as part of the agreement to purchase the land, if not why? Will the hours be in effect 7 days a week?*

O3-18



### Neighborhood Community Communication

This project falls under the auspices of the state.

- *To prevent issues that affect the Serra Mesa community and to resolve issues (e.g., parking, traffic, noise) when they arise will there be a liaison for the community to contact and a process for resolving any issues? It would be better to discuss this item prior to the redevelopment in order to establish rapport and avoid the problems encountered by the College area community.*

O3-19

### Study area

"The study area was determined in a manner that would identify all locations potentially significantly impacted by the proposed project, including intersections, roadway segments, freeway segments, and freeway on- and off-ramp meters and ramps, respectively." (p. 4.15-15)

- *What criteria were used for determining the study area?*

O3-20

Serra Mesa is known as a pass through community, providing daily access for many people to Mission Valley and Kearny Mesa. Streets commonly used for access are Murray Ridge, Raejean, Greyling, Sandrock, Hammond, Gramercy, Ruffin, Mission Village Drive, and Mission Center Road. Additionally, Serra Mesa streets are used to avoid gridlock caused by congestion in neighboring communities.

Additionally, vehicles will travel on Serra Mesa streets for access to I-805 at Murray Ridge. Gramercy between Sandrock and Ruffin was studied but not the connecting street, Sandrock, which leads to Kearny Mesa via Aero or Mission Valley via Murray Ridge. Vehicles don't terminate at Gramercy, which was studied.

O3-21

Since the mitigations for ramps to I-15 (TR-24, TR-25, TR-26) are infeasible or unfunded, the impacts remain significant and unavoidable. Consequently, this situation will lead to more vehicles using Serra Mesa streets to access I-805.

- *The streets mentioned in the first paragraph (except for Ruffin, Mission Village Drive, Gramercy between Mobley and Ruffin) were not included in the existing conditions analysis. What will be the impact to these streets? What are possible mitigation measures?*
- *The intersection at Aero and Sandrock wasn't included in the study. What will be the impact at this intersection?*
- *An analysis wasn't made of the I-805 ramps at Murray Ridge. Yet this is an area that vehicles will use for I-805 access. What would be the impact to the ramps? What are possible mitigation measures?*
- *The analysis doesn't seem to account for alternate routes through Serra Mesa to avoid gridlock. What would be the impact to Serra Mesa streets if realistic traffic assumptions were considered? What are possible mitigations?*

O3-22

O3-23

O3-24

O3-25

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Page 4

# **Traffic Study and Kearny Mesa Community Plan Update**

## Existing Conditions for Street Segments

As part of the Kearny Mesa Community Plan update a Final Mobility Existing Conditions Report was produced, available at [http://kearnymesaconnected.com/wp-content/uploads/Appendix-A-Mobility-ECR\\_No\\_Appendices-1.pdf](http://kearnymesaconnected.com/wp-content/uploads/Appendix-A-Mobility-ECR_No_Appendices-1.pdf). Shown in the report is the Existing Roadway Level of Service conducted in 2016:

Aero Dr from Sandrock to Ruffin (Page 173): ADT 21,420; V/C 0.714; LOS D

Ruffin from Aero to Gramercy/Mission Village (Page 179): ADT 14,350; V/C 0.478; LOS C

Sandrock from Aero to Hurlbut (Page 178): ADT 13,590; V/C 0.906; LOS E

The SDSU stadium redevelopment study indicates for existing conditions:

Aero Dr from Sandrock to Ruffin (Page 4.15-35): ADT, 19,636; V/C<sup>2</sup>, 0.49; LOS B

Ruffin from Aero to Mission Village (Page 4.15-35): ADT, 13,617; V/C<sup>2</sup>, 0.478; LOS C

Sandrock from Aero to Hurlbut – Not studied.

There are discrepancies between the two analyses, especially on Aero. Since there has been more development in Mission Valley and the study for this EIR was conducted in 2018 it would be expected that there would be more traffic not less.

- *Why are the results in this EIR for Aero so different from the results in the Kearny Mesa analysis?*

## Proposed (Street Segments)

The Kearny Mesa Mobility Technical Report DRAFT available at [http://kearnymesaconnected.com/wp-content/uploads/Kearny-Mesa-Mobility-Technical-Report-DRAFT\\_CLEAN.pdf](http://kearnymesaconnected.com/wp-content/uploads/Kearny-Mesa-Mobility-Technical-Report-DRAFT_CLEAN.pdf) indicates for Roadway Segment Analysis – Proposed Plan Conditions (refers to the community plan update changes and not the SDSU proposal):

Aero Dr from Sandrock to Ruffin (Page 106): ADT, 37,500; V/C, 1.203; LOS F

Ruffin from Aero to Gramercy/Mission Village (Page 109): ADT, 16,100; V/C, 0.537; LOS C

Sandrock from Aero to Hurlbut (Page 178): ADT, 16,300; V/C, 1.087; LOS F

The SDSU stadium redevelopment study indicates for Horizon Year Plus Project without Event:

Aero Dr from Sandrock to Ruffin (Page 4.15-35): ADT, 25,505; V/C<sup>2</sup>, 0.64; LOS C

Ruffin from Aero to Mission Village (Page 4.15-35): ADT, 19,086; V/C<sup>2</sup>, 0.64; LOS C

Sandrock from Aero to Hurlbut – Not studied.

The EIR doesn't seem to take into account the Kearny Mesa Community Plan update, which will significantly impact Aero Drive and the surrounding area. The western part of Aero is being proposed for high density multi-family housing. Currently, a 434 unit project, The Aero, is being considered at 8225 Aero Drive.

O3-26

O3-27

SDSU Mission Valley Campus Master Plan EIR  
September 19, 2019  
Page 5

- *If the Kearny Mesa Community Plan update is considered, what is the impact on the road segments?*

Proposed (I-805 Freeway)

The Kearny Mesa Mobility Technical Report DRAFT available at [http://kearnymesaconnected.com/wp-content/uploads/Kearny-Mesa-Mobility-Technical-Report-DRAFT\\_CLEAN.pdf](http://kearnymesaconnected.com/wp-content/uploads/Kearny-Mesa-Mobility-Technical-Report-DRAFT_CLEAN.pdf) indicates for I-805 Analysis – Proposed Plan Conditions (refers to the community plan update changes and not the SDSU proposal):

Kearny Villa Rd/Mesa College Drive to Phyllis Place (Page 148):

- NB: AM – Peak Hour Volume, 13,170; LOS F; PM – Peak Hour Volume, 6,051; LOS C
- SB: AM – Peak Hour Volume, 4,191; LOS B; PM – Peak Hour Volume, 12,758; LOS E

The SDSU stadium redevelopment study indicates for Horizon Year Plus Project Conditions:

Murray Ridge Rd/Phyllis Pl to Mesa College/Kearny Villa Rd (Page 4.15-113)

- NB: AM – Peak Hour Volume, 11,875; LOS F; PM – Peak Hour Volume, 6,876; LOS C
- SB: AM – Peak Hour Volume, 5,992; LOS C; PM – Peak Hour Volume, 10,862; LOS F

The EIR doesn't seem to take into account the Kearny Mesa Community Plan update. This update will impact I-805 as shown in the Kearny Mesa analysis.

- *If the Kearny Mesa Community Plan update is considered, what is the impact on the I-805 Plus*
  - *Project? Would the impact be significant?*
  - *Project – plus stadium event conditions? Would the impact be significant?*

**Traffic**

The SDSU Draft Environmental Impact Report's (DEIR) discussion of potential environmental impacts does not contain graphics, charts, and/or language which a layperson can sufficiently understand to enable those who did not participate in its preparation to fully consider the issues raised by the proposed project

However from what little can be understood the following deficiencies noted in the DEIR by the Serra Mesa Planning Group are as follows:

Traffic and Schools

In the Traffic Impact analysis, page 36, in the description of Gramercy Drive there is no mention of Taft Middle School being located at the intersection of Gramercy Drive, Ruffin Road, and Mission Valley Drive where the speed limit is 25 mph when children are present which would be at least four times a day at arrival, departure for and return from lunch, and dismissal. In addition there are extended morning and afternoon hours through San Diego Unified School District's PrimeTime program. There is also much double parking as parents stop to drop off and pick-up children, and children also frequently run across Gramercy Drive instead of crossing at the light at the intersection. Extra added traffic resulting from the SDSU Mission Valley campus will make it more much dangerous for children attending Taft Middle School.

↑ O3-27  
Cont.

O3-28

O3-29

O3-30

O3-31

SDSU Mission Valley Campus Master Plan EIR  
September 19, 2019  
Page 6

The same danger to children from extra added traffic will also exist in the vicinity of Jones Elementary School on Greyling Drive and Angier Elementary School on Hurlbut St. because a 25 mph speed limit is in effect in both locations as well when children are present.

Motorists using Mission Center Road to avoid gridlock on Friars Road will soon discover they can use Greyling Drive to avoid further gridlock on Murray Ridge Road to access Gramercy Drive to go to and from the SDSU Mission Valley campus. Extra added traffic resulting from the SDSU Mission Valley campus will make it much more dangerous for children attending Jones Elementary School. Jones Elementary also participates in extended hours PrimeTime

O3-32

Motorists using Aero Drive from the west to access Sandrock Road to proceed to the SDSU Mission Valley Campus will soon discover they can use Hurlbut St. to access Murray Ridge Road to Sandrock Road to Gramercy Drive to avoid gridlock on Aero Drive. That extra added traffic on Hurlbut St. resulting from the SDSU Mission Valley campus will make it more much dangerous for children attending Angier Elementary School. Angier also participates in the extended hours PrimeTime program.

O3-33

- *Why was there no mention of the 25 mph speed zone near Taft Middle School in the Traffic Impact Analysis mentioning Gramercy Drive?*
- *Why was there no Traffic Impact Analysis completed for Greyling Drive and Hurlbut St, since there is a 25 mph school zone speed limit in effect when children are present?*
- *Is there a plan to mitigate the danger to children resulting from increased traffic in the School Zones on Gramercy Drive and Greyling Drive, and Hurlbut St. and if so what is the plan? If there is no plan, why?*

O3-34

O3-35

O3-36

#### Traffic and Serra Mesa Residential

There is no mention in the DEIR regarding the large apartment complex whose driveway entrance and exit is located on Gramercy Drive just down the hill about a half block from Taft Middle School. The extra traffic generated by the SDSU Mission Valley campus project will be a recipe for disaster for apartment residents.

- *Is there a plan to mitigate the danger to allow safe access onto Gramercy Drive from the apartment complex, and if so what is the plan? If there is no plan, why not?*

In the document Significance Determination Thresholds, page 72, Item 6 states: "If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant."

O3-37

There is no mention of the substantial restriction in access to residential driveways which will occur along the impacted roads in Serra Mesa due to increased traffic resulting from the SDSU Mission Valley project. The only impact which is mentioned in the DEIR is wait times for vehicles at intersections and freeway ramps.

- *Is there a plan to mitigate the danger for residents backing out of their driveways into the increased traffic that will result from the project, and if so what is that plan? If not, why?*

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Page 7

Furthermore:

- *Is there a plan to help alleviate the anticipated increased traffic noted in the DEIR which will lower the quality of life for Serra Mesa residents?*
- *Why has SDSU not considered a zero parking space policy for students and others living on the Mission Valley campus instead of allocating 1.23 spaces per dwelling unit?*
- *Why has a policy to severely limit parking for other students and staff not been considered?*

O3-38

These are not novel ideas because according to U.S. News, four universities report that zero percent of students had cars on campus in 2018: Georgetown University; Johns Hopkins University; Princeton ; and the University of Wisconsin—Madison. Many other colleges and universities also drastically limit on campus parking especially in this age of concern over greenhouse gases and global warming.

O3-39

<https://www.usnews.com/education/best-colleges/the-short-list-college/articles/2018-03-06/11-national-universities-where-students-rarely-bring-cars>

- *Why is SDSU not more environmentally conscious of the air pollution caused by vehicles and how that can be greatly mitigated by using extremely limited parking availability on the Mission Valley campus where mass public transportation is readily available and easily accessible ?*

O3-40

#### Cumulative Projects

An approved development project located in Serra Mesa, approximately 1½ miles from the Project, for 160 multifamily housing units and 15,000 s.f. of retail at the corner of Ruffin and Gramercy, 9294 Gramercy Drive, wasn't mentioned. The roads surrounding this project were studied.

- *Does this project impact the traffic study and analysis?*
- *Would stadium redevelopment impact this project?*
- *Are mitigations needed?*

O3-41

Thank you for the opportunity to review this DEIR. If you have any questions with reference to any of the items raised in our response, please contact me. We look forward to your response.

O3-42

Sincerely,

Bryce Niceswanger  
Chair, Serra Mesa Planning Group

Comment Letter O4



**NORTH PARK PLANNING COMMITTEE**

<http://www.northparkplanning.org>

[info@northparkplanning.org](mailto:info@northparkplanning.org)

September 20, 2019

To: Laura Shinn, Director, Facilities Planning, Design, and Construction;  
San Diego State University, 5500 Campanile Drive, San Diego, CA 92182-1624  
Via email: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)

From: North Park Planning Committee (NPPC)

Re: **SDSU Mission Valley Campus Draft Environmental Impact Report (DEIR)**

The North Park Planning Committee (NPPC) hereby submits the following comments on the SDSU Mission Valley Campus Draft Environmental Impact Report (PEIR)

1. The City of San Diego should grant authorization to implement improvements as outlined in the Draft EIR for the California State University (CSU)
2. The outdated methodology of Level of Service (LOS) should not be the only methodology used to determine transportation impacts and mitigation, and other methods should be used such as Vehicle Miles Traveled (VMT) that are consistent with the City General Plan and the Climate Action Plan.
3. The SDSU Mission Valley Campus Draft EIR shall match the Mission Valley Community Plan Update that was approved by City Council on 9/10/19 for traffic mitigation and fire safety
4. The following additional recommendations are made for Texas Street/Qualcomm Way:
  - a. Adding protected bike lanes on Texas Street/Qualcomm Way from Camino Del Rio South to Friars Road would improve bicycle utilization
  - b. Adding a northbound right turn lane at Texas St. and Camino Del Rio South would improve traffic flow
5. The following intersections should have synchronized traffic lights to improve traffic flow:
  - a. Texas St. at Camino del Rio South and at I-8 Eastbound Off Ramp
  - b. Qualcomm Way at Camino del Rio North and at Camino de la Reina

O4-1

O4-2

O4-3

O4-4

O4-5

O4-6

O4-7

O4-8

O4-9



SDSU Mission Valley Campus DEIR  
Page 2 of 2

The comments above are consistent with the motion made at the September 17, 2019 NPPC meeting.

04-10

Sincerely,

A handwritten signature in black ink, appearing to read 'René A. Vidales', with a horizontal line underneath.

René A. Vidales, Chair  
North Park Planning Committee



# SIERRA CLUB

## SAN DIEGO CHAPTER

8304 Clairemont Mesa Blvd., Ste 101 • San Diego, CA. 92111

TEL: 858-569-6005 • FAX: 858-569-0968

<http://sandiego.sierraclub.org>

September 26, 2019

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

Dear San Diego State University Administration:  
Attention Laura Shinn:

From the outset of SDSU West proposal, Sierra Club San Diego has been a strong supporter of San Diego State Mission Valley. It has all the elements of an excellent addition to the city and the region that would benefit the people of the San Diego Region, the University, and the regional economy. Moreover, the initiative's pledge to do a full CEQA review, and to create a San Diego River Park were key elements in our support for this project. Last February, we responded to the scoping document by recommending 15 important environmental concerns that should be in the draft EIR. In this letter we revisit these 15 recommendations (that are underlined) after a thorough examination of the DEIR for SDSU Mission Valley. In each of the 15 sections we make important recommendations (**which are bolded**) that in the view of Sierra Club San Diego, *must* be included in the final EIR.

1. Please be advised that Sierra Club considers SDSU West in the same realm as signature San Diego features such as Balboa Park, Mission Bay, and our irreplaceable coastal shoreline. We view the San Diego River, and the potential for a river park as a valuable resource for all of San Diego. Aside from the central thrust of the SDSU West objectives of providing education

O5-1

O5-2

O5-3

and housing opportunities, we see heightened potential as a recreational destination for all Southern California. Please comment on recreational and cultural components of the plans for the San Diego public.

O5-3  
Cont.

Sierra Club finds that the DEIR does a good job of highlighting the recreational and cultural component of the plans for SDSU Mission Valley. We agree with the DEIR that the proposed river park, “would implement the River Park Master Plan and enhance the character of the River Valley by activating the river influence area with passive and active recreation uses and natural, context-sensitive landscaping.” In addition, public hiking and biking trails are proposed throughout the eastern and south portions of the site including roughly parallel to the Murphy Canyon Creek and the San Diego River. We also agree that the proposed open space within the project and the river park will reduce the park deficit in Mission Valley. However, certain vital information is missing that we need to see in the final EIR. One omission is that despite an extensive lighting study in the appendix, there is no analysis of the impact of the athletic fields, presently adjacent to the San Diego River habitat.

O5-4

O5-5

- a) Is the proposed river park and trail system continuously integrated into other trails and parks that extend along the river? Such continuity is vital in a meaningful river rehabilitation and providing pathways for bicycles, joggers, and pedestrians.**
- b) Will there be a gymnasium and pool facilities (a public aquatic center) as well as the proposed athletic fields that will be available to the public as well as students and staff from SDSU?**
- c) We applaud the construction of athletic fields with lighting, but request that these lighted areas be buffered from the riparian habitat to protect nocturnal species. We believe a 100 foot setback is insufficient and requires reexamination with a primary focus on reducing night light in the riparian zones.**
- d) The final EIR needs to provide more information on the riparian habitat along Murphy Canyon Creek and its restoration.**

O5-6

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O5-8

O5-9

It is our hope that this new campus be a landmark intellectual, cultural, and recreational facility for the region.

O5-10

2. At the scoping meeting it was stated that the former Qualcomm Stadium will be recycled for building materials on the SDSU west project. Please detail how all the elements of the former Qualcomm Stadium will be recycled including, but not limited to, concrete, steel, and other elements amenable to recycling. Similarly, please detail the reuse or disposal of the asphalt and concrete from the stadium parking lot.

O5-11

The DEIR states: "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." Similarly, the DEIR states that "During construction of the proposed project, California State University (CSU)/San Diego State University (SDSU), or its designee, shall reuse all demolition waste to the extent feasible. CSU/SDSU, or its designee, shall dispose of all recyclable demolition waste products at a construction waste recycling facility." We applaud these actions however,

O5-12

- a) **The final EIR should provide a more detailed description of how and where recycled materials would be used. Onsite recycling would be preferable to minimize transportation of these materials.**
  - b) **More detail needs to be provide regarding which material can be recycled (e.g. steel, concrete, asphalt etc.) and how disposal of the unused material will occur.**
  - c) The term "feasibility" is notorious as an ambiguous criteria for developments to avoid environmentally superior project alternatives. **Please address the "feasibility" constraints which may be encountered in recycling the very basic construction materials that comprise the existing stadium and parking lot.**
  - d) **Please develop and advise what alternative safety strategies will be employed should public health concerns be raised by the previously undetected presence of asbestos, heavy metals, subsurface petroleum products, Volatile Organic Compounds (VOCs) or Contaminants of Emerging Concern (CEC).**
3. Please detail any residual toxic pollution from the Kinder Morgan tank farm on the north side of the project. To what extent is the project site impacted from petroleum and chemical pollution, and how will it be treated, isolated,

O5-13

O5-14

O5-15

O5-16

O5-17

contained, or removed? Please advise the requirements for test wells and reports of toxics to the City, State, and the public.

↑ O5-17  
Cont.

The DEIR states that, “Multiple environmental investigations and remedial activities have occurred at the project site related to releases of petroleum hydrocarbons, primarily from KMEP MTV. As a result of these investigations, more than 100 groundwater monitoring wells, extraction wells, and soil vapor monitoring probes have been installed at the project site. The Regional Water Quality Control Board (RWQCB) has approved decommissioning of some of the monitoring and extraction wells and soil vapor monitoring probes, and these wells are reportedly scheduled to be decommissioned in late 2019 or early 2020. Only a few sentinel wells will reportedly remain near the northeastern boundary of the project site in order to monitor the progress of ongoing remediation at the MVT property, and to confirm that contaminants from the MVT property are no longer migrating onto the project site (Appendix 4.8-2). As of July 2019, dozens of monitoring wells, extraction wells, and soil vapor monitoring probes remain on the project site.”

O5-18

Additionally the DEIR states, “In July 2016, the San Diego RWQCB concluded that the off-Terminal remediation had achieved the objectives stated in the cleanup order, and approved discontinuance of site remediation and post-remediation monitoring activities. Specifically, on July 15, 2016, the San Diego RWQCB issued Addendum No. 8 to CAO 92-01.” We are gratified to learn that the Kinder-Morgan petroleum farm is no longer a significant problem. However, we are concerned that, “A 10-inch-diameter underground petroleum pipeline used to transmit fuel products from the Kinder Morgan Energy Partners (KMEP) Mission Valley Terminal (MVT) to San Diego Harbor traverses the eastern portion of the Site.” While this pipeline is mentioned in the report and in the appendices, there is no information regarding the impact of the pipeline to the project. The DEIR also reports the discovery of unknown pipelines and shows a picture of valves associated with this unknown pipeline in the appendix 4-8-2 photograph 9.

O5-19

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**a) Please provide information regarding the risks associated with the 10 inch active fuel pipeline that traverses the eastern portion of the project.**

O5-22

- |  |                           |
|--|---------------------------|
| <p><b>Please detail the risks both during construction and operation of SDSU Mission Valley.</b></p>   | <p>O5-23</p>              |
| <p><b>b) Please provide additional investigation or other pipelines and discuss that impact and/or remediation of such pipelines.</b></p>  | <p>O5-24</p>              |
| <p>4. <u>Residential and commercial buildings are one of the largest sources of carbon emissions for cities and counties in California, and roughly half of building emissions come from on-site combustion appliances such as gas or propane furnaces and water heaters. Reducing these emissions is critical to achieve municipal and state climate goals. With a rapidly decarbonizing electricity grid, gas powered space and water heating in buildings is quickly becoming a large source of emissions. Please indicate if currently available high-efficiency electric heat pump technology, or other electric technologies can reduce carbon emissions relative to the most efficient gas-fired alternatives. If so, to what extent?</u></p> | <p>O5-25</p>              |
| <p>Sierra Club San Diego does support the common heating and cooling feature that is presented in the DEIR. However, in the scoping document we requested that electric heat pumps or other electric technologies be used that do not directly produce greenhouse gas at the site, but no mention of electric heating or cooling can be found in the DEIR. <b>Please provide information on the extent of heat pumps and electric heating and cooling to be employed in the project in the final EIR.</b></p>  | <p>O5-26</p>              |
| <p>a) Sierra Club San Diego strongly opposes the use of natural gas in the San Diego State Mission Valley campus. The use of 102,012,852 k/btu/year of natural gas, as stated in the DEIR is completely unacceptable. Additionally, Sierra club strongly disagrees with the following statement. "Operation of the proposed project requires natural gas, mainly for building heating and hot water." That statement is completely erroneous. It is entirely possible to efficiently heat and cool with electric systems. <b>Sierra Club San Diego requests that the project eliminate any use of natural gas, a dangerous greenhouse gas from the project.</b></p>  | <p>O5-27</p> <p>O5-28</p> |
| <p>b) The DEIR makes erroneous and misleading statements by comparing electrical use and natural gas use in the proposed project to an almost idle stadium site. "The project's efficiency (as expressed via a natural gas</p>   | <p>O5-29</p>              |



consumption per service population metric) is improved when compared to the existing condition.” “The project’s efficiency (as expressed via a natural gas consumption per service population metric) is improved when compared to the existing condition.” That statement is false since the existing condition is that the stadium site and parking lot is only used for a few events each year and the project will be a 24/7 year around operation. The efficiency of an idle site will inevitably be lesser than a project used continuously by thousands of people. **In the final EIR please compare the project to future goals for the reduction of greenhouse gas, not to some standard where there is a high ratio of energy projection to population.**

O5-29  
Cont.

O5-30

5. As natural gas, propane, and oil are a major source of greenhouse gas (GHG) the new project should be 100% electric which is a cleaner energy source and can increasingly be generated from renewable sources. This should be true for the Stadium, residences, retail establishments, hotels, classrooms, and office space. Please indicate if heat pumps or other electric technologies can be employed as the source for heating and cooling.

O5-31

- a) **The Sierra Club strongly opposes any used of natural gas, a dangerous greenhouse gas on the project. Please convert the entire project to electric energy.**

O5-32

- b) We are gratified that the energy technical report suggests that “Construction of the project is not anticipated to require natural gas, but this is not the case for the actual operation of the site. The DEIR states that, “The proposed project is incorporating a limited number of natural gas fireplaces, and no wood-burning fireplaces, within project residences. Of all residential units in the proposed project, up to 5% of the units may include a natural gas fireplace. This serves to minimize the consumption of natural gas within the building envelopes of project residences.” There is no reason for fireplaces at all in the project, even in just 5% of the units. **Please eliminate any use of gas fireplaces in the final EIR.**

O5-33

- c) Since it is untrue the natural gas is needed at all, the Sierra Club strongly disagrees with the statement form the DEIR that, “Operation of the proposed project requires natural gas, mainly for building heating and hot water.” This misstatement is repeated throughout the EIR and the Energy

O5-34

Technical Report Appendix. The project could run entirely on electrical energy. Natural gas is a major source of GHG and no new construction should utilize it. It is also much more costly than an all-electric project. Sierra club can provide extensive documentation that electric utilities are significantly less costly to install and operate than natural gas. **Please delete erroneous claims in the final EIR that natural gas is needed at all.**

- d) As currently proposed the project will result in massive use of natural gas, 5500% higher than its current use! The DEIR states, "Natural gas usage was estimated to be 1,822,990 kBtu for the existing Stadium (based on a review of meter readings) and 102,012,852 kBtu for the proposed project (based on use of CalEEMod parameters) as shown #Representative concentration pathways RCP)." This is a massive increase in the production of GHG here in San Diego. The project can be built with no natural gas. It is outrageous that it is planning to use billions of BTU's of natural gas unnecessarily. **Please eliminate any use of natural gas in the proposed project.**

- e) The DEIR uses misleading comparisons to minimize the production of greenhouse gas such as the following: "For comparison, based on 2017 consumption, operation of the proposed project would equate to less than 0.3% of the total natural gas demand citywide and less than 0.01% of the total natural gas demand statewide (Table 4.5-5)." This appears to be a small increase but it is not! Increasing natural gas by a nearly a third of a percent citywide is unacceptable. **Please eliminate such misleading comparisons in the final EIR and simply report the amount of additional greenhouse gas that will be produced as a result of the project.**

- f) **Please do not use SDG&E's energy mix in any analysis of the project.** In both the DEIR and in the Energy Technical report appendix there is reference to the current mix of energy production which has no relevance to the future. The region is rapidly adopting community choice aggregation, so any reference to SDG&E should be deleted. As SDG&E has announced it will retire entirely from the electricity procurement business, **please commit to buying electricity from a company that will provide**

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**greater than 90% of their energy from renewable energy sources, not gas or oil.**

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Cont.

g) The DEIR states that “As a state agency, California State University (CSU)/SDSU is not subject to local land use regulatory/planning documents, ordinances, regulations, policies, rules, fees, or exactions such as those described herein.” This is generally true but state agencies are not exempt from rulings of the California Courts which have recently held that greenhouse gas must be mitigated within San Diego County. **Please propose mitigation within the county that comports with the ruling of the California Courts.**

O5-39

h) **The following conclusions from the EIR is completely incorrect and misleading, and should be eliminated.** “Based on the above, natural gas consumption during operation would not be wasteful, inefficient, or unnecessary, and impacts would be less than significant.” Also: “The proposed project’s potential impacts with respect to energy requirements and energy use efficiencies are less than significant.” The fact is as currently proposed the project would massively increase energy consumption and greenhouse gas. **Please honestly conclude that the emissions from the project would be significant and propose appropriate mitigation in the county to offset this large increase in greenhouse gas.**

O5-40

O5-41

6. Similarly, please detail plans for renewable energy generation on the SDSU project site including wind, solar, and other sources. Any above ground parking lots, the Stadium, and the numerous buildings would be ideal sites for solar power generators.

O5-42

Sierra club applauds the fact that: “The proposed project is incorporating solar photovoltaic (PV) panels on available roof space that is expected to result in a total generation capacity equivalent to 10,819,478 kilowatt hours (kWh) of electricity, or 14.9% of the proposed project’s total electricity demand.” 14.9 percent of the projects energy demand.” However, the following details are missing:

O5-43

- a) Please indicate, more specifically, where solar panels will be installed. Will rooftop solar be installed on all offices, retail businesses, dormitories, and the Stadium roof? Can this 14.9% figure be increased? O5-44
- b) Will solar panels cover any parking areas to both provide shade and generate energy? O5-45
- c) Please provide information as to why no mention of wind power is mentioned, considered, or evaluated as an energy source in the proposed project. O5-46
- d) It is noted that the “utilities and service systems” section 4.17 presents basic mapped schematics for existing Sewer, Potable Water and Storm Drains, however Electrical and Natural Gas analyses are not provided. Please explain how these highly significant utilities are not presented. O5-47
7. Please indicate requirements for residences, hotels, classrooms, businesses, and the stadium to employ recycling and other green practices during operation of the site. O5-48
- The Sierra Club applauds SDSU’s current recycling efforts, proposals in the EIR to recycle construction waste, and the proposal to maintain an active recycling program at the proposed site. However,
- a) The DEIR states that, “The proposed project would include recycling bins in the housing and campus innovation buildings.” What about the rest of the project? **Please specify if recycling bins would be included in the entire project including retail businesses, trails and walkways, hotels, classrooms, and most importantly, the stadium.** O5-49
- b) **Please provide information on maintenance and emptying of recycling bins during home football games and other stadium events. Please include provisions for assuring these considerable quantities of recyclable items are indeed recycled according to the standards of Cal Recycle.** <https://www.calrecycle.ca.gov> O5-50
8. Please detail plans for the river park. Please indicate how an ecologic reserve along the river and recreational access by the public can coexist compatibly. Provide details on removal of nonnative plants and introduction of native species along the river park. O5-51
- a) Sierra Club appreciates that the “sports or recreational fields and courts shall be set back a minimum of 100 feet from the floodway of the San Diego River to reduce noise and lighting impacts.” **Please provide a** O5-52

- rationale in the final EIR that 100 feet is sufficient to reduce these impacts.**
- The DEIR cites the San Diego River Park Master Plan that a goal is to “Eliminate invasive plant species and reintroduce native species,” but no plan to meet this goal is evident in the DEIR.
- b) The DEIR acknowledges that, “The project site already contains invasive species (e.g., pampas grass). Exotic plant species may establish adjacent to the project site, and alter habitats and displace native species over time, leading to extirpation of native plant species and unique vegetation communities.” What procures does the project intend to employ for the removal of exotic, nonnative species in the river park?**
- c) The DEIR also recognized that, “The project site already contains invasive species (e.g., pampas grass). Exotic plant species may establish adjacent to the project site, and alter habitats and displace native species over time, leading to extirpation of native plant species and unique vegetation communities.” What plans does the project have for replacement of invasive species with native plants on an ongoing basis?**
9. An underlying design goal should be to transform this now utterly urban landmark into the previously wild river and wetlands that are key components of a natural river park. Sierra Club anticipates that SDSU West will seek diverse river park designs and amenity requests for proposal (RFPs) constructed around a design competition. Sierra Club looks forward to the migration and implementation of the “The Red and Black is keeping it green” main campus tradition to the Mission Valley site and related facilities.
- See comments in item 8 where these points are made.
10. Please detail plans for the hydrology and flood prevention on the project. Please include plans for 100-year floods in Mission Valley, the prospect of larger rainstorms due to climate change, and the possibility and consequences of dam failure in Mission Valley and upstream.
- a) The DEIR acknowledges that, “Potential hazards or events that may trigger an emergency response in the County include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms, and

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Cont.

O5-53

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freezes.” Moreover, the DEIR states that, “In the existing condition, Murphy Canyon Creek floods under 100-year and 500-year storm events as shown in Figure 2-5, Planning Constraints. The proposed project would employ grading techniques that elevate vertical construction of the project site outside the floodplain and thereby protect people and property from flood conditions. Areas in the floodplain would be exclusively park and open space, designed to occasionally flood and filter stormwater draining to the San Diego River.” However no mention is made of how the project might cope with such events. **Please provide plans to protect all of the proposed buildings during flooding that has been frequent at the project site.**

O5-58  
Cont.

- b) Though there is no mention of atmospheric rivers the DEIR acknowledges that as climate change increase that “Based on these current projections, the current 100-year storm could occur once every year.” **In the final EIR please specify evacuation plans that would be needed during these increasingly likely storm events.**

O5-59

11. The increasingly common phenomena of atmospheric rivers delivering vast quantities of rain with increased duration storms may soon challenge the existing capabilities of the San Diego River to accept the runoff from impervious surfaces. Please explain what plans SDSU West has constructed to mitigate the high water traditional to Mission Valley even in dryer years.

O5-60

See item 10.

12. Even with the excellent transit provided by the trolley and best efforts at creating a Leed certified project, SDSU West will generate large quantities of GHG during construction, operation, and with automobile traffic that will generate considerable vehicle miles travelled (VMT) to and from the site. Please detail the plans for mitigation of GHG on the project site and offsets elsewhere in San Diego County. Please be aware that the California Courts have recently prohibited “out of county” mitigation.

O5-61

Unfortunately the DEIR is alarmingly inadequate in analyzing and mitigating the substantial increased greenhouse gas generated by this project. The DEIR

O5-62



admits that significant and unmitigatable impacts would occur to air quality, construction equipment emissions, state ambient air quality, increased cancer risk, etc. Surprisingly, among “the environmental topics analyzed in Chapter 4, Environmental Analysis, the following are determined to have potentially significant impacts requiring mitigation” Stunningly, greenhouse gas is not listed among the impacts!

O5-62  
Cont.

a) Construction alone would generate substantial greenhouse gas that would continue during operation as admitted in the DEIR: “Construction of the proposed project would result in the use of nonrenewable resources and energy sources. This consumption would occur during the construction phase of the proposed project and would continue throughout its operational lifetime. In particular, project construction would require fossil fuels, a nonrenewable resource, to power construction vehicles, delivery, and employee vehicles.” Indeed, the DEIR concludes that total greenhouse gas emissions from all construction activities would result in 32,303 metric tons of carbon dioxide. **In the final EIR, Sierra Club San Diego respectfully requests that a candid statement of the significant unmitigable onsite production of greenhouse gas associated with construction and operation be provided. It is important that the DEIR honestly conclude that these are significant unmitigatable impacts on greenhouse gas generation.**

O5-63

O5-64

b) As stated above construction activities alone will generate enormous amounts of greenhouse gas. As stated in the DEIR this would involve:

- “Demolition: involves tearing down of buildings or structures.
- Grading: involves the cut and fill of land to ensure the proper base and slope for the construction foundation.
- Paving: involves the removal of existing concrete and asphalt in addition to laying new concrete or asphalt such as in parking lots or roads.
- Building Construction: involves the construction of structures and buildings.
- Architectural Coating: involves the application of coatings to both the interior and exterior of buildings or structures.
- Off-site Improvements: involves the construction of off-site improvements.”

O5-65

**Sierra Club San Diego respectfully requests that an honest assessment of the significant unmitigated production of greenhouse gas associated with demolition and construction be provided.**

O5-66

c) Sierra Club San Diego objects to the conclusions drawn from the DEIR that:

“the proposed project would not conflict with the City’s CAP, the City’s draft MVCP, SANDAG’s RTP/SCS, or statewide emission reduction targets. Therefore, the proposed project and cumulative GHG emissions impacts would be less than significant. Mitigation Measures No significant impacts related to GHG emissions have been identified. No mitigation measures are required,” and “Because the proposed project would not consume an unusual amount of energy or materials, and would implement design features to operate in a sustainable manner, potential impacts associated with nonrenewable energy consumption would be less than significant.”

O5-67

This is a major flaw in the DEIR project and greenhouse gas production must be candidly discussed. **Sierra Club respectfully requests the applicant provide the only valid standard for the impact of SDSU Mission Valley: A net comparison of the greenhouse gas generated prior to the start of the project and the greenhouse gas that will be generated as a result of the project.**

O5-68

d) A thorough search of the Energy Technical Report in the DEIR appendices reveals no total amount of GHG generated by project. **Please provide an analysis of the total GHG generated during demolition, construction, operation, and the transportation associated with SDSU Mission Valley.**

O5-69

e) The fact the DEIR erroneously concludes that there are no significant impacts on greenhouse gas, the DEIR provides no means for offsite mitigation of greenhouse gas. **Sierra Club San Diego requests that in the final EIR that a plan for the mitigation of greenhouse gas be provided that mitigates the considerable greenhouse gas generated by the project.**

O5-70

f) The DEIR quotes the following provision of CEQA out of context. “As provided in CEQA Guidelines Section 15183.5, a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the proposed project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.” The entire subsection of CEQA Guidelines Section 15183.5 continues as follows:

O5-71

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.

(2) Use with Later Activities. A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project."

**Sierra Club San Diego humbly requests that the DEIR comply with the entirety of CEQA Guidelines Section 15183.5.**

13. In addition to the transit provided by the Trolley please provide detailed plans on Transit to reduce Vehicle Miles Travelled.

O5-71  
Cont.

O5-72

O5-73

Sierra Club San Diego applauds the transportation demand management concept and are gratified that it is being implemented for this project. Likewise, we support unbundled residential parking, metered on-street parking, and reduced supply parking that are included in the DEIR.

O5-74

a) There is no mention of dividend account parking a where residents are provided a dividend and they can spend it or high priced parking, use it on transit, or pocket it and walk, bike or carpool. **Please indicate in the final EIR if dividend account parking will be utilized at SDSU Mission Valley.**

O5-75

**b) Please provide plans for other transit (such as a new transit center or bus routes that will stop at SDSU West) in addition to the trolley.**

O5-76

The DEIR suggest that there will be a large number of parking spaces in the SDSU West Mission Valley Site. The DEIR reports that there will be 6,205 parking spaces for stadium events, 5,663 parking spaces for residents, 5,000 parking spaces for students, faculty, and other employees SDSU Campus Education and Innovation Area, 463 parking stalls for hotel guests, and 840 parking spaces along streets. There is no accounting of the total number of parking spaces from these 5 parking areas but it appears to be 18,171 spaces. Even a fraction of these spaces will result in massive car travel to and from the site and a hug number of related vehicle miles traveled.

O5-77

**c) Please give a complete accounting of the total number of parking spaces at SDSU Mission Valley.**

O5-78

**d) Please reconsider that need for these thousands of parking spaces that will preclude the use of transit for some many people.**

O5-79

**e) Please analyze the vehicle miles travelled (VMT) as a result of the project and provide a detailed mitigation plan for the pollution and greenhouse gas that results from the increase VMT.**

O5-80

14. As the State of California has passed a “Buy Clean” law that applied to all state entities, how will SDSU West assure that construction, operation, retail outlets, and the University adhere to “Buy Clean” requirements?

O5-81

We are pleased that the DEIR intends to comply with the California Buy Clean Law.

a) One provision in the DEIR states, “Where applicable, compliance with the Buy Clean California Act (AB 262, 2017) also would be required to aid in the reduction of GHG emissions associated with the manufacture and

O5-82

transport of products used in public works projects. Where applicable, compliance with the Buy Clean California Act (AB 262, 2017) also would be required to aid in the reduction of GHG emissions associated with the manufacture and transport of products used in public works projects.”	
b) Another provision in the DEIR states, “Where applicable, compliance with the Buy Clean California Act (AB 262, 2017) also would be required to aid in the reduction of GHG emissions associated with the manufacture and transport of products used in public works projects.”	O5-82
c) These provisions are most welcome but are qualified by the words “where applicable.” <b>To eliminate the potential for a loophole could the final EIR specify when the “Buy Clean” provisions would be applicable and inapplicable?</b>	O5-83
15. <u>Please detail plans and logistics of the affordable housing units that are proposed at SDSU West.</u>	O5-84
In the project description it is stated that the campus will provide “approximately 4,600 residences including student, faculty, staff, workforce, and affordable housing, within a vibrant, transit-oriented university village setting,” which we support. Additionally it states: “Provide up to 4,600 residences with a mix of student, faculty, staff, workforce, and affordable housing, with adequate parking, within a vibrant, transit-oriented university village setting and in proximity to trolley and other public transportation uses to reduce reliance on automobiles But there is no mention of affordable housing. Likewise the EIR states, “The proposed project would comply with the City’s affordable housing requirements by building the required affordable units on-site.” Likewise, it is stated that 718 affordable units will be constructed, about 15% of available units, which Sierra Club supports.	O5-85
a) <b>In the revised EIR could you indicate who will be eligible for affordable housing and who will make that decision?</b>	O5-86
b) <b>What mechanism will be used for pricing affordable house and what assurances are there that affordable housing will remain affordable rather than increased by resellers or flippers?</b>	O5-87
Sierra Club sincerely hopes that the final EIR will honestly deal with the above issues and that San Diego State will build a campus that reflects their own	O5-88

commitment to sustainability, fully acknowledges the urgency of the climate crisis, and is a project that Sierra Club will be proud to support.

↑ O5-88  
Cont.

Respectfully Yours,

Dr. Peter A. Andersen, Chairperson  
Sierra Club San Diego

George Courser, Chairperson  
Conservation Committee  
Sierra Club San Diego

Comment Letter O6



October 1st, 2019

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

Sent via USPS and facsimile

***SUBJECT: Responses to SDSU West, PEIR 2019***

To whom it may concern:

This letter is hereby submitted on behalf of the Navajo Community Planning Group (NCPI) in response to San Diego State University's Draft Environmental Impact Report for SDSU West.

The below responses have been compiled by community and subsequent sub-committees of NCPI, after analysis and research of the EIR document.

Navajo Community Park and Recreation Subcommittee:

Since early 2000's the Navajo Community Park and Recreation Subcommittee has worked closely with the City of San Diego Park and Recreation Department, Planner Robin Shifflet to develop park equivalency acreage for the Navajo Community area. Under the Grantville Focus Plan Amendment to the Navajo Community Plan of 2015, it was determined that when the stadium site was redeveloped, a future 30-acre park termed "Qualcomm Major Park and Recreation Center" would be built. The Navajo Community Plan reflects that the Navajo Community would receive 10 acres of said 30 to be allotted to their Park Equivalency. In addition, the Community Plan called for the construction of a 25,000 square foot recreation facility, of which 5,000 would be allocated to Navajo.

The Navajo Community would like to make sure that the development of the park(s) within the SDSU property is completed in such a way that reflects the Navajo Community Plan, and it is awarded these critical 10 acres of recreational area. Being that the City has already allocated

O6-1

O6-2

O6-3



these 10 acres to Navajo, we hereby ask the project applicant to involve the Allied Gardens Recreation Council have a say in the programing, design and operation of our 10 acres.

↑ O6-3  
Cont.

Please refer to pages 78-90 of the 2015 Navajo Community Plan, for further reference and stated allocation of this future park and recreational facility.

↑ O6-4

#### Community of Allied Gardens

The D-EIR Section 4.15.2.1 , Project Study Area, the analysis of roadway traffic does not extend to the east of Mission Gorge Road. Conspicuously absent from the analysis are:

- Zion Avenue between Mission Gorge Road and Waring Road
- Twain Avenue/50<sup>th</sup> Street/Orcutt Avenue between Mission Gorge Road and Waring Road
- Mission Gorge Place between Mission Gorge Road and Alvarado Canyon Road
- Alvarado Canyon Road/Adobe Falls Road between Mission Gorge Road and Waring Road.

The traffic from activities in the project area does not and will not somehow evaporate at Mission Gorge Road. Zion Avenue and Twain Avenue are heavily trafficked, both east and west, during morning and evening commutes and more so after stadium events. Twain Avenue is heavily impacted before and after stadium events by drivers seeking to bypass congested areas. Mission Gorge Place and Alvarado Canyon Road/Adobe Falls Road are typically heavily trafficked on stadium days as folks look for alternate routes to the freeway.

↑ O6-5

The residents of Allied Gardens will be adversely affected by the SDSU development. It is our understanding that our interests would have been address if this project was undertaken by a private developer under the aegis of the City Planning Department.

#### Community of Grantville

The Grantville community will serve as one of the most important pass-through communities surrounding the project site. Situated between the primary SDSU Campus and the project site, Grantville's traffic impacts based on the EIR's findings have not been properly mitigated. Two key transportation corridors (Camino Del Rio North and Twain Ave/San Diego Mission Road) will serve the West entrance points to the project site.

↑ O6-6

Please address the mitigation efforts, whether monetary or specific projects, that SDSU plans to contribute to the Navajo Community, to assist in reducing the increased traffic impacts along the following transportation corridors:

↑ O6-7

- Camino Del Rio North at the Fairmount Ave Intersection.

Navajo PFFP #T-12C

↑ O6-8

- San Diego Mission Road at the Twain and Fairmount Ave Intersection.

Navajo PFFP #T-29

↑ O6-9

- Alvarado Canyon Road Re-alignment

Navajo PFFP# T-12B, CIP #P-18007

↑ O6-10

Respectfully submitted,

David S. Smith  
Chair  
Navajo Community Planners, Inc.

Matt Adams  
Vice Chair  
Navajo Community Planners, Inc.

Comment Letter O7

From: **Adam Deutsch** <[adam.s.deutsch@gmail.com](mailto:adam.s.deutsch@gmail.com)>  
 Date: Wed, Oct 2, 2019 at 11:08 AM  
 Subject: [mvcomments] Response to EIR from the NHCPG  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>, Caroline McKeown <[caroline.mckeown@gmail.com](mailto:caroline.mckeown@gmail.com)>, Gary Weber <[roseweb@cox.net](mailto:roseweb@cox.net)>, Rose Newberry <[rose.m.newberry@gmail.com](mailto:rose.m.newberry@gmail.com)>

**Normal Heights Community Planning Group**

**SDSU Stadium Site - Response to EIR Scoping document**

The site, from the point of view of Normal Heights, is poorly connected to its surrounding environs, and requires a number of fixes to simply be functional if dense development is anticipated. While every effort should be made to enhance the use of non-motorized mobility options the usage of the automobile is ubiquitous, and must be considered. In particular:

- The site needs, and could accommodate, direct access connections to the freeways and major arterials at its NE, SE, and SW corners. Alternative circulation patterns should be prepared and evaluated.
- The intersection of I-8 and Fairmount is an incomprehensible gridlock of traffic and needs a thorough re-design to make it functional. For residents of our neighborhood of Normal Heights, and surrounding ones, Fairmount is the only surface street access to the eastern part of the valley including both the stadium site and the Grantville trolley station. The intersection is particularly hostile to non-motorized movement options.
- To greatly improve accessibility there needs to be a bridge across the SD River, preferably a full bridge at Fenton Parkway, to assist in traffic distribution by connecting the site directly to Cam del Rio N & S. There is no other sensible way to get to the site from the south with any method of mobility. This location also allows for a connection to the mesa above, and the neighborhoods with park deficiencies access to the San Diego River Park.
- At present the neighborhoods on the mesa have virtually no access to the river park or the stadium site. The introduction of a non-motorized link with the mesa rim in Normal Heights would be significant mitigation for a project that currently pays little attention to its neighbor across the street, a neighborhood that is dramatically short of meeting its park standards. This connection needs to be recognized for its significance and implemented as part of the initial project development activity so that its completion coincides with that of the project itself.
- The purple line (along Route 15) needs to be expedited, and connected to the Green Line at the bottom of the hill, not only to enhance access to the MV destinations, but to connect the large population on the mesa above, many of them transit dependent, directly to

O7-1

O7-2

O7-3

O7-4

O7-5

O7-6

O7-7

the trolley.

- The Route 15 bikeway needs to be sensibly connected to both Grantville and the project site by overcoming the freeway and the river barriers.

↑ O7-7  
Cont.  
↓ O7-8

[Preview attachment Stadium EIR Resonse from NHCPG.pdf](#)

Comment Letter O8

From: **Karen Durant** <[outlook\\_0A16A025D0D3C708@outlook.com](mailto:outlook_0A16A025D0D3C708@outlook.com)>  
Date: Thu, Oct 3, 2019 at 10:51 AM  
Subject: [mvcomments] Mission Valley Planning Group Comments on Draft EIR  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

The attached documents contain the MVPG Comments on the Draft EIR for SDSU Mission Valley Project.

There are two files attached, the first are comments from Jonathan Frankel, Chair of MVPG and Kaye Durant, Vice Chair of MVPG.

The second file are comments from Michele Addington, member of MVPG.

Thank you for your consideration of our comments. We are excited for the project to move forward.

Kaye Durant

Vice Chair, MVPG

Sent from [Mail](#) for Windows 10

O8-1

1) During site preparation and grading activities, the project should utilize Tier 4 equipment, without exception.	O8-2
2) The EIR discloses that the project construction will result in an exceedance of the human health risk ("HRA") threshold for cancer. The project should extend construction phases to reduce the number of pieces of heavy equipment used concurrently.	O8-3
3) The EIR should analyze the potential to include additional photovoltaic (solar) capacity to reduce operational emissions	O8-4
4) Operational emissions exceed adopted local standards and the EIR concludes there are no additional feasible mitigation measures. The project should consider a cap on the number of parking spaces in order to reduce auto trips to the site, which is largely the cause of the air quality impact during operations. The project could also include additional Transportation Demand Management ("TDM") strategies that would further reduce car trips to the site. For example, the project should consider providing all SDSU employees on the project site a free or discounted MTS trolley pass or financial incentives for using transit.	O8-5 O8-6 O8-7
<b>Aesthetics</b> No comments since the aesthetics will be better once the parking lot is gone and the new buildings are not significantly higher than the current stadium	O8-8
<b>Housing &amp; Population</b> Mission Valley Community Plan Update requires greater density and this adds significantly towards that goal. Only issue is the MVCPU projected 4800 housing units and this plan projects 4600. Not a significant decrease but it is there.	O8-9
<b>Noise</b> Alternate design of the stadium to close the ends would be preferable for noise reduction during events. Most impacts from noise will be during construction, however significant increases in traffic noise along Friars Road and Mission Valley Road will be constant. Possible demolition of stadium by blasting may be preferable as a short term versus the long term of saw cutting and jack hammers.	O8-10 O8-11 O8-12
<b>Cultural Resources</b> Mitigation of possible Tribal artifacts is addressed via onsite monitor. Only significant impact is loss of possible Historical Resource (San Diego Stadium, Jack Murphy Field, Qualcomm Stadium and SDCCU Stadium). This is one of the last "cookie cutter" stadiums in the US. (This is my opinion, but it can't go fast enough!!)	O8-13 O8-14
<b>Wildfire</b> Only significant concern is the loss of staging area during an evacuation. Mitigation is far from Mission Valley i.e. County parking lot or Del Mar.	O8-15

----- Forwarded message -----

From: **Karen Durant** <[outlook\\_0A16A025D0D3C708@outlook.com](mailto:outlook_0A16A025D0D3C708@outlook.com)>

Date: Thu, Oct 3, 2019 at 5:06 PM

Subject: [mvcomments] MVPG Comments

To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Cc: [kaye.durant@gmail.com](mailto:kaye.durant@gmail.com) <[kaye.durant@gmail.com](mailto:kaye.durant@gmail.com)>

I submitted comments earlier today, however, I omitted to submit the most important comment of the Mission Valley Planning Group.

We feel strongly that there MUST be a fair share commitment to the infrastructure of Mission Valley by SDSU.

The EIR states that once the land is transferred to SDSU it becomes a CSU property and no longer in the city application for permits. This takes the entire property out of the DIFF that pays for infrastructure improvements. This entire project will require massive infrastructure improvements and the San Diego and more importantly Mission Valley should not be on the hook for these improvements.

Please address this MAJOR issue in the EIR and negotiations with the City prior to SDSU/CSU obtaining rights to this valuable parcel in Mission Valley.

Kaye Durant

Vice Chair Mission Valley Planning Group

Sent from [Mail](#) for Windows 10

O8-16



Comment Letter O9

From: <[carylowe@cox.net](mailto:carylowe@cox.net)>  
 Date: Thu, Oct 3, 2019 at 12:18 PM  
 Subject: [mvcomments] Comments on SDSU Mission Valley  
 DEIR To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

On behalf of Citizens Coordinate for Century 3 (C-3), I am submitting the comments below and in the attachment regarding the Draft Environmental Impact Report for the SDSU Mission Valley project. C-3 is a non-profit San Diego organization dedicated since 1961 to preserving and improving this region's natural and built environments.

O9-1

In preparing these comments, C-3 has consulted with a wide variety of local organizations having knowledge and experience in the land use and design fields. We hope that our comments will result in an improved project and an improved DEIR.

O9-2

Our comments on the DEIR are as follows:

Project Description

- It fails to adequately describe the pending transfer agreement with the City of San Diego. It merely notes that negotiation of an agreement is in progress, but does not describe any of the possible/actual terms. As a result, the DEIR cannot adequately discuss whether the terms of the agreement will affect either the scope of the project or the potentially significant environmental impacts. This also makes it questionable whether this EIR can be used by the city in connection with approval of a transfer agreement.
- It provides inadequate information on the actual, as opposed to possible, physical elements of the project. It presents numerous illustrations showing possible designs for the stadium, housing, office/research facilities, parks, etc. However, since these are acknowledged to be merely conceptual, they do not provide a sound basis for a meaningful environmental analysis.
- The list of proposed stadium uses (Table 2.4) entirely omits future NFL games. That might require expansion of the stadium, which would then require a supplemental CEQA analysis, but it should be

O9-3

O9-4

O9-5

O9-6

identified and discussed here, as the currently described project is a significant component of any such future development.

- It fails to identify permits required for construction of the river park, including compliance with the MSCP and the city's Climate Action Plan. This project component is all or mostly on land remaining in city ownership and will be subject to city regulations. Also, it fails to address long-term maintenance of the river park, either as a project component or as a mitigation measure.
- It incorrectly describes SDSU's obligation as being to comply with the "framework" of the SDSU Initiative; it should state an obligation to comply with the precise terms of the initiative.

↑ O9-6  
Cont.  
I O9-7  
I O9-8  
I O9-9

### Cumulative Projects and Methods

- It fails to address cumulative housing impacts or to identify feasible mitigation measures (see below).
- It fails to address cumulative circulation impacts or to identify feasible mitigation measures (see below).

I O9-10  
I O9-11

### Biological Resources

- It contains conflicting statements regarding use of Murphy Canyon Creek as a wildlife corridor.
- It incorrectly concludes construction and long-term activity (noise, light) will not impact wildlife in the Murphy Canyon Creek corridor.
- The biological surveys performed to Murphy Canyon Creek were insufficient and decisions based on these surveys will be incomplete.
- It contains inconsistencies as to the extent of light spillage into wildlife areas, and fails to mandate mitigation measures to reduce this impact to a level of insignificance.
- It ignores the city-owned part of the project site being subject to the MSCP.

I O9-12  
I O9-13  
I O9-14  
I O9-15  
I O9-16

### Cultural Resources

- It fails to adequately address the existing stadium's historical significance, including recognition by the national AIA.

I O9-17

### Energy

- The project layout does not comply with the model to get LEED ND credit for solar. Also, the north-south orientation does not provide optimal layout for solar efficiency.
- It includes inadequate discussion of possible water reuse to meet state and local water conservation goals. The discussion of LEED v4 water efficiency is only conceptual, without specific plans.
- It fails to address anticipated changes in energy codes during the life of the project, including pending requirements for increased percentage of energy from solar.
- It fails to comply with Governor's Executive Order B-1812 for zero net energy.
- It fails to adhere to the adopted SDSU Climate Action Plan which applies to the rest of SDSU's facilities.

I O9-18  
I O9-19  
I O9-20  
I O9-21  
I O9-22

- It fails to address higher energy requirements for stadium demolition and new stadium construction, compared with renovation of the existing stadium.

I 09-23

#### Greenhouse Gas Emissions

- It fails to address compliance with the City of San Diego Climate Action Plan, even though the SDSU West initiative called for compliance with city ghg reduction goals. Even the ghg reduction targets in that CAP are insufficient for climate stabilization, particularly as to reduction of motor vehicle travel, but this environmental analysis and proposed mitigations do not even meet that minimal standard.
- It fails to address ghg emissions associated with stadium demolition and trucking away debris.

I 09-24

I 09-25

I 09-26

#### Land Use and Planning

- The plan and the environmental analysis are isolated from the goals and underlying principles of the Mission Valley Community Plan, particularly the goals of improving current traffic, recreation, and other conditions in the area. As a result, proposed mitigation measures do not adequately address needs of the area which this project, along with all other projects, is expected to contribute to resolving.
- It is not based on an actual land use plan, but rather only on a conceptual plan. As a result, it does not provide definite locations for many of the proposed land uses, including parks and open space other than the river park. As a result, traffic and other impacts associated with the various land use cannot be analyzed with the required level of specificity or certainty.
- Fails to explain why future stadium expansion is not reasonably foreseeable, when this has been part of planning discussion all along.

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I 09-28

I 09-29

I 09-30

#### Population and Housing

- It fails to consider mitigation measures for cumulative housing impacts, e.g., limiting on-site housing occupancies to students, faculty, and households earning no more than 120% of area median income.

I 09-31

#### Public Services and Recreation

- Fails to make clear how the project's park requirements will be met, relative to or in addition to the river park.

I 09-32

#### Transportation

- It analyses traffic impacts in isolation, apart from existing traffic levels in the surrounding community and from other projects anticipated in the foreseeable future.

I 09-33

- It fails to address traffic between the project site and the main SDSU campus, or to discuss plans for transportation improvements (other than use of the trolley). I 09-34
- It fails to address the need for multi-agency agreements, e.g., with MTS and SANDAG, for expansion and coordination of transit services. It also identifies mitigation measures that rely on funding and implementation actions by the State Legislature and the City of San Diego, over which SDSU has no control. I 09-35
- It fails to address (or perhaps is incapable of addressing) fair share traffic mitigation requirements under the terms of the transfer agreement with the city. I 09-36
- It fails to address the Fenton Parkway bridge as a possible project element remaining to be resolved. I 09-37
- It fails to identify traffic-calming measures to be included in the project. I 09-38
- It is unclear as to whether streets will be constructed to city standards. I 09-39
- It ignores previous recommendations for added bus service to the site, reorientation of major streets, and other circulation improvements. I 09-40
- It fails to discuss how location of the Purple Line trolley through portion of site would impact the project and create impacts needing analysis. I 09-41
- It contains an insufficient discussion of overflow parking impacts on the surrounding area from use of the stadium and other special events on site. I 09-42
- It lacks adequate discussion of connections to adjacent/nearby existing uses, e.g., Fenton Marketplace and major nearby streets. I 09-43
- It fails to adequately discuss active transportation modes (walking, cycling, other mobility devices) or to provide sufficiently for them as project elements or mitigation measures. I 09-44
- It fails to integrate circulation improvements with those called for in the Mission Valley Community Plan. I 09-45
- It fails to consider reconfiguration of circulation improvements in the project vicinity, e.g., reducing traffic lanes on Friars Road and replacement with bicycle lanes, as mitigation measures for traffic impacts. I 09-46
- It fails to consider transit connections, other than trolleys, or additional bus transit lines, as mitigation measures for traffic impacts. It also fails to address alternatives if provision of parking near the trolley station does not induce significant increase in trolley ridership. I 09-47
- It fails to consider dividend account parking or other methods of inducing less reliance on motor vehicle use as mitigation measures for traffic impacts. I 09-48
- It fails to address circulation needs of mobility-challenged travelers, e.g., wheelchair or scooter users, to reach transit connections or in the surrounding area impacted by the project. I 09-49

#### Other Environmental Considerations

- Certain graphics are not clear on line and not reproducible. I 09-50
- The conclusion of SDSU being exempt from local school fees conflicts with terms of the SDSU West Initiative. I 09-51
- It fails to address hauling and landfill impacts of demolition and removal of the existing stadium. I 09-52
- It fails to address the need for the project to provide employment opportunities which pay well enough to allow workers, whether employed by the university or other entities, to afford housing costs within close proximity to the project site. This would reduce vehicular traffic and thereby reduce greenhouse gas generation. I 09-53

#### Alternatives

- Fails to consider highly plausible alternatives such as a higher-density development, construction of the stadium at a different location (e.g., Balboa Stadium), construction of a larger stadium, and 100% park use of the site.
- Improperly dismisses the stadium reuse alternative without adequate explanation, and ignores historical/cultural bases for retaining and reconstructing it.
- The Stadium Reuse Alternative appears to be Environmentally Superior, because it restores the architecturally significant stadium, restores much of the San Diego River wetlands and provides recreational open space for residents of Mission Valley, while accommodating growth.
- Because it retains the large parking area on historic wetlands, the No Project Alternative is not Environmentally Superior, even though it retains the historic stadium.

I O9-56

I O9-57

I O9-58

I O9-59

I O9-60

We look forward to SDSU's responses to our comments. Thank you.

Cary Lowe, Ph.D., AICP

Chair of C-3 Mission Valley Committee

Tel. (619) 255-3078

E-mail [carylowe@cox.net](mailto:carylowe@cox.net)

Comment Letter O10



October 3, 2019

**RE: Comments on the SDSU Mission Valley Project DEIR**

To whom it may concern,

On behalf of the San Diego Environment + Design Council (E+DC), we are submitting the following comments on the SDSU Mission Valley project DEIR. We appreciate all the work that has been done on this project and the opportunity to comment on the DEIR.

O10-1

The San Diego Environment + Design Council is a coalition of organizations whose primary interest is to promote environmentally-sustainable land use policies that create healthy, green neighborhoods and great public spaces in the San Diego-Tijuana region. We provide an open venue for diverse organizations and interests to come together and develop recommendations to improve how our communities live, work and play together.

O10-2

**Comments and Recommendations:**

The DEIR was discussed at our monthly meeting on October 2, 2019. There was a general consensus that it was pointless to comment on the DEIR since a real project (with detail) has not actually been put forward. We have reviewed the comments assembled by C3 and are in basic agreement, however, we have decided not to comment on project specifics since there really are no project specifics. Clearly, our Council has great interest in the project and we will continue to be involved as the project progresses. The following Op-Ed (in dark blue italics) was written by Mike Stepner and Mary Lydon for the Voice of San Diego on September 27, 2019. We are in agreement that this article best represents the feelings of the San Diego Environment+Design Council regarding the project at this time.

O10-3

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O10-6

*Since asking for San Diego voters' support in 2018, San Diego State University leaders have promised to redevelop Mission Valley's prize stadium site with a vision that is nothing short of magnificent: to serve higher education, the public good and the community's goals and aspirations for a vibrant, mixed-use, medium density, transit-oriented development.*

*Having a strong vision for this important public asset is key to its success. In the words of the past influential city planner Max Schmidt, "Whatever we do on this site, we ought to do it as an example of the highest possible architectural and landscaping standards, so that when we come to rebuilding Mission Valley and addressing some of the older uses which are becoming obsolescent, that we have a model for that development."*

O10-7

*With the release of the draft environmental impact report — a possibly premature move but one that should be watched carefully — it is clear there is much work to be done to ensure delivery of the special project promised. An environmental impact report is a document that attempts to identify and mitigate significant and unavoidable project impacts, but many times it becomes a pointless exercise because a developer would not move forward on a project or spend the money on the report if they didn't think they could justify the overall impacts. To be clear, it is going to be very difficult for San Diego, without a strong vision, to actually develop this land differently from any other development.*

*The concept design that served as the basis of the draft environmental impact report was quickly put together to show the public during the ballot campaign. It was always accompanied by promises for further discussion on development details of the project's master plan. As promised, the university has held workshops, but the concept has not been developed sufficiently.*

*Real issues that still need addressing are the overall design, how the project is connected and integrated into the Mission Valley community, details on affordable housing and how the project will meet the city's Climate Action Plan goals.*

*Ideally, before comments on the draft environmental impact report can be submitted, there would be a fully developed project for review. And that plan needs to acknowledge that SDSU has a responsibility as the steward of public lands to look beyond the parcel lines since their large footprint will impact greater Mission Valley and even the San Diego region. Knowing that a return to the drawing board on the draft environmental impact report is politically impossible (comments are due by Thursday), we'd recommend a design framework with four overarching principles.*

*First, to ensure effective, human-scale connections between people and places, special attention should be paid multi-modal transportation, including walking and bicycling and improved roadway access, as well as connections to the overall community of Mission Valley.*

*The project also needs to promote human well-being through sustainable design, environmental stewardship and green infrastructure. SDSU West will become a state-owned campus; it must comply with California's climate goals.*

*The university should also create a mixed-income inclusive community that provides housing for students, faculty and service workers with a cap on housing affordability at 120 percent of the area median income.*

*And finally, fully implement the San Diego River Park Master Plan, which has been vetted and thoroughly approved by stakeholders. Before any meaningful comments can be made about the draft environmental impact report, there must be a meaningful project to review. The SDSU West proposal is not yet at that point and we would invite the SDSU West Team to review some of the concepts already developed by some of the region's top architects and land use professionals.*

*SDSU West is not a typical real estate deal. It is a major investment in the future of the university, an investment in San Diego's future economy and a public asset that will require the highest level of stewardship.*

**Thank you for the opportunity to comment. If we can be of further assistance, please let me know at 619 236-0143 or at [vestrada@estradalandplan.com](mailto:vestrada@estradalandplan.com).**

Sincerely,

Vicki Estrada, FASLA, APA



Chair

I10-7  
Cont.

O10-8

Comment Letter O11



1

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

Dear Laura Shinn,

At the Associated Students Green Love Sustainability Commission of San Diego State University, we recognize our considerable stake in the University’s plan for development, operations, and programming. We’re thankful for the time, energy, and thought put into the project by the team—as well as community outreach. After reviewing the SDSU Mission Valley Draft Environmental Impact Report (DEIR), our SDSU Advisory Committee led our Commission in identifying key areas the University should improve upon regarding this project.

Our Commission holds a longstanding goal of leading the university to sustainability, advocating for environmentally and socially responsible leadership. This letter provides our recommendations.

O11-1

**Sustainable Goals & Climate Action Plan**

We are pleased the SDSU Mission Valley DEIR lists “sustainability” among the project objectives. However, the DEIR does not apply the SDSU Climate Action Plan, citing it is “not an applicable document for the purposes of the proposed project.”<sup>1</sup> Our SDSU Climate Action Plan (CAP) was signed by SDSU President Elliot Hirshman in 2017,<sup>2</sup> foreshadowing future campus development and growth— “whether in-house or contracted out.”<sup>3</sup> The DEIR states how, “the SDSU Mission Valley Campus Master Plan Design Guidelines are being prepared in order to ensure that SDSU’s leadership on sustainability and stewardship issues [are] carried forward to the proposed project.”<sup>4</sup> We recommend solidifying a method as to *how* the University’s leadership, in this regard, will be carried forward at the SDSU Mission Valley Campus.

O11-2

<sup>1</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.10-14.

<sup>2</sup>T. Abram. SDSU. “Climate Action Plan for San Diego State University.” 2017.

<sup>3</sup>T. Abram. SDSU. “Climate Action Plan for San Diego State University.” 2017. “New Construction and Renovations.”

<sup>4</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.7-20.





Importantly, the California State University’s (CSU) 2014 Sustainability Policy notes the importance of an integrated and strategic plan for energy and resource use.<sup>5</sup> Our SDSU Climate Action Plan provides the specified means to guide energy use at the University as a whole, and should be utilized as such. We ask, if the SDSU CAP does not apply, how will project managers effectively secure our leadership and stewardship for SDSU Mission Valley? We recommend adapting plans to concretely and clearly adhere to the SDSU CAP or creating a specific CAP with the knowledge of on-campus sustainability professionals to ensure SDSU’s leadership on sustainability.

O11-3

O11-4

#### **Leadership in Energy & Environmental Design (LEED)**

The SDSU Mission Valley DEIR provides options for mitigation, but does not provide a comprehensive building design plan or an environmental sustainability plan. The proposed mitigation, gradually mentioned throughout the report, meets basic compliance measures *relating* to the environment—rather than achieving true sustainable design. At SDSU, we are leaders in innovation and sustainability. Achieving LEED Gold Certification from the United States Green Building Council (USGBC) should be a first priority rather than a last consideration.

O11-5

O11-6

The CSU 2014 Sustainability Policy requires LEED Silver standards, at a minimum.<sup>6</sup> As the University is a center for innovation and leadership, we believe the site presents an opportunity to create a minimum standard of LEED Gold. The Associated Students of SDSU committed to LEED Gold certification or better by 2020 with a goal set by student leaders in 2008, and is proud to have reached the goal over this past summer.<sup>7</sup> Through the work of committed staff and students, the Conrad Prebys Aztec Student Union reaps the benefits of LEED Double Platinum certification through significant cost savings.<sup>8</sup>

O11-7

<sup>5</sup>California State University Sustainability Policy. Energy Conservation and Utility Management.: “Each CSU campus is encouraged to develop and maintain a campuswide integrated strategic energy resource plan, which will include tactical recommendations in the areas of new construction, deferred maintenance, facility renewal, energy projects, water conservation, solid waste management, and an energy management plan. This plan will guide the overall energy program at each campus.”

<sup>6</sup>California State University Sustainability Policy. Sustainable Building Practices.: “. The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED “Silver.” Each campus shall strive to achieve a higher standard equivalent to LEED “Gold” or “Platinum” within project budget constraints.”

<sup>7</sup>Associated Students SDSU. “A.S. Long-Term Sustainability Goals.”

<sup>8</sup>Associated Students SDSU. “A.S. Long-Term Sustainability Goals.”



The current DEIR plan does not commit to any LEED certification, stating buildings will achieve a “LEED Silver rating or its equivalent.”<sup>9</sup> The terminology, “or equivalent” implies the absence of an official certification from the USGBC and inevitability, a less sustainable building— both economically and environmentally. As described in a report by SmartMarket, green buildings bring “significant operating cost savings, short payback periods and asset value increases.”<sup>10</sup> From on-campus examples within Associated Students and values-based reasoning, SDSU Mission Valley should be 100 percent LEED for Neighborhood Development Gold. We ask, will the site commit all buildings to at least LEED Gold Certification?

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### Energy

To justify the 14.915% of renewable on-site solar energy planned, the DEIR claims carbon emissions from the development are “not significant” to cumulative impacts of climate change,<sup>11</sup> locally or globally. In this regard, the report mentions how the campus will only comply “to the extent applicable” with our 2014 CSU Sustainability Policy, which specifies how all CSU buildings, “should be operated in the most energy-efficient way possible, regardless of funding.”<sup>12</sup> We believe the CSU Sustainability Policy is 100% applicable in this project, especially its stipulation for 33% renewable energy by 2020.<sup>13</sup>

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According to the “Energy” section of the DEIR, the SDSU Mission Valley project has significant plans to use natural gas to power the project site.<sup>14</sup> The CSU Sustainability Policy specifies the need for campuses to “pursue energy procurement and production to reduce energy capacity requirements from fossil fuels.”<sup>15</sup> The current plan will *create* a capacity and need for fossil fuel use, instead of reducing it.

O11-11

Natural gas is a greenhouse gas and its power system operates under different infrastructure than electric wiring. Natural gas power be the default plan at SDSU’s innovation-minded campus. A long-term and financially feasible strategy is the electrification of the entire site— with electric wiring to all buildings. A great deal of work should be done to ensure all possible electrify all appliances and

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<sup>9</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 5.3.2.

<sup>10</sup>SmartMarket. “World Green Building Trends.”

<sup>11</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.5-2.

<sup>12</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.2-21.

<sup>13</sup>California State University. “2014 CSU Sustainability Policy.”

<sup>14</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.5-19.

<sup>15</sup>California State University Sustainability Policy. “Energy Independence and Procurement.”



systems (pools, heaters, stoves, etc.), as the Associated Students has done by institutionalizing environmentally sustainable development.<sup>16</sup>

After electrification is completed, the site may source power from San Diego’s newly instituted Community Choice Aggregation and energy grid— which will achieve 100% renewable energy by 2035.<sup>17</sup> The electrification of San Diego’s energy grid provides a monumental opportunity for cost savings in concurrence with SDSU values. We ask, will the SDSU Mission Valley project ensure complete electrification of the site and remove natural gas infrastructure from all buildings possible?

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### Safety

New safety considerations arise as we move to a site far away from the University’s main campus. We worry about the physical environment, and its lack of safety for long term building users. As students at the University, we are challenged with potential safety concerns each day. Environmental safety concerns are often difficult to “fix” once ignored, and we recommend further research and mitigation measures to protect future students, staff, faculty, and community members on-site.

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The presence of hazardous vapor from unspecified, decommissioned wells is one, specific safety risk.<sup>18</sup> Hazardous vapors have been known to cause a number of health problems, including increased cancer risk.<sup>19</sup> With no current mitigation measures planned for this risk, how will the SDSU community be protected from toxic air in the learning and recreation environments on site?

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Also worth noting is how the DEIR declares the existence of a pipeline that would run along the project boundary.<sup>20</sup> In the event of a pipeline corrosion or failure, the report specifies no mitigation measures other than consultation with Kinder Morgan, the owner of the pipeline.<sup>21</sup> Given the massive scale of construction and years of potential underground maintenance work in the SDSU Mission Valley project, the pipeline is at particular risk for damage. Even if the pipeline remains stable, there is potential for it to leak. Currently, there are no mitigation measures to process frequent oil spills on the north-end of the SDSU Mission Valley site, meaning hazardous waste exposure to building tenants nearby. We

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<sup>16</sup>Associated Students SDSU. “A.S. Long-Term Sustainability Goals.”

<sup>17</sup>City of San Diego. “Background on CCA: How We Got Here.”

<sup>18</sup>San Diego State University Mission Valley Draft Environmental Impact Report: ES.3.4.

<sup>19</sup>LA County Public Health. “Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County. 2018.

<sup>20</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.8.

<sup>21</sup>San Diego State University Mission Valley Draft Environmental Impact Report: ES.3.4.



ask, what are the specific mitigation measures in the case of a spill to protect students, staff, the SDSU community, and our environment at the SDSU Mission Valley site?

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#### Air Quality

The project is located within 500 feet of a major interstate freeway, subjecting the project's future residents to indefinite hours of traffic pollution exposure. Concerningly averages produced by the Union of Concerned Scientists describe how Latinx, Black, Asian Californians are consistently exposed to more air pollution from vehicles than White Californians<sup>22</sup>. At SDSU, we pride ourselves on diversity, equity, and inclusion. The Mission Valley Campus should leverage sustainability to promote those values.

O11-18

Particularly, the DEIR states the project is “in compliance with both CAAQS and NAAQS,” but does not note how the compliance is only true for the monitoring period extending until 2017<sup>23</sup> when the project is scheduled for completion in 2037. By 2037, the concentration of traffic air pollution is expected to increase, exposing surrounding residents to significant levels of harmful chemicals. Evidence shows how traffic pollution, especially for people living and working within a .3 mile radius of highways especially impacts health. Traffic pollution impacts a wide range of health problems—including the onset of childhood asthma, impaired lung function, premature death and death from cardiovascular diseases<sup>24</sup>. Specifically noted by the American Lung Association is how teenagers and children more vulnerable to traffic pollution<sup>25</sup>. As students coming to the University still in our developing years, often as teenagers, we recommend ensuring the highest quality of air filtration, using buildings and infrastructure, to keep site-users as healthy as possible.

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While many of the health risks associated with the project are challenging or impossible to remove, it is in the best interest of project developers and future facility users to take proactive measures to alleviate future health impacts. Given the site location, we ask for built and natural solutions to mitigate these effects, like LEED Gold Certified buildings, carbon sinks, and natural barriers.

O11-22

<sup>22</sup>Union of Concerned Scientists. “Inequitable Exposure to Air Pollution from Vehicles in California.”

<sup>23</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.2-1.

<sup>24</sup>American Lung Association. “State of The Air.” 2019.

<sup>25</sup>American Lung Association. “State of The Air.” 2019.



Considering long-time inequalities in the air we breathe, we ask— how will the project ensure safe air for users over a long period of time?

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### Transportation

Transportation is vitally important to accessibility at the Mission Valley site. Using a broad lens, the SDSU Mission Valley campus will be located only three MTS trolley stops away from the main campus.<sup>26</sup> Project objectives four, six, eight, nine, twelve, and sixteen state how the campus will be transit-oriented.<sup>27</sup> However, the DEIR does not propose sufficient measures to create the described transit-oriented reality. For example, the DEIR describes how the Mission Valley campus will, “maintain the existing transit pass program for students in place at the College Area campus.”<sup>28</sup> As students currently attending SDSU, we know we only receive a 10-15% reduced priced fare on semester-long transit passes. This moderate discount does not give students or faculty an accessible or equitable option when choosing to commute by transit over car. Simply having a trolley run through campus is insufficient in designating the campus as “transit-oriented.” We ask, what are the specific Transportation Demand Management (TDM) measures to reduce Vehicle Miles Traveled (VMT)?

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The SDSU Mission Valley DEIR’s transportation plan is isolated from goals and principles in the newly adopted Mission Valley Community Plan—particularly, goals for improving current traffic, recreation, housing, and other conditions in the area.

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Secondly, the DEIR only focuses on off-site traffic mitigation measures, such as the expansion of side roads and traffic lights. But, the DEIR does not provide any mitigation measures for sustainable transportation.<sup>29</sup> The DEIR also states the proposed campus would include “enhanced use of the MTS Green Line Stadium Trolley Station; minimizing vehicular traffic use; and accommodating the planned Purple Line on the project site,” but there are no current mitigation measures to expand incentives to use MTS.<sup>30</sup> San Diego has the sixth most air in the state<sup>31</sup> and needs to be a focus.

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<sup>26</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.15-29.

<sup>27</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 2.2-4.

<sup>28</sup>San Diego State University Mission Valley Draft Environmental Impact Report: 4.14-8.

<sup>29</sup>San Diego State University Mission Valley Draft Environmental Impact Report: ES.3.4.

<sup>30</sup>San Diego State University Mission Valley Draft Environmental Impact Report: ES.3.1.

<sup>31</sup>American Lung Association. “State of The Air.” 2019.



## Water

San Diego is a region where water is historically an issue. Water procurement should be done to best possible way to ensure water conservation. Evident in the report is the program, “Pure Water” San Diego— which will provide recycled water to Mission Valley in 2035<sup>32</sup>. In 2035, the Pure Water program will supply only one third of the city’s potable water. In a region with a limited water supply coming from outside sources, new developments in San Diego should utilize existing technology to minimize the amount of potable water used for activities like toilet flushing and landscape irrigation.

Thankfully, there are multiple kinds of water purchase agreements available for developments to affordably install water treatment and reuse systems. We recommend bringing on and off-campus water sustainability experts, like Dr. Natalie Mladenov and Tom Abram, who would provide a wealth of knowledge on the subject. There, they will be able to identify appropriate water-reuse purchase agreements and actively participate in incorporating water use minimization, rain capture, and greywater treatment into the Requests for Proposals (RFP).

Campuses like UC Davis<sup>33</sup> and Microsoft’s Silicon Valley<sup>34</sup> are examples of large institutions which have implemented Net Zero Water infrastructure and/or water treatment systems. Notably, the Gillette Stadium in Massachusetts, Maryland one of many successful case studies of a major stadium which meets non-potable water demands sustainably<sup>35</sup>.

We recommend the project to include extensive purple piping, or at least purple pre-piping for the planned city Pure Water source. We also ask, will on and/or off-campus water sustainability experts be brought to help plan and develop sustainable water systems at the SDSU Mission Valley site?

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## Zero Waste

A necessary consideration for sustainable development at the project site is the amount of waste it will produce during construction and operations of the site buildings. In order to send waste accordingly, the site must consider local landfills. Miramar Landfill is projected to reach capacity around 2030,<sup>36</sup> before the project completion date. Switching to another landfill should be regarded as an

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<sup>32</sup>City of San Diego. “Pure Water San Diego.”

<sup>33</sup>University of California, Davis: Center for Water-Energy Efficiency. “Zero-Net Water.”

<sup>34</sup>J. Henretig. Microsoft. “Building the First Net-Zero Water Campus in Silicon Valley.”

<sup>35</sup>Natural Systems Utilities. “Gillette Stadium.”

<sup>36</sup>EDCO. “2018 Sustainability Report.”



inadequate and short-term solution to a prevalent and long-term issue. Organic matter (i.e. food waste and landscape trimmings) decomposes anaerobically in landfill environments— releasing methane, a greenhouse gas many times more potent than CO<sub>2</sub>, into the atmosphere. The City of San Diego is partnering with EDCO to bring composting services with an anaerobic digestion facility in 2020<sup>37</sup>. We ask, will the site contract with the San Diego’s EDCO Anaerobic Digestion facility?

Additionally, materials like metal, paper, plastic, and glass take large quantities of natural resources and energy to produce. Because of this, procurement of recycled content products should be a necessary principle to include in negotiations with potential building tenants. Waste-related emissions fall into “Scope Three” of a site’s environmental footprint<sup>38</sup>. We recommend a high landfill diversion rate at the SDSU Mission Valley campus.

Markedly, the City of San Diego has a goal of achieving a “target 75% diversion by 2020, 90% diversion by 2035, and zero by 2040.”<sup>39</sup> Former California Governor Jerry Brown set a waste reduction goal of achieving 75% diversion by 2020.<sup>40</sup> Currently, the average diversion rate for our main, College Area campus hovers around 30%, according to recent billing invoices from our waste contractor, EDCO<sup>41</sup>. California campuses, such as the California Polytechnic State University, San Luis Obispo<sup>42</sup> and the University of California, Berkeley,<sup>43</sup> have full-time waste specialists who work with all departments to increase diversion and reduce hauling costs. Achieving a 75% diversion rate will require a comprehensive waste plan and ongoing expertise at the SDSU Mission Valley campus. We ask, will SDSU hire a full-time Waste Reduction Coordinator for the site?

## Conclusion

As active students at San Diego State University, we know how “leadership starts here.” With an underlying purpose to, “support SDSU’s academic, educational and cultural mission,” we are excited to support this campus through its development. Unfortunately, we recommend significant changes to the current project plan expressed in the Draft Environmental Impact Report. As the Draft Environmental

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<sup>37</sup>EDCO. “2018 Sustainability Report.”

<sup>38</sup>T. Abram. San Diego State University. “Climate Action Plan for San Diego State University.” 2017.

<sup>39</sup>City of San Diego. “Zero Waste.”

<sup>40</sup>State of California. “California’s 75 Percent Initiative Defining the Future”.

<sup>41</sup>San Diego State University: Sustainable SDSU. “Metrics & Reports”

<sup>42</sup>N. Anastasia.

<sup>43</sup>University of California, Berkeley: Berkeley Facilities Services. “Cal Zero Waste.”



Impact Report focuses on a plan-as-we-go project, focused on basic compliance, we regard the current plan as a baseline of unsustainable resource use. This DEIR does not reflect a plan which demonstrates leadership in sustainability, especially regarding energy use and building design. Importantly, environmental sustainability is a core value of students, demonstrated through our Associated Students.

As the Sustainability Commission of the Associated Students at San Diego State University, we are tasked with leading the University to sustainability. Each day, our sustainable values are reflected through our students, buildings, and practices at the University and beyond. Together, we have the opportunity to be regional and global leaders in sustainable architecture, planning, and design—let's do it! We look forward to further collaboration.

Respectfully,

Green Love Sustainability Commission  
Associated Students, San Diego State University

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O11-40  
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Comment Letter O12

From: **Rob Hutsel** <[rhutsel@sandiegoriver.org](mailto:rhutsel@sandiegoriver.org)>  
 Date: Thu, Oct 3, 2019 at 4:55 PM  
 Subject: [mvcomments] San Diego State University Mission Valley Campus Master Plan  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: Rob Hutsel <[rob@sandiegoriver.org](mailto:rob@sandiegoriver.org)>

RE: Comments to Draft EIR

Thank you for the opportunity to comment on the adequacy of this draft document. The intent of these comments are to gain clarification of portions of the EIR with the intent that decisionmakers have adequate information before them.

O12-1

**4.3 Biological Resources**

I would encourage clarification on the comment "As discussed previously, SDSU was not involved with the preparation of the Subarea Plan and is therefore not a permittee under this HCP. Because SDSU is not a permittee of this HCP and because SDSU does not need to obtain any entitlements that would constitute a discretionary action by the City, the restrictions typically placed on land within the MHPA per the City's Biological Resource Guidelines do not apply to SDSU or SDSU-owned land. SDSU also is not subject to the City's land use policies."

O12-2

While this may be true, portions of the draft EIR relate to lands which are owned and will continue to be owned by the City of San Diego. Therefore, unless the draft EIR does not intend to address lands which are currently owned and or will be owned by the City of San Diego, additional information should be provided to clarify whether this project needs to comply with adjacency issues associated with the MSCP and whether parcels owned by the City of San Diego which may be partially within the MSCP, need to comply with it.

**City of San Diego Biology Guidelines**

Please clarify whether this project will comply with the City's Biology Guidelines and specifically the Environmentally Sensitive Lands Ordinance. It appears from the language "City of San Diego Biology Guidelines The City's Development Services Department developed the Biology Guidelines presented in the Land Development Manual "to aid in the implementation and interpretation of the Environmentally Sensitive Lands Regulations (ESL), San Diego Land Development Code (LDC), Chapter 14, Division 1, Section 143.0101 et seq, and the Open Space Residential (OR-1-2) Zone, Chapter 13, Division 2, Section 131.0201 et seq." (City of San 4.3 – Biological Resources SDSU Mission Valley Campus Master Plan EIR 11555 August 2019 4.3-14 Diego 2012). The guidelines also provide standards for the determination of impact and mitigation under CEQA. The State of California,

O12-3

as the lead agency, is not subject to the City's guidelines; however, this section includes the same level of detail and analysis that is expected for a report that is within the City's jurisdiction." Whether the section provides the same level of detail and analysis is important. The lands which will continue to be owned by the City of San Diego would appear need to continue to follow these guidelines and the City's ESL Ordinance. The Ordinance mandates certain buffers from wetlands. These buffers may impact project design.

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#### Noise

Please clarify whether amplified music is anticipated in areas along the River. Are mitigation measures included which limits amplified music which might impact MSCP lands associated with the River? Noise monitoring should be included as a mitigation measure until a time when it can be determined that sound levels are not above background levels or levels which could impact wildlife, especially during breeding season(s).

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Thank you, Rob Hutsel  
President & CEO  
The San Diego River Park Foundation  
619-297-7380

Dedicated to creating a better future for the historic San Diego River through meaningful actions, philanthropy, passion, advocacy and volunteerism.

For more information, visit [www.sandiegoriver.org](http://www.sandiegoriver.org)

Comment Letter O13

October 03, 2019

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

Re: San Diego State University Mission Valley Campus Master Plan Project Draft  
Environmental Impact Report

Dear Laura,

In response to the project's Draft Environmental Impact Report ("DEIR"), the following comments largely focus on the unavoidable consequences that doubtlessly would result from the initial construction, development and (long-term) operation of the SDSU Mission Valley Campus Project ("Project"). These *reasonably foreseeable environmental effects* of the project, whether short- or long-term, will have significant adverse impacts on both (i) the *biological* systems of the Lower San Diego River and Estuary, and (ii) the *human* systems of primarily San Diego State University's *very own* community of students, faculty and staff (amongst others).

O13-1

Because of the reasons expounded below, ***it is crucial that the DEIR is NOT approved in its current state, and that it corrects various inconsistencies and flaws, before moving on to the next step of producing a Final EIR.***

O13-2

The critical biological resources that will inevitably face anthropogenic molestation from this major, economically-driven development project include some key sensitive habitats for a handful of state- and/or federally-listed endangered and threatened species, located directly on or adjacent to, as well as *offsite and downstream* from, the proposed site location. On this immediate point, it's absolutely necessary to address how—despite the lead agency's legal obligation to *consider a project's significant effects "in the full environmental context"* of the regional setting (under §15125(c) of the CEQA Guidelines)—the DEIR, as a whole, fails to consider and analyze the project's *reasonably foreseeable* significant effects on *offsite* biological resources, located further *downstream* from the site. This procedural insufficiency of the DEIR concerns the adversely impacted *offsite* biological resources that are either (a) never mentioned at all, or (b) unjustly excused as not likely to occur within the project's offsite vicinity.

O13-3

In addition to the already-sensitive *biological* systems that will be significantly impacted by the unavoidable effects of the project's construction, development and operation, as mentioned above, the Project as it's currently proposed would also inevitably impact *human* systems—that

O13-4

is, *San Diego State University's very own community of students, faculty and staff*, along with the workers and developers who'd take part in constructing the project. Such inevitable impacts on these human systems would be both short- and long-term, both direct and indirect. And, regardless of how we may classify such impacts on human systems, they nonetheless are reasonably foreseeable due to the historical observations of the extreme hazards at hand—whether of floods, or of contamination leakages—along with the inevitable circumstances that we know we all are to face in light of climate change (and particularly with regard to flooding).

Such reasonably foreseeable effects, and the respective adverse impacts, that would result from undertaking this Project—at least as it currently stands—may sufficiently be linked to the *variety of incapacities of the proposed location*. By the incapacities of the proposed project's current location, namely *three things* come to mind:

- I. The proposed site, which immediately borders the San Diego River and Murphey Canyon Creek (which flows into the SD River), is located *approximately five miles upstream of the crucial salt-marsh/estuarine habitat* that exists along the entire stretch of the San Diego River Channel/Floodway, just before the River's mouth—this offsite area of impact has, for long, been observed to provide important habitat (primarily nesting and foraging) for multiple special-status species listed under *both* the federal and/or the California Endangered Species Act(s);
- II. As previously mentioned, the eastern and southern boundaries of the project site are *entirely* bordered by Murphey Canyon Creek and the Lower San Diego River, respectively. Accordingly, *a majority of the project site is situated within BOTH 100-year and 500-year Floodplains*, as defined by the Federal Emergency Management Agency (FEMA). Murphey Canyon Creek, a tributary of the Lower San Diego River (HA 907.10), is effectively a water drainage for a land area that extends as far north as Miramar, and the San Diego River defines the second largest Watershed Management Area (WMA) in all of San Diego County, encompassing a total of 277,554 acres of land area (SDCDPW, 2016). Given these factors of location in relation to the regional hydrology—along with the extensively-documented history of severe flooding throughout the Lower San Diego River/Mission Valley area, *dating back to as early as 1770* (San Diego National Weather Service, "A History of Significant Weather Events in Southern California", 2017)—*the proposed site is situated in an area of extreme flood hazard*. And, with the exacerbating effects of Climate Change that will inevitably increase regional precipitation during wetter years, the magnitude of this flood hazard for the given area will only grow worse with time;
- III. Lastly, the project's site is situated *directly across from a highly-flammable, historically-polluting oil refinery facility* (known as the *Mission Valley Terminal*, or *MVT*). Given the proximity of the MVT to the proposed project, and given its position in relation to the surrounding topography of Mission Valley (of which highly influences the flow, or behavior, of wind patterns), the location may be reasonably foreseen to pose as a

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tremendous fire hazard to the project and its future inhabitants in the event of a wind-driven wildfire. Furthermore, as the site sits directly above the Mission Valley Groundwater Aquifer, and given the historical leakages of the MVT into that Groundwater Basin, the location poses as a reasonably foreseeable health threat to the individuals carrying out construction—not only has the groundwater been historically contaminated, but so has the soil, and there’s been much concern over the potential health effects for those who may come into contact with that groundwater and/or soil.

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O13-11

While these three incapacities of the proposed project’s location may not be explicitly tied to the DEIR document, itself, they are nonetheless of vital relevance. These factors are not only partially, or totally, ignored and/or excused throughout the Report; they are required to be disclosed, considered and mitigated under the California Environmental Quality Act (CEQA). With regard to the inevitable impacts of the project’s effects on humans, and particularly how it establishes a hazardous, unsafe environment in which up to 20,000 individuals will work and/or live, the DEIR ought to do a more thorough job at establishing the extant flood hazard conditions of the existing environment.

O13-12

O13-13

After all, CEQA requires “that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies...shall regulate such activities so that major consideration is given to preventing environmental damage, **while providing a decent home and satisfying living environment for every Californian**,” (PRC §21000(g) – emphasis added). Following this point, the same provision also specifies that it absolutely “is **necessary** to provide a **high-quality environment that at all times is healthful and pleasing to the senses and intellect of man**” (§21000(b) – emphasis added); and that, furthermore, there’s “a **need** to understand *the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state...*” (§21000(c) – emphasis added). Also, in the provisions of CEQA, the legislature further invokes that state policy requires officials to “[e]nsure that the *long-term protection of the environment, consistent with the provision of decent home and suitable living environment for every Californian*, shall be the *guiding criterion in public decisions*” (§21001(d) – emphasis added).

O13-14

Keeping the language of these CEQA provisions in mind—particularly “decent home and satisfying living environment” (§21000(g)), the “general welfare of the people of the state” (§21000(c)), and a “suitable living environment for every Californian...[as the] guiding criterion in public decisions” (§21001(d))—the Lead Agency’s approval of the project at the proposed site would effectively mean an approval to have members of the SDSU community (attempt to) live and learn in an area of extreme historical flooding.

O13-15

With the exacerbating effects of climate change, it isn’t unreasonable to expect such a flood hazard to only get much worse, and CEQA Guidelines §15126.2(a) requires that “[t]he EIR shall

↓ O13-16

also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example, the EIR should evaluate any potential significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g. *floodplains*...), including both *short-term and long-term conditions*...” (emphasis added).

O13-16  
Cont.

Even if the effects of climate change, and the resultant impacts on the environment (whether natural or manmade), are uncertain and unpredictable, ***why would the Lead Agency, CSU Board of Trustees, be willing to make such a risk at all?*** Approving the project at the proposed location—even with the ‘mitigation’ efforts of grading—would show us, the SDSU community, and the citizens of the state, that CSU Board of Trustees is willing to risk the general welfare of their own students and employees on behalf of economic development and infrastructural expansion.

We kindly—but firmly—ask the Board to reconsider their priorities with undertaking this project, along with the uncertain, yet undeniable, risks that are inevitably associated with building a campus at a locale that sits within 100- and 500-year floodplains, and is directly adjacent to a highly flammable, historically-leaking oil refinery.

O13-17

Especially concerning the proposed projects location in two historical floodplains, is such an economic and infrastructural advancement worth the risks that—though maybe uncertain in magnitude or extent—your students, staff, faculty and athletes will inevitably face in the long-term view of things?

#### *Biological Resources*

The DEIR’s analysis of, and mitigation for, the proposed project’s reasonably foreseeable significant impacts to biological resources is ultimately insufficient—and due to the nature and extent of this insufficiency, *we ask that the appropriate measures be taken to adequately analyze the impacts to, and mitigation for, the offsite biological resources that will experience adverse effects from the carrying-out of the project.* The document fails to disclose, evaluate, and/or avoid the significant impacts of the project to multiple special-status species residing in *offsite* habitats that are downstream of the project’s site, along with those impacts to the natural habitats, themselves. As required by CEQA, “[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment...” wherein both “[d]irect and indirect significant effects of the project on the environment shall be clearly identified and described,” (§15126.2(a)). Thus, both direct and indirect effects *must* be considered by the Lead Agency. Because §15358(a)(2) of the Guidelines defines “indirect” or “secondary” effects as those “which are caused by the project and are...*farther removed in distance, but are still reasonably foreseeable,*” the DEIR *must* consider, analyze and mitigate the significant impacts that are

O13-18

reasonably foreseeable for the special-status species and sensitive natural communities, offsite and downstream from the project.

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While the Report discusses the potential impacts, and mitigation measures, of the project to biological resources *on-site*, and immediately *adjacent* to the site, *the DEIR ultimately fails to fully disclose, in a good-faith effort, the reasonably foreseeable impacts to offsite (i.e. downstream) biological resources*—including, but not limited to, multiple species of endangered and/or threatened birds (at the state *and* federal levels). Along with these offsite impacts to several special-status birds downstream from the project, at the San Diego River Channel/Estuary, the DEIR also fails to identify and consider the reasonably foreseeable impacts of the project *on the sensitive aquatic plant and/or fish species that such special-status birds rely on for nesting and/or foraging*.

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Despite the DEIR’s utter lack of consideration for the offsite occurrence of these particular special-status species, the species are *known* to inhabit and/or utilize the coastal salt-marsh/estuarine habitat that’s located downstream of the project site, at the San Diego River Channel/Estuary and the River’s mouth. This final strip of the San Diego River (i.e. the River’s Channel/Estuary and mouth), though not necessarily defined as critical habitat under the USFWS, has been designated as the “Southern Wildlife Preserve” by the Mission Bay Park Master Plan Update (1994). It, accordingly, has provided *important nesting and foraging habitat* for numerous special-status bird species (both endemic *and* migratory), with recorded observations supporting this from over the last twenty-five years (Mission Bay Park MPU, 1994).

Furthermore, it also harbors some of the last remaining coastal salt-marsh/estuarine habitat in San Diego County—of which is crucial to sustaining the populations of a handful of such special-status species. In addition to this critical (and very rare) salt-marsh/estuarine habitat that occurs within the final stretch of the Lower San Diego River, at the River Channel, there also exists an abundance of sensitive aquatic plant species, namely Eelgrass (but also others like Cordgrass).

O13-22

Figures 1 and 2, shown below, illustrate the presence and distribution of these extremely biodiverse facets to the habitat of the SD River Channel; Figure 1 displays the coastal salt-marsh/tidal flat and tidal marsh habitats, whereas Figure 2 illustrates the location of Eelgrass within the Channel. Given the cumulative environmental effects that these birds, and the salt-marsh/estuarine habitat they use to breed/nest and forage, already endure from past and present projects throughout the San Diego River Watershed, *it is absolutely essential that the DEIR considers the potentially significant impacts to these special-status biological resources, along with the required mitigation measures* and sufficient analysis as backed by substantial evidence.

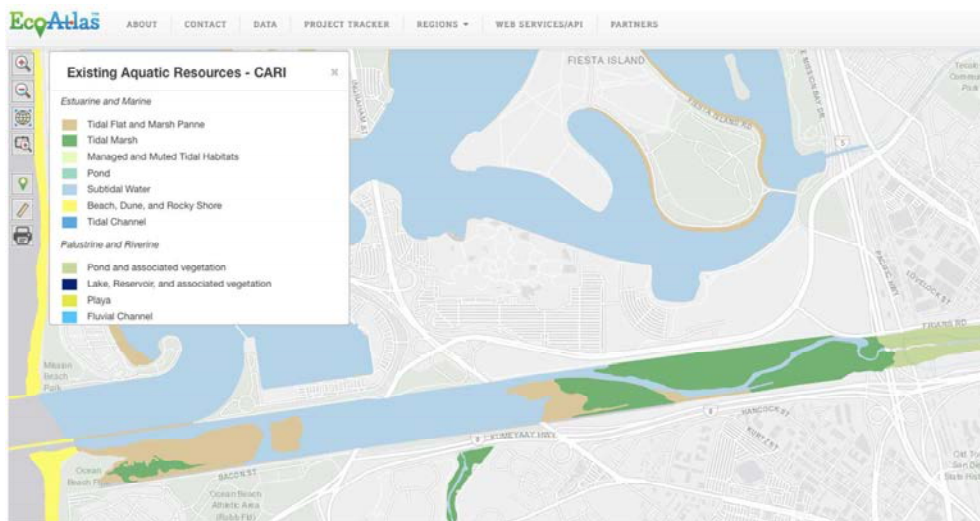


Figure 1: Salt-Marsh ("Tidal Flat and Marsh Panne") Habitat is shown in tan, while Tidal Marsh Habitat is shown in dark-green. (California Wetlands Monitoring Workgroup, 2019)

O13-23

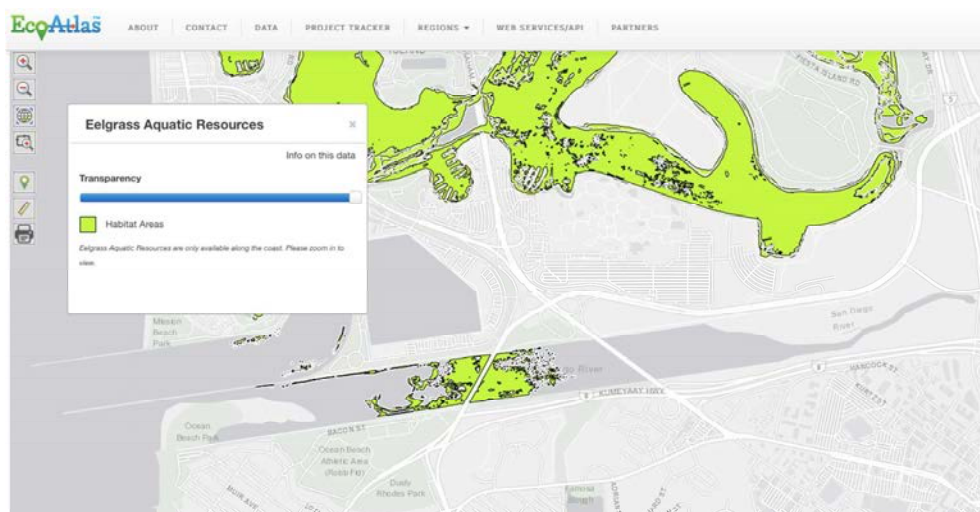


Figure 2: Distribution of Eelgrass habitat in SD River Channel, shown in lime-green, towards the center of the River Channel. (California Wetlands Monitoring Group, 2019)

O13-24

These offsite special-status species that the DEIR essentially ignores include, but are not limited to: the California Least Tern (**endangered** under *both* the federal and California ESAs); the light-footed Ridgway's Rail, formerly known as the light-footed Clapper Rail (both federal- *and* state-listed, **endangered**); the Belding's Savannah Sparrow (state-listed, **endangered**); and the

O13-25



Western Snowy Plover (federal-listed as **threatened** for Pacific coastal populations—including those found offsite, downstream of the project).

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Along with failing to discuss these particular special-status species of birds, and the direct impacts that any pollution from runoff may have on them and their young, the DEIR fails in entirety to address the *indirect* impacts of the proposed project on these species. For example, the Report fails to address and analyze the impacts of construction activities on the aquatic plant species that some of these species rely on for nesting—including, but not limited to, species such as Eelgrass and Cordgrass. Furthering this example, the Report also doesn't consider the potentially significant short- and long-term impacts on the vast array of fish species that all four species of special-status birds rely on as a source of food.

O13-26

O13-27

The existence of these particular special-status species within this *offsite* habitat, located *downstream* of the proposed project's site, has been explicitly observed for some time now. Though not limited to these particular species of bird listed above, the 1994 Mission Bay Park Master Plan Update (MPU) recorded each of these species *to be inhabiting and/or utilizing the salt-marsh/estuarine habitat of the San Diego River Channel*. It was in that same 1994 plan that a series of periodical summaries, evaluations, and surveys, were conceptualized for each of these species—but most notably the California Least Tern and the light-footed Ridgway's (formerly Clapper) Rail. For these particular two species, there have been several official examinations and reports carried out over the years by federal and state agencies—including the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), and the U.S. Army Corps of Engineers (USACE)—but also from reputable non-governmental agencies, like the Audubon Society. Such periodical reports have been conducted as recently as 2016 (including the USACE's May 2016 Review, "California Least Tern Foraging Ecology in Southern California, and the CDFW's 2016 Report, titled "Light-footed Ridgway's (Clapper) Rail Management, Study, and Zoological Breeding in California").

O13-28

Because of the various insufficiencies with the DEIR in its current state, including the lack of disclosure for the offsite biological resources and an insufficient environmental baseline of the proposed project's location as situated within two major floodplains (and while keeping the long-term conditions of the location in mind, with regard to the exacerbating effects of climate change), ***we do not condone any approval of the Project itself and/ the Draft Environmental Impact Report as it currently stands. Please sufficiently provide the disclosure, reports, and analysis of these various concerns of ours before continuing with the next step in the EIR process.***

O13-29

The Promise Posterity Organization was founded on behalf of the direness of humanity's global climate crisis—as a community of young and old individuals, we are deeply concerned with both the protection and preservation of our environment for our posterity, and promote development

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that is sustainable and maintains harmony between humanity and the natural environment. We are dedicated to fighting any and all short-term, economy-based projects and/or initiatives that blatantly ignore the long-term effects and consequences (whether intended or not) on both natural and human systems.

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We appreciate our opportunity to become involved in this process, and we look forward to working with the CSU Board of Trustees on this project in the future.

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O13-31

Sincerely,



Austin Gent  
Director  
Promise Posterity Organization  
[director@promiseposterity.org](mailto:director@promiseposterity.org)



Comment Letter O14



October 3, 2019

San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, CA 92182

Attn: Laura Shinn, Director

Dear San Diego State,

The San Diego Green Building Council (SDGBC) is a 501(c)3 environmental nonprofit made up of a community of building industry professionals and sustainability advocates with expertise in areas such as architecture, construction, design, urban planning, policy, and more. We are the local aligned community for the U.S. Green Building Council and partner to the International Living Future Institute. We work together to promote sustainable building and community practices to bring the San Diego region closer to achieving its climate, water, waste, and energy goals. We appreciate the opportunity to review and provide comments on the San Diego State University (SDSU) Mission Valley Campus Draft Environmental Impact Report (EIR).

O14-1

We applaud SDSU's efforts of looking to incorporate many green building strategies into the development plan of the overall site and buildings as this will be a model project for future developments around the San Diego region. After review of the Draft EIR, we would like to highlight a few sections and provide comments on items to be included in the final EIR.

O14-2

1 – Introduction and Existing Environmental Setting

- Figure 1-5 showing Master Plan layout
  - Current layout of buildings and streets may just be conceptual, but it does not fit:
    - LEED ND credit for solar orientation
    - the most optimal layout for energy efficiency and the north-south orientation does not provide the optimal alignment for solar production
  - We encourage reorienting the street blocks in the east-west orientation versus the north-south orientation which can potentially improve energy efficiency of the buildings by over 15%

O14-3

2 – Project Description

- 2-20
  - *"The proposed project's water demand is approximately 693,343 gallons of water per day (or 776 acre-feet per year). The City's Water Utilities Department currently provides water to the project site as part of its metropolitan system. All water infrastructure would connect to existing City of San Diego infrastructure and be built by CSU/SDSU in coordination with the City."*

O14-4



- The Draft EIR discusses how the new development will tie into City infrastructure and that LEED v4 will be followed for buildings which highlights water conservation measures.
- We encourage the total site plan to investigate water capture and reuse practices to lower the potable demand from new buildings. This onsite captured and treated water can be used for irrigation, central cooling plants, and other non-potable water end uses.

O14-4  
Cont.

#### 4.5 Energy

- 4.5-1
  - With this project build out lapsing from 2020 through 2037, we encourage SDSU to evaluate how the design and construction of buildings will be impacted by Zero Net Energy goals being pursued through California and local building codes.
  - "EV ready infrastructure" for 3% of residential and 6% for non-residential; 50% will be installed with EV chargers
    - This appears to be CALGreen minimum and 2019 has the multifamily units number going up to 10% for EV ready spaces
    - We encourage the Final EIR to be brought up to current standards going into effect January 1, 2020.
- 4.5-3 - *The proposed project would achieve Leadership in Energy and Environmental Design (LEED) Version 4 at a Silver or better certification level, as well as a Neighborhood Development designation for site-wide design. LEED certification is based on standards that encourage the development of energy-efficient and sustainable buildings.*
  - While this is current CSU and SDSU policy, we encourage SDSU to continue to be seen as local sustainability leaders and incorporate other green building rating systems to limit the climate impacts and strive for LEED Gold or higher.
  - We encourage SDSU to include Zero Net Energy and International Living Future Institute's Living Building Challenge strategies into the plan.
- 4.5-11 - *Because San Diego State University 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. However, for informational purposes, the proposed project has considered these planning documents and the project's site location within, and relationship to, each. 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 of San Diego General Plan (<https://www.sandiego.gov/planning/genplan>), Mission Valley Community Plan, or City municipal zoning code.*
  - With CSU/SDSU being a state agency, they should adhere to Executive Orders. In other sections, Executive Orders by the governor have been mentioned as applicable "Policies, Plans, Ordinances". However, the following EO was left off the relevant policies – E.O. B-1812 (ZNE for state buildings)
    - It states "that all new State buildings and major renovations beginning design after 2025 be constructed as Zero Net Energy facilities with an interim target for 50% of new facilities beginning design after 2020 to

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be Zero Net Energy. State agencies shall also take measures toward achieving Zero Net Energy for 50% of the square footage of existing state-owned building area by 2025.” <https://www.cpuc.ca.gov/ZNE/>

- We encourage SDSU to evaluate this Executive Order in their construction of future buildings and strive for Zero Net Energy.
- 4.5-27 and 4.7-38 – In order to have consistent language the following is from the Consistency Analysis tables. *“Additionally, individual buildings within the proposed project development area would be designed to achieve LEED Version 4 equivalent standards (Silver minimum); and the proposed project, as a whole, would be designed to achieve LEED-Neighborhood Design Version 4 equivalent standards (Silver minimum).”*
  - We suggest having this language be consistent throughout. In these tables, the language is using “equivalent” standards which can sometimes indicate not pursuing full certification. The rest of the document uses language to allude to actually pursuing certification.

O14-9  
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O14-10

#### Greenhouse Gas Emissions

- When discussing SDSU CAP: *“It contains goals and actions in various emission sectors; however, SDSU’s CAP was developed for and is focused on issues specific to the already built-out SDSU main campus located in the College area. SDSU’s CAP is not an applicable document for purposes of the proposed project, which proposes the establishment of an SDSU Mission Valley campus.”*
  - We encourage the Final EIR to have the “Carbon Commitment” that SDSU has signed to apply to “all” operational carbon regardless of the campus location, and so that it applies to the Mission Valley Campus.

O14-11

We look forward to seeing the responses to all Draft EIR comments put forth and hope SDSU continues to showcase itself as a local sustainability leader. We can be a resource and advocate to help you enhance the financial, environmental and design impact of the new Mission Valley development.

O14-12

On behalf of the San Diego Green Building Council organization,

Josh Dean, CEM, LEED AP O+M  
Executive Director

Comment Letter O15



October 2, 2019

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

**Re: Comments on San Diego State University Mission Valley Campus Master Plan Environmental Impact Report**

Dear Laura Shinn:

Thanks for the opportunity to comment on The SDSU Mission Valley Campus Master Plan DEIR (DEIR). The San Diego Audubon Society advocates on the behalf of wildlife and the environment. The Mission of San Diego Audubon is to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. The following are some concerns SDAS has after reviewing the DEIR, and we hope they can be addressed before the Final EIR is released and approved. Questions are in **bold** providing easier location.

O15-1  
O15-2

**Habitat Connectivity and Wildlife Corridors**

These comments are in response to, Chapter 2, Section 4.3 Biological Resources. These comments are centered around the analyses of impacts to the Murphy Canyon Creek, which is widely discussed in this section. More specifically Section 4.3.1.7, Habitat Connectivity and Wildlife Corridors, starts the basis of the biological impacts and mitigation to Murphy Canyon Creek that should be properly referred to as Murphy Canyon Wildlife Corridor (MCWC) when not referring to the creek itself. This section has some conflicting information. On page 4.3-9, third paragraph it states, "Due to the nearby urban areas, highways, and existing Stadium, wildlife are not expected to use the project site as a wildlife corridor; however there may be movement of urban adapted wildlife species through the existing area when it is not being used by people." In the next paragraph, "Murphy Canyon Creek, however, does support a linkage function from Murphy Canyon to the San Diego River and would be considered suitable for smaller wildlife species, particularly birds and reptiles, to move in a north-south direction." So here the conclusion is that wildlife are not expected to use the site as a wildlife corridor but then explains a scenario in which wildlife are using the site as a corridor. The first statement should be changed to remove "wildlife are not expected to use the project site as a wildlife corridor" and replaced with "the value of the north-south Murphy Canyon Wildlife Corridor is compromised." The DEIR uses the term Murphy Canyon Creek for the area in the project site southeast by Rancho Mission Road as the boundary crosses the Creek to the Northeast point of the project site, as shown in Figure 4.3-1, page 4.3-45. The term MCWC would be more appropriate as it contains the creek and adjacent wildlife habitat that functions as a pathway for numerous wildlife species, (not just urban-adapted as referred to in the DEIR). Studies by tracking teams have found evidence of larger animals, including coyotes, bobcats, opossums, raccoons and rabbits traversing through the MCWC. A more diverse and wide range of wildlife, than the bird and reptiles mentioned in this section, travel back and forth from the tributary canyons north and northeast of the project site to the San Diego River habitat area. For all intents and purposes, MCWC, including Murphy Creek, is in the project site regardless of boundary lines defined on numerous figures in this section. It is hard to reconcile a reality where you are in the Wildlife

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Corridor/Project Site, then take 2 steps northeast and be in the Wildlife Corridor/**Not** the Project Site. Continuing along this section will support these conclusions and will be discussed in the following paragraphs. **Will the DEIR update sections when the referral to the Murphy Canyon Wildlife Corridor is appropriate and correct the references to the Creek that should include the Corridor? Will the DIER correctly reflect that MCWC is in the project site? Also that it accords a wide range of wildlife, that should be properly identified and documented in this DEIR that travel to and from the canyons through the project site to the San Diego River?**

The following examples are descriptions of wildlife being impacted by project activities. As discussed above, there has been evidence of larger animals than birds and reptiles using this MCWC in a north-south direction. So when this letter refers to impacts to wildlife it refers to a wide range of wildlife and a more comprehensive study of MCWC with the aid of the San Diego Tracking team would support the statements detailed here. On page 4.3-20, under Human Activity, the report states, "Construction activities adjacent to the San Diego River and Murphy Canyon Creek can deter wildlife from already constrained habitat areas near the project site." And it is repeated on page 4.3-21, "Increased human activity could result in the potential for trampling of vegetation and soil compaction outside of the impact footprint, and 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 proposed project footprint, particularly if people go into the San Diego River or Murphy Canyon Creek." On page 4.3-28, under Indirect Impacts, Short Term, "The project site itself is not considered important for wildlife movement; however, the San Diego River just south of the project site is an important habitat area for wildlife, particularly birds. Murphy Canyon Creek provides additional habitat for wildlife, particularly birds, traveling to and from the river, especially because of the level of urban development and the opportunities for north-south movement across the San Diego River. Short-term indirect impacts to the San Diego River and Murphy Canyon Creek could result from increased human activity, lighting, and noise." This last statement here describes a wildlife corridor while the next section attempts to state that this is not the case. On page 4.3-26, under Direct Impacts, "The project site is approximately 96% developed with the existing SDCCU Stadium, parking lot, and roads. Wildlife may use the small riparian area in the southwest corner for local movement between urban areas and the San Diego River, as well as Murphy Canyon Creek. More urban-adapted wildlife species may use the entire site to move through, particularly when the Stadium is not in use. However, none of the project site is considered a wildlife corridor. Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and impacts would not be considered significant." On page 4.3-27, under Migratory Birds, "Murphy Canyon Creek is a narrower channel, but provides foraging and nesting habitat for birds." Repeating on the next page, 4.3-28, "The project site itself is not considered important for wildlife movement...Murphy Canyon Creek provides additional habitat for wildlife, particularly birds, traveling to and from the river...opportunities for north-south movement across the San Diego River." There is a dichotomy in this section of the DEIR, as it repeatedly states that no wildlife are using the project site, and then immediately describes wildlife using habitat that is in the project site as concluded in the second paragraph of this letter. In addition to our corridor connection concerns, migratory birds fly into buildings that are not designed correctly to prevent bird strikes. New technology and research have pointed to ways to minimize and avoid bird strikes while still accomplishing all we need to from our built infrastructure, and this plan should commit SDSU to use the best available technology to avoid bird strikes from migratory and resident birds. Partnering with organizations and designers with expertise could bring this design requirement into the planning phase of the project. This section has defined, in several sections, as on page 4.3-9, scenarios of wildlife using and travelling through the MCWC, including Murphy Canyon Creek, in a north-south direction from the Canyons north, northeast of the project site and through the San Diego River watershed to the mainstem of the River. The conclusion formed, with

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proper surveys of the complete MCWC, will support that there is a vital wildlife corridor in the project site on the eastern boundary. The statement in 4.3-26 “However, none of the project site is considered a wildlife corridor. Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and impacts would not be considered significant” should be changed to conform to the realities that the rest of the report acknowledges, that the:

- MCWC is used as a wildlife corridor
- Impacts to that corridor should be minimized during construction and throughout the life of the project
- The corridor should be improved in the design of the project.

**Will these corrections detailed above be made in the final EIR? Will the EIR acknowledge the presence of the Murphy Canyon Wildlife Corridor? Will there be a more comprehensive biological survey of the MCWC to account for all wildlife habitat and species and document them in the final EIR with any appropriate mitigation? Will the final EIR commit SDSU to using best available technology to prevent bird strikes in the new development?**

#### Biological Resources Impacts and Mitigation

Mitigation measures are chronicled in Table ES-2, Summary of Project Impacts, page ES-5. Biological Resources Impacts and Mitigation starts on page ES-9 and these comments will be in response to information in this Table. Impact BIO-1- The project would have a substantial adverse effect on least Bell’s vireo. MM-BIO-2 describes Habitat Mitigation, “Conservation of habitat shall be by on-site preservation, offsite creation and/or enhancement, and/or by purchase of appropriate credits at an approved mitigation bank in San Diego County.” We strongly recommend any mitigation be done on-site and mitigation banks be of the last resort. Habitat can be mitigated by restoration of degraded habitat along Murphy Canyon Creek in the Murphy Canyon Wildlife Corridor. Least Bell’s vireo habitat mitigation can be created by on-site preservation as listed in the mitigation measure. Mitigation banks don’t attend to the local habitat concerns that should be the focus. It seems BIO-MM-3 notes the appropriate mitigation, “MM-BIO-3. The mitigation habitat shall include appropriate habitat for special-status amphibians, reptiles, mammals, and birds with potential to occur on site.” Though it is missing the key point that the habitat should be local to the project site.

Impact BIO-2 – The project would have a substantial adverse effect on southwestern willow flycatcher.

Impact BIO-3 – The project would have a substantial adverse effect on other special status birds.

Impact BIO-4 – The project would have a substantial adverse effect on special-status amphibians and reptiles. MM-BIO-02, For the three above Impacts, we again strongly recommend habitat mitigation be on-site mitigation instead of using mitigation banks that do not address local degraded habitat that can be restored to function as improved habitat attractive to the species the project would have a substantial adverse effect on. **Will there be a priority to address significant impacts to Special-Status Wildlife by using on-site preservation and enhancement local habitat to the project site to bring the impacts to less than significant?**

Impact BIO-6 – The project would have a substantial adverse effect on migratory birds. MM-BIO-3 Bird Surveys puts a lot of responsibility on the site/project biologist. This mitigation measure should be handled in consultation with a qualified ornithologist with experience in the species identified in the project site. In the report the biologist must perform a biological survey for nesting bird species to be conducted within the proposed impact area within a 500-foot buffer within 72 hours prior to construction. If nests are detected, areas must be flagged and mapped. This information must be relayed to the construction team on site. The biologist must serve as a construction monitor to prevent inadvertent impacts. The biologist can adjust the barriers at their discretion depending on the species and location of the nest. This is also listed in this mitigation measure, “If occupied nests are found, then limits of construction (e.g., 250 to 500 feet) to avoid occupied nests shall be established by the project

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biologist in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas.” **Can there be more definitive descriptions of what the biologist will use to mark occupied nests?** Flagging, Fencing or other appropriate barriers is another example of the need to identify exactly what is being used to determine if these measures will be effective. This can’t be done when there is no clear example of what will be used. **Is there an industry standard being used? Something that all construction crew or others on the site will recognize as a warning sign for a nesting site and eliminate confusion as to what the flag, fence or barrier is warning against? Is it 250 feet for 500 feet to avoid occupied nests?** This DEIR should list the species expected to be nesting on site and the appropriate buffer required for constructions activities to take place. Only then can experts reading this report decide if this is a proper mitigation measure and its effectiveness. This project is quite large with a lot of moving pieces with critical sensitive wildlife habitat. This mitigation measure is too optimistic, for one biologist to perform such responsibilities over such a large area. Then to effectively relay this important information to large construction crews with no (presumed) scientific training. **What is the protocol for the biological surveys of nesting sites 72 hours prior? Can this be detailed in this report so experts can vet for its effectiveness at identifying nesting sites? Can certain species build a nesting site in less than the 72-hour window of the survey? Why is the biologist adjusting barriers to their discretion? Should they not be following protocols that have been defined in this DEIR? Should or did the project/site biologist assist in writing this section?**

Impact BIO-7 – The project would result in significant short-term indirect impacts to special-status plants and sensitive natural communities. MM-BIO-5: CONSTRUCTION MONITORING AND REPORTING lists so many duties that the site/project biologist is required to perform to make this mitigation measure effective. **It would be proper in this DEIR when appropriate, as in this example, to replace “biologist, project biologist, site biologist” with “a team of biologists needed to effectively perform the required plans for effective mitigation working closely with an ornithologist with pertinent expertise for species identified in this report”?** This mitigation measure will require a single biologist to be in 9 places all at once as there are 9 different duties the biologist has to perform. One of the concerns to note is the required communication between biologist, contractor and construction crews. Some examples are: “meet with key construction personnel to prevent... conflict between the timing and location of construction activities with other mitigation requirements, describing the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife...”, “... ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved....” Beyond that work, the biologist is also required to monitor the large project site, including, “Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas...”, 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...”, “...final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resource.” “...monitoring log; photos of the site before, during, and after the grading and clearing activities; and a list of special-status species observed.” **Will the construction teams and other contracted work be able to receive instructions from the project/site biologist and effectively understand with limited or no biological training? How can this be improved so that working crews understand the mitigation measures, why they are in place and what they are protecting? Are there scheduled meetings between project/site biologist, contractor, construction crews to coordinate the day’s activities and implementation of any mitigation measures?** This is why a biological team with required expertise to effectively perform and convey to large teams and personnel what the required measures are to be performed and the biological team should have a more detailed strategy and checklists that can be provided in this DEIR. This would allow a dramatic increase in confidence from experts and the public reading this report that SDSU is ensuring

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mitigation to lower the impacts to less than significant. **Can these improvements be implemented in the final EIR?**

Impact BIO-8 – The project would result in significant long-term indirect impacts to special-status plants and sensitive natural communities. MM-BIO-7: SIGNAGE AND BARRIERS, describes signage and visual barriers will be installed along wildlife habitat along the San Diego River and Murphy Canyon Creek. Also, barriers would be installed where appropriate. This alone does not bring the impact to less than significant. People ignore signs and climb fences. There needs to be a more detailed description of the barriers being proposed so they are wildlife friendly and reasonably effective to prevent human intrusion. Also, there should be an education component to the public about the ecosystem and wildlife using the habitat as educational and a sense of responsibility will be a more useful deterrent than fences and signs. MM-BIO-8: INVASIVE SPECIES PROHIBITION, this details that the project biologist is to guard against invasive plant species are included in final landscape plans and to periodically check landscape product for compliance. It would follow best practices to have a qualified botanist be in charge of these important duties to protect against invasive plant species having an opportunity to escape the project site and invade sensitive native plant habitat. A botanist will have a deeper knowledge to identify mistakes in plans or protocols that could lessen the effectiveness of this mitigation measure to protect native plants in the San Diego River watershed and Murphy Canyon Wildlife Corridor.

Impact BIO-9 – The project would result in significant short-term indirect impacts to special-status wildlife species. MM-BIO-9: NOISE, details that a qualified biologist shall perform surveys prior to construction for any special status bird species to document presence and extent of occupied habitat including a 300-foot buffer of construction activities. **What is the timetable on the prior-to-construction activities? Can the protocol for this survey be detailed here so experts can vet for effectiveness of success in identifying occupied habitat? Why doesn't the DEIR report include a pre-report survey of wildlife habitat of the 300-foot buffer so a pre-construction survey will be more successful?** This is included in the mitigation, "If active nests for any of these species are detected, on-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 (dBA) hourly equivalent noise level..." **Can it be detailed in the DEIR what are on-site noise reduction techniques so they can be vetted for effectiveness as mitigation? Where does the 60 (dBA) noise threshold come from? Can the noise threshold for all special status species expected to be in or near the project site be listed in the Biological Resources Technical Report?**

Long Term Impacts to Special Status Wildlife Species, page 4.3-20. It states that 60 dBA Leq threshold is typically used for analyzing impacts to special-status species. The predicted operational noise levels range from 60 to 65 dBA Leq within the San Diego River south of the project and near the riparian vegetation adjacent to Fenton Parkway. The predicted noise levels exceed the threshold to special status species yet it is determined that no long-term impacts to special status species are expected. **How can there be no expected impacts if this threshold is already exceeded? Why is 60 dBA the threshold used for all special status species? What's the threshold for species not determined to be special status expected to use wildlife habitat near the project site? This section should also include an analysis and mitigation measures for wildlife using the Murphy Canyon Wildlife Corridor.** On page 4.3-28, the DEIR states, "Noise. Construction-related noise could occur from equipment used during vegetation clearing." **Have there been studies to see if noise occurs when construction equipment is used? If so, can the words could occur be changed to will occur so we can properly determine if mitigation is warranted?**

Impact BIO-10 – The project would result in significant long-term indirect impacts to special-status wildlife species. MM-BIO-10: INDIRECT EDGE EFFECTS, this mitigation measure states that all recreational fields will be set back 100 feet from the San Diego River to reduce noise and lighting impacts. **Is there a study the DEIR can refer to that details 100 feet as being the effective distance to reduce light and noise impacts?** There is the glaring omission that this mitigation measure does not

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include a buffer zone for Murphy Canyon Creek and MCWC. **Can the recreational facilities be set an effective distance away to prevent light and noise impacts to MCWC? Could the plan implement a native plant barrier along MCWC of sufficient height and breadth that will act to absorb residual light and noise, in conjunction with distance, to further lessen these impacts on all wildlife using the corridor especially in the evening hours?** This would be beneficial to nocturnal wildlife who could be impacted by these edge effects.

MM-BIO-11: LIGHTING PLAN, on page 4.3-21, Under Long-Term Indirect Impacts to Special-Status Wildlife there the DEIR includes this sentence: "With lighting design and shielding devices internal to the luminaire, there should be no light spillage into the River Corridor Area, and lighting should be directed away from sensitive areas to ensure consistency with the MSCP's Land Use Adjacency Guidelines." The next sentence states, "Similar to the sports fields, lighting would be shielded, with directional LEDs so there would be very little light spill." On page 4.3-29, under Indirect Impacts, Lighting, these two sentences are repeated. The underlined points shows there isn't a conclusion if there will be light spillage or not from the project site into wildlife habitat. The section explains there will be LED's but there are no diagrams, photos, detailed descriptions of light post height, light post location, or project layout location. It also states, "... lighting **should be** directed away from sensitive areas...", instead of saying that it **will be** directed away from sensitive areas. The issue is that the ballparks are in the vicinity of the MCWC, in actuality a baseball's throws away. When it gets dark at 4:30 pm in December and January, the ballparks and trails along the MCWC will be illuminated for up to 8-10 continuous hours. The mitigation details and lack of information leaves the reader unable to come to the conclusion that this impact has been lowered to less than significant for light impacts to the MCWC/Murphy Canyon Creek and other sensitive wildlife habitat. **Can this mitigation measure provide more details mentioned above in the final EIR so a determination can be made if this mitigation is effective?**

Biological Resources Technical Report for the SDSU Mission Valley Campus Master Plan Project

Referring to the Biological Resources Technical Report for the SDSU Mission Valley Campus Master Plan Project. In Section 2, Methodology, more specific, 2.2 Field Reconnaissance and 2.5.1 Focused least Bell's Vireo, Southwestern Flycatcher Survey, including Figures 3 and 4 show a very limited, properly executed, survey protocols performed in the Murphy Canyon Wildlife Corridor (MCWC). This corridor encompassing Murphy Canyon Creek is an extension of the San Diego River. They are a connected ecosystem unit and to ignore a part of the system will provide incomplete empirical data in which decisions are made in this DEIR and will suffer from under reported data for the Biological survey. Section 2.7 Survey Limitations, This section explains the methodology and reasoning for surveys with the following statement, "Dudek did not conduct focused surveys for special-status wildlife species other than least Bell's vireo, southwestern willow flycatcher, and California gnatcatcher because no other listed species have high potential to occur on site or immediately adjacent to the site." There is no explanation for the incomplete survey of Murphy Canyon Creek (Murphy Canyon Wildlife Corridor) as shown in Figure 3. It surveys only half of the corridor in the project site. It was also noted there were no meetings with local CDFW personnel for their expertise in wildlife to be expected to occur in the vicinity of the project site. There are explanations of using pertinent literature on distribution and habitat preference, recorded off-site observations, but no details to what records biologists were referring to for experts reviewing this section to determine their veracity and current accuracy to current conditions. On page 26, there is a discussion of Critical Habitat by stating, "There is no USFWS-designated critical habitat for wildlife species mapped within the project site or off-site areas." There is no definition of what constitutes an "off-site area", and why only the inclusion of "USFWS-designated critical habitat". Even though MCWC is in the project site, it is sometimes not recognized as such in the DEIR. **Is the**

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**MCWC considered an off-site area? Is there a map provided to show these designations discussed here? Is MCWC considered critical habitat under the definition in other regional conservation plans?**

Figure 3 does identify several yellow warblers (Special Status Species) in the MCWC. There is also identification of Disturbed Habitat located right on top of the project boundary. Due to the proximity to the project site to MCWC there are concerns to be raised in the Thresholds of Significance listed on page 35 of this Section. Following are concerns with analysis of Threshold 1, 4, 6 and 7.

Threshold 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." Under Other Special-Status Birds on page 38, there is the determination of no impact to Murphy Canyon Creek. Though the project site contains disturbed habitat where Yellow Warbler has been identified in this report. It is also important to document here that during a survey in the MCWC on Friday September 27, 2019, several California Gnatcatchers (*Poliophtila californica*) were documented. This was just north of the project site of about 100 yards. Though this in contrast to what is documented in the DEIR, "Surveys for coastal California gnatcatcher (*Poliophtila californica californica*; federally threatened; SSC) were negative. Given the small patch of Baccharis-dominated Diegan coastal sage scrub and the narrow Diegan coastal sage scrub along the berm between the river and the Stadium parking lot, the habitat is considered marginal for coastal California gnatcatcher. This species is not expected to nest on site." This is a direct example identifying the incomplete Biological Survey that was performed in MCWC. A federally listed, SSC, species is not being documented that has high potential to having its habitat affected by the project. If not a direct impact, there is a high probability of edge effects to further degrade this disturbed habitat. So the determination of no impacts does not recognize the fragile state of this narrow wildlife corridor where small impacts can have large consequences. This should be revisited and proper mitigation be implemented to protect and improve the disturbed habitat identified to protect yellow warbler habitat. **Will the determination of no impact to Murphy Canyon Creek (MCWC) and yellow warbler habitat be corrected in the final EIR? Will the Murphy Canyon Wildlife Corridor have a more complete, comprehensive biological survey performed to identify special status species not being identified in this DEIR?**

Threshold 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." Under Direct Impacts 5.4.1, there is the following, "The project site is 96% developed with the existing SDCCU Stadium, parking lot, and roads. Wildlife may use the small riparian area in the southwest corner for local movement between urban areas and the San Diego River, as well as Murphy Canyon Creek. More urban-adapted wildlife species may use the entire site to move through, particularly when the Stadium is not in use. However, none of the project site is considered a wildlife corridor." Tracking surveys has shown that wildlife is using the MCWC and this sentence says as much, **so part of the project site is a wildlife corridor. Wildlife are traveling from the tributary canyons north and northeast of the project site through Murphy Canyon Wildlife Corridor (MCWC) to the San Diego River Watershed.**

In the report's conclusion for this Threshold, it's stated that "Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and would not be considered a significant impact." This is not a proper conclusion because the report improperly concludes there is no wildlife corridor. It is even stated in the DEIR on page 42, under Increased Human Activity, "Construction activities adjacent to the San Diego River and Murphy Canyon Creek can deter wildlife from using already constrained habitat areas near the project site." There is a propensity in this report that there is no wildlife corridor but in several places the DEIR admits to wildlife movement in the corridor. In Figure 3, part of the wildlife corridor is in the project site and part of it is on top of it, so in reality the projects site contains part of the MCWC which includes Murphy Canyon Creek. **Will the final EIR properly**

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**address this mischaracterization and recognize the MCWC and properly identify the significant impacts of disturbed habitat of yellow warbler (Special-Status Species) and other wildlife not addressed and documented in this DEIR with proper mitigation measures?**

Threshold 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? Direct Impacts- "The proposed project would not result in direct impacts to the MHPA, which covers the San Diego River. Additionally, SDSU is not a signatory to the San Diego MSCP and thus is not a "permittee" under this HCP. 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, there is no impact to the City of San Diego or other local agencies' abilities to implement the MSCP." There is a continuous conclusion formed throughout this DEIR that SDSU is not subject to policies and ordinances that provide protections for environmental resources. In fact, it's quite cynical and troubling that one of the leading educational institutions in San Diego is proposing they are not party to habitat conservation plans or ordinances because they are not a signatory. The EIR is to document significant environmental impacts for public disclosure. Beyond the validity of the proposition put forth that SDSU is not liable to a whole host of protective measures because they are not a "permittee", does not provide a free pass to document the significant impacts by implementation of the project objectives regardless if mitigation will be proposed to lower the impacts to less than significant. The documentation of these impacts should be provided in detail and then the project planners can propose that mitigation measures will not be provided because they are exempt from such measures for the public to understand what they can expect for future projects by such a negligent and unacceptable party to regional environmental concerns.

This subject of SDSU not being a "permittee" is addressed further in Section 4.10 Land Use and Planning. More specifically, on page 4.10-12 under City of San Diego Multiple Species Conservation Program Subarea Plan. Here it details that SDSU is absolved from the protections afforded the environment through the Multiple Species Conservation Plan (MSCP), Multiple Habitat Planning Area (MHPA) and any Habitat Conservation Plan (HCP). As stated in the DEIR, "As discussed above, SDSU was not involved with the preparation of the City's Subarea Plan and is therefore not a "permittee" under this HCP. Because SDSU is not a Permittee of this HCP and because SDSU does not need to obtain any entitlements that would constitute a discretionary action by the City, adherence to the restrictions typically placed on land within the MHPA as per the City's Biological Resource Guidelines does not apply to SDSU or SDSU-owned land." That is quite a statement from a leading educational institution. It is highly questionable if it's an accurate proclamation. This section details the importance of these programs in conservation and its inclusive participation with this statement, "The City MHPA is an area within which a "hard line" preserve will be developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups." That SDSU would take this stance and when impacts are identified in this DEIR, to plead that it does not apply to them because, "SDSU was not involved with the preparation of the City's Subarea Plan and is therefore not a "permittee" is quite shameful and will impact negatively with groups that share concerns about the environment and wildlife protections. **Will SDSU reverse course on these shallow proclamations and make a pledge to be an inclusive member of the City of San Diego Multiple Species Conservation Program Subarea Plan, following through on our shared obligations to ensure that our environment doesn't needlessly suffer while we develop certain areas?**

Threshold 7. "Result in a cumulative impact when considered with other present and probable future projects in the region." This Section discusses the proposed San Diego Trolley "Purple Line" and that all biological impacts will have to be fully mitigated in order to not contribute to cumulative impacts. And proper adherence to the San Diego MSCP and conservation plans NCCP/HCP to avoid and mitigate for impacts. Then with the City's Subarea Plan and establishment of the regional preserve

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system, to ensure compliance for the long-term management of the established preserves. With all this documented it is concluded, “Due to this consistency with these regional planning tools, the project would not result in cumulative impacts to plant and wildlife resources.” It sounds great on paper, however, a greater appreciation that there are opportunities for future realities to not meet all the standards listed above. This section should recognize the unknown future probabilities and the chances that all conservation plans will not be implemented completely in good faith or mitigation measures will not be effective or poorly executed. A more sober and realistic conclusion would be that cumulative impacts to native plant and wildlife resources could result with the implementation of this project with cumulative impacts occurring as development continues in the Mission Valley Region. The EIR should provide SDSU conservation commitments for the future and to document a leadership role of being a leading proponent of wildlife conservation efforts regionally. **Can SDSU make these statements of working with conservation groups and city planners to make changes to the project that will not contribute to cumulative impacts that can be properly identified?**

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#### Alternatives

In the Alternatives Section, 6.3.2.4, page 6.9, describes the All Park Alternative. It is noted that comments were received suggesting the entire project site be developed as a park and include the restoration of the adjacent Murphy Canyon Creek. This alternative was rejected due to not meeting the plan objective including hindering the City meet its Regional Housing Needs Assessment goals. It also states that this alternative would not meet increasing demand for higher education demand within a vibrant SDSU Mission Valley Campus and declares no reasonable means to fund this project. However, there are no objections raised to the comments received regarding improving the adjacent Murphy Canyon Creek, and CWC. There wouldn't be large financial requirement to make simple but effective improvements to the MCWC when so many local conservation organizations would be invested in contributing their expertise, including the California Native Plant Society and San Diego Audubon Society. It follows what is documented in the DEIR on page 4.10-26, Table 4.10-3 Project Conformance with San Diego River Park Master Plan. It states the following, “Extend open space corridor to create new habitat and trail connection to Murphy Canyon. The proposed project includes parks, recreation, and open space along the eastern edge of the project site, adjacent to Murphy Canyon Creek.” The plan clearly calls for open space corridors to create new habitat. Compliance with the River Park Master Plan stipulates guidance for a plan to improve the MCWC in conjunction with plans for parks and recreation. The project planners should make a commitment to the wildlife habitat component and take appropriate action to protect and improve sensitive biological resources in and adjacent to the project site. **Will SDSU become a leader and a partner in recognizing, protecting and improving the MCWC as called for in the San Diego River Park Master Plan, and document this in the final EIR?**

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#### Murphy Canyon Wildlife Corridor

San Diego State University is becoming the main steward in this region that inhabits a critical wildlife ecosystem, including the remaining wildlife corridor (MCWC) in this region that connects the canyons and habitats to the north and northeast to the San Diego River watershed. As one of the leading educational institutions in the region, great leadership and responsibility is expected. The university should see this region as part of their campus and home and should take great strides to recognize its importance and significance to the region. There is great educational benefit to the University and the public at large to see positive and pro-active measures to protect and improve the habitat of the wildlife we share the region with. SDSU should take Murphy Canyon Wildlife Corridor into the project framework and work with local conservation groups who want to see that it is protected and it flourishes for years and decades to come. If the MCWC becomes more degraded and doesn't function as a wildlife corridor the following are the negative consequences: Habitat fragmentation reducing genetic

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diversity leading to less resilient and healthy wildlife populations, creating unbalanced control of nuisance animals, and the ability of animals to respond to seasonal changes in water use and foraging opportunities. We have a unique opportunity to repair vital wildlife habitat that has been overlooked and ignored. Let's get it right this time as San Diego residents and conservation groups would appreciate SDSU's partnership and leadership.

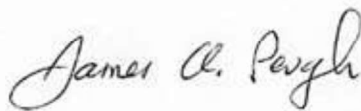
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Attachment

Included with this letter is a PowerPoint that details some simple ideas to improve the Murphy Canyon Wildlife Corridor. This critical corridor extends from the San Diego River along the eastern edge of the project site to the tributary canyons north and northeast. These are not concrete plans, but are presented to stimulate a conversation on what is feasible and effective and most important doable. These ideas include plans in the projects site and upstream of the project site as we require SDSU to be a partnership in habitat restoration in the projects site along the eastern edge. We look forward to participating with SDSU and other local environmental groups on this most important cause.

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Sincerely,



James A. Peugh  
Conservation Chair  
San Diego Audubon Society

Comment Letter O16

Environmental Review Committee

4 October 2019

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

Subject: Draft Environmental Impact Report  
Mission Valley Campus Master Plan

Dear Ms. Shinn:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its cultural resources appendices, our only comment is to note that MM-CUL-1 calls for HABS documentation but fails to specify the documentation level. It appears that Level II is intended. Given the stadium's public nature, there are certainly extensive historic photos available. But efforts should be made to also include interior spaces not normally accessible to the public.

Thank you for providing the opportunity for SDCAS to offer comments on this project.

Sincerely,

James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: Dudek  
SDCAS President  
File

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Comment Letter I1

From: **Mark Nelson (Home Gmail)** <[menelson@gmail.com](mailto:menelson@gmail.com)>  
 Date: Mon, Aug 5, 2019 at 4:24 PM  
 Subject: [mvcomments] Re: SDSU Mission Valley Draft Environmental Impact Report (DEIR) Published, Public Comment Period Open  
 To: SDSU Mission Valley <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>, <[cfowler@calstate.edu](mailto:cfowler@calstate.edu)>

How does SDSU have statutory authority to 1) raise funds, 2) expend funds and 3) conduct an EIR on a site that SDSU has not procured? Notwithstanding the current negotiation process, there is not sale transaction and there may be none. I cannot find any precedent for conducting an EIR on a prospective site under a 3rd party's ownership.

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I'll send an inquiry to AG Becerra's office under separate email.

On Mon, Aug 5, 2019 at 2:58 PM SDSU Mission Valley Team <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)> wrote:

[Home](#) | [Overview](#) | [Community Input and Engagement](#) | [FAQs](#) | [Visuals](#) | [News At SDSU](#)

Dear Mark Nelson,

Marking a major milestone in the Mission Valley project, San Diego State University published the SDSU Mission Valley Draft Environmental Impact Report (DEIR) today. The DEIR can be found on the SDSU Mission Valley [website](#).

Release of the DEIR is also an exciting time, as it provides a new level of public engagement. The release marks the opening of the 60-day public comment period for the DEIR, during which members of the public have an opportunity to review and provide written comments on the project and associated technical analysis.

We welcome your comments and are providing several opportunities for you

to gain more insight into the project and engage directly with the technical team before the public comment period closes on Thursday, Oct. 3, 2019.

### **Next Steps**

SDSU will host three public meetings during the DEIR comment period to provide the public with an overview of the findings of the report, opportunities to review project information and speak with the technical team.

All CEQA-related comments submitted in writing and received during the extended 60-day comment period will be responded to in the Final EIR.

Meetings will be open to the campus community and members of the public and will be held at the following times and locations:

- **Thursday, Sept. 12, from noon to 1:30 p.m.**, at SDSU's Parma Payne Goodall Alumni Center, 5250 55th St., in San Diego. A parking garage is located just south of the building.
- **Thursday, Sept. 12, from 5:30 p.m. to 7 p.m.**, at SDSU's Parma Payne Goodall Alumni Center, 5250 55th St., in San Diego. A parking garage is located just south of the building.
- **Tuesday, Sept. 24, from 5:30 p.m. to 7 p.m.** at the Mission Valley Marriott, 8757 Rio San Diego Dr., in San Diego.

A Final EIR will be presented to the California State University (CSU) Board of Trustees for consideration and approval. Once approved, the final SDSU Mission Valley EIR will be an important road map and guide to ensure that significant environmental impacts will be mitigated.

SDSU hopes to present the Final EIR to the CSU Board of Trustees in early 2020, and if the proposed project is approved, to purchase and to start construction on the site soon thereafter.

### **What is an EIR?**

An EIR, or Environmental Impact Report, is a document that identifies and examines the likely environmental impacts of a proposed project, and recommends measures to address those impacts. Construction on a project cannot begin until an environmental analysis has been completed and

approved by the appropriate governing body, in this case, the CSU Board of Trustees.

The SDSU Mission Valley Campus DEIR discloses all possible environmental effects of the project, including but not limited to effects on local and regional traffic, public services and utilities, protected plant and animal species, archaeological artifacts, historic resources, air quality and sound. DEIRs are prepared by qualified professionals in the fields of engineering, land planning, biology, hydrology, archaeology and environmental planning, and other technical disciplines, and are the result of field surveys, modeling, technical analysis and research.

Once a DEIR is prepared, it is made available to the public for review and comment. The SDSU Mission Valley EIR will be available for 60 days -- 15 more than the state California Environmental Quality Act's (CEQA) mandated 45-day-period.

Once the public review comment period has closed, SDSU, as the agency preparing the DEIR, will update and finalize the EIR. That process includes responding, in writing, to written comments relating to the CEQA issues submitted during the public comment period, including those from environmental agencies, planning groups, public agencies, individuals, and all other stakeholders with an interest in the project. A Final EIR will include responses to these comments, as well as any necessary corrections to the Draft EIR, and clarification of issues that arise from the public review of the DEIR.

### **What is CEQA?**

The California Environmental Quality Act, or CEQA, is California's most expansive environmental disclosure and protection law. CEQA indicates that all agencies of the state government shall regulate their activities so that major consideration is given to studying and disclosing to the public and decision makers, potential environmental impacts of a proposed project with the intent of reducing and/or preventing impacts to the environment.

The California State University is complying with CEQA through the preparation and approval of a Final EIR.

For information and updates, please continue to regularly visit the SDSU Mission Valley website: <http://missionvalley.sdsu.edu/>

*SDSU Mission Valley Team*

**San Diego State University**  
5500 Campanile Drive San Diego, CA 92182 Tel: 619-594-5200  
[Digital Privacy Statement](#)

This email was sent to [menelson@gmail.com](mailto:menelson@gmail.com). To manage your email preferences visit [this page](#) at any time.

Comment Letter I2

From: **John Riedel** <[jriedel8837@gmail.com](mailto:jriedel8837@gmail.com)>  
 Date: Mon, Aug 5, 2019 at 7:07 PM  
 Subject: [mvcomments] SDSU Mission Valley  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello MVcomments,

Thank you for having this venue where we can bring up issues and ideas we have for the SDSU Mission Valley Development. One of the priorities that must at the forefront is the protection of wildlife habitat surrounding the project site. This entails the habitat along the San Diego River Watershed but also the vital Murphy Canyon wildlife Corridor that connects the San Diego River to the canyons west and northwest of the project site. this corridor is in a degraded state and the development team must work with conservation groups to protect and improve this vital wildlife corridor to preserve genetic diversity within San Diego wildlife. There should be an emphasis to use anti-birdstrike methods on all buildings and structures as there is no excuse why the University would not support this. The project should also be progressive in best current practices for smart sustainable building practices. We should expect the new campus to be an example not for just the State but for the Country and a leading University like SDSU should strive to be.  
 Thank you.

I I2-1  
 I I2-2  
 I I2-3  
 I I2-4  
 I I2-5  
 I I2-6

--  
**Regards,**  
**John Riedel**  
[Jriedel8837@gmail.com](mailto:jriedel8837@gmail.com)

Comment Letter I3

---

From: <[rgarner2@san.rr.com](mailto:rgarner2@san.rr.com)>  
Date: Tue, Aug 6, 2019 at 12:02 PM  
Subject: [mvcomments] Mission Valley Campus Plan EIR  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

8859 Sandmark Avenue

San Diego CA 92123

August 6, 2019

SDSU

5500 Campanile Drive

San Diego CA 92182-1624

Attn.: Laura Shinn, Director of Facilities Planning, Design, and Construction

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Proposed San Diego State University Mission Valley Campus Master  
Plan

I am pleased to provide comments on Traffic Impacts for the subject EIR study.

Based on a detailed review of Transportation Impact Analysis of the SDSU Mission Valley Campus Project by Gatzke Dillon & Balance, dated July 29, 2019, I submit the following,

I  
↓  
I3-1  
↓

including the attached drawing that describe Projects and their traffic impacts that were not covered in the subject traffic analysis:

↑ I3-1  
Cont.

- Data for traffic to and from San Diego Gas and Electric Company (SDG&E) Mission Control Center at

9060 Friars Road.

I3-2

This 148 Acre site currently contains over 350 designated employee parking places plus undesignated parking for service and equipment vehicles (trucks). The entry and exit to this facility is on 9060 Friars Road between I-805 and River Run Drive and adds significant traffic at this location.

- Data for future increased traffic to and from this facility due to the planned expansion of this facility as

described in the SDG&E Mission Control Master Plan.

I3-3

This expansion includes up to 100,000 square feet of new and expanded facilities to accommodate both expanded and relocated staff and would include additional parking. This will also add to traffic at the 9060 Friars Road entry/exit.

There is a possibility that SDG&E will re-route traffic from this expansion to their Sandmark Avenue entrance, currently used only for special equipment. This will add traffic to the intersection of Murray Ridge Road and Mission Center Road, and will in turn require a specific study of this impact.

I3-4

- Data for the future increased traffic, including heavy equipment, to and from the planned substation east

of Encino Avenue.

I3-6

This expansion includes construction of a new substation on the 15-acre property recently sold to SDG&E by the City of San Diego in January, 2017. This will also include changing the zoning of this property from OC1-1, Open Space/Canyons, to a zoning appropriate for substation use.

These items, especially those affecting traffic at 9060 Friars Road, are relevant to the Transportation Impact Analysis.

↓ I3-6

Thank you for this opportunity to comment.

↑ 13-6  
1

Sincerely,

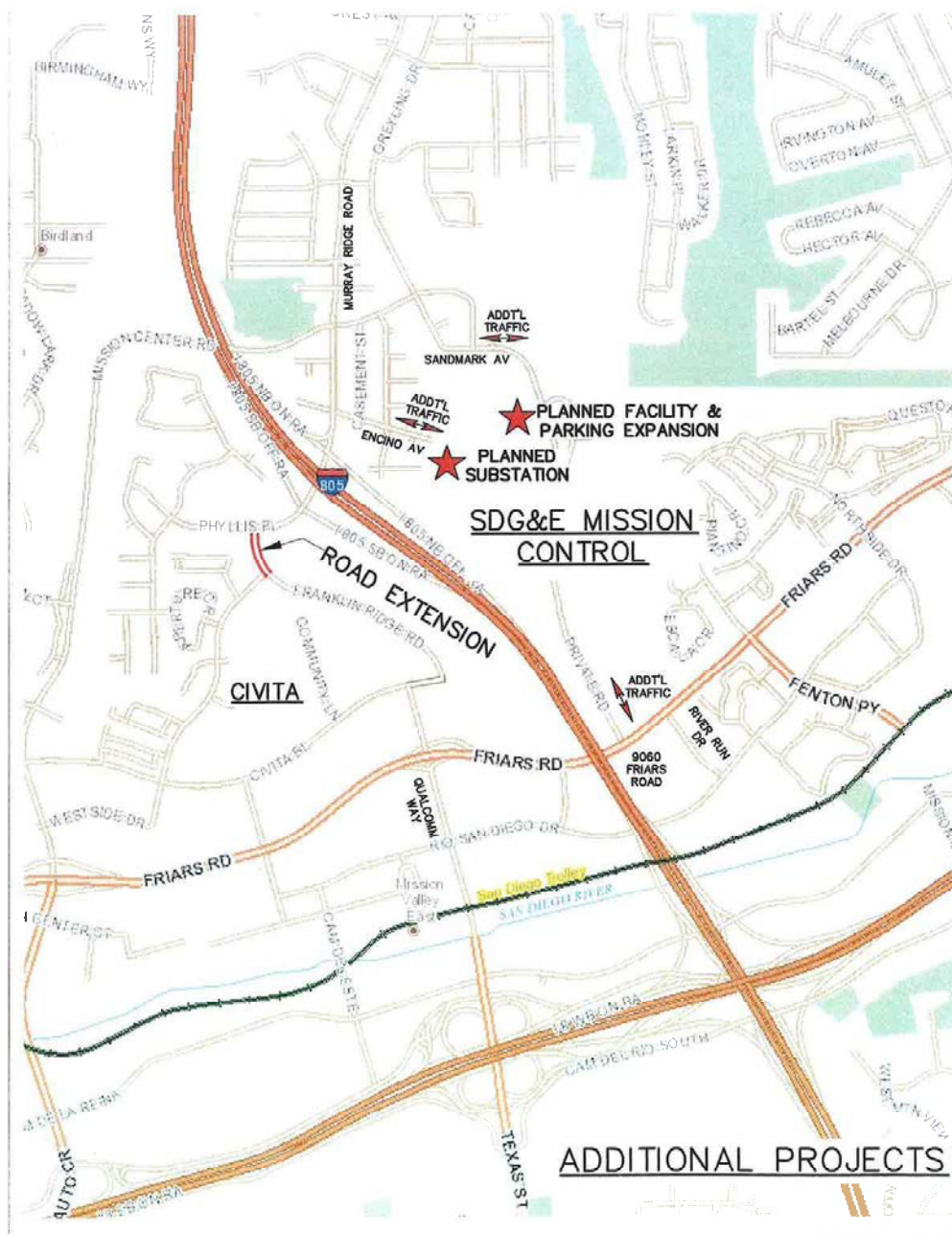
R. Garner

Robert Garner

Encl.

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13-7

Comment Letter I4

From: **Megan Flaherty** <[flaherm7@gmail.com](mailto:flaherm7@gmail.com)>  
 Date: Tue, Aug 6, 2019 at 12:34 PM  
 Subject: [mvcomments] SDSU West comments  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello,

My name is Megan Flaherty and I am a San Diego resident, having grown up nearby the current SDSU campus. I have the following comments for the proposed SDSU West project:

- This project should prioritize habitat protection and restoration. We have already developed the majority of the Mission Valley floodplain, drastically changed the hydrology of the area, and greatly reduced habitat quality and connectivity. This has had severe impacts on our wildlife, contributed to increased flooding, and reduced opportunities for outdoor recreational opportunities for the public.
- Key to this is the creation of a River Park that serves wildlife as well as people. There should be portions of the River Park that are focused solely on habitat and wildlife movement, as numerous species will no longer use an area if human presence and disturbance reaches a certain threshold. The River Park should be resilient to climate change, flooding and potential outbreaks of invasive tree pests. Using plants native to the San Diego region will greatly help in these efforts, as well as establishing trails in appropriate areas (i.e. not in core habitat areas), and enforcing ordinances in terms of staying on trails and not littering or creating fires. There are plenty of opportunities for interpretive and informational signage, to educate the public about how the floodplain functioned prior to development. Portions of this River Park could be a living laboratory for SDSU students, who could learn about land use, ecology, habitat restoration, invasive plant removal, wildlife movement, etc. The [San Diego River Park Foundation](#) will surely be a fantastic resource for responding to homelessness, invasive plants, and other issues which would impact ecological functioning.
- [Murphy Creek](#) is the only existing wildlife corridor which connects the San Diego River to the nearby tributary canyons. Currently, there is only a small sliver of wildlife habitat that runs adjacent to the hardened creek, which also includes a paved bike path. Despite the low quality of habitat here, the [San Diego Tracking Team](#) has found sign of numerous species, including raccoon, bobcat, coyote, opossum and cottontail rabbit (see attached for a write up of the wildlife survey from 2018). Some native plant species were also observed - Broom Baccharis, Coast Goldenbush, Cottonwood, Sycamore, San Diego Sunflower and Lemonade Berry. There is great potential to widen this corridor, improve it with more native plants and ramps to allow wildlife to escape the flood control channel during floods, and other wildlife mitigation strategies.

I 14-1  
 I 14-2  
 14-3  
 14-4  
 14-5  
 14-6  
 14-7  
 14-8  
 14-9

The San Diego Audubon Society has been looking at this area and has put together an informative Power Point, with ideas for improving this area (see attached).

I 14-10

- I would recommend working with local experts on wildlife corridors ([Megan Jennings](#) with the Lewison Lab, Cara Lacey with the Nature Conservancy ([cara.lacey@tnc.org](mailto:cara.lacey@tnc.org)) to get a better sense of how this area could be folded into other nearby protected areas and restored to support wild species and their movements.
- When designing the actual offices, student housing units and other buildings, care should be taken to [prevent bird strikes](#), maximize energy efficiency and minimize water use. Native plants should also be used in all landscaping, as this would greatly contribute to all of the aforementioned issues.
- This project should help the City (and the County) meet their [Climate Action Plan](#) goals of reducing greenhouse gas emissions. This can be achieved by creating energy and water efficient buildings, creating housing nearby public transit, installing solar panels where appropriate, encouraging non-motorized travel via bicycles, and creating student communities which support green lifestyle choices (i.e. community gardens, composting/waste diversion programs, etc.).

I 14-11

I 14-12  
I 14-13

I 14-14

Overall, this project constitutes a visionary opportunity to restore degraded habitat, support habitat connectivity, create outdoor learning and recreating spaces for students and members of the public, and establish an innovative auxiliary campus which adopts high standards of energy and water efficiency.

I 14-15

Please keep me informed of additional milestones and opportunities to provide feedback.

I 14-16

Thank you much for your time.

Best,

--

*"In every outthrust headland, in every curving beach, in every grain of sand there is the story of the earth." - Rachel Carson*

**Megan Flaherty**

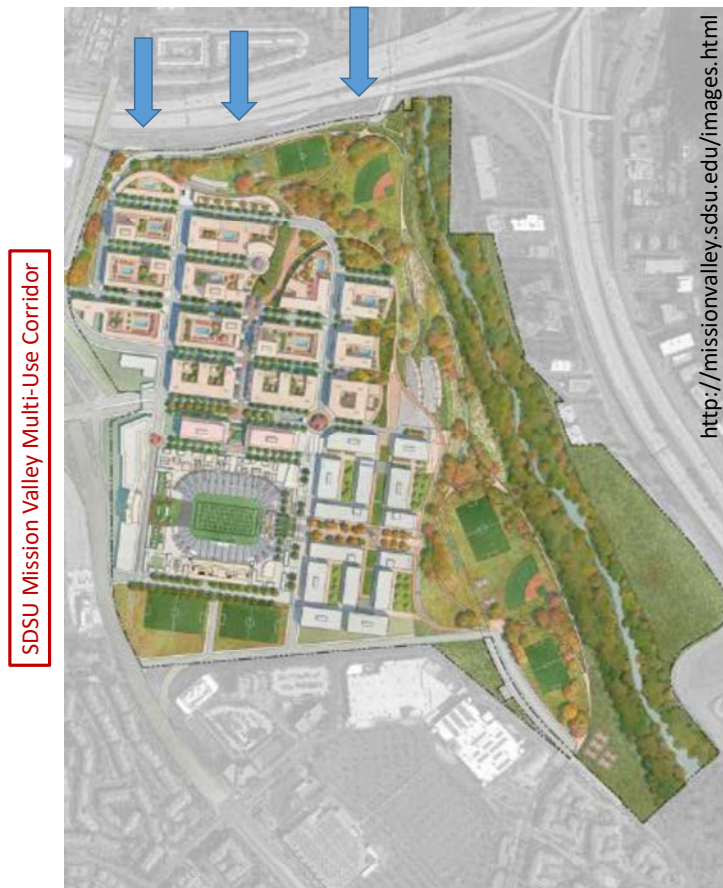
### Murphy Canyon Wildlife Corridor & SDSU Mission Valley

- Road Leaving Project Eastward Spans Wildlife Corridor
- Widen and Improve Wildlife Corridor at SDSU Mission Valley
- Allow Access Under Roads/Bridges and Low Impact Lighting
- Widen and Improve Wildlife Corridor along Murphy Canyon Pathway
- Allow Animal Movement across Cement Culvert
- Promote Multi-Use Pathway for Animals and Citizens
- Advocate for Pathway to be Closed from Dusk to Dawn to Allow Larger Animals Access for Nighttime Movement

San Diego Audubon Society April 2019

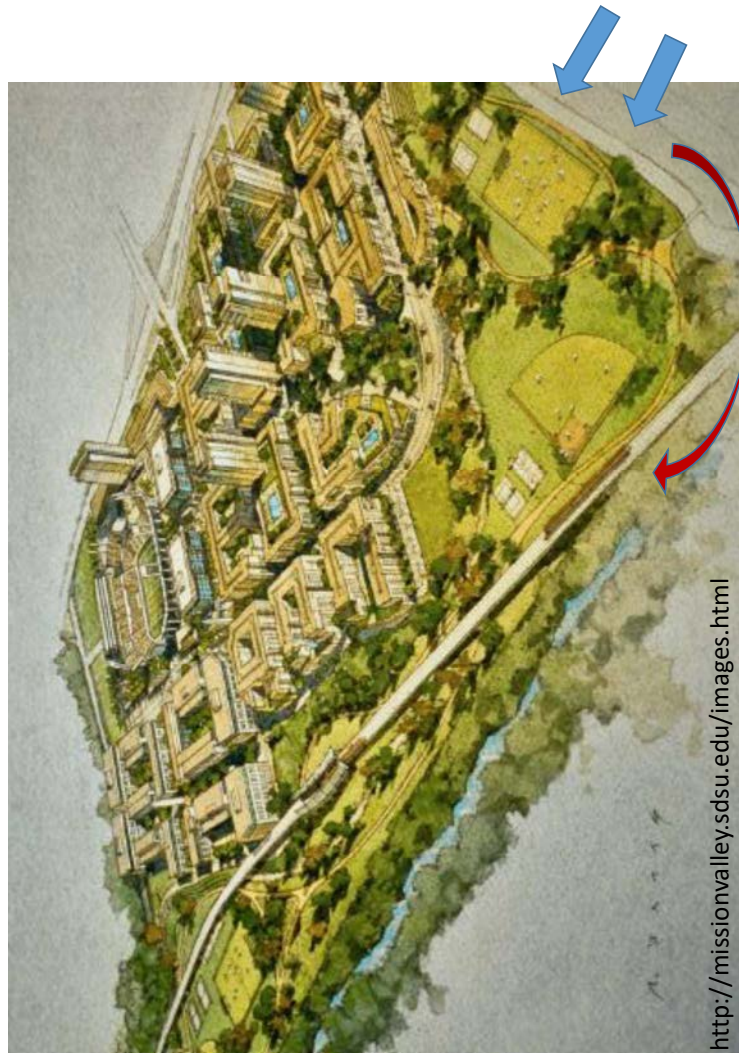
Proposed Road Leaving Project Elevates Over Corridor







Desired Wildlife Movement from Corridor to River Channel



Multi-Use Corridor Adjacent to SDSU Mission Valley

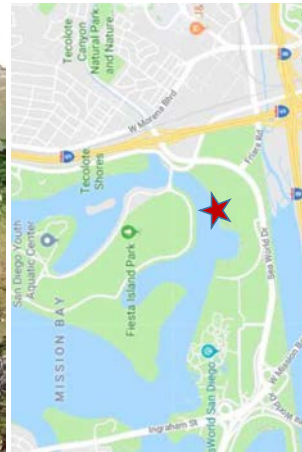


Corridor Concept Courtesy of Phoenix Von Hendy

Google Images



Examples of Low-Impact Lighting to Illuminate Pathway and Decrease Stress on Nocturnal Wildlife



Google Maps

Photographs-Riedel



Bottleneck

Bridge to Allow Animal Movement Over Cement Culvert



Photograph-Riedel



Google Images

Bottleneck

Bridge to Allow Animal Movement Over Cement Culvert



Google Images

Photograph-Riedel





Google Images



Photograph-Riedel

Tunnel Under Road and Trolley Bridge for Animal Access



Idea Courtesy of Jim Peugh

Google Images

Widen Animal Corridor up to 6 Feet for Smaller Animals



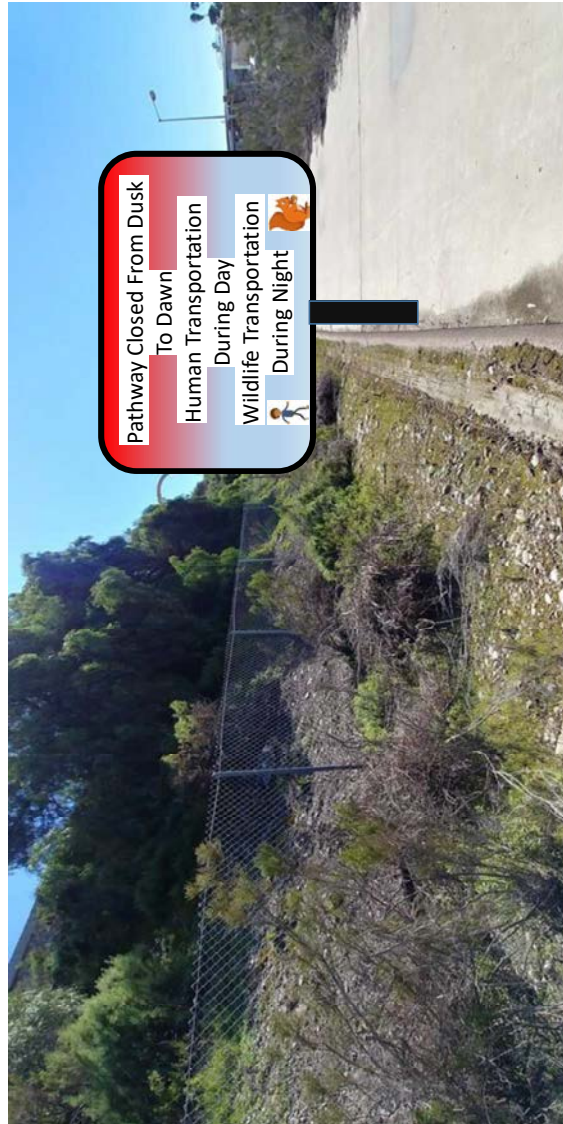
Photograph-Riedel

Replace With 6 Feet of Native Habitat

Move Fence 4 Feet



We Can All Get Where We're Going!



Photograph-Riedel



<b>INITIAL STUDY</b> <b>SAN DIEGO STATE UNIVERSITY</b> <b>MISSION VALLEY CAMPUS</b> <b>MASTER PLAN PROJECT</b>	<b>1.1 Project Title</b> SDSU Mission Valley Campus Master Plan project <b>1.2 Lead Agency Name and Address</b> The Board of Trustees of the California State University 401 Golden Shore Long Beach, California 90802 562.951.4700	<b>1.4 Project Location</b> The proposed project site is located at 9449 Friars Road, San Diego, California 92108, which is the current site of the existing San Diego County Credit Union Stadium. <b>1.5 Project Sponsor's Name and Address</b> Facilities Planning, Design and Construction San Diego State University 5500 Campanile Drive San Diego, California 92182-1624
<b>Prepared for:</b> The Board of Trustees of the California State University 401 Golden Shore Long Beach, California 90802 <b>Prepared by:</b> San Diego State University Facilities Planning, Design, and Construction 5500 Campanile Drive San Diego, California 92182-1624	<b>1.3 Contact Person and Phone Number</b> Laura Shinn, Director Facilities Planning, Design, and Construction Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego, California 92182-1624 619.594.5224	

DUDEK

Initial Study  
January 2019

#### 5.4 Biological Resources

Environmental Issues – Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

The proposed project would be constructed on previously disturbed portions of the project site, north of the San Diego River and west of Murphy Canyon Creek. While direct impacts to these areas are not anticipated, there is the potential for off-site improvements (i.e., drainage outfalls, head walls and energy dissipating devices/riprap, etc.) to be constructed within or adjacent to the

floodway of the San Diego River and/or Murphy Canyon Creek to meet stormwater and hydrology requirements. These improvements may result in direct and/or indirect impacts to (1) species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Plan (MSCP) or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service; (2) Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the City's Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; or (3) waters/wetlands. While the site of the proposed project is previously developed, the introduction of 20-story buildings and 35,000-seat multipurpose stadium may result in potentially significant impacts to migrating birds. The Draft EIR will evaluate the proposed project's consistency with the MSCP. The Draft EIR and associated biological resources technical report will evaluate the proposed project's impacts on sensitive biological resources, identify feasible mitigation measures, and analyze reasonable alternatives to the proposed project.

**\*Request Biological Resources Mitigation to Fund Wildlife Corridor Improvements**

DUDEK

Initial Study  
January 2019

## Informal Wildlife Survey at SDCCU Stadium in Mission Valley

Date: 23 October 2018

Participants: Phoenix Von Hendy, Erik Tracy, Megan Flaherty, Jim Peugh

Start time: 10:05 am

End time: 12:15 pm

General conditions: Sunny, no clouds, temperature 76 degrees, last rain was 10 days ago. On the weekend of the 13th, we had thunderstorms with hard rain. Rainfall totals were between .5 and .7 inches.

We started our survey at the northeast corner of the stadium parking lot and proceeded north along the drainage channel and bike trail for approximately 1 kilometer. We did not measure the distance or record GPS coordinates.

There was a shallow stream of water, approximately 24" wide, flowing down the center of the concrete drainage channel. An abundance of algae was present in the stream, which would indicate regular flow of water in this area. A 6' tall chain link fence separates the drainage channel from the bike trail. South of the Friars Road interchange, the fence sits right up against the paved bike trail. North of the interchange, there is a strip of land between the fence and the paved trail, ranging from 6 - 12 feet wide, which supports a fair amount of native vegetation, predominantly Broom Baccharis. On the west side of the bike path, there are a few trees, both native Cottonwoods and Sycamores, and non-native Eucalyptus and Pepper trees. Non-native vegetation, primarily ice plant, predominates on the west side near the overpasses.

We divided the survey into two sections, based on physical characteristics of the area. Section 1 ran from the start of the survey to the first group of gasoline storage tanks at the tank farm, just past the San Diego Mission Road overpass.

Section 2 proceeded north to the ending point of the survey, passing under the Friars Road overpass and approximately 3/4 of the tank farm.

## Findings:

### Section 1

Raccoon Tracks - 1

Bobcat Tracks - 1

Use by Dogs, Hikers, Bikers, Motor vehicles, Squatters

Comments: We found domestic cat tracks, along with dog tracks, by the tank farm. These were most likely from pets, as they were near a homeless encampment that had apparently been cleared out on October 18th. There was a sign posted on the 17th stating the the encampment would be cleared on the 18th. Some refuse from the encampment remained.

## Section 2

Coyote Scat - 1  
 Raccoon Tracks - 7  
 Opossum Tracks - 1  
 Presence of Cottontails, Small Rodents  
 Use by Dogs, Hikers, Bikers, Motor Vehicles, Squatters

Comments: Most of the tracks were found on the east side of the bike trail, between the pavement and the chain link fence, where there is a fair amount of native vegetation.

## Native plants:

Broom Baccharis (in bloom - predominant)  
 Coast Goldenbush (in bloom)  
 Cottonwood  
 Sycamore  
 San Diego Sunflower  
 Sunflower (Helianthus - in bloom)  
 Lemonade Berry (in bloom)  
 Everlasting  
 Willow (near stadium parking lot only)

## Non-native plants:

Feather Grass (Pennisetum sp? - in bloom)  
 Castor Bean  
 Wild Fennel  
 Pepper Tree  
 Eucalyptus  
 Be Still (Cascabela thevetia - in bloom)  
 Ice Plant (Delosperma sp - in bloom)  
 Bermuda Grass  
 Sow Thistle  
 Heavenly Bamboo (Arundo donax - near stadium parking lot only)

We were not looking for birds and noise from the I-15 freeway prevented us from hearing bird calls, however, we did see or hear the following birds:

- Lesser Goldfinch
- American Kestrel
- Black Phoebe
- House Finch
- Bewicks's Wren (?)

Comment Letter I5

From: **David Smith** <dave@dgs999.com>  
 Date: Wed, Aug 7, 2019 at 11:55 AM  
 Subject: [mvcomments] Stadium Mission Valley Site  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: David Marshall ([david@heritagearchitecture.com](mailto:david@heritagearchitecture.com)) <[david@heritagearchitecture.com](mailto:david@heritagearchitecture.com)>, Jack Carpenter <[jackcfaia@gmail.com](mailto:jackcfaia@gmail.com)>, Logan Jenkins ([lbjenkins5437@gmail.com](mailto:lbjenkins5437@gmail.com)) <[lbjenkins5437@gmail.com](mailto:lbjenkins5437@gmail.com)>, patrick shea <[patshea@icloud.com](mailto:patshea@icloud.com)>

Where is the analysis of removing the existing stadium? This is much more than just the estimated demolition cost which is at the end of the process that could require three or more years to accomplish with considerable legal costs.

15-1

Also, there are 1,800 pileons (100' to 130 feet long I-beams down to bedrock) as part of the footing system under the current stadium. This system was deemed necessary when the stadium was originally built and those standards have only increased today. What it illustrates is that the alluvial soils that exist throughout the site require footing systems that are more extensive and expensive than average footing systems for all buildings in the development plan including a new stadium.

15-2

The Mission Valley site requires a full analysis of two alternatives (1) providing a new stadium that must include the full costs of removing the current stadium and an accurate estimate of the time required to permit this demolition and all legal fees and (2) an estimated cost to return the current stadium to its original design of around 50k seats. Only when the city, SDSU and the public can see this side by side comparison can an informed decision be made on what alternative is the most feasible. This will also help determine the value of the site. Otherwise there is a dependency on unconfirmed numbers like the estimate of the new stadium cost at \$250 million that does not factor in stadium removal costs.

15-3

15-4

For a complex land deal like the MV stadium site it is imperative for both parties to be able to analyze accurate and comprehensive site improvement costs. Otherwise, it's a shell game where costs are being ignored and/or moved around to reflect an inaccurate/incomplete number. Usually the buyer over pays in these type of situations if the deal ever gets completed at all.

15-5

This is exactly what is going on now.

15-6

Comment Letter I6

From: **Denise Davidson** <[denisedavidson1884@gmail.com](mailto:denisedavidson1884@gmail.com)>  
 Date: Wed, Aug 7, 2019 at 6:49 PM  
 Subject: [mvcomments] Comments to the Mission Valley proposed campus master plan  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: DENISE DAVIDSON <[denisedavidson1884@gmail.com](mailto:denisedavidson1884@gmail.com)>

Dear Laura Shinn,

I have multiple questions I'd like answers to that concern the proposed campus in Mission Valley — where SDCCU stadium is at now.

I 16-1

1. Why wasn't a traffic impact study completed for the Serra Mesa neighborhood? There is no denying that Serra Mesa will be impacted by the new stadium, buildings and homes, yet there is no study done to report the purposed environmental impact done to this area, why not?

I 16-2

2. How can this traffic study into Serra Mesa be requested and be completed (with mitigationirg solutions suggested) — especially concerning the streets (but not limited to) Mission Village Drive, Ruffin Road, Gramercy Road, Murray Ridge Road, Marathon Street, Melbourne Street and any other streets that feed into or out of Serra Mesa or connect to the adjacent freeways — be done before construction starts?

I 16-3

2. What time frame before construction starts will the Serra Mesa traffic impact study (requested above) be completed and reported to the public by?

I 16-4

3. What kind of traffic abatement will be completed on the busy Friars Road for residents from Serra Mesa accessing nearby CostCo, Ikea going west and I-15 onramp going east?

I 16-5

4. How many free public parking spaces will be available for public parking so non-SDSU people ride the trolley?

I 16-6

5. Will construction trucks and other materials move through Serra Mesa to reach the Mission Valley site? If so, what will the impact to the neighborhood be?

I 16-7

6. What kind of noise and air pollution will be generated from the construction site over the years?

I 16-8

7. How will a fair and equitable price of the Mission Valley land be agreed on?

I 16-9

8. How will SDSU maintain the River Park that will be installed there?

I 16-10

9. Who will you be working with if archeological artifacts are discovered, particularly from

I 16-11

ancient Indians that lived in this area?

↑ I6-11  
Cont.

Thank you for your time and I look forward to satisfactory answers to all my questions.

↓ I6-12

Best,

Denise Davidson

Email: [denisedavidson1884@gmail.com](mailto:denisedavidson1884@gmail.com)

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Comment Letter I7

From: **Maryann Beck** <[mtb@san.rr.com](mailto:mtb@san.rr.com)>  
Date: Sun, Aug 11, 2019 at 3:50 PM  
Subject: [mvcomments] Mission Valley project  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>



SDSU needs to stay out of Mission Valley. Developing it as planned will be a disaster for the Mission Village neighborhood. Mission Village Drive used to be a quiet, neighborhood street and now it is like a highway. With SDSU plans, it will become like

I 17-1  
↓  
I 17-2

a freeway. We don't want or do we need all the extra traffic and negative impact on our environment.

↑ I7-2  
| Cont.

I sincerely hope the sale of the land by the city to SDSU does not happen.

| I7-3

Maryann T. Beck

Comment Letter I8

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From: **Leon Mack** <[githdum@gmail.com](mailto:githdum@gmail.com)>  
Date: Sun, Aug 11, 2019 at 7:06 PM  
Subject: [mvcomments] Traffic at Expanded Mission Valley SDSU site  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I just saw the numbers of the estimated increase in traffic if the current plan is approved. Hard to believe that anyone in their right mind would expect that to be acceptable. No way this should be approved; no way.

I  
18-1

Comment Letter I9

From: **Jennifer Reed** <[mariahrocks3@gmail.com](mailto:mariahrocks3@gmail.com)>  
 Date: Mon, Aug 12, 2019 at 1:40 AM  
 Subject: [mvcomments] NO to SDSU Mission Valley  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello. I am a lifelong Serra Mesa resident and I travel to and from Mission Valley on a daily basis. I would like to appeal to your proposed project at the current SDCCU stadium site. This is a MAJOR traffic problem area as it is but adding your project would make it impossible for me to come down to shop at any of the restaurants or get gas at Costco or even go to the library or the mall. I would be spending ALL of my time in traffic! This is ridiculous and completely unacceptable for our community. PLEASE do not build your proposed SDSU West site at the stadium!

I9-1

I9-2

Sincerely,  
 Jennifer R

Comment Letter I10

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From: **Patrick Staight** <[pstaight@gmail.com](mailto:pstaight@gmail.com)>  
Date: Mon, Aug 12, 2019 at 11:16 AM  
Subject: [mvcomments] Keep up the great work  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I'm excited that we are adding more housing to San Diego.  
You may be getting many comments complaining about increased traffic.  
I wanted to express my enthusiasm for the project.

I I10-1  
I I10-2  
I I10-3

Comment Letter I11

From: Sharon Pearce <[sharonpearce@silentvoices.org](mailto:sharonpearce@silentvoices.org)>  
 Date: Mon, Aug 12, 2019 at 11:19 AM  
 Subject: [mvcomments] VERY concerned about traffic in Serra Mesa  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

**I can guarantee you that NO ONE in Serra Mesa voted for SDSU to obtain the Mission Valley site – we ALL know the nightmare this is going to create for everyone who lives in this community. We already have way too much traffic on the main streets in and out of Serra Mesa during “rush hour” – now we’ll have tens of thousands more cars on our streets – streets that were not built to accommodate that much traffic. I think SDSU needs to find a way to get traffic in and out of the site without accessing**

I11-1  
 I11-2  
 I11-3

**Friars Road or Mission Village Road – maybe a bridge over the river (under the trolley station)? I am also concerned that students will start parking in our neighborhood and using Uber or Lyft to get down the hill to avoid the cost of student parking. Our streets are already lacking in adequate parking for those of us who live here. I can’t even begin to imagine what it’s going to be like when SDSU invades our community.**

↑  
I11-3  
Cont.  
I11-4  
I11-5

**Sharon Pearce**

**Serra Mesa Home Owner**

All electronic transmission from @[silentvoices.org](https://silentvoices.org), and any documents attached hereto, (a) are protected by the Electronic Communications Privacy Act (18 USC §§ 2510-2521), (b) may contain confidential and/or legally privileged information, and (c) are for the sole use of the intended recipient named above. If you have received this electronic message in error, please notify the sender and delete the electronic message. Any disclosure, copying, distribution, or use of the contents of the information received in error is strictly prohibited. c435y832

Comment Letter I12

8/15/2019

San Diego State University Mail - [mvcomments] SDSU West Campus Project



Laura Shinn <lshinn@sdsu.edu>

**[mvcomments] SDSU West Campus Project**

1 message

**'Tony Carlson' via SDSU Mission Valley Comments** <mvcomments@sdsu.edu>

Tue, Aug 13, 2019 at 1:25 PM

Reply-To: Tony Carlson <stn1159@yahoo.com>

To: mvcomments@sdsu.edu

I would like to express my disapproval of the proposed campus to be built in Mission Valley. Under the current conditions, gridlock is now normal during peak traffic hours. With continued development of more apartments and your campus, these problems will become a living hell for those forced to deal with it. I can guarantee that there will be a dramatic spike in car accidents, road rage and lost revenue to businesses that are trapped inside a barrier of cars. Real estate values of the surrounding homes will plummet, as well. In all of San Diego County, is this the only viable location for a new campus?

I I12-1  
I I12-2  
I I12-3  
I I12-4  
I I12-5

Scott Nenn

2617 Palace Dr. SD, CA. 92123

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641784730046323928&simpl=msg-f%3A1641784730046323928>

1/1



Comment Letter I13

From: **Fishinity** <[fishinity@gmail.com](mailto:fishinity@gmail.com)>  
Date: Tue, Aug 13, 2019 at 6:58 PM  
Subject: [mvcomments] Stop the Crush  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Please reconsider the impact on our lives that the additional traffic will cause. I 113-1

Thank You.

Comment Letter I14

8/12/2019

San Diego State University Mail - [mvcomments] Comments on SDSU Mission Valley DEIR



[mvcomments] Comments on SDSU Mission Valley DEIR

rocketzamboni@att.net <rocketzamboni@att.net>  
 Reply-To: "rocketzamboni@att.net" <rocketzamboni@att.net>  
 To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Mon, Aug 5, 2019 at 6:13 PM

I have several comments on the DEIR transportation analysis that should be addressed in order to have a more complete and thorough report:

1. The vehicle trip generation totals used to evaluate potential intersection and roadway impacts include internal trip reduction for mixed-use development, which is appropriate. However, substantial trip credits are also taken for the future TDM program. The TDM program is a speculative estimate, and its efficacy cannot be assured. If the current SDSU campus has a TDM program then perhaps that could be evaluated and used to back-up the trip reduction estimate. In the absence of verifiable TDM data, the trip generation estimate should take a more typical and conservative approach used in other CEQA documents, and analyze potential transportation impacts without the TDM program. TDM programs are more often noted as project requirements and as a mitigation measure. As presented, the trip generation estimate is misleading and underestimates potential transportation impacts.

2. How does the transportation analysis account for trip interaction between the campuses in the future? The Mission Valley campus will not operate in isolation from the current campus.

3. The transit analysis makes several broad assumptions about transit trips that require further explanation as they greatly affect the analysis results, and underestimate the potential impacts to transit operations:

3.1 The analysis does not consider transit load factors, only the riders getting on and off at one stop. This is more of a platform analysis approach for pedestrian spacing and not a transit operations analysis. Adding patrons to crowded trains is actually the issue, and not how many get off at one particular stop. The question to be analyzed and answered is whether or not the trains actually accommodate more passengers so that seats are still available or it leads to more standees? In other words, how will transit load factors change?

3.2 A transit analysis at a college campus should consider college class schedules. Transit trips are not evenly distributed as described in the DEIR. Just observe the current campus bus and rail stations and notice how transit riders arrive in larger numbers just before class, and have similar bunching patterns in the afternoon. As SDSU is a commuter school as well as a residential campus, this effect on transit services and operations is prevalent every day, and would continue to be so at the new campus.

3.3 Estimating transit trips should consider the transit mode share of the current SDSU campus. This will lend credibility to the assumptions used in the DEIR, or provide a basis for refinement of DEIR transit trip estimation.

3.4 Even with differences in campus location and other assumptions, a comparison of the existing campus bus and rail transit services, mode share, load factors, queue space, riders, etc. to the same items at the new campus should be made. Otherwise, there is little basis to back up the DEIR transit assumptions, analysis and conclusions. Please provide a detailed table comparing these items.

-Victoria E.

I 114-1

I 114-2

I 114-3

I 114-4

I 114-5

I 114-6

I 114-7

I 114-8

I 114-9

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permmsgid=msg-f%3A1641078078005270431&simpl=msg-f%3A1641078078005270431> 1/1

Comment Letter I15

From: **Nick Barber** <[barberna82@gmail.com](mailto:barberna82@gmail.com)>  
 Date: Mon, Aug 26, 2019 at 7:26 AM  
 Subject: [mvcomments] DEIR comments  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am an assistant professor in the Department of Biology at SDSU, and I have been excited to follow the planning for SDSU Mission Valley. I am an ecologist and my research examines how human activities shape plant and animal diversity as well as how we can restore habitats to support wildlife and the benefits they provide to us.

I15-1

After looking through the DEIR, I am glad to see there are opportunities to bolster environmental protection through the development project, particularly by protecting nearby wildlife habitat. Indeed, the presence of wildlife habitat in the middle of a highly-developed metropolitan area is quite unique among American cities and contributes to quality of life in the region.

I15-2

In particular, there is an opportunity to enhance the Murphy Canyon Wildlife Corridor. I am teaching a Conservation Ecology course this fall, and a major topic is the value of corridors both to helping wildlife and minimizing human-wildlife conflicts. Restoration of the corridor habitat with native vegetation would not only enhance habitat and biodiversity in the area, it could also protect wildlife and people. High-quality corridors encourage animal movements through the corridor itself rather than across dangerous roadways or through neighborhoods where conflicts with people or pets is likely.

I15-3

Lastly, if the stadium plans include extensive glass surfaces and lighting, anti-bird strike materials should be included. Millions of birds migrate through San Diego each year, and glass building can be significant dangers. The Minnesota Vikings' stadium has experienced this in recent years, with hundreds of dead birds littering the ground around the stadium. Given that fall migration peaks during football season, seeing dead birds scattered around the new SDSU stadium would likely alarm fans and should be avoided.

I15-4

Thank you for considering my comments, and please let me know if there is any other information I can provide.

I15-5

Sincerely,

Nicholas A. Barber  
 Assistant Professor, Department of Biology  
 San Diego State University  
[nbarber@sdsu.edu](mailto:nbarber@sdsu.edu)  
<https://barberna.wixsite.com/barberecology/>

Comment Letter I16

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From: **Patti Roscoe** <[Patti.Roscoe.224956994@actnow.io](mailto:Patti.Roscoe.224956994@actnow.io)>  
 Date: Sat, Aug 31, 2019 at 12:39 AM  
 Subject: [mvcomments] Support the open process, approve SDSU Mission Valley!  
 To: Laura Shinn <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Ms. Shinn,

I wanted to express my strong support and satisfaction with the recently released environmental impact report for the SDSU Mission Valley Project.

I16-1

Throughout the election and planning stages of this project, residents of San Diego were promised an open and public process. I am extremely pleased that San Diegans continue to have the voice we deserve as our city grows and develops.

I16-2

Additionally, I am very happy to see that the many other components promised in this project have been addressed in the report as well. The construction of new parks, expanded university space, and a state-of-the-art stadium is something I think all of us can get behind. This truly is a project by San Diegans, for San Diegans.

I16-3

I appreciate the opportunity to voice my input and hope this project will move forward to construction very soon.

I16-4

Thank you for your time,  
 Patti Roscoe  
 3025 N Arroyo Dr  
 San Diego, CA 92103

Comment Letter I17

8/12/2019

San Diego State University Mail - [mvcomments] SDSU Mission Valley



[mvcomments] SDSU Mission Valley

Thor Biberman <Thor\_Biberman@sdttranscript.com>  
To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Tue, Aug 6, 2019 at 1:13 PM

Dear Ms. Shinn:

My name is Thor Kamban Biberman and I am a reporter with the San Diego Daily Transcript.

I was wondering if you could address an alternative for the stadium location. It was reported in the draft EIR that one possible alternative would be to place the stadium on the existing campus east of College Avenue. Could you tell me exactly where that would be located if it came to that?

Also, has SDSU issued any statements with regards to the amount of traffic the project would generate.?

Thank you very much for your time;

Sincerely yours;

Thor Kamban Biberman

I I17-1  
I I17-2  
I I17-3

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permmsgid=msg-f%3A1641149770121259067&simpl=msg-f%3A1641149770121259067> 1/1

Comment Letter I18

8/12/2019

San Diego State University Mail - [mvcomments] Request for speaker from SDSU regarding Mission Valley West project



**[mvcomments] Request for speaker from SDSU regarding Mission Valley West project**

'Bob Chambers' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>

Fri, Aug 9, 2019 at 10:22 AM

Reply-To: Bob Chambers <chambersbc@yahoo.com>

To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>, "stratcomm@sdsu.edu" <stratcomm@sdsu.edu>

Cc: Robert Chambers <chambersbc@yahoo.com>

Greetings,

I hope you can assist me -- I am with the Rancho Bernardo Rotary Club and I'm assisting in locating speakers for our November/December meetings. Our members would be very interested in learning more about the Mission Valley West project and SDSU's other plans for the future.

I note that there have been presentations to other community organizations, including other Rotary clubs.

Thank you for your assistance.

Regards,

Bob Chambers  
Rancho Bernardo Rotary Club  
858-432-9070

I18-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permmsgid=msg-f%3A1641410850054455024&simpl=msg-f%3A1641410850054455024> 1/1

Comment Letter I19

8/26/2019

San Diego State University Mail - [mvcomments] DEIR Informational Meetings



**[mvcomments] DEIR Informational Meetings**

2 messages

'Shain Haug' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>  
Reply-To: Shain Haug <shainh\_2000@yahoo.com>  
To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Mon, Aug 19, 2019 at 9:31 AM

The recent email indicates meetings on each September 12, 2019, September 12, 2019, and September 24, 2019. Is the subject matter of each the same so that attendance at one will cover all issues or are the meetings consecutive in the development of the topic? In other words, do I need to attend all three to get the whole picture or will attendance at any one suffice?

Thank you,

Shain Haug

619 992 7808

Sent from Mail for Windows 10

'Shain Haug' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>  
Reply-To: Shain Haug <shainh\_2000@yahoo.com>  
To: SDSU Mission Valley <mvcomments@sdsu.edu>

Mon, Aug 19, 2019 at 10:10 AM

Thank you.  
Shain Haug

On Monday, August 19, 2019, 09:55:22 AM PDT, SDSU Mission Valley <mvcomments@sdsu.edu> wrote:

Hi Shain,  
Thanks for your email. Each meeting will follow the same format and content so your attendance at any one of the meetings will suffice.  
Best,  
Gina  
[Quoted text hidden]

I 119-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1642313615518553727&simpl=msg-f%3A1642313615518553727&...> 1/1

Comment Letter I20

8/26/2019

San Diego State University Mail - [mvcomments] Re: River Park, Community Advisory Groups Formed



**[mvcomments] Re: River Park, Community Advisory Groups Formed**

1 message

**Michael Clifton** <mclifton@advantageinfo.tv>

Thu, Aug 22, 2019 at 3:10 PM

To: mvcomments@sdsu.edu

Hello,

Please update date me on any future River Park and or Community meetings. I do have time to participate if you need additional support. Otherwise, I would like to attend meetings.

I am a local resident living near the new development and alumni of SDSU.

Best Regards

Mike Clifton

Cell: 619.925.1300

[mclifton@advantageinfo.tv](mailto:mclifton@advantageinfo.tv)



I I20-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1642608363020203795&simpl=msg-f%3A1642608363020203795> /3



Comment Letter I21

8/26/2019

San Diego State University Mail - [mvcomments] FW: SDSU Mission Valley Draft Environmental Impact Report (DEIR)  
Published, Public Comment Period Open



[mvcomments] FW: SDSU Mission Valley Draft Environmental Impact Report (DEIR) Published, Public Comment Period Open  
2 messages

Cindy <C.a.moore@sbcglobal.net>  
To: mvcomments@sdsu.edu

Mon, Aug 26, 2019 at 8:07 AM

Hello,

I'm reviewing the EIR and can't find Figure 13 in either the TIA or the Transportation section. There are numerous references to it in the Transportation section. Where do I find it? Please send me the link and page number.

I I21-1

Cindy Moore

Serra Mesa Resident

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1642942478662806485&simpl=msg-f%3A1642942478662806485&simpl=msg-f%3A1642946696772935188>

1/9

Comment Letter I22

San Diego State University Mail - [mvcomments] Where are the public NOP comments posted on SDSU website? Pls send link



**[mvcomments] Where are the public NOP comments posted on SDSU website? Pls send link.**

I I22-1

2 messages

**Mark Nelson** <reno.mark.nelson@gmail.com>  
To: mvcomments@sdsu.edu

Sat, Aug 17, 2019 at 10:17 AM

Sent from my iPhone

**Mark Nelson** <reno.mark.nelson@gmail.com>  
To: SDSU Mission Valley <mvcomments@sdsu.edu>

Mon, Aug 19, 2019 at 10:23 AM

Thx

Sent from my iPad

On Aug 19, 2019, at 8:08 AM, SDSU Mission Valley <mvcomments@sdsu.edu> wrote:

Hi Mark,

Thank you for reaching out. The NOP comment letters are posted in the Appendices section of the Mission Valley EIR. <http://missionvalley.sdsu.edu/eir-appendices.html>

The direct link to download the PDF is here: <http://missionvalley.sdsu.edu/assets/pdfs/EIR/technical-appendices/Appendix-1-1-NOP-Initial-Study-and-Comment-Letters.pdf>

Best,  
SDSU Mission Valley Team

On Sat, Aug 17, 2019 at 10:17 AM Mark Nelson <reno.mark.nelson@gmail.com> wrote:

Sent from my iPhone

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1642135319732489222&simpl=msg-f%3A1642135319732489222&...> 1/1

Comment Letter I23

San Diego State University Mail - [mvcomments] Public Commentary on the DEIR



**[mvcomments] Public Commentary on the DEIR**

'Steve' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>

Sat, Aug 31, 2019 at 9:11 AM

Reply-To: Steve <sdahms100@yahoo.com>

To: mvcomments@sdsu.edu, skilkenny@dudek.com

How do I prepare and file my public commentary? Are there specific forms? What are the protocols? Is there a page limitation?

I I23-1

How do I search for specific terms...e.g., viruses, toxins, pathogens, etc. I have done it in the Appendices via Google Drive.

I I23-2

A. Stephen Dahms

Member, River Park Advisory Group

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permmsgid=msg-f%3A1643399531873600502&simpl=msg-f%3A1643399531873600502> 1/1

Comment Letter I24

San Diego State University Mail - [mvcomments] MV Student Housing Development



[mvcomments] MV Student Housing Development

1 message

**Tommy Friedrich** <tfriedrich@cresa.com>  
To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Thu, Sep 5, 2019 at 10:55 AM

Hello,

I represent a multi-family developer that has significant experience with the development of student housing. Is there someone that I can get in contact with regarding a partnership for the development of SDSU west housing? Is there some sort of bid process?

Thank you,

**Tommy Friedrich**  
Vice President  
BRE#: 01972321



[tfriedrich@cresa.com](mailto:tfriedrich@cresa.com)  
858.369.5416 direct  
760.419.3342 mobile

3580 Carmel Mountain Road, Suite 150  
San Diego, CA 92130



I24-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1643859004053630309&simpl=msg-f%3A1643859004053630309> 1/1

Comment Letter I25

San Diego State University Mail - [mvcomments] Sign-up form



**[mvcomments] Sign-up form**

1 message

**Paige** <paiger@san.r.com>  
To: mvcomments@sdsu.edu

Sun, Sep 8, 2019 at 6:09 PM

Hi,

Please add me to the email list for the announcements and Newsletter for the Mission Valley Campus. I am a community member. Thank you.

I I25-1

Paige R.

619-857-0807

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1644158127326442439&simpl=msg-f%3A1644158127326442439> 1/1

Comment Letter I26

---

From: **Robert Claesson** <[awesomeclaes@hotmail.com](mailto:awesomeclaes@hotmail.com)>  
Date: Tue, Sep 10, 2019 at 12:19 PM  
Subject: [mvcomments] Community Planning Team  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hi,

I would like to get information about community planning teams for the SDSU Mission Valley expansion.

I 126-1

Thank you,  
Robert Claesson

Comment Letter I27

**Name:** Thomas Graves

**Email:** [tomsol2009@hotmail.com](mailto:tomsol2009@hotmail.com)

**Affiliation:** Alumni

**Questions or comments:** Many fans are elderly and some handicapped, please configure the new stadium with overhangs etc to provide shaded seating areas.

I27-1

San Diego State University  
Digital Privacy Statement

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646213953792466673&simpl=msg-f%3A1646213953792466673&...> 1/2

10/1/2019

San Diego State University Mail - Fwd: Strategic Planning Email Submission Confirmation

—  
J. Luke Wood, PhD  
Chief Diversity Officer  
Associate Vice President for Diversity & Inclusion  
Distinguished Professor of Education  
Division of Diversity & Innovation  
San Diego State University  
[5500 Campanile Drive](#), PSFA 101D  
San Diego, CA 92182

Indigenous Residence: **Kumeyaay**  
Indigenous Upbringing: **Wintu**  
Pronouns: **He/Him/His**  
**A Proud Hispanic/Latinx Serving Institution**





Comment Letter I28



**Fwd: Strategic Planning Email Submission Confirmation**

1 message

From: **SDSU Strategic Planning Team** <[strategicplanning@sdsu.edu](mailto:strategicplanning@sdsu.edu)>  
 Date: Thu, Sep 12, 2019 at 3:57 AM  
 Subject: Strategic Planning Email Submission Confirmation  
 To: <[knielsen@sdsu.edu](mailto:knielsen@sdsu.edu)>  
 Cc: <[jernst@sdsu.edu](mailto:jernst@sdsu.edu)>, <[strategicplanning@sdsu.edu](mailto:strategicplanning@sdsu.edu)>



This is a notification that a new submission has been completed for the Strategic Planning feedback form.

**Name:** Marilyn Jess

**Email:** [rdms87@aol.com](mailto:rdms87@aol.com)

**Affiliation:** Alumni

**Questions or comments:** As SDSU moves forward with the new Mission Valley campus, here are some ideas about how this can be best accomplished, and integrated into the existing campus. \*Transportation between the two locations

I28-1  
 ↓  
 I28-2

needs to be seamless, and free, or very low cost. \*An increased emphasis, on both campuses, on better advising to help people graduate quicker, and connect better to alumni advising services. The first job after graduation is important, and too many students don't get good guidance on those. \*Too many are also still majoring in fields, such as psychology, communication, etc, that lead to jobs that don't require a degree. While college is a good experience for most, it often leads to low wage jobs, and unfocused study. \*More internship requirements tied to a degree. \*A business center on campus--where students can connect to businesses directly. Using SDSU alumni to staff it would be ideal. Thanks for listening.

↑ I28-2  
Cont.  
I28-3  
I28-4  
I28-5  
I28-6  
I28-7

San Diego State University  
Digital Privacy Statement

--  
J. Luke Wood, PhD  
Chief Diversity Officer  
Associate Vice President for Diversity & Inclusion  
Distinguished Professor of Education  
Division of Diversity & Innovation  
San Diego State University  
[5500 Campanile Drive](#), Manchester Hall 3310Y  
San Diego, CA 92182

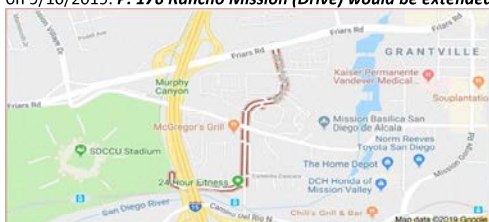
Indigenous Residence: **Kumeyaay**  
Indigenous Upbringing: **Wintu**  
Pronouns: **He/Him/His**  
**A Proud Hispanic/Latinx Serving Institution**

Comment Letter I29

Michele C. Addington 6371 Rancho Mission Road Unit 7, San Diego CA 92108 858-334-8019

Michele Addington Comments submitted September 14, 2019 Page 1

1. 38 Annual Events (P. 166 with 20,000+ attendees of which 7 events will have 32,500 attendees) will be held at the new Stadium Vs 16 in 2018). Please consider Mitigation by include Price of MTS Trolley & Bus fares in the Price of a Ticket, thus encouraging use of Public Transportation.
2. Will Reports that will be developed for specific issues be available to Public and where? See P63, P64, P68, P70, P71, P75/76, P77, P81 of Durek EIR.
3. At full capacity, 27,662 persons will be coming into the site Daily (P163 (Employees) and P. 29 (Students "The SDSU Mission Valley Campus Master Plan would be able to accommodate up to 15,000 full-time equivalent students (FTES) over time, resulting in a total student headcount of approximately 20,000 students" Please provide information on how they will get to the site without Severely Impacting Friars Road/15/8 freeways DAILY.
4. Please explain how Rancho Mission Drive (there is no Street named Rancho Mission DRIVE) can be extended into a Four Lane? There is no land available to do so and nor is it on the Mission Valley Planning Group Plan Update passed by City Council on 9/10/2019. P. 176 Rancho Mission (Drive) would be extended south into the project site as a four-lane Urban Major road.



5. Parking Numbers are not consistent throughout the EIR P. 177 Parking indicates Hotel parking at 485 spaces, whereas P. 174 shows hotel parking at 425 (this discrepancy is repeated for every parking category.)
6. Phase 1 (2020) (P. 178) "would include demolition of the western third of SDCCU Stadium" – Why Phase 1 and Phase 2 are 2 years apart? Phase 2 (P. 179) will occur in 2022?
7. P. 178 shows A Construction Phase, shouldn't this EIR include an Implosion Phase?
8. P. 195 indicates 81.5 acres land – City General Fund Land and 87.9 acres – City Water Fund Land, how does this affect the Sale of the Land to SDSU?
9. MTS currently Allows Stadium Parking (5,000 spaces) for its Trolley stop at the Stadium, how will this MTS Public Parking be affected? This is not addressed in the EIR. <https://www.sdmts.com/rider-info/transit-station-parking>

Old Town Transit Center	Green	4009 Taylor St.	412
Morena/Linda Vista	Green	5210 Linda Vista Rd.	199
Fashion Valley Transit Center (only spaces marked as Trolley Parking)	Green	1205 Fashion Valley Rd.	63
Hazard Center (weekdays after 5pm and weekends only, limited to lower level.)	Green	7611 Hazard Center Dr.	1,500
Stadium (except during major event at Stadium)	Green	9449 Friars Rd.	5,000

10. P. 225 – Figure 2-11A indicates a 2 lane collector with bike lanes whereas Rancho Mission (Drive) is slated to be extended into 4 lanes (see item 4 above) and so does P. 1053 indicated 2 lane collector with bike lanes, whereas Rancho Mission (Drive) is slated to be extended into 4 lanes. Currently it 1 lane with street parking.
11. P. 358 – Solar Photovoltaic Panels these panels are estimated to have a total generation capacity equivalent to 10,819,478 kilowatt-hour (kWh) of electricity, or 14.9% of the proposed project's total project electricity demand.

Michele Addington Comments

SDSU EIR published August 2019

Michele C. Addington 6371 Rancho Mission Road Unit 7, San Diego CA 92108 858-334-8019  
Michele Addington Comments submitted September 14, 2019 Page 2

12. P. 461 – Gas Fireplaces up to 5% of the units, WHY?  
Berkeley City has BANNED Natural Gas Utilities In New Buildings beginning January 1, 2020. Re: [blog.ucsusa.org “why Berkeley Banned Natural Gas in New Buildings”](http://blog.ucsusa.org/why-berkeley-banned-natural-gas-in-new-buildings) July 31, 2019.  
<https://blog.ucsusa.org/mark-specht/why-berkeley-banned-natural-gas-in-new-buildings> and Dozens of California cities are trying to address the same concern: reducing fossil fuel use to combat climate change.  
Will SDSU contemplate removing Natural Gas use in its EIR. 129-12
13. P. 477 “Operation of the proposed project **requires** natural gas, mainly for building heating and hot water.”  
Will SDSU contemplate removing the use of Natural Gas throughout the property? 129-13
14. P.109 - Natural Gas “The existing natural gas service to SDCCU Stadium is fed from one 2-inch-diameter high-pressure gas line that is fed from a 3-inch-diameter high-pressure gas line located in Friars Road. This line enters the Stadium on the western side (City of San Diego 2015).” No Diagram exits as to Location for this Line, and nor it is shown within the Utilities Section 4.17. Why? 129-14
15. P. 515 “in addition, the proposed project anticipates future transit service and provide for bus service to the Stadium Trolley Station”. Please explain that since “...all buildings will be within 0.5 miles” of Trolley Station.  
Why would you need a Bus Service to the Stadium? What purpose would it serve? Are SANDAG/MTS aware of this? 129-15
16. P. 711 & P. 723 - Which will it be Controlled Detonation or Not Controlled Detonation?  
The sentence states “while controlled detonation is not anticipate to be used, demolition may include controlled detonation”. “P. 723 “that one large implosion may occur” 129-16
17. During Construction, have you anticipated the **Number of Cement Trucks that will be Traveling East to West on Friars Road?** How many an Hour, what hours of the day and what days of the week? And duration in days, weeks, months?  
How will Friars Road traffic be impacted. 129-17
18. P. 810 “to reduce the number of vehicle trips ... The TDM Program would reduce projected 129-18
19. P. 836 – Bus Route 14 “...operates from 5:45AM to 7:30PM in the...”  
How will SDSU work with MTS to increase frequency and provide Weekend availability: No weekend service as of 9/13/2019 129-19

Route 14 – Monday through Friday / Lunes a viernes									
Grandville ← La Mesa					La Mesa → Grandville				
Stop	Stop	Stop	Stop	Stop	Stop	Stop	Stop	Stop	Stop
10:00am	10:00am	10:00am	10:00am	10:00am	10:00am	10:00am	10:00am	10:00am	10:00am
10:05	10:10	10:15	10:20	10:25	10:30	10:35	10:40	10:45	10:50
10:10	10:15	10:20	10:25	10:30	10:35	10:40	10:45	10:50	10:55
10:15	10:20	10:25	10:30	10:35	10:40	10:45	10:50	10:55	11:00
10:20	10:25	10:30	10:35	10:40	10:45	10:50	10:55	11:00	11:05
10:25	10:30	10:35	10:40	10:45	10:50	10:55	11:00	11:05	11:10
10:30	10:35	10:40	10:45	10:50	10:55	11:00	11:05	11:10	11:15
10:35	10:40	10:45	10:50	10:55	11:00	11:05	11:10	11:15	11:20
10:40	10:45	10:50	10:55	11:00	11:05	11:10	11:15	11:20	11:25
10:45	10:50	10:55	11:00	11:05	11:10	11:15	11:20	11:25	11:30
10:50	10:55	11:00	11:05	11:10	11:15	11:20	11:25	11:30	11:35
10:55	11:00	11:05	11:10	11:15	11:20	11:25	11:30	11:35	11:40
11:00	11:05	11:10	11:15	11:20	11:25	11:30	11:35	11:40	11:45
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11:10	11:15	11:20	11:25	11:30	11:35	11:40	11:45	11:50	11:55
11:15	11:20	11:25	11:30	11:35	11:40	11:45	11:50	11:55	12:00
11:20	11:25	11:30	11:35	11:40	11:45	11:50	11:55	12:00	12:05
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19:45	19:50	19:55	20:00	20:05	20:10	20:15	20:20	2	

Comment Letter I30

From: **Paul Holloway** <[Paul.Holloway@welkgroup.com](mailto:Paul.Holloway@welkgroup.com)>  
 Date: Mon, Sep 16, 2019 at 7:25 PM  
 Subject: [mvcomments] Getting SDSU Students from North-East County to Take the Bus  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello,

I was just looking at the [transit plans](#) for your proposed Mission Valley Center and noticed that transit is supposed to be a top priority. However, I don't see how it can be considered a top priority to get people out of their cars if it remains heavy on hooking up to the nearby light-rail system and light on bus rapid transit (Rapid). Students commuting via public transit from the north-east part of the county (i.e. Escondido, San Marcos) to SDSU (all those who major in something not offered at CSUSM) currently have to take MTS Rapid bus 235 to City Heights and then transfer to Rapid bus 215 to SDSU, and we all know that the trip through City Heights is not as Rapid or nice as the Green Line trolley through Mission Valley. It is so bumpy that I don't know how anyone could write anything while on the bus there.

I30-1

I30-2

One would think looking at SD regional transit [map](#) that the major link between the MTS light rail (Trolley) and BRT (Rapid) systems, besides downtown, would be right where the old Chargers stadium currently is. One would think there would be a transit center there with a freeway-level bus stop (like the ones in City Heights and LA) for passengers travelling north-south on Rapid 235 to transfer to go east-west on the Green Line trolley. However, sadly even after researching this issue a few years ago when trying to figure out how to save commuter bus 870 (from Santee to Kearny Mesa via SR-52), and discovering that there are no plans for making a bus 235 stop during their last Transit Optimization Plan public meeting when my suggestions were all politely disregarded. My cheapest suggestion was to simply turn bus 870 into a shuttle bus from a new bus 235 stop at the Friars Rd off-ramp to the Stadium Green Line station operating during normal commuting hours on weekdays to provide this critical Trolley system-Rapid Bus system connection.

I30-3

I'm hoping that maybe this could be added to your transit plan in some form to help people from all parts of San Diego to use public transit when traveling to different parts of the county. For instance, I work in San Marcos and live in Santee. When I take my e-bike over the 52 and catch bus 235 it takes 1.75 hours to get from work to home. Last Friday, when my bike was in the shop, it took a little over 3 hours to get home, with most of the time spent going way out of my way from Kearny Mesa to City Heights and then back to get home. Taking out the bus 215 ride with a direct connection to the Green Line (with a dedicated bus lane from Kearny Mesa to the dedicated lane on the other side of I-8) would drastically decrease commute times via public transit during rush hour for people heading against the traffic during rush hour, promote mass transit usage in San Diego County, promote energy efficiency and independence, and help start ending extinction through avoiding worse climate change. Besides having a freeway level BRT station near Friar's Road would make SDSU Mission even more attractive for those up north and from other places in the county.

I30-4

I30-5

I30-6

I30-7

Thank you,



**PAUL HOLLOWAY**

Sr. Developer, BI | Team Member since 2015  
p 858.222.7691

300 Rancheros Drive | Suite 450 | San Marcos, CA 92069



SAN DIEGO • PALM SPRINGS • BRANSON • CABO SAN LUCAS • LAKE TAHOE • BRECKENRIDGE



Comment Letter I31

San Diego State University Mail - [mvcomments] Dedicated Bike Path from SDSU Main Campus to SDSU Mission Valley Campus



**[mvcomments] Dedicated Bike Path from SDSU Main Campus to SDSU Mission Valley Campus**

1 message

'joel anderson' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>

Tue, Sep 17, 2019 at 11:28 AM

Reply-To: jcanderson74@yahoo.com

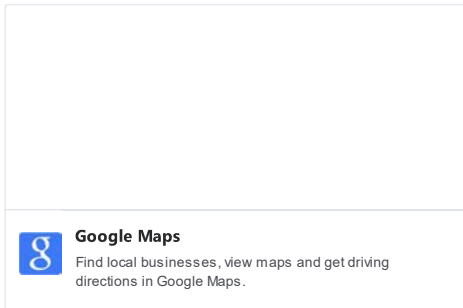
To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

There is not a very good bike path from main campus to SDSU Mission Valley... if you want the average person to ride bikes or electric bikes to and from those locations the city/SDSU needs to build a dedicated safe/protected bike path that connects the two. Or at least have the majority of the path protected. I'm an experienced bike rider and am ok with this path but the average person/resident/student would not be comfortable with this route on crowded city streets. Clearly the Trolley and Bus will be the most widely used public transportation used between the two sites but a safe bike path would encourage riders and offer another transportation solution.

I31-1

I31-2

[Google Maps](#)



Regards,

Joel Anderson



**BikePathSDSU2MV.JPG**  
313K

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1644948242396174685&simpl=msg-f%3A1644948242396174685>

1/1

Comment Letter I32

San Diego State University Mail - [mvcomments] CSU Stadium Costs



[mvcomments] CSU Stadium Costs

**David Smith** <dave@dgs999.com> Wed, Sep 18, 2019 at 9:24 AM  
 Reply-To: dave@dgs999.com  
 To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>  
 Cc: patrick shea <patshea@icloud.com>, "David Marshall (david@heritagearchitecture.com)" <david@heritagearchitecture.com>, Jack Carpenter <jackcfaia@gmail.com>, "Logan Jenkins (lbjenkins5437@gmail.com)" <lbjenkins5437@gmail.com>, "Jim Thompson (jtsuperstar@aol.com)" <jtsuperstar@aol.com>, Ben Clay <bclay@carpiclay.com>, "Cary Lowe (caryl原因@cox.net)" <caryl原因@cox.net>, AHayes SOHO <ahayes.sohosandiego@gmail.com>, "Ry Rivard (ry.rivard@voiceofsandiego.org)" <ry.rivard@voiceofsandiego.org>

<https://www.coloradoan.com/story/news/local/csu/2017/06/10/2-years-later-csu-stadium-would-cost-25-m-more/382513001/>

I I32-1

The attached article illustrates the ever increasing construction and financing costs of a new stadium. The base line of this article used 2015 when construction of the CSU stadium commenced. If you extrapolate construction and financing costs to 2021 when you could expect the SDSU stadium to commence construction you can see that it represents at least a \$300 million project. When you add on the demolition of the current stadium costs including the processing costs to garner the necessary permits you can see how the new stadium could easily exceed \$350 million or \$100 million more than the published cost estimate by the SDSU Athletic Department of \$250 million. The important question to now answer is how much would it cost to restore the current stadium to its original design of 45,000 seats? The delta between these two alternatives will be considerable.

I I32-2

I I32-3

I I32-4

Please may we respectfully request that this side by side comparison be initiated by SDSU by engaging a qualified third party to conduct it so that SDSU can make an informed decision on what alternative is best and most cost effective for the institution and the community.

I I32-5

Dave Smith  
 Alumni to Save the Stadium  
 858-342-3166

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1645031042877309760&simpl=msg-f%3A1645031042877309760&...> 1/1



Comment Letter I33

San Diego State University Mail - [mvcomments] SDSU West Resident Input



**[mvcomments] SDSU West Resident Input**

3 messages

**'RICKY THOMPSON' via SDSU Mission Valley Comments** <mvcomments@sdsu.edu>

Wed, Sep 18, 2019 at 6:45 AM

Reply-To: dentwhiz93@yahoo.com

To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Please add a Large Splash Park divided for Kids and Adults and shaded seating to the plans. Would be nice to have an area to get cool and be social.

Thank you,

Ricky Thompson

[Sent from Yahoo Mail on Android](#)

I 133-1

<https://mail.google.com/mail/u/0?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1645021052096914531&simpl=msg-f%3A1645021052096914531&...> 1/1

Comment Letter I34

San Diego State University Mail - [mvcomments] CSU Stadium Costs



[mvcomments] CSU Stadium Costs

David Smith <dave@dgs999.com> Wed, Sep 18, 2019 at 9:24 AM  
 Reply-To: dave@dgs999.com  
 To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>  
 Cc: patrick shea <patshea@icloud.com>, "David Marshall (david@heritagearchitecture.com)" <david@heritagearchitecture.com>, Jack Carpenter <jackcfaia@gmail.com>, "Logan Jenkins (lbjenkins5437@gmail.com)" <lbjenkins5437@gmail.com>, "Jim Thompson (jtsuperstar@aol.com)" <jtsuperstar@aol.com>, Ben Clay <bclay@carpiclay.com>, "Cary Lowe (caryl原因@cox.net)" <caryl原因@cox.net>, AHayes SOHO <ahayes.sohosandiego@gmail.com>, "Ry Rivard (ry.rivard@voiceofsandiego.org)" <ry.rivard@voiceofsandiego.org>

<https://www.coloradoan.com/story/news/local/csu/2017/06/10/2-years-later-csu-stadium-would-cost-25-m-more/382513001/>

I I34-1

The attached article illustrates the ever increasing construction and financing costs of a new stadium. The base line of this article used 2015 when construction of the CSU stadium commenced. If you extrapolate construction and financing costs to 2021 when you could expect the SDSU stadium to commence construction you can see that it represents at least a \$300 million project. When you add on the demolition of the current stadium costs including the processing costs to garner the necessary permits you can see how the new stadium could easily exceed \$350 million or \$100 million more than the published cost estimate by the SDSU Athletic Department of \$250 million. The important question to now answer is how much would it cost to restore the current stadium to its original design of 45,000 seats? The delta between these two alternatives will be considerable.

I I34-2

I I34-3

I I34-4

Please may we respectfully request that this side by side comparison be initiated by SDSU by engaging a qualified third party to conduct it so that SDSU can make an informed decision on what alternative is best and most cost effective for the institution and the community.

I I34-5

Dave Smith  
 Alumni to Save the Stadium  
 858-342-3166

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1645031042877309760&simpl=msg-f%3A1645031042877309760&...> 1/1

Comment Letter I35

September 10, 2019

To: Rachel Gregg

From: Steve Dahms

Re: My Involvement With and Knowledge Concerning the Valley Fever Pathogen and Algal Bloom Produced Microcystins

I thought that it might be helpful to explain the reasons for my concern regarding two topics associated with the MV Project, the first topic being Valley Fever (VF). At the end of this letter I have appended a general statement concerning VF and its causative agent *Coccidioides*, a fungal pathogen that leads to the disease Coccidioidomycosis.

I will try to keep this short.

My involvement with this pathogen extends back to 2006 when I was nominated by the Biotechnology Industry Organization to the Secretary of Commerce for appointment to the new federal committee, the Emerging Technology and Research Advisory Committee (ETRAC). I was appointed after a rigorous FBI review.

This Committee of 25 was created for a variety of critical reasons. These include the tracking and scouting of new technologies that need to be evaluated for possible control due to national security concerns, the maintenance of the federal Commerce Control List, the merging of ITAR and Munitions List items, export controls on new and expanded technologies and products, etc. Due to the classified nature of our dealings and our briefing of the defense agencies (and visa versa) the Committee members hold top secret security clearances and we meet in special facilities to assure full confidentiality.

A glimpse of our serious responsibilities can be seen at [www.bis.doc.gov](http://www.bis.doc.gov). Export controls are designed to keep key technologies out of the hands of bad actors and bad actor countries. The US government controls the sale or distribution or transfer of key national security-related materials and technologies specified on the 9-category Commerce Control List and it also maintains the Commerce Country List. In order to export items on the Commerce Control List, a company, an institution, a laboratory, or a person must apply for a license to prove that the transaction is a legal one. Not to do so results in serious fines and in some cases imprisonment.

I35-1

Among the multitude of classified national security-impactful export controlled items in Commerce Control List Category 1 are “Special Materials and Related Equipment, Chemicals Microorganisms and Toxins”. The entire printed Commerce Control List is about 9 linear feet.

Subcategory 1C351 lists “Human and Animal Pathogens and Toxins”. There are 56 viruses, 22 bacteria, and 20 toxins on this list.

Subcategory 1C353 lists “Genetic Elements and Genetically-modified Organisms”.

Subcategory 1C354 lists 20 “Plant Pathogens”.

Notably, the section 1C351 to and including 1C354 occupies only 9 pages, but they are critical pages. Importantly when ETRAC was formed I was assigned the role as the sole ETRAC member responsible for the 1C351-1C354 items in all of our quarterly meetings.

Of relevance to this communication, there is only one fungal pathogen regulated by the US government. It is Coccidioides, the VF pathogen, Commerce Control List item 1C351e.1. It was used as a biowarfare agent in WW1. I am quite familiar with the organism and the disease.

My responsibilities on ETRAC dealing with regulatory controls were from 2007-2018. ETRAC is being rechartered and reconstituted. The members will be identified by the Secretary of Commerce in the next few months. The FBI reviews are costly, extensive and take 6-9 months. I am on the list for consideration.

Due to my ETRAC responsibilities 5 years ago I joined the Cocci Study Group, an assembly of international physicians and biomedical scientists specialized in this disease that meets annually. I have made a presentation to the Cocci Study Group regarding the export controls that they must adhere to in exchanging samples internationally.

The bottom line is that I am well-versed regarding this organism. My public commentary to the DEIR will address the need to monitor air and soil during construction and transportation. In contrast to the DEIR statement that there are no commercial entities to conduct such analyses, in fact there are two university laboratories that conduct these analyses for service fees. I have spoken with both.

I think SDSU has a legal and ethical responsibility to conduct these analyses and to start doing so before construction begins in order to assure a credible baseline. This will also provide a public service to San Diego residents.

Now...if that were not enough, regarding the second MV Project topic, I have to point out that I feel that under certain conditions the San Diego River and the Mission Gorge Creek may have to be monitored and certified to be relatively free of algal blooms. Blue-green algae can produce algal blooms at certain times of the year and under certain conditions. The algae produce a serious neurotoxin in algal blooms, the microcystins. Microcystins have been the topic of several California environmental reports. Microcystin levels are reported to the State. Recreational health thresholds of microcystins have been established by the State to be 0.8ug/liter. If any part of the San Diego River or the Mission Gorge Creek flows

I35-1  
Cont.

I35-2

I35-3

I35-4

I35-5

through university property, SDSU will have the legal and ethical responsibility to assure that pets and people cannot come in contact with the river/creek water. If the river/creek is city property, SDSU has to provide the signage to keep them from the water. I am knowledgeable regarding the microcystins...they are on the Commerce Control List (1C351d.9). I can tell you that one lake in California has a microcystin level of 13,000 ug/liter, but I cannot disclose its location.

I35-5  
Cont.

Saxitoxin is another algal bloom toxin, a serious neurotoxin. It has been found in the Santee Lakes. It is Commerce Control List item 1C351d.12.

I35-6

Lastly, on a related topic, regarding native vegetation, the Castor Bean plant, *Ricinus communis*, has to be rigorously eliminated from the River Park territory and any SDSU property to avoid contact with children or pets. This plant is the source of notorious toxin, Ricin. Allowing this perennial on accessible university property has legal impacts for SDSU. Ricin is on the Commerce Control List (1C351d.11). I have not examined the DEIR for *Ricinus communis* concerns...or concerns regarding other toxin-producing vegetation.

I35-7

#### Valley Fever 1

Coccidioidomycosis, often referred to as San Joaquin Valley Fever or Valley Fever, is one of the most studied and oldest known fungal infections. Valley Fever varies with the season and most commonly affects people who live in hot dry areas with alkaline soil. This disease affects both humans and animals, and is caused by inhalation of arthroconidia (spores) of the fungus *Coccidioides immitis* (CI). CI spores are found in the top few inches of soil, and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte (an organism, especially a fungus or bacterium, which grows on and derives its nourishment from dead or decaying organic matter) in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-disturbing activities and become airborne. Agricultural workers, construction workers, and other people who are outdoors and are exposed to wind, dust, and disturbed topsoil are at an elevated risk of contracting Valley Fever (California Department of Public Health [CDPH] 2013). Most people exposed to the CI spores will not develop the disease. Of 100 persons who are infected, approximately 40 will exhibit some symptoms and will have the more serious disseminated forms of the disease. After recovery, nearly all, including the asymptomatic, develop a life-long immunity to the disease (Guevara 2014). African Americans, Asians, women in the third trimester of pregnancy, and persons whose immunity is compromised are most likely to develop the most severe form of the disease (U.S. Center for Disease Control and Prevention [CDC] 2013). In addition to humans, a total of 70 different animal species are known to be susceptible to Valley Fever infections, including dogs, cats, and horses (Los Angeles County Public Health 2007). The Proposed Project is in an area designated as suspected endemic for Valley Fever by the Center for Disease Control (CDC 2013). Annual case reports for 2000 through 2013 from the CDPH indicate that San Diego County has reported incident rates for Valley Fever that range from 1.8 to

I35-8

4.8 cases per year per 100,000 population (CDPH 2011; CDPH 2016). These incidence rates for San Diego County have been below the State average incidence rates and have been well below the worst-case annual rates for other counties within the State during this period, which occurred within the San Joaquin Valley, where there have been over 300 cases per 100,000 population in some calendar years.

↑  
I35-8  
Cont.

Comment Letter I36

From: **Mark Nelson (Home Gmail)** <[menelson@gmail.com](mailto:menelson@gmail.com)>  
 Date: Fri, Sep 20, 2019 at 3:17 PM  
 Subject: [mvcomments] Comments to SDSU Mission Valley DEIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

1. In the prior certified by CSU EIR for the west campus housing development, SDSU asserted that there was ample parking, even when the project was 2400 beds. This fall, SDSU banned all freshman from having cars, citing a lack of parking. It's clear that SDSU erred, or mislead the public. Irrespective of which it is, what additional process controls has SDSU put in place to avoid having the CSU certify false information in this EIR? I36-1
2. Purpose and Need is insufficient. SDSU fails to provide a an adequate purpose and need for the project. No surveys, statistical analysis or other fact-based need is made. As such, this is purely a discretionary project. I36-2
3. As a discretionary project without a need, no part of the project should be allowed to have a significant impact on the environment. I36-3
4. Most CSUs do not have stadiums. SDSU fails to analyze the no project case where its teams play elsewhere or are disbanded. A thorough no project case is required and has not been provided, especially the option of disbanding sports instead of invoking the environmental trauma of the project. I36-4
5. SDSU asserts that it will ignore City of San Diego ordinances and invoke State of California pre-emption. That was not part of the Measure approving the transfer, and therefore, invalidates it and creates the need for a re-vote with accurate language I36-5
6. AQ-1 is not unavoidable cannot be ignored as SDSU proposes.. SDSU must adhere to the existing air quality plans and use offsets or other actions to mitigate to less than significant. There is NO REASON that lives should be shortened in the area and in the San Diego air basin for this discretionary project. I36-6
7. AQ-2 is not unavoidable and cannot be ignored as SDSU proposes. SDSU must adhere to the existing air quality regulations and use offsets or other actions to mitigate to less than significant. There is NO REASON that lives should be shortened in the area and in the San Diego air basin for this discretionary project. I36-7
8. AQ-3 is not unavoidable and cannot be ignored as SDSU proposes. SDSU must adhere to the existing air quality regulations and use offsets or other actions to mitigate to less than significant. There is NO REASON that lives should be shortened in the area and in the San Diego air basin for this discretionary project. I36-8

9. AQ-4 Oh my God. SDSU asserts that it is unavoidable to give more people cancer. This project will, by SDSUs own admission, result in an increased cancer risk above SDAPCDs limits and SDSU proposes to proceed and simply ignore that. There is NO REASON that lives should be shortened and cancer rates increased in the area and in the San Diego air basin for this discretionary project.	I 136-9
10. CUL-1. The existing stadium should be reused. This discretionary project is not required by definition, and should not destroy the cultural resource.	I 136-10
11. CUL-2 The existing stadium should be reused. This discretionary project is not required by definition, and should not destroy the cultural resource.	I 136-11
12. MM-CUL 1, 2 and 3 are insufficient and without any CEQA precedent.	I 136-12
13. HAZ-1 understates the hazards and risk and MM-HAZ1 assumes, but fails to demonstrate its effectiveness. Therefore, HAZ-1 is significant.	I 136-13
14. NOI-1 Residents will be exposed to unacceptable levels of noise and will sustain permanent hearing loss. It is unacceptable for a discretionary project to damage the health and welfare of residents and be simply ignored as unavoidable.	I 136-14
15. NOI-2 The project must conform to existing standards. Deviations of the standards of NOI-2 are unacceptable.	I 136-15
16. NOI-9 The project will result in stress, PTSD, long term hearing loss, loss of habit from noise, and loss of quiet enjoyment of the surrounding neighborhoods. It is unacceptable for a discretionary project to declare this unavoidable. All current standards must be met.	I 136-16
17. PS-1 Residents and Visitors to the area will have their public safety permanently reduced and SDSU asserts that it is unavoidable. As per Supreme Court ruling, the CSU and SDSU must fully mitigate by adding whatever needed public and emergency services are required to fully restore public safety to the baseline. The CSU and SDSU must fully fund the restoration to the City and County of San Diego and other agencies.	I 136-17 I 136-18 I 136-19
18. TR-1 through 33 The transportation impacts are in violation of SB100 and other laws that require a reduction in GHGs. Further, the PMx and other criteria pollutants must be managed inside existing regulations. TR-1 through 33 must be fully mitigated or it is on its face in violation of statute.	I 136-20
19. ES-5 issues must be fully resolved and the DEIR reissued. The DEIR is incomplete and in violation of CEQA.	I 136-21
20. No Project Alternative - The City's planning objectives are not retroactively applicable. SDSU errs in its analysis of the No Project Alternative. The No Project Alternative when correctly analyzed is environmentally superior.	I 136-22
21. Table ES-3 clearly shows that the environment is further degraded and damaged, along with the human beings surrounding the area from any alternative other than No Project.	I 136-23
22. SDSU does not own nor have site control of the location. Statue does not allow a	



speculative EIR on a 3rd party's site.

↑ I36-23  
1 Cont.

Comment Letter I37

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From: **christa mcintosh** <[christa.mcintosh@gmail.com](mailto:christa.mcintosh@gmail.com)>  
Date: Sun, Sep 22, 2019 at 8:22 AM  
Subject: [mvcomments] SDSU Mission Valley Plan  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I'm looking forward to the implementation of this plan. I did notice a typo on page 31--should be "roller bladers," not "roller bladders." Otherwise, great plan!

I 137-1

Chris McIntosh

Comment Letter I38

From: **David Smith** <[dave@dgs999.com](mailto:dave@dgs999.com)>  
 Date: Tue, Sep 24, 2019 at 2:29 PM  
 Subject: FW: Stadium site  
 To: [gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu) <[gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu)>

We have been trying to prevail upon SDSU for 18 months to at least give the idea of reusing the stadium a fair hearing with no success. What it boils down to is that a stadium restoration to its original design of 45k seats will be significantly more cost effective than building a new smaller stadium. The email below outlines the reasoning. For SDSU Mission Valley to be feasible will require that the most cost effective stadium be utilized and this is clearly a stadium reuse plan. We would ask, what amount of savings would represent a tipping point? \$50 million? \$100 million? We predict that a stadium reuse plan will be necessary for SDSU Mission Valley to become a reality. This should be fully investigated now rather than later into the process. Ignoring the idea is poor planning. We respectfully request a side by side comparison of the two stadiums be initiated and the results made public. If the smaller stadium is the better deal so be it.

I38-1

We have spent the last couple days going through all the articles about the stadium site since the first of the year and it couldn't be more confusing. The SDSU Athletic Department proceeds as if SDSU owns the site. They have gone to some expense to hire an architect, contractor and a stadium marketing company while simultaneously it has been announced that JMI is going to be in charge of the whole development process. The site price negotiation between the city and SDSU are secret and the council is unaware of its progress. An EIR has been released but it doesn't contain any information on the soils, which is critical information. The council person for the stadium site district has recently gone on television to state that the cost of demolishing the stadium should not be included in the site price which is more than baffling because how can it not be? The value of any land must take the improvement cost into account and also what the market value of an improved site would be. This would require an appraisal which has not yet been forthcoming. To observe that this is an extremely disorganized process is an understatement. The redevelopment of the stadium site is very complicated, first for physical matters like being in a river bed. Secondly, it is very complicated for political reasons. It all started with a secret agreement with an out of area developer that had inside political lobbying help to achieve an ill advised development agreement which included a new "soccer" stadium. This was accomplished in the wake of the Chargers leaving San Diego and it was an ill-advised attempt by the current city administration to placate the voters by replacing a professional football team with a professional soccer team. It was the soccer team that demanded a smaller stadium venue than the current stadium (or a modified smaller one that was still too big). In the subsequent negotiations between Soccer City and SDSU a compromise of the 35,000 seat stadium was made. The whole thing fell apart because of exactly what is happening now. The parties couldn't arrive at a site price. Why, because the site is so complicated for the many reasons outlined. It is likely that the total costs to improve the site, that would also include the stadium demo costs, will exceed the market value of the site. For profit developers cannot deal with this situation and we would guess that the Soccer City people were relieved to have lost the election because they had a tiger by the tail. SDSU now has a hold on it.

I38-2

I38-3

I38-4

Here's what this is going to boil down to. First, if you tried to build the stadium on the subject site today you would not be issued a permit to do so because the site is in a river. In the 60's when the site was considered to be not of much use for development, the city managed to get a stadium permitted but it did require an extraordinary and costly footing plan. At that time the rules and regulations were far more flexible and state and federal agencies more pliable so the stadium got built. In retrospect it was lucky and amazing that it was accomplished. Now, fast forward 50 years. The physical nature of the stadium site has not changed but the rules and regulations have gotten far more stringent and Mission Valley has really grown.

Development costs including material and labor, are way higher. Traffic issues are a huge concern. The whole political climate is much more difficult. The electorate is distrustful of all development. Getting things entitled takes ten times longer than it did in the 60's. Maybe longer. A big snafu for SDSU in their dreamy stadium and campus plan is both the cost and the legal labyrinth they face in permitting the removal of the stadium which represents huge environmental issues. Why? It's in a river. Will the Army Corps of Engineers allow for the ground up concrete to be used as fill for the overall project? Maybe, but how long will that discussion be? Think of how many truck loads of debris will require to be trucked somewhere? How much will it impact traffic and for how long? Amazingly difficult problems that SDSU is simply ignoring. So are their consultants which is really baffling. There is this strange attitude that everything will simply fall together and SDSU will host its first of six home games in 2022. That's what is continually peddled on talk radio. It seems as if the SDSU Athletic Department is the single source of information on the topic from the institution. The voters require to know that SDSU and the California University system is fully behind the establishment of a world class campus in Mission Valley, that includes a sports field which is the domain of the athletic department.. Where does the new SDSU President stand on the matter?

I38-5

There are thousands of government owned sites across the nation which have had similar grandiose development plans that have languished undeveloped forever. SDSU West could easily be one of them because what is now being proposed and how the parties are going about it is not working. Is a new stadium really going to go forward if it's \$100 million more to build than modifying the current stadium? If the costs to improve a site are greater than the market value of the site, can any price to be paid for the site be determined? Is any price going to be enough to satisfy an ill informed public? What is the solution? Usually it is to do nothing which puts both the city and SDSU in a bind. SDSU does need more campus space. The city needs to fix or remove the stadium. How can both sides be accommodated in a win win manner? SDSU is well positioned to tackle a development project that a private developer would not be able to profitably address. The establishment of an extended world class SDSU campus is the most legitimate objective for all parties and the long term value (and income) of that is immense. It dwarfs any monies that the city could realize in a site purchase. You only have to look as far as UCSD to realize the economic and social benefit of such a campus. So, change the energy being spent on nit picking the site price and dueling over parks and roads. How can a world class campus be made to happen? SDSU needs to put forward the most cost sensitive stadium plan because the stadium is secondary to the establishment of a world class campus. The electorate would be far more willing to consider a favorable land deal for SDSU if their priority was the campus development and not a boutique stadium that is too expensive especially when you consider that SDSU requires it for six home games. Meaning SDSU would be well served to champion the reuse of the most significant historical landmark we have here and take advantage of significant cost savings by doing so.

I38-6

We call upon SDSU and its many advisors, and the Mayor and the council to make a pivot. Acknowledge the huge complexity of the Mission Valley site. Open the books on soils information and a detailed appraisal that that will explain why the site is so problematic. Discuss and explain at the city level why bequeathing the site to SDSU is a reasonable and good proposition. It could be the only way to make the deal work. Mutually acknowledge the necessary infrastructure costs like the river park and Fenton Parkway and figure out a cost sharing arrangement. Save the stadium because it's a much better deal and yes, it's quite historic. Could it be an idea for the city and SDSU to co-own the stadium? Focus on the idea of a partnership between SDSU and the citizens of San Diego, and the area, to share in the extraordinary benefits of a world class campus in Mission Valley with considerable public space that will also be created for all to use, as a heart within the city.

138-7

Dave Smith

SDSU Alumni to Save the Stadium

858-342-3166

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Comment Letter I39

Lauran Shinn,  
Director, Facilities, Planning & Construction  
San Diego State University  
5500 Campanile Drive, San Diego, CA

Dear Ms. Shinn;

Thank you for the opportunity to comment on the San Diego State University (SDSU) Mission Valley DRAFT Environmental Impact Report (DEIR). This project will provide SDSU with the capacity to support a growing and evolving population, and will allow the University to expand its athletics programs, academic research and core educational services into the next century and beyond. While I am excited about this important endeavor, I respectfully request that the University consider the following comments about this project's environmental impact and the opportunity it presents for SDSU to demonstrate to the region, and to the state, that the University values environmental sustainability, and is an active participant in achieving California's leading greenhouse gas (GHG) emission reduction targets to address the catastrophic impacts of a changing climate.

I39-1

**Bold Action is Needed to Address Climate Change**

Since the enactment of Assembly Bill (AB) 32 (Nunez, Chapter 488, Statutes of 2006)<sup>1</sup>, California has been at the forefront of championing creative, new policies aimed at mitigating the worst impacts of a changing climate. These policies<sup>2</sup> have and continue to target key emission sources of heat trapping GHGs and are demonstrating to the world that an economy-wide, comprehensive and multifaceted suite of policy actions can have meaningful, measurable impacts. In fact, California has been so successful at reducing GHG emissions that the state achieved its 2020 target in 2016<sup>3</sup>. Not only that, but from 2000 to 2017, the carbon intensity of California's economy has decreased by 41 percent from 2001 peak emissions, while simultaneously increasing gross state product by 52 percent.<sup>4</sup> California is proving to the world that environmental stewardship and economic prosperity are not mutually exclusive.

I39-2

In furthering California's climate policy leadership, the state enacted Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016) and SB 100 (De Leon, Chapter 312, Statutes of 2018)<sup>5</sup>. Governor Brown also signed Executive Order B-55-18<sup>6</sup>. These visionary and forwarding thinking laws and goals send a signal to the world that the state is committed to decarbonizing its economy, while providing opportunity for all. Achieving these targets will not be easy, but are critical if California is going to

<sup>1</sup> Amongst other provisions, established the state's first legally binding climate target of reducing greenhouse gas emissions to 1990 levels by 2020.

<sup>2</sup> California Air Resources Board: 2017 Climate Change Scoping Plan Update. Pg. 25 - <https://www3.arb.ca.gov/cc/scopingplan/scopingplan.htm> (accessed 9/16/19)

<sup>3</sup> California Air Resource Board: Climate pollutants fall below 1990 levels for first time. July 11, 2018 - <https://www2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time> (accessed 9/16/19)

<sup>4</sup> California Air Resources Board: California Greenhouse Gas 2000-2017 Emissions Trends and Indicators Report - [https://www3.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2017/ghg\\_inventory\\_trends\\_00-17.pdf](https://www3.arb.ca.gov/cc/inventory/pubs/reports/2000_2017/ghg_inventory_trends_00-17.pdf) (accessed 9/23/19)

<sup>5</sup> SB 32 – Established the legal binding climate target of reducing greenhouse gas emission 40 percent below 1990 levels by 2030; SB 100 – increased California's Renewables Portfolio Standard target to 60 percent by 2030 and established the goal of 100 percent of California's electricity met by zero-carbon energy resources by 2045.

<sup>6</sup> Established the carbon-neutral economywide goal to be achieved as soon as possible but no later than 2045.

contribute its share of the climate mitigation burden of preventing global temperatures from rising more than 2 degrees Celsius above pre-industrial levels to avoid the worst impacts of climate change.<sup>7</sup> Meeting these targets will require building upon and expanding California's existing GHG emission reduction policies and efforts, the continued support of all Californians and meaningful actions at the local level. That said, I am disappointed by SDSU's lack of commitment toward achieving California's GHG emission reduction targets and goals as indicated in the SDSU Mission Valley DEIR. Though this project integrates some environmentally minded features such as open space, multi-modal forms of transportation, dense infill development and limited on-site renewable electric generation, overall, the DEIR demonstrates minimal efforts by the University to reduce the project's environmental impact. I strongly encourage the University to seriously consider and act upon the following recommendations –

**1. Fully Commit to Developing and Certifying All of SDSU Mission Valley to Leadership in Energy and Environmental Design (LEED) for Neighborhood Development Gold or Better Requirements.**

The SDSU DEIR proposes several mitigation measures to reduce the project's building development footprint, but it falls short of committing to a comprehensive building design, construction and operations environmental sustainability framework. These proposed mitigation measures, outlined in the Executive Summary and throughout several chapters, focus on basic compliance actions to reduce the projects environmental impact rather than on long-term environmental enhancement goals. For example, the DEIR makes no mention of the University's environmental sustainability objectives for SDSU Mission Valley, nor does it comply with the SDSU Climate Action Plan. As a University that prides itself as an incubator and laboratory for developing creative solutions to address the world's challenges, including major environmental problems, it should be second nature for the University to fully commit to following the well-renowned and recognized LEED green building standards created by the United States Green Building Council. With that said, SDSU Mission Valley should commit to achieving and certifying the entire project to, at a minimum, LEED Neighborhood Development Gold requirements.

Meeting this goal is possible and has already been demonstrated by other public entities including the Associated Students (AS) of SDSU. In 2011, the AS of SDSU established and approved several long-term sustainability goals, including that all AS managed facilities would achieve LEED Existing Building Operation and Maintenance (EB: O&M) Silver certification or better by 2020.<sup>8</sup> It is my understanding that AS has not only achieved this target for all of its managed facilities, but has exceeded this goal by certifying many of their facilities to LEED EB:O&M and New Construction Gold and Platinum requirements. The example set by the AS of SDSU should serve as starting point for SDSU Mission Valley on how to design, construct and operate resource efficient, high-performing buildings. The AS of SDSU is not alone in the example they have set. In fact, the state of California is investing billions of dollars in new buildings that are slated to achieve LEED for New Construction Platinum requirements.<sup>9</sup> SDSU

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Cont.

I39-3

I39-4

<sup>7</sup> 2015 United Nations Framework Convention on Climate Change: Paris Agreement - <https://unfccc.int/process-and-meetings/the-paris-agreement/what-is-the-paris-agreement> (accessed 9/16/19)

<sup>8</sup> Associated Students Long-Term Sustainability Goals - <https://as.sdsu.edu/sustainability> (accessed 9/16/19)

<sup>9</sup> California Department of General Services: Real Estate Services - <https://www.dgs.ca.gov/RESD> (accessed 9/16/19)

Mission Valley should follow these examples as well as others established by similar higher education public institutions.<sup>10</sup>

## 2. **Commit to Electrifying ALL SDSU Mission Valley Buildings.**

In early 2014, the California Air Resources Board (CARB), California Energy Commission (CEC), California Public Utilities Commission (CPUC), and the California Independent System Operator (CAISO) contracted with a the consulting Energy+Environmental Economics (E3) to evaluate the feasibility and cost of a range of potential 2030 GHG emission reduction targets (including the target that would later become a statutory mandate by SB 32) along the way to the state’s goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. E3 developed scenarios that explored the potential pace at which GHG emission reductions would need to be achieved, as well as the mix of technologies and practices deployed. All the scenario results, published in 2015, incorporated a significant portion of the state’s new and existing buildings electrifying end-uses that have typically been dominated by fossil natural gas (i.e. space and water heating) or mixing fossil natural gas with biogas.<sup>11</sup>

In recent years, the state has made a concerted effort to examine pathways for decarbonizing new and existing buildings in California, since GHG emissions attributable to buildings in California currently represent about a 25 percent of the state’s total GHG emissions.<sup>12</sup> In fact, the CEC contracted with E3 again to build upon its 2015 scenario analysis to advance the state’s understanding of what is required for technology deployment and other GHG emission reduction strategies if California is to meet its 2030 and beyond GHG emission reduction targets. The report specifically focused on a High Electrification scenario and found that it was the one of the lower-cost, lower-risk GHG emission reduction scenarios. This scenario included high levels of energy efficiency and conservation, renewable generated electricity (the CEC estimates that 34 percent of California’s retail electricity sales in 2018 was provided by Renewables Portfolio Standard-eligible renewable resources with the statutory target of achieving 60 percent by 2030)<sup>13</sup>, and the **electrification of buildings** and transportation, with reliance on biomethane in the pipeline to serve mainly industrial end-uses.<sup>14</sup>

Building upon the results of these analyses, the Legislature in 2018 acted and passed SB 1477 (Stern, Chapter 378, Statutes of 2018) that was subsequently signed by Governor Edmund G. Brown Jr. This bill directed the CPUC, in consultation with the CEC, to develop statewide market transformation incentive programs aimed at advanced the state’s market for low-emission space and water heating equipment for new and existing residential and non-residential buildings and to develop an incentive program to fund near-zero emission technology for new residential and commercial buildings. The CPUC and CEC are currently developing these programs with stakeholders, and implementation is expected to

<sup>10</sup> Best Colleges: Greenest Universities - <https://www.bestcolleges.com/features/greenest-universities/> (accessed 9/16/19)

<sup>11</sup> Summary of the California State Agencies’ PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios - [http://www.ethree.com/wp-content/uploads/2017/02/E3\\_Project\\_Overview\\_20150406.pdf](http://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf) (accessed 9/18/19)

<sup>12</sup> Residential Building Electrification Building Electrification in California: Consumer Economics, Greenhouse Gases and Grid Impacts. Pg. i - [https://www.ethree.com/wp-content/uploads/2019/04/E3\\_Residential\\_Building\\_Electrification\\_in\\_California\\_April\\_2019.pdf](https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf)

<sup>13</sup> California Energy Commission – Tracking Progress: Renewable Energy. Pg. 1 - <https://www.energy.ca.gov/sites/default/files/2019-05/renewable.pdf>

<sup>14</sup> Deep Decarbonization in a High Renewables Future: Updated Results from the California PATHWAYS Model. Pg.3 - <https://www2.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>

↑ I39-4  
Cont.

I39-5  
↓



begin sometime in 2020.<sup>15</sup> The establishment of these programs marks a monumental effort toward the decarbonization of the state's buildings. It is also highly likely that the state Legislature will take future action in this area. Especially, given California's aggressive GHG emission reduction targets.

Recognizing the state's targeted efforts to decarbonize buildings, with a keen focus on electrifying building space and water heating, it is discouraging that the SDSU Mission Valley DEIR and implementation plan make no mention of these efforts and has accepted the use of fossil natural gas in the project's buildings. For a development that likely won't be completed until 2037, if not later, and will exist well into the 21<sup>st</sup> century and beyond, there is no reason why SDSU Mission Valley should not commit to fulling electrifying all its buildings. Over the long-term it is a no regrets strategy that will significantly reduce future GHG emissions of the project and will likely be remarkedly less costly to the University than investing in natural gas infrastructure that could be obsolete in the coming decades. It is worth nothing, the state is already exploring strategies for potentially phasing out natural gas distribution infrastructure in California as evidenced by a recent analysis funded by the CEC and developed by E3.<sup>16</sup>

In conclusion, I appreciate the opportunity to comment on the SDSU Mission Valley DEIR. I respectfully request that the University adopt the aforementioned recommendations. The planning and design of SDSU Mission Valley presents a once-in-a-lifetime opportunity for the University to think beyond the next decade or two and into the next century. Yes, there are many unknowns going forward, but what is known, is that our climate is changing, human civilization is contributing to this change, and that all 40 million people in California are starting to experience the adverse impacts of extreme weather events caused by our changing climate.<sup>17</sup> It is time that SDSU rise to the challenge of aggressively reducing GHG emissions with the development of SDSU Mission Valley and support the great state of California in its pursuit of addressing climate change.

Sincerely,



Grant Austin Mack

Senior Legislative Consultant, California Public Utilities Commission\*  
Energy Policy Advisor to Chair Robert B. Weisenmiller, California Energy Commission, 2011-16\*  
San Diego State University Alum & Associated Students President, 2010-11\*

<sup>15</sup> California Public Utilities Commission: Building Decarbonization - <https://www.cpuc.ca.gov/BuildingDecarb/>

<sup>16</sup> Energy+Environmental Economics DRAFT Results: Future of Natural Gas Distribution in California - [https://www2.energy.ca.gov/research/notices/2019-06-06\\_workshop/2019-06-06\\_Future\\_of\\_Gas\\_Distribution.pdf](https://www2.energy.ca.gov/research/notices/2019-06-06_workshop/2019-06-06_Future_of_Gas_Distribution.pdf)

<sup>17</sup> California's Fourth Climate Change Assessment: Statewide Summary Report. Pg. 20 - <https://www.energy.ca.gov/sites/default/files/2019-07/Statewide%20Reports-%20SUM-CCCA4-2018-013%20Statewide%20Summary%20Report.pdf>

*\*The recommendations provided in this letter do not necessarily represent the views of the California Public Utilities Commission, California Energy Commission and the Associated Students of San Diego State University. I include these titles only to express my background and the value of the aforementioned information presented in this letter.*

Comment Letter I40

From: **Robert Claesson** <[awesomeclaes@hotmail.com](mailto:awesomeclaes@hotmail.com)>  
 Date: Wed, Sep 25, 2019 at 3:56 AM  
 Subject: [mvcomments] Plan - will save SDSU \$ Millions  
 To: SDSU Mission Valley <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

President de la Torre,

Hello,

I attended the community comment meeting today at the Marriott in Mission Valley. I have been reading about the plans for the SDSU expansion into Mission Valley throughout each phase of the development concept, the ballot measure and now with the Public Review Draft EIR. I listened to the representatives from each of the construction companies and from SDSU and I studied the plans / illustrations for the proposed campus expansion.

I40-1

I am in favor of the SDSU expansion in Mission Valley, including the new campus classrooms and education facilities, tech center, residential, recreation and sports fields and river park. However there are a few aspects to your plan that are not designed properly for the near future and do not meet the goals and interests for most residents of the San Diego region.

I40-2

I40-3

This is the eighth largest city (population) in the U.S. Actually much larger, when considering the massive number of part-time residents that we host from our major military bases, tourism, college students, business, technology and industry, "snowbirds", multi-home owners, travelers and immigrants across the busiest international border in the world and many other people for many reasons call San Diego home for at least part of the year. When including all of the "transient" residents who spend a few days to several months in this region each year, the population is much closer to fourth in the nation (behind New York, L.A. and Chicago). San Diego planners have a long history of miscalculating growth in this region, partly because of these transient residents and also just poor understanding of the people who have lived here for many years (including myself). I was born in San Diego and have lived here a total of forty five years.

I40-4

Therefore, I have a few suggestions that you should consider in your planning.

1. Parking, especially for large sports events, is not adequate in your plans. I have some solutions.

I40-5

2. The new SDSU stadium that will provide around 35,000 seats is great for SDSU sports in 2019-2021. But this university is growing, your student enrollment is increasing, especially with your Mission Valley expansion and your teams (especially basketball and football) are improving and will be more competitive and football games will require more seats in the new stadium. You will also have the opportunity to host many major sports and entertainment events in the stadium that can host 50,000 to over 80,000 people, including: SDSU-MWC championship football games, college bowl games, future college playoffs, a future NFL franchise (the NFL will bring a franchise to SD soon), NFL playoffs and Superbowls, professional/international soccer, high school football playoffs, several other major sports events, major concerts and entertainment. I have a solution.
 

I40-6
  
3. Traffic, vehicle congestion and related pollution (as well as increased stress for everyone attempting to drive through the area and emergency contingency plans). Traffic is already a major problem throughout Mission Valley and your plans do not create any solutions. The plans will increase traffic with each additional vehicle driven by students, professors, tech center workers, campus employees, athletes and sports personnel, event staff, retail shopping, new residents, visitors, etc. I have a solution.
 

I40-7
  
- All of these problems are related and each can be solved with related solutions.
 

I40-8
1. Your current plan for about 6,000 parking spaces in structures built under the athletic fields in the park are a great idea. You simply need to go further with that (as most major development now plans for electric vehicle-charging stations in all large parking areas). Increase the underground parking structures and include electric vehicle-charging stations and maintenance facilities.
 

I40-9
  
2. I have designed an engineering design for the stadium that will allow it to seat 20,000, 30,000, 40,000, 50,000, 75,000, 100,000 people - whatever amount you expect, can be accommodated. The best part of my design is that it will save SDSU and the CSU Regents several million dollars. Your present plan is estimated to cost \$250 million, most of that is not necessary. That does not account for the total cost of destroying the current stadium or the real cost of future maintenance. It also fails to take into account the terrible waste of destroying one stadium, building another and then in a few years, an NFL franchise owner will destroy the top level and build another larger expansion again. This is absolutely wasteful and inefficient. This will be another major blunder in the long history of planning for San Diego. This city and entire region continues to grow (while L.A. and other areas in California are decreasing in population). San Diego is one of the most attractive and desirable places to live in the world, it is going to continue to grow for many years. You need to plan for SDSU to continue to grow along with the region. I can solve this stadium attendance problem with my engineering design.
 

I40-10

I40-11

I40-12

3. Traffic can be addressed with several solutions in phases. I have some solutions that include the first phase relatively quickly addressing primarily SDSU commuters from Pacific Beach and interstate 5 routes. The next phases are very large projects that will take time to implement.

I  
140-13  
I

I would like to meet with you to discuss my solutions and the SDSU expansion plans that will affect almost everyone who lives year round or part-time in this region.

I  
140-14  
I

Thank you,  
Robert Claesson  
(please contact me by email: [awesomeclaes@hotmail.com](mailto:awesomeclaes@hotmail.com))

Comment Letter I41

From: **George Franck** <[geomfranck@cox.net](mailto:geomfranck@cox.net)>  
 Date: Wed, Sep 25, 2019 at 1:48 PM  
 Subject: [mvcomments] Environmentally Superior Alternative  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Project selection and design should not be finalized until the capital costs for potentially restoring the original stadium and the cost of stadium removal are estimated and evaluated. I believe that the comparison of these costs would reveal that the Stadium Reuse Alternative is the best and most cost effective project for SDSU and the City on the Mission Valley stadium site.

I41-1

The DEIR incorrectly identifies the Existing Conditions Alternative as environmentally superior. Although it would retain the historic stadium structure, this alternative would retain the large asphalt parking lot which would continue to have severe negative impacts on the river wetlands.

I41-2

The Stadium Reuse Alternative appears to be environmentally superior to the other alternatives evaluated in the DEIR, including the recommended project. It restores the historic stadium and much of the wetlands; while providing a smaller football (& potential) soccer stadium, other proposed campus facilities and parkland for Mission Valley residents.

I41-3

I believe that the Stadium Reuse Alternative should become the project.  
 Sincerely, George M. Franck, 619-370-3887; 3545 Inez Street, San Diego 92106

I41-4

Comment Letter I42

From: **David Smith** <dave@dgs999.com>  
 Date: Wed, Sep 25, 2019 at 2:37 PM  
 Subject: [mvcomments] SDSU Mission Valley  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: Tom McCarron ([tmccarron@mail.sdsu.edu](mailto:tmccarron@mail.sdsu.edu)) <[tmccarron@mail.sdsu.edu](mailto:tmccarron@mail.sdsu.edu)>

<https://www.voiceofsandiego.org/topics/news/just-how-close-soccercity-and-sdsu-got-to-a-deal-and-how-it-all-fell-apart/>

I 142-1

**This is a very pertinent article** regarding the extraordinary site improvement costs that face any developer of the Mission Valley site. Soccer City did their homework and estimated that the breakeven number was \$13 million an “improved” acre or almost \$300 per sq. ft. Half this number would be prohibitive to any for profit developer. It behooves SDSU to fully examine the most costly expense which is the stadium. This requires that a restoration of the stadium be at least considered and fully analyzed. Also, scaling down the site plan is worth consideration.

I 142-2  
 I 142-3  
 I 142-4

Under these circumstances there is no reasonable sale price that can be justified. The city needs to sell the site to SDSU for \$1 and be happy there is a qualified entity that can deal with such a problematic development and deliver over time such an asset to the community. This dwarfs any short term gain from a complicated land sale. Fair market price is actually less than zero.

I 142-5

Dave Smith

SDSU Alumni to Save the Stadium

858-342-3166

Comment Letter I43

From: **Sweet James Yoga** <[sweetjamesyoga@gmail.com](mailto:sweetjamesyoga@gmail.com)>  
 Date: Wed, Sep 25, 2019 at 3:33 PM  
 Subject: [mvcomments] Public meeting Q & A  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello everyone,

First, thank you all for keeping us in the loop about the finer details of this important project! It was nice to see how our initial suggestions from the earlier public meetings made it onto paper for a clearer image of what this area will feature in a few year. Speaking of which, I forgot to ask the presenters what the new stadium will actually look like (if known), now that it's going into the hands of developers/designers?

I 143-1

Will it try to mimic the 'old' stadium, but on a smaller scale? Will it be a highly modern stadium similar to the Aviva in Ireland? Will the local public get to vote on a design after a few concepts are made available?

I 143-2

Given that this stadium is a key component for the overall project (and we neighbors that live very close by are going to have to look at it every single day!) will we at least have a say in its aesthetic quality?

I 143-3

Looking forward to the next phase!  
 SJ

--

*~Remember. everything is energy. Your thought begins it. Your emotion amplifies it. Your action determines its momentum.~*

*Sweetjamesyoga. est 2016*

Comment Letter I44

From: **David Smith** <dave@dgs999.com>  
 Date: Fri, Sep 27, 2019 at 10:16 AM  
 Subject: The Real Future of Football  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: Gina Jacobs <[gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu)>

<https://theundefeated.com/features/the-real-future-of-football-is-as-an-esport/>

I 144-1

At a pivotal time when SDSU is planning on the largest investment in its history, of which the most costly component is a football stadium, let's examine the future of the sport. Last week we met with a well-known local fitness expert who was personal friends with Junior Seau. He told us that Seau had 21 concussions over his storied career. In response to our question of his prediction where the sport was heading, he said it wouldn't survive ten more years, at all levels. The future of the sport does seem to lie in video gaming as outlined in the attached article. This situation illustrates that to proceed with a costly new football stadium development now may not be a very good bet. Assuming that a current stadium retrofit is a less expensive proposition, that would seem to be a better way for SDSU. To evaluate this alternative will require that a formal estimate of a retrofit plan be undertaken. It will also require compromises like downsizing the site plan which might also be a reasonable idea in light of the huge improvement costs. We encourage this evaluation.

144-2

144-3

Dave Smith

SDSU Alumni to Save the Stadium

858-342-3166



Comment Letter I45

**From:** [Gina Jacobs](#)  
**To:** [Sean Kilkenny](#); [Laura Shinn](#)  
**Subject:** Fwd: [mvcomments] Missing Drainage Area from Mission Valley  
**Date:** Friday, September 27, 2019 2:25:45 PM  
**Attachments:** [Missing Watershed.pdf](#)

---

comment

----- Forwarded message -----

From: <[rgarner2@san.rr.com](mailto:rgarner2@san.rr.com)>  
Date: Fri, Sep 27, 2019 at 1:33 PM  
Subject: [mvcomments] Missing Drainage Area from Mission Valley  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

8859 Sandmark Avenue

San Diego CA 92123

September 27, 2019

San Diego State University

SDSU Mission Valley Team

River Park Advisory Group

5500 Campanile Drive

San Diego CA 92182

Subj.: SDSU River Park and Mission Valley Community Plan Update

As a follow up to my correspondence to you of July 24, 2019, I have further reviewed the missing watershed issue and present the following in support of the River Park.

I 145-1

The watershed property is not contiguous to the River Park property being considered for purchase, but presents a rich source of “fix its” as may be needed to support the Park. As noted, a portion of this eroded property is shown to be City owned and this may explain their reluctance - I have not developed a successful line of communication with the City on this.

I 145-2  
145-3

The restoration of this property could be an excellent source of mitigation for nearly any impact the River Park could have on the San Diego River. To keep you apprised, I enclose recent correspondence with the City.

145-4

Sincerely,

(signature on original)

Robert Garner, P.E.

Encl.: Correspondence from July 23, 2019 through September 17, 2019

--  
Gina Jacobs '01, '10  
Associate Vice President  
Mission Valley Development  
San Diego State University  
619-594-4563  
[gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu)

8859 Sandmark Avenue  
San Diego CA 92123  
July 23, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update

Dear Ms. Graham:

I am a Civil Engineer engaged in a hydrological study of a watershed that is contributory to the San Diego River in Mission Valley.  
I advise you that a significant contributory watershed appears to be missing from the Subject Report, specifically from Appendix I, Hydrology and Water Quality Report.  
To my chagrin, the Report appears to have excluded the very canyons and their problems that are a part of our hydrological study! We have found significant erosion and pollution problems in this watershed, and offer this information under our responsibility for due diligence.

Thank you for your attention to this, and please feel free to contact me for further information.

Sincerely,



Robert Garner, P.E.

8859 Sandmark Avenue  
San Diego CA 92123  
July 24, 2019

San Diego State University  
SDSU Mission Valley Team  
River Park Advisory Group  
5500 Campanile Drive  
San Diego CA 92182

Subj.: SDSU River Park and Mission Valley Community Plan Update - Environmental Impact Report

In support of SDSU River Park and as a follow up to my April 6, 2019 e-mail to you regarding assisting the River Park Advisory Group, I have reviewed the Mission Valley Community Plan EIR and found that an entire watershed was omitted from the Report, specifically from Appendix I, Hydrology and Water Quality Report.

Although this watershed is outside of the defined boundary of Mission Valley, it is significant as a direct tributary to the San Diego River – our study of this watershed shows it to be a major source of soils erosion contributing to the resulting alluvial flooding experienced downstream in the Fashion Valley area.

The Subject EIR indicates that approximately 15-acres of this watershed property borders a severely eroded creek and is owned by the City. This presents an opportunity for partnering with the City in the restoration of the River.

This watershed is located in Serra Mesa and drains into the canyon south of Sandmark Avenue. I am currently in contact with the City regarding this and I will keep you advised. Your comments and questions are welcomed.

Sincerely,



Robert Garner, P.E.

Cc: City of San Diego Planning Department

I45-5

8859 Sandmark Avenue  
San Diego CA 92123  
July 26, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

I am following up to my July 23, 2019 correspondence to you regarding the watershed that is apparently missing from the Community Plan Update EIR. For lack of a better mystery area term, I will call this Area Oz-1.

I admit to being surprised that an entire watershed was missing from the report, especially since it includes the canyon that is the subject of our study, now being undertaken in conjunction with SDSU River Park. This canyon is ripe with environmental needs ready for our fixin', all to the good of the San Diego River below. This was to be the jewel in our cleanup effort! Actually, we are cataloging possible mitigation sites to compensate for unavoidable impacts from the River Park. I note that I have successfully restored creeks in the Santa Cruz Mountains which were undergoing erosion issues identical to those in our canyon here. I will be pushing for a site tour of this work when the time is appropriate, but this is Lockheed-Martin property with high security. I worked in their Facilities Group on these measures at the time.

I confess that I seldom work in Mission Valley so I don't keep up with Mission Valley documents. However, my involvement with SDSU River Park has me "Crossing the Border and Finding our Interconnect". It's like Sera Mesa is giving birth and the baby is coming out in Mission Valley.

On a final note, I have just become aware of construction in Sera Mesa that adds another 2.6-acres of impervious surfacing. That's another 5-cfs flowing into and out of our canyon, and of course into Mystery Area Oz-1. That's not much flow but it keeps adding up. Obviously, absent this drainage area, the Mission Valley Community Plan Update does not reflect any of this and I assume there will be an update to your update.

Sincerely,



Robert Garner, P.E.

8859 Sandmark Avenue  
San Diego CA 92123  
August 2, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

I'm following up to my recent communications with you regarding the mysterious Watershed Oz-1 that is missing from the Community Plan Update EIR. Have you heard from your Environmental Team on this?

In my study of this canyon as I have previously noted, I have found severe soils erosion and other problems impacting the San Diego River. I have communicated these problems to others whom I believe should have been involved in the Community Plan Update. Most notably Councilmember Scott Sherman.

This information was also sent to private companies involved in the preparation of the Community Plan Update. The omission of this watershed from the Report may be an issue for the City Attorney. Would you be the lead person on this?

Perhaps there are valid reasons for this watershed to disappear, but I would respectfully request that the watershed be returned so that, in support of SDSU River Park, we could properly restore this property, and reduce flooding downstream.

Thank you for your time on this and I remain available to assist in any way.

Sincerely,



Robert Garner, P.E.

Ps.: Fashion Valley Mall thanks you.

8859 Sandmark Avenue  
San Diego CA 92123  
August 9, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

Whoops!! I just determined that a large piece of property in the missing watershed is owned by the City. And, during my hydrology study, this specific property has been found to be a significant pollution contributor to the San Diego River.

What now?

Regards,

  
Robert Garner, P.E.

8859 Sandmark Avenue  
San Diego CA 92123  
August 12, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

Thank you for your e-mail of August 12 advising me to contact the City Get It Done system to take care of the missing watershed.

I would respectfully request that you re-read my recent correspondence to you to give you a better idea of what I am presenting to you.

I would further refer you to my correspondence to you dated August 2, 2019 regarding my correspondence with Scott Sherman on this issue. I have notified Scott Sherman by e-mail on July 27, 2019 and requested that he meet with you on this. Of course, I have copies of previous correspondence with Scott Sherman on this issue if he does not. Over the years, I have corresponded with Scott on this issue and I authorize him to release all correspondence over my signature.

I also noted correspondence with a Consultant to the City involved in the preparation of the Community Plan. As a Civil Engineer myself, I cannot see how this watershed could have been omitted by this Consultant, and I will pass this on to the City Attorney.

Regards,



Robert Garner, P.E.



8859 Sandmark Avenue  
San Diego CA 92123  
August 13, 2019

Office of the City Attorney  
1200 Third Avenue #1620  
San Diego CA 92101

[cityattorney@sandiego.gov](mailto:cityattorney@sandiego.gov)

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

(Please refer to the attached correspondence.)

How can one hundred acres of San Diego disappear? One hundred acres of poorly managed land that is polluting the San Diego River and contributing to the flooding of Mission Valley?

Although the watershed is outside of Mission Valley, its rainfall and everything carried by that rainfall goes into Mission Valley. And the San Diego River. Its absence from the Community Plan won't make its problems go away.

As a Civil Engineer and contributor to the SDSU River Park Advisory Group, I am researching designs for restoration of this property as possible mitigation for unavoidable impacts from the River Park. But first, we have to recognize that the watershed is there.

I welcome your reply.

Regards,



Robert Garner, P.E.

8859 Sandmark Avenue  
San Diego CA 92123  
August 16, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

As a follow up to my August 12, 2019 e-mail to you regarding my correspondence with Scott Sherman, I enclose a letter to Scott which gives a good indication of some of the needs in this watershed issue.

This correspondence was written at a time when Scott was frustrated by SDRWQCB in inhibiting the clean up of the San Diego River. Now is his chance!  
Regretfully, none of the funds mentioned in the letter went to the problems I noted.

My best regards to both you and Scott. Again, please let me know if I can assist in any way.  
Thank you.

Sincerely,



Robert Garner, P.E.  
Encl.

8859 Sandmark Avenue  
San Diego CA 92123  
December 10, 2015

Councilmember Scott Sherman  
City of San Diego Council District 7  
202 C Street MS 10A  
San Diego CA 92101

Attn.: Mr. Scott Sherman

Subj.: State of Emergency Declaration for Drainage Restoration in San Diego River Basin

Dear Councilmember Sherman:

I applaud your actions in securing an El Nino State of Emergency Declaration for the drainage restoration of the San Diego River Basin. I trust that this will enable action on those erosion areas affecting drainage into the San Diego River as noted in my recent correspondence with your office. For your reference, I refer to the following correspondence with your office:

October 23, 2015  
May 5, 2015  
March 26, 2015<sup>4</sup>

I note that you have not responded to this correspondence.

The areas described in this correspondence affect drainage to a direct tributary of the San Diego River ("Waters of the State") and as such are under Water Board jurisdiction and subject to all Clean Water Act Section 401 Certification requirements.

In support of your efforts toward the restoration and health of the San Diego River, I look forward to seeing erosion repairs being undertaken in these areas.

Sincerely,



Robert Garner

cc.: et. al.

8859 Sandmark Avenue  
San Diego CA 92123  
August 30, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

I have a meeting scheduled with some folks at the SDSU River Park Group and I want to give you this update. The meeting will discuss my catalog of mitigation by restoration items to date. Since the work is offsite from the River Park, there is some resistance to including it. But there is interest because some of this is City property. The photographs included with the Scott Sherman correspondence show some of this erosion. My recent site visits reveal that this erosion into the City property continues and is exacerbated by construction on neighboring property.

I await to hear from you on my other recent correspondence. Thank you for your time.

Sincerely,



Robert Garner, P.E.

Cc: Office of the City Attorney

8859 Sandmark Avenue  
San Diego CA 92123  
September 5, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

I had a successful meeting with some SDSU River Park Group people and they were favorable to the possibility of restoring the creek shown on the enclosed photo. This is the main creek flowing through this canyon and is representative of conditions throughout this watershed. I believe this creek may border the City property. While at the site, I located iron pipe markers adjacent to the fence but could not determine if they were property line markers.

The size and extent of erosion here makes this creek ideal for the "Santa Cruz Type D Restoration", which can also provide some detention capacity as well as silt removal (as previously noted, I have developed a number of successful creek restoration designs for an aerospace facility in the Santa Cruz Mountains). Detention could be important considering that these flows must pass through a downstream culvert of finite capacity. And development in this watershed may be pushing that capacity. I am currently developing a hydrograph to see what we can do to moderate these flows, but there are limits. I have already determined that the existing vernal pond in this canyon has no detention capacity.

I welcome your inquiries. Thank you for your time.

Sincerely,



Robert Garner, P.E.

Encl.

8859 Sandmark Avenue  
San Diego CA 92123  
September 6, 2019

City of San Diego Planning Department  
9485 Aero Drive MS 413  
San Diego CA 92123

Attn.: Ms. Nancy Graham, AICP

Subject: Mission Valley Community Plan Update  
Missing Drainage Area

Dear Ms. Graham:

I refer to my correspondence with you dated July 26, 2019 which advised of 2.6 acres of recent construction in the subject watershed. This construction consists of an unsurfaced access road excavated in the throat of the canyon at its upper reach. BMP's were in place, consisting of silt fencing and fiber rolls. There was no channelization or detention of runoff flows.

A couple weeks ago, I was surprised that all BMP's were removed. Hydroseeding was attempted but did not result in vegetation. This was their second failure of hydroseeding. The heavy rain that we experienced on Wednesday, September 4, 2019 has commenced erosion of these soils into the canyon, and into the mystery watershed.

I am researching the permitting for this work at this time and do not expect any City action on this. This work and the erosion it is causing is exactly what I am looking for to further the cause of SDSU River Park. It must be acknowledged, however, that this construction adds to runoff that is apparently not included in previous drainage considerations in Mission Valley.

This particular construction would seem to be a good reason to "disappear" this watershed and I will accordingly pass this on to the City Attorney "just in case".

Sincerely,



Robert Garner, P.E.

Cc: Office of the City Attorney

8859 Sandmark Avenue  
San Diego CA 92123  
September 12, 2019

Office of the City Attorney  
1200 Third Avenue #1620  
San Diego CA 92101

[cityattorney@sandiego.gov](mailto:cityattorney@sandiego.gov)

Subject: Environmental Impact Report for Mission Valley Community Plan Update  
Missing Drainage Area – Recent Construction Within Area

Regarding this Recent Construction, I refer to correspondence dated September 6, 2019 to Ms. Nancy Graham with a copy to your office.

As if I did not already have a plate full (valley-full?) of erosion problems to fix for the good of the San Diego River, along comes this work! But this one appears to have major erosion potential and is worthy of further study. In advance preparation, I have prepared the enclosed Preliminary Brief of Findings dated September 12, 2019 describing the Subject Construction. The Brief is purposely vague on the location of the work because downstream property owners may have a cause for action here and I am trying to notify them before I "muddy the waters", pun intended.

I trust this is not the City property?

Again, I look forward to any questions you may have.

Regards,



Robert Garner, P.E.

Encl.

Cc: Ms. Nancy Graham, City Planning Department



Preliminary Brief of Findings  
September 14, 2019

Following is a Preliminary Brief of Findings related to an unsurfaced dirt road excavated in a canyon in Serra Mesa.

An unsurfaced dirt road has been constructed on steep slopes in a canyon in Serra Mesa. The road traverses the wall of the canyon at an approximate slope of 2:1(+) to the bottom of the canyon where the road curves and follows the throat of the canyon upstream for an undetermined distance. The road is a cut and fill prism with a surface approximately 16-feet wide at the top of the canyon wall, tapering to approximately 8-feet wide at the throat of the canyon. The width of the road is being reduced from erosion as noted below. There is no apparent cross grading of the road surface and there is no channelization or control of runoff flows.

The cuts and fills are generally balanced except at the steep, curved portion of the road where the fill slope is approximately seven feet high at the outside of the curve. The fill slopes are approximately 1:1 and these fill soils were placed without mechanical compaction equipment. Water was applied only for dust control. There was no observed use of water for optimum moisture density control and no soil sampling was observed during construction. The uphill cut slopes are near vertical with a maximum height of approximately three feet.

Erosion protection, consisting of silt fences and fiber rolls, was in place until its removal around the week of June 24, 2019. During construction, there were two attempts and subsequent failures at hydroseeding of the exposed soils. A windrow of eroded soils was observed having collected along the previously installed silt fence line, as was the purpose of the silt fence. With the removal of the silt fence, eroded soils are no longer retained.

There are sections of road undergoing sloughing at the outer shoulder. This has reduced road width to about six feet in these areas. Subsequent rock debris is seen below this sloughing, and additional boulders are being exposed in the embankment.

These soils are part of the Friars Formation consisting of dense sand and silt conglomerate with cobbles. This was confirmed by consultation with the Geotech at recent soil borings along adjacent roads. These soils exhibit good slope stability as noted by observation of the surrounding natural steep slopes and the subject road's ability to sustain, at least temporarily, the steep slopes at which they were placed. Slope stability being defined here by the soil's ability to resist shear/cohesion failure on a circular slip surface below grade.

These soils are very sensitive to surface erosion from direct and indirect rain runoff. That this erosion is occurring is exhibited by the boulders that are scattered over the slopes below this work. The boulders were well mixed within the soils when placed, however, erosion has removed soils supporting the boulders and they are rolling down the slope. Boulders, 8 inches to 14 inches in size are seen resting (temporarily) in place on the slope below the work. The eroded soils themselves are obscured by the ice plant covering this area and cannot be seen without removal of vegetation. It is noted that ice plant is ineffective at erosion control.



8859 Sandmark Avenue  
San Diego CA 92123  
September 17, 2019

Office of the City Attorney  
1200 Third Avenue #1620  
San Diego CA 92101

[cityattorney@sandiego.gov](mailto:cityattorney@sandiego.gov)

Subject: Mission Valley Community Plan Update  
Missing Drainage Area – Recent Construction Within Area

I refer to my correspondence to you dated September 12, 2019 describing construction causing erosion in a watershed of Serra Mesa which drains through Mission Valley to the San Diego River.

Prior to contacting property owners as noted in this correspondence, I respectfully request the City's comments on this issue. I would be pleased to provide any further information required.

Thank you.

Regards,



Robert Garner, P.E.

Cc: Ms. Nancy Graham, City Planning Department

[NHGraham@sandiego.gov](mailto:NHGraham@sandiego.gov)

Comment Letter I46

From: **linda hassakis** <[lindahassakis@gmail.com](mailto:lindahassakis@gmail.com)>  
 Date: Mon, Sep 30, 2019 at 11:22 AM  
 Subject: [mvcomments] comments after 9/24/19 community meeting  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello SDSU,

I'm on the Citizens Advisory Committee and want to tell you that presentation on the 24th was great and I felt like the I got it after reading the executive summary of the DEIR. There are however, a couple of issues for me that are still unclear.

Parking: There will be 5,000 spaces built "below grade". I asked the general question folks about these spaces flooding and one person said yes the other no.

Also, the 1,114 additional parking spaces on green space for stadium events. Is there environmental impact from this? Will native habitat be destroyed?

Another thought I have is regarding parking vs trolley use. Will there be incentives for students to use the trolley instead of their cars? Is there any movement on SDSU becoming a carbon free campus like UC Davis?

As you can tell parking and traffic are my issues!  
 Thank you for the opportunity to provide feedback,  
 Linda

Linda Hassakis  
[lindahassakis@gmail.com](mailto:lindahassakis@gmail.com)

I 146-1  
 I 146-2  
 I 146-3  
 I 146-4  
 I 146-5  
 I 146-6

Comment Letter I47

From: <[dwood8@cox.net](mailto:dwood8@cox.net)>  
 Date: Mon, Sep 30, 2019 at 6:51 PM  
 Subject: [mvcomments] My comments and an op-ed on the proposal by the former San Diego City Architect  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Cc: Mike Stepner <[stepner1@gmail.com](mailto:stepner1@gmail.com)>, <[mary@lyndon-associates.com](mailto:mary@lyndon-associates.com)>

Dear Laura Shinn:

As an SDSU Grad (class of 1970), who attended the university back when you could still see and architectural “bones” of the campus, (see attached images)

I am deeply disappointed by the initial projects renderings put forward by Gensler, as I am by the selection of Gensler as the project architectural

firm. I would prefer it if SDSU had chosen an architect who is a “local”, who attended and graduated from SDSU instead of an outside company headquartered in another state.

The initial renderings show a collection of generic flat roofed corporate office campus style buildings that show little or no

relationship to the original campus. Where are the tile roofs and archways that were the signature features of the original campus? Did Gensler’s design

staff even take a tour of the original campus before they began drawing

I47-1

I47-2

up proposed renderings of the new sister campus?

Please order Gensler to spend some time among the original campus buildings, then go back to the drawing board and come up with building designs

that reflect the fact that the new campus will be San Diego State University West.

↑  
I47-2  
Cont.

I also agree with my old Friend Mike Stepner, former San Diego City Architect and dean of the New School of Architecture that the initial project designs

raise a host of issues that have not been properly addressed.

I47-3

<https://www.voiceofsandiego.org/topics/opinion/sdsu-needs-a-stronger-vision-for-the-future-of-mission-valley/>

I47-4

While SDSU has promised to address those issues in future project design updates, it still

needs to happen. Please pay attention to these concerns before the public turns against this project.

I47-5

Thank you for the opportunity to comment on this initial project proposal.

I47-6

Don Wood

619-463-9035

Comment Letter I48

From: **Chuck Srock** <[chuck\\_srock@hotmail.com](mailto:chuck_srock@hotmail.com)>  
 Date: Tue, Oct 1, 2019 at 3:13 PM  
 Subject: [mvcomments] Draft EIR Comment  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

My primary comment is for Section 4.13.4.2 “Displacement of People and Housing”. Near the bottom of page 4.13-17, the EIR states “while the development of the proposed project would have impacts as a result of increased population and employment on the project site, it would not be expected to displace substantial numbers of existing people in these communities.” What methods or analysis were used to determine that displacement of substantial numbers of existing people should not be expected? Without that understanding, how can the conclusion be drawn in Section 4.13.17 that “the proposed project would not displace any existing housing or people such that it would necessitate the construction of replacement housing elsewhere; therefore, no impact would occur”?

I 148-1  
 148-2  
 148-3

Population and Housing, Section 4.13, makes great effort to detail the expected increasing in housing and housing density in the Mission Valley Planning Area. Table 4.13-4b even sets expected thresholds for the population in 2050, with the projected need met by denser buildout. Additionally, Section 4.13.2 explains in great detail the lack of housing stock in the region. It again attributes the Mission Valley Community Plan Update for the need and desire for denser housing stock (pg 4.13-9 and again in Table 4.13-5). This all makes logical sense; higher density is the solution to our current housing inventory shortfall.

148-4

However, I believe the EIR incorrectly conflates increased housing density needs over the next 30 years and the immediate impact of this particular high density project on the adjacent communities in the very short term.

148-5

The EIR does not take into account at any point the impacts to the non-Mission Valley communities.

148-6

The EIR also does not take into account the current shortage of housing for existing SDSU students, nor the new students required to make the proposed project successful. What is not discussed anywhere in the EIR is where these new students will live. The proposed project establishes a target for increased student enrollment, without matching that enrollment with housing. These students will need a place to live, and the proposed project does not address that need. I believe this topic has been woefully under-analyzed. Assumptions have been made, specifically to this project’s impact to surrounding neighborhoods.

148-7

BACKGROUND

Based on SDSU’s own published information via the office of Analytic Studies and Institution

148-7

Research (ASIR) there are currently 31,200 full time equivalent (FTE) students enrolled at the university.

Source:

<https://asir.sdsu.edu/fes-by-college-year-discipline/>

While I could not find any official SDSU statistics on housing location, US New & World Report's latest update on the university indicates 84% of student's live off campus.

Source:

<https://www.usnews.com/best-colleges/san-diego-state-university-1151/student-life>

Meaning at this time, approximately 26,000 students are living off campus.

The Initial Study for the Mission Valley campus indicated in Section 1.6.2 that the proposed project will add 15,000 FTE to SDSU's current student population. The proposed project also has housing for "4,600 residential homes, including student, faculty, staff, and market-rate housing". It is unclear what proportion of this housing will be for students, so it is impossible to determine the number of FTE students who will be housed by the proposed plan. Assuming 50% of the housing is for students, and there are 2 students per residential home, the proposed project would result in housing for 4,600 students. The remaining ~10,000 FTE students would then need to live off campus, a net of approximately 35,000 FTE students enrolled at SDSU needing housing off campus.

#### CONFIRMATION OF EIR ASSUMPTIONS

In order to confirm the assumption near the bottom of page 4.13-17, that the proposed project "would not be expected to displace substantial numbers of existing people in these communities", I believe it is necessary to look at data rather than simply assume. Below I outline two logical steps that would help the authors validate their assumption.

First, I believe we need to know where the current student population lives. Of specific interest are location and relative distance from the existing campus. One could argue that the proportion of students living at the beach communities, Uptown, or East Village would remain constant. At the same time the proportion that choose to live adjacent to or near campus would also remain the same. This analysis could be used to estimate the pool of new residents to the Mission Valley area based on the proposed site.

Second, I believe we need to understand how that increased student pool who chooses to live near or adjacent to campus will be integrated into the existing communities. This could be done by a market survey to understand volume of existing rental units (apartments, condominiums, homes, etc) that are available to college students. Clearly price will be a discriminator in Mission Valley, as the vast majority of students will not be able to afford luxury rentals in (for example) Escala. There a number of HOA controlled communities in Mission Valley, so therefore a clear understanding of their covenants / rules is required. For example, some HOA's do not allow their owners to rent, may limit the duration of their rentals, or may limit the number of renters to the number of bedrooms.

I believe this market analysis is critical for understanding what housing stock is available for these new students, and will likely indicate a shortage of rental units in the immediate area. If

148-7  
Cont.

148-8

148-9

that is true, one could reasonably assume that existing owner occupied condominiums and homes would be converted to rental stock. This has happened before to neighborhoods adjacent to an SDSU campus. The mini-dorm issues of the College Area have been well documented in the local press and heavily litigated. All community based and city ordinance efforts to maintain the quality and character of the existing neighborhoods have been challenged, and ultimately overturned in court. There is no clear path forward to resolve that neighborhood's quality of life concerns and SDSU student's need for adjacent, affordable, housing. Clearly the university's goals for increased enrollment over the last two decades did not consider the existing neighborhood stakeholders. The local community bore the cost of SDSU's expansion.

<https://www.sandiegouniontribune.com/news/politics/sd-me-mini-dorm-20171221-story.html>

<https://www.sandiegoreader.com/news/2018/feb/16/ticker-college-area-mini-dorm-litigants-win/>

I am concerned that history will repeat itself. I am concerned that transitional neighborhoods like mine, Serra Mesa, are the most likely to be damaged by conversion of existing family homes to mini-dorms. Our neighborhood's age is bi-modal, young families with new mortgages and retired elderly folks with old or no mortgages. One can imagine the economic realities of renting a home for \$3,000 - \$4,000 a month as a mini-dorm would be enticing to someone whose mortgage is \$1200 or less. This increased net income would facilitate their move to another, less college student impacted community. In business school we called that arbitrage. A few owners making that decision could quickly snowball into an entire community changing. Economically, I would be a fool not renting my home if could make \$1000 it as a mini-dorm while simultaneously avoiding the issues that come with college students living in a family neighborhood setting.

Therefore, I believe it is prudent not to assume that the proposed project "would not be expected to displace substantial numbers of existing people in these communities". Rather, I believe the university has the talent and expertise at its disposal to better analyze this issue. I'm a well-trained alumni, and could assist if requested.

Section 4.13.6 says that mitigation of all population increases are not possible. At the macro level I agree, our region is growing and more density is needed. However, that is a 10, 20, or 30 year issue. The proposed project point-loads a potentially large near-term population increase into a very small area. I believe SDSU owes the community, alumni, and stakeholders a much more thorough analysis.

Thank you,

Chuck Srock  
Mission Village (Serra Mesa) resident  
SDSU MBA, Class of 2012  
734.657.5544

148-9  
Cont.

148-10

148-11

148-12

Comment Letter I49

10/1/2019

San Diego State University Mail - [mvcomments] SDSU West EIR Respnse



[mvcomments] SDSU West EIR Respnse

1 message

**Douglas Livingston** <ddivings2000@hotmail.com>  
 Reply-To: ddivings2000@hotmail.com  
 To: SDSU Mission Valley <mvcomments@sdsu.edu>

Tue, Oct 1, 2019 at 11:15 AM

Dear Ms. Shinn,

In response to the EIR for SDSU West, I would like to offer the following issues for inclusion or mitigation for the future development.

1. (2.3.4.7) The SDSU West development should be designed to be inclusive of the greater communities including and most importantly Mission Valley, Linda Vista, Serra Mesa, Navajo, College, Mid-City, North Park and Uptown. Being 'inclusive' should offer the greater community the opportunity to find parking within the site to use the park and recreation facilities. It should not be exclusive to the surrounding communities, but include them being developed as a regional park. Offering parking to these recreation facilities would be critical for the mission of San Diego State.
2. (2.3.4.3) The park and recreation facilities should be easily accessible (vehicular parking) to City residents.
3. (2.3.4.3) Programming for the park and recreation facilities should be under the jurisdiction of the City of San Diego for the cities' use.

Regards and thank you for reviewing these items,  
 Doug Livingston 619.583.4166

I I49-1

I I49-2

I I49-3

I I49-4

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646215829647426406&simpl=msg-f%3A1646215829647426406>

1/1



Comment Letter I50

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From: **Jean-Louis Coquereau** <[jean-louis@jlcarchitecture.com](mailto:jean-louis@jlcarchitecture.com)>  
Date: Wed, Oct 2, 2019 at 6:44 AM  
Subject: [mvcomments] EIR comments.  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Laura Shinn, Director; Facilities Planning, Design, and Construction.

Ms. Shinn,

In response to my review of the Environmental Impact Report please note that a pedestrian/ bike link between Normal Heights neighborhood is strongly lacking.

The successful development of Mission Valley should include, at this early stage, strong links between the valley and the surrounding neighborhoods.

Other cities with even more challenging topography have been successful in this matter.

San Diego State University wants itself to be a leader, an community innovator. This is a great opportunity to shine.

I50-1

With respect, and hope.

Jean-Louis Coquereau, Architect

**JLC Architecture**

[www.jlcarchitecture.com](http://www.jlcarchitecture.com)

337 South Cedros Avenue, Suite J

Solana Beach, Ca, 92075

(858) 436-7777 ext 1#

Comment Letter I51

From: **Andrew Wiese** <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>  
 Date: Wed, Oct 2, 2019 at 10:42 AM  
 Subject: [mvcomments] Comments on DEIR, SDSU Mission Valley  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear colleagues,  
 Please take note of my formal comments in regard to the SDSU Mission Valley DEIR.  
 Please let me know if you have any questions.  
 Sincerely,  
 Andrew Wiese  
 Professor of History, SDSU  
 2936 Gobat Avenue, San Diego, CA 92122

I 151-1

Comments:

**Wildlife corridors.** Section 4.3.1.7. I agree with our friends in the San Diego environmental community that the project does not go nearly far enough in protecting and expanding the north-south wildlife corridor between Murphy Canyon and the SD River.

I 151-2

**Recognize.** The proposed ‘River Park’ on site should be recognized as a ‘wildlife corridor’ for a variety of species under a variety of circumstances. The EIR acknowledges that a variety of wildlife already use the site as a corridor. Thus, the summary statement of section 4.3.1.7 should acknowledge what the supporting sentences reveal. **“Wildlife ARE expected to use the project site as a wildlife corridor.”**

I 151-3

**Restore.** The DEIR takes a surprisingly narrow view of “wildlife” and its resiliency to reclaim and use restored habitat and linkages. The DEIR asserts that the “existing Stadium” and its parking lot may not attract or facilitate movement of wildlife species today. This may be true or false, but it is not strictly relevant to the future. The project under consideration does not envision leaving these in place. Thus, the expectation that wildlife will not use the site as a corridor is not a conclusion based on analysis of the future project but an assumption implicit in how the project is being planned.

I 151-4

**Protect.** When the current structures and paving are removed by the project, the features that replace them will shape how wildlife will use the site. The choices made in project design will govern the site’s value as a wildlife corridor. In this light, the site should be planned with functionality as a corridor between habitat to habitat corridor in mind. It should acknowledge the existing wildlife passage between Murphy Canyon and the San Diego River corridor, it

I 151-5  
 ↓

should expect this use will continue and expand with the project, and it should embrace the opportunity this presents and work to enhance and restore this connection for a greater volume of wildlife and wildlife species.

↑ I51-5  
Cont.

**Connect.** The DEIR correctly recognizes the important role of San Diego canyonlands in regional biodiversity, however, it does not accurately or adequately reflect the propinquity of the project site to existing open space areas both inside and outside the city MHPA. The DEIR notes, “Canyonlands in San Diego are rapidly disappearing and are largely the only habitat corridors that still remain within urbanized areas of San Diego. *There are no canyonlands within or adjacent to the project site.*” 4.3.1.7 This statement does not accurately represent the site location.

I51-6

In fact, the site is adjacent to several significant sections of protected habitat in San Diego’s MHPA, including the slopes of Murphy Canyon and a finger canyon system reaching deep into Serra Mesa just across Friars Rd. The site also abuts the core biological resources of the San Diego River, noted in the DEIR, and it is close to open space slopes across Friars Rd and I-15 to the NE, which offer a second connection for birds and insects to the San Diego River valley as it enters Mission Gorge. These adjacent or nearby open space / habitat areas provide connectivity for a variety of avian and insect species that the DEIR for some reason seeks to minimize.

**Restore/Enhance through appropriate landscaping choices in the River Park and throughout the MV project site:** In addition to protecting Murphy Canyon Creek as a functioning wildlife corridor, the adjacent River Park itself should be **designed and landscaped with linked habitat segments and wildlife corridor functions in mind.**

**Landscaping should maximize native planting,** including native trees – live oak, sycamore, cottonwood, willows – and sections of native shrubs and grasses to facilitate habitat connections and linkages for birds, insect pollinators and other species. This would reinforce the San Diego River Park Master Plan that the River Park include “*natural landscaping* through the River Park and adjacent parks, recreation, and open space areas adjacent to the SD River.” (see Table 4.10-3, Recommendation 3.2 and B. Qualcomm Stadium Site).

I51-7

Features that will impede this functionality – lighting (4.3.21), dog park, etc. - should be withdrawn from strategic edges of the site to minimize disturbance and facilitate use by nocturnal wildlife (as referenced in MM BIO 10 and 11).

I51-8

**Native tree planting** (including street trees) will contribute to seasonal habitat for birds and other species, to the enhancement of the site as a regional wildlife corridor and to conformance with the SD River Park plan, but to San Diego’s urban forest goals.

I51-9

**Take leadership.** SDSU should exercise regional leadership in ecologically resilient landscape design for our region. Cutting edge examples from the Silicon Valley, including Google’s innovative landscape design for its new campus in Mountain View, illustrate the value of place sensitive native landscaping to revitalize and restore historic habitat connections and to more effectively integrate urban landscapes in the ecosystems that support them. (see: <http://resilientsv.sfei.org/pages/resilient-silicon-valley>). (see also, Making Nature’s City: A Science Based Framework for Building Urban Biodiversity, San Francisco Estuary Institute, Sept, 2019 : <https://www.sfei.org/news/building-cities-better-support-biodiversity#sthash.ATj0ol2a.dpbs>)

I51-10

The SDSU West site, which sits at the intersection of two water and wildlife pathways linking different local habitat types, presents an analogous case and opportunity to establish SDSU as an exemplar for ecologically resilient landscape design that others will follow. What San



Diego does not need is ‘one more landscaped office park.’

#### 4.3 – Biological impacts. (4.3-14)

The DEIR discussion of Direct impacts to Least Bell’s Vireo (at 4.3-14) appears quite misleading, at best. The misrepresentation evident in the discussion of impact and ‘mitigation’ is of the sort that can diminish public trust in the document as a whole.

The report claims that impacts to the multi-year resident LBV at the SW corner of the site would be “potentially significant absent mitigation (Impact BIO-1).” 4.3.14. However, this wishful spin on potential mitigation is quickly dashed in the separate section on MM BIO-1 where the DEIR reports that the proposed ‘mitigation’ is a ‘take.’ Please revise 4.3.14 to reflect that this direct impact is not mitigable through MM BIO-1. Same point at 5.3.4.

In the case of MM BIO-2, I urge the project to plan Mitigation for Direct Impacts to Least Bell’s Vireo to take place on the project site as a means to ensure habitat resilience and species survival. Destruction of habitat for a rare bird that is persistent in this location may result in its extirpation from the project site, which is an impact that cannot be mitigated through habitat enhancement off site. Reduction of the # and range of locations where a rare bird such as LBV exists increases the long-term threat to the species by increasing the danger to the species through unforeseen impacts (such as fire, or future development) to the remaining, smaller number of habitat pockets. A goal of the Mission Valley campus project should be to increase the biodiversity of the project site and its immediate surrounds.

Consider revising MM BIO 1 or 2 to reflect the commitment to restore LBV habitat on site or immediately adjacent, preferably in the immediate vicinity of the existing LBV residence, or in the adjacent SD river corridor. Consider modification of site plan to enhance willow and cottonwood-willow habitat at the SW corner of the project site.

MM BIO 15 and discussion at 4.3-41: The proposal to consider off site mitigation at San Luis Rey is a disturbing revelation that I would urge be reconsidered and rejected.

With the limited habitat resources available in the urban heart of San Diego, the project should be planning habitat mitigation that enhances and expands these resources in this immediate area. Mitigation should take place on site or in the adjoining San Diego River corridor to maximize the resilience of this river side location – and to enhance the habitat value of the SD River Park in the Mission Valley.

Furthermore, habitat destruction in the core of San Diego in exchange for preserved or restored habitat at the outer edge of San Diego County poses an unmitigable impact on the human as well as animal communities. Reduction of green space and proximity to nearby nature for urban San Diegans cannot be mitigated with green space at a remove of 40+ miles. The proposal raises stark questions about SDSU’s commitment to social equity by removing green space from a central area of San Diego where residents face a nature deficit to a part of the county, with a different social profile, where they do not.

#### Urban forest (4.7-33).

**Plant native.** Reinforcing comments related to native landscaping across the project and River Park overall, planning for tree planting should absolutely emphasize native trees.

The DEIR notes plan for 616 new trees to meet SD urban forestry goals. Rather than merely repeating city language about the objective of a greater ‘tree canopy,’ SDSU planners should

I51-10  
Cont.

I51-11

I51-12

I51-13

respond critically and carefully to this city program, which is currently poorly conceived and pays insufficient attention to sound ecological science, habitat resilience, water consumption, fire hazard (and simple math).

One way to avoid many of these inherent problems is to plan for a ‘tree canopy’ at SDSU west which relies on native trees. Native species are evolved to flourish in this climate without human help or negative externalities. Native trees require less water and less direct human energy input, they contribute to habitat resilience, providing nesting, foraging, and feeding sources for many native species, and they resist or respond naturally to wildfire. They also sink carbon just like other tree options. Finally, reliance on native trees will have the advantage of producing a consistent aesthetic appearance on campus that is at once sensitive to its location (and in harmony with the adjacent San Diego River corridor and environmentally sensitive valley/canyon slopes) and symbolic of SDSU’s intention to be a leader in sustainable development that, as our new statement of land and remembrance states, lives in balance with the world around it.

I51-13  
Cont.

No invasive trees, no invasive plants. SDSU West should make an explicit commitment to planting no invasives on the project site, including SDSU’s iconic fan palms (*Washingtonia robusta*), or similar pests, which will immediately invade and degrade the habitat preserve (MHPA) areas downstream from the campus site. SDSU West should set the standard for a new iconic university tree. It should be homegrown and friendly to the environment. It should not be a fan palm. Coast Live Oak, California Sycamore, Fremont Cottonwood... These are beautiful trees and we should select among them.

I51-14

Housing:

SDSU should contribute to solving the regional housing crisis by committing to the construction of housing affordable to a *much* wider segment of population than is currently served by the new construction market. SDSU should commit to development on its campus that aims higher than current city standard proportion of “affordable” units in all market rate developments. It should also leverage its own resources to construct housing affordable to its own faculty and staff – perhaps pegged to the salary of new assistant professors. Our housing crisis will not be solved by numbers of units alone, since the market today does not serve the vast majority of San Diego’s population and it is distorted by global real estate investment and short term vacation rentals and other factors. SDSU should contribute to solving the regional housing problem by committing to the construction of affordable units for San Diego residents - SDSU faculty and staff and students in particular - from the date of occupancy. People expect more of SDSU than the minimum standards required by the city.

I51-15

Comment Letter I52

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From: **Sara Cabak** <[scabak123@gmail.com](mailto:scabak123@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:22 PM  
Subject: [mvcomments] Sdsu mv deir comments  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I'm a member of the Associated Student Green Love Sustainability Commission at SDSU. I urge the project to work towards making all the building reuse water and Leed Gold. We hope that you can bring to life what was created on the SDSU campus and is still being created.

I 152-1

Comment Letter I53

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From: **Lizzie Annison** <[lizzie@theannisons.com](mailto:lizzie@theannisons.com)>  
Date: Wed, Oct 2, 2019 at 12:22 PM  
Subject: [mvcomments] SDSU MV DEIR comment  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am a member of the Associated Students Green Love Sustainability Commissions at SDSU. I urge the project to use recycled water throughout the center, in an attempt to cut down on unnecessary water waste. In addition, cut car emissions by providing bus routes to and from mission valley.

I thank you for your time and consideration,  
Elizabeth Annison

Sent from my iPhone

I  
I53-1

Comment Letter I54

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From: **Brittney Salazar** <[brittneysalazar01@gmail.com](mailto:brittneysalazar01@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:23 PM  
Subject: [mvcomments]  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am a member from SDSU Greenlove club. I think it is really important to follow the multi-species conservation program because San Diego is a biodiversity hotspot and most importantly because the infrastructure will be built on the river valley. This project has to focus on protecting the species around the area because they are crucial for the standard living of other organisms around there and humans as well.

I  
I54-1  
I



Comment Letter I55

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From: **'Jonathan Clay' via SDSU Mission Valley Comments** <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Wed, Oct 2, 2019 at 2:45 PM  
Subject: [mvcomments] SDSU Mission Valley Draft EIR  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I have looked at the SDSU Mission Valley EIR and I believe it proposes a sound project that meets the environmental protections required under California law. I look forward to seeing the final EIR and completion of the project. Please feel free to contact me if there are questions regarding my position.

I  
I55-1  
I

JC

Comment Letter I56

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From: **Briana Blake** <[brianablakem@gmail.com](mailto:brianablakem@gmail.com)>  
 Date: Wed, Oct 2, 2019 at 2:41 PM  
 Subject: [mvcomments] Comment  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
 I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. First and foremost I urge the project to make all buildings LEED gold certified. Also to make it easily accessible through public transportation. Lastly to create a strategic plan with the city to assist the current homeless population occupying that space. Thank you.

I I56-1  
 I I56-2  
 I I56-3

Sincerely,

Naomi Waldron, Matthew Garcia, Natalie Penney, and  
 Briana Blake  
[brianablakem@gmail.com](mailto:brianablakem@gmail.com)  
 201.316.6907

Comment Letter I57

From: **Emma Farrell** <[emma@emandra.com](mailto:emma@emandra.com)>  
 Date: Wed, Oct 2, 2019 at 2:03 PM  
 Subject: [mvcomments] Mission Valley DEIR Comment  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I wanted to write to you today to urge that in this construction project, the idea of zero waste practices are implemented. It would be great to see compost bins and recycling bins inputted into all the buildings on site and making sure people know how to properly use such bins through things like recycling education programs. Assuming that private business restaurants will be going into these retail spaces as well, I would love to see compostable and/ or recyclable to-go packaging while reducing how much "to-go" packaging is given (i.e. such as not giving a stack of napkins and utensil set in a plastic bag as Rubios does here on campus). Also, it would be amazing to see these restaurants allow people to get their food to go in a reusable Tupper Wear. One of the biggest things I struggle with being on the meal plan on campus is that the majority of food establishments here will not accept my reusable containers to put my food in so I end up using so much single-use plastic, which is a shame.

I57-1

Thank you so much!!

Comment Letter I58

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From: **Ben Moraga** <[benmoraga@gmail.com](mailto:benmoraga@gmail.com)>  
 Date: Wed, Oct 2, 2019 at 1:57 PM  
 Subject: [mvcomments] Mission Valley  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

I wanted to take this opportunity to write to say that I fully support your plan for Mission Valley. Not only does our region desperately need more affordable housing, bike trails, and a much anticipated River Park, but we also need space for SDSU to grow. With over 100,000 applicants last year, SDSU is bursting at the seams. And, it's a powerful economic generator for all of San Diego. As an alum and active supporter, I am thrilled to support your vision and design for Mission Valley.

I58-1

Sincerely,

Ben Moraga

Comment Letter I59

From: 'Emily Bews' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Date: Wed, Oct 2, 2019 at 12:35 PM  
 Subject: [mvcomments] Mission valley comments  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello,

I am a fourth year student in the sustainability commission (green love) studying environmental science at SDSU and I am hoping the mission valley campus team will implement sustainable methods for building, powering, and maintaining the mission valley campus, and strive to uphold a high standard for sustainability.

This is what I hope to see included in the mission valley campus:

Every building must be Leed certified gold or better.

Electrify all of the buildings or build them to convert to sustainable energy when natural gas and other current energy options obsolete.

Work with the San Diego river not against it.

Keep the river undeveloped and allow lots of green space to increase the opportunity for groundwater recharge.

Composting throughout the entire campus.

Native plant species and natural habitat remediation.

Please help define SDSU as a leader in San Diego working to protect our environment, our water, our resources, and our home.

Thank you,  
 Emily Bews

I 159-1  
 I 159-2  
 I 159-3  
 I 159-4  
 I 159-5  
 I 159-6  
 I 159-7  
 I 159-8  
 I 159-9

Comment Letter I60

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From: **'Jaida Hunt' via SDSU Mission Valley Comments** <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Wed, Oct 2, 2019 at 12:30 PM  
Subject: [mvcomments] Mission Valley Buildings  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Missions Valley Team,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to consider helping the cause of sustainability by incorporating energy efficient appliances and thinking about the environment when building throughout these next years. Thank you for considering just the smallest ways that you can help with overall sustainability in San Diego.

I  
I60-1

Comment Letter I61

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From: **Izabella Brattesani** <[izabella@brattesani.com](mailto:izabella@brattesani.com)>  
Date: Wed, Oct 2, 2019 at 12:30 PM  
Subject: [mvcomments] Mission Valley DER Comment  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to consider incorporating energy efficient windows to decrease energy waste used on air conditioning and heating used in the buildings and building solar panels on the roofs and around the buildings so that the energy used in these complexes are clean energy. Thank you for listening to my suggestions.

I  
I61-1  
I

Izabella Brattesani, SDSU First-year student

Comment Letter I62

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From: **Simran Jain** <[simranjain110401@gmail.com](mailto:simranjain110401@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:29 PM  
Subject: [mvcomments] Mission Valley DER comment  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
I'm a member of the associated students Green Love Sustainability Commission at SDSU. I urge the project to consider water usage, and cycling water in a way that it can be reused for things like fountains and plants.  
Thank you for your consideration, and as a constituent, I am excited to see what you do with my suggestion!  
Simran Jain  
SDSU class of '23

I  
I62-1  
I



Comment Letter I63

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From: **Karinne Nevarez** <[karinnenevarez@gmail.com](mailto:karinnenevarez@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:29 PM  
Subject: [mvcomments] Environmental impact  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to utilize sustainable practices within the building. I urge you all to please reduce your greenhouse gas emissions during the building process and to create a building that does the same. Please follow the Multi-Species conservation program to protect our biodiversity. Thank you.  
-a concerned student

I I63-1  
I I63-2  
I I63-3

Comment Letter I64

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From: **cassidy melton** <[cassidymelton10@gmail.com](mailto:cassidymelton10@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:29 PM  
Subject: [mvcomments] Mission Valley DEIR Comment  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to develop the buildings in a sustainable way. In the development I hope that all buildings meet sustainable and environmental standards, making the buildings leed gold is a great example.

I  
I64-1  
I

Thank you for your consideration of our planet!  
Cassidy Melton

Comment Letter I65

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From: **Pia Twittmann** <[pia@twittmann.com](mailto:pia@twittmann.com)>  
Date: Wed, Oct 2, 2019 at 12:28 PM Subject:  
[mvcomments] Comments for deir To:  
<[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I  
urge the project to reuse the water and electrify the site.  
Also we want to have bus routes to/from Mission Valley.

I I65-1  
I I65-2

Thank you for your time!  
Pia Twittmann

11555

Comment Letter I67

From: **Gener Abdon** <[gener.abdon4@gmail.com](mailto:gener.abdon4@gmail.com)>  
 Date: Wed, Oct 2, 2019 at 12:27 PM  
 Subject: [mvcomments] SDSU MV DEIR Comment  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to make all buildings LEED Gold!

I 167-1

Sincerely,  
 Gener Abdon

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**Gener Abdon**

*AASHE STARS Student Intern, Facilities Services*  
 (619) 508-2473

**San Diego State University**  
 5500 Campanile Drive, San Diego, CA 92182

Comment Letter I68

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From: **Naya Ravelo** <[nayaravelo@gmail.com](mailto:nayaravelo@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:27 PM Subject:  
[mvcomments] Mission Valley DEIR To:  
<[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to commit to 100% electrification, a minimum LEED Gold certification for every building, and a water reuse system.

I  
I68-1

Thank you for your time,  
Naya Ravelo

Comment Letter I69

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From: **Grace Markel** <[gmarkel@sbcglobal.net](mailto:gmarkel@sbcglobal.net)>  
Date: Wed, Oct 2, 2019 at 12:27 PM  
Subject: [mvcomments] Comments for DEIR To:  
Mvcomments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to make all the buildings LEED Gold and for the site to be electrified. Thank you.

I  
I69-1

Best regards,  
Grace Markel

Comment Letter I70

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From: **Caroline Kamin** <[akamin3@pacbell.net](mailto:akamin3@pacbell.net)>  
Date: Wed, Oct 2, 2019 at 12:27 PM  
Subject: [mvcomments] Comments for DEIR To:  
<[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,  
I'm a member of the associated students Green love sustainability commission at SDSU, I  
urge the project to 100% electrify the sights, and make all the buildings leed gold.

I 170-1

Thank you  
Caroline Kamin



Comment Letter I71

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From: 'Audrey Carlson' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Wed, Oct 2, 2019 at 12:26 PM  
Subject: [mvcomments] Mission Valley  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am a sustainability major at SDSU and a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge you to consider sustainable transportation, solar panels, sustainable food, vegan options, refillable Water fountains and to reduce plastic in markets. Thank you for your consideration!  
- Audrey Carlson

I  
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I71-1  
I

Comment Letter I72

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From: **Chloe Price** <[cpric399@gmail.com](mailto:cpric399@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:26 PM  
Subject: [mvcomments] Comment on Mission Valley Campus  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am student in the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to electrify the site and make all the buildings Lead Gold.

I 172-1

Thank you,  
Chloe Price

Sent from my iPhone

Comment Letter I73

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From: **Eva Huber** <[egh1017@gmail.com](mailto:egh1017@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:26 PM  
Subject: [mvcomments] Sustainability!!  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge you to consider sustainable transportation, solar panels, sustainable food, vegan options, refillable Water fountains and to reduce plastic in markets!

I  
|  
I73-1  
|  
I

Thank you,  
Eva Huber

Comment Letter I74

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From: **Haley Ledford** <[hledford8557@sdsu.edu](mailto:hledford8557@sdsu.edu)> Date:  
Wed, Oct 2, 2019 at 12:25 PM  
Subject: [mvcomments] Mission Valley  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

To whom it may concern,

I urge you to address the multi-species conservation program. There are many species of animals in San Diego that are specific to San Diego and need to be protected and conserved.

I 174-1

Fellow member of SDSU's Green Love,  
Haley Ledford

Get [Outlook for iOS](#)

Comment Letter 175

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From: **Journey Woods** <[journeyytw@gmail.com](mailto:journeyytw@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:25 PM  
Subject: [mvcomments] SDSU Green Love  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge you to consider sustainable transportation, solar panels, sustainable food, vegan options, refillable Water fountains and to reduce plastic in markets!

175-1

Comment Letter I76

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From: **Taitum Buckley** <[taitum.buckleygrote@gmail.com](mailto:taitum.buckleygrote@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:25 PM  
Subject: [mvcomments] Comments for DEIR  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to make all the buildings LEED GOLD.

I 176-1

Comment Letter I77

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From: **Anna Cilley** <[cilleyanna@gmail.com](mailto:cilleyanna@gmail.com)> Date:  
Wed, Oct 2, 2019 at 12:24 PM  
Subject: [mvcomments] SDSU NV DEIR comment  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to start the process of making all your buildings L.E.E.D GOLD certified; reusing all of your water for saving purposes; as well as creating new bus routes that take people/students to AND from Mission Valley. Thank you for listening, please truly consider these ideas!

-Anna Cilley

I77-1

Sent from the iPhone of Anna Cilley

Comment Letter I78

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From: **Scarlett Alexander** <[scarlett.alexander@gmail.com](mailto:scarlett.alexander@gmail.com)>  
Date: Wed, Oct 2, 2019 at 12:24 PM  
Subject: [mvcomments] SDSU MV DEIR comment  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

My name is Scarlett Alexander, and I am a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to make all the buildings LEED Gold, create bus routes to and from Mission Valley, and reuse all water. Thank you for your consideration and hard work in efforts to make the world a better place, starting locally!

I78-1

Best regards,  
Scarlett Alexander  
Green Love



Comment Letter 179

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From: **Delaney Down** <[delaney.down@sbcglobal.net](mailto:delaney.down@sbcglobal.net)> Date:  
 Wed, Oct 2, 2019 at 12:23 PM  
 Subject: [mvcomments] Multi-Species Conservation Program  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I'm a member SDSU's Green Love. I think it is really important to follow the multi-species conservation program because San Diego is a biodiversity hot spot. San Diego has so many species that are unique to the environment we have here. We should protect and conserve their home.

179-1

Delaney Down  
[delaney.down@sbcglobal.net](mailto:delaney.down@sbcglobal.net)  
 916-350-0979

Comment Letter I80

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From: **Candra Preovolos** <[preovolosc@gmail.com](mailto:preovolosc@gmail.com)>  
Date: Wed, Oct 2, 2019 at 4:30 PM  
Subject: [mvcomments] EIR Mission Valley  
To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To Whom it May Concern,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the two years of public outreach and the bold vision to make SDSU one of the best campuses in the country. With a new stadium, tech and incubator space, housing on site and a gem of a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. It has the ability to grow the economic impact of SDSU well beyond the \$5.6B that is always quoted. And the opportunities are endless for Aztec athletics and the many outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

I80-1

Sincerely,

Candra Preovolos

Comment Letter I81

From: **Sandra Stahl** <[sandramstahl@hotmail.com](mailto:sandramstahl@hotmail.com)>  
 Date: Wed, Oct 2, 2019 at 4:43 PM  
 Subject: [mvcomments] SDSU Mission Valley Campus DEIR  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

SENT BY EMAIL AT 4:45 p.m.October 2, 2019

Sandra Stahl  
 8975 Gowdy Avenue  
 San Diego, CA 92123  
 858-560-8934

October 2, 2019

RE: Draft San Diego State University Mission Valley Campus Master Plan  
 Environmental Impact Report

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

Dear Ms. Shinn:

Below are my comments and questions regarding the SDSU Mission Valley Campus  
 DEIR:

I 181-1

*Traffic Impact analysis, page 36, re: Gramercy Drive*

- *Taft Middle School is located at the intersection of Gramercy Drive, Ruffin Road, and Mission Valley Drive. The speed limit in that area when children are present is 25 mph which is not just during normal school hours; children are present at various times from 6 a.m. to 6 p.m. due to the San Diego City Schools Prime Time Extended Day Program.*

I 181-2

*That 25 mph speed limit during a large part of the day will severely impact the flow of the additional traffic and slow it down considerably at that intersection all resulting from the SDSU Mission Valley project. Why is that reduced speed limit not mentioned in the DEIR along with a plan to mitigate the resulting backed up traffic.*

I 181-3  
 I 181-4

- *The same situation will also exist in the vicinity of Jone Elementary School on Greyling Drive and Angier Elementary School on Hurlbut St. Why was there no traffic impact study done for those two areas?* 181-5
- *It is not sufficient to say that speed limits are under the authority of the City of San Diego because the problem the increased traffic will bring to those areas surrounding the schools is one that will be caused by the SDSU Mission Valley project and a plan should be in place to mitigate it as much as possible. Why was this problem not even mentioned in the DEIR? And please don't answer saying the City controls speed limits because this has more to do with San Diego State University having a responsibility to deeply consider the impact the Mission Valley Campus will have on the Serra Mesa Community and carries with it a responsibility to the Serra Mesa Community, as well as all other surrounding communities, to reduce that impact as much as possible. Why hasn't an SDSU operated park & ride lot on Aero Drive with an SDSU operated shuttle to the Mission Valley campus been considered as a way to partially mitigate this problem of increased traffic which will result in the area of schools in Serra Mesa?* 181-6  
181-7

Thank you,  
Sandra Stahl

Comment Letter I82

From: 'Glenn Marshall' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Date: Wed, Oct 2, 2019 at 4:55 PM  
 Subject: [mvcomments] Fw: SDSU Mission Valley  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

[Sent from Yahoo Mail for iPad](#)

Begin forwarded message:

On Wednesday, October 2, 2019, 4:24 PM, Glenn Marshall <[glennymarshall@yahoo.com](mailto:glennymarshall@yahoo.com)> wrote:

I am writing this because I have a very strong conviction that the project commonly known as SDSU Mission Valley will be a significant asset that will contribute and enhance the economic viability of the university as well as to the overall community of our fine city and county of San Diego.  
 This amazing project has so many tangible and intangible benefits that will have an immediate impact and far reaching results affecting future generations.  
 As a native San Diegan and graduate of SDSU, I have seen the transformation over my 66 years from a navy community to a vibrant and thriving economic hub. If it was not for the vision of our past leaders that fought vigorously and with persistence, we would not have seen the development of Petco Park and its direct impact it had on revitalizing the real estate landscape that surrounded the property.  
 We need to continue to seek this same type of opportunity when it is quite evident that SDSU Mission Valley will be an economic boost that will propel San Diego to another milestone.

Glenn Marshall  
 Class of 1975

[Sent from Yahoo Mail for iPad](#)

I82-1

I82-2

Comment Letter I83

From: **peter elia**  
<[pacerpete@gmail.com](mailto:pacerpete@gmail.com)> Date: Wed, Oct  
2, 2019 at 5:24 PM Subject:  
[mvcomments] SDSU  
To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

Dear SDSU,

As an alum and supporter of SDSU athletics, I can't tell you how excited I am about your vision for Mission Valley. Coach Long and his talented teams deserve a quality venue to play in. And fans finally deserve a stadium that highlights the fan experience and makes us proud to be Aztecs. It is for this reason and many others that I can't wait to see you break ground on Mission Valley. It is a bold and exciting plan, and one that I am proud to support.

I  
183-1

Please let me know how I can help!

Peter Elia  
9492121333

Comment Letter I84

From: **Kory Kavanewsky** <[korykavanewsky@gmail.com](mailto:korykavanewsky@gmail.com)>  
 Date: Wed, Oct 2, 2019 at 7:04 PM  
 Subject: [mvcomments] SDSU Mission Valley Plan  
 To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To Whom it May Concern,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the two years of public outreach and the bold vision to make SDSU one of the best campuses in the country. With a new stadium, tech and incubator space, housing on site and a gem of a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. It has the ability to grow the economic impact of SDSU well beyond the \$5.6B that is always quoted. And the opportunities are endless for Aztec athletics and the many outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

I84-1

Sincerely,

Kory Kavanewsky

Comment Letter I85

From: **Allan, Jason (CAI - Irvine)** <[Jason.Allan@coxautoinc.com](mailto:Jason.Allan@coxautoinc.com)>  
 Date: Wed, Oct 2, 2019 at 6:07 PM  
 Subject: [mvcomments] Let's break ground, baby!!!  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

I'm emailing in strong support of your plan for Mission Valley, what I see as the **last piece of the puzzle** in turning the school into a **wholly world-class institution and experience**. The students, alum, supporters and team **deserve a stadium to be proud of**, and the region deserves the River Park and a more connected Mission Valley. More student and faculty housing will give the school the ability to **admit more students**, and relieve much of the pressure that's come with SDSU's ascension as **one of the most popular colleges in the country**. Let's get this project going so we can start counting the days to kickoff!

I85-1

**Go Aztecs!**

Thanks,

Jason Allan '95



Comment Letter I86

Lauran Shinn,  
Director, Facilities, Planning & Construction  
San Diego State University  
5500 Campanile Drive, San Diego, CA

Dear Ms. Shinn and SDSU Mission Valley Project Team,

San Diego State University's Mission Valley campus plan is a momentous project, and I appreciate the opportunity to comment on its Draft Environmental Impact Report (DEIR). As an institution, the University has great potential to serve a growing number of students. A campus in Mission Valley would assist in serving that purpose. I'm enthusiastic about the road ahead for the University, and I ask you to consider the recommendations and needs of University students at the forefront of this project. This letter presents general areas of great concern found in the DEIR from my own, student perspective. I ask you to hold them, along with recommendations from my peers, with high regard.

I86-1

**Climate Change and the Student Population**

A student like me, born in 1998, will be 39 years old when the SDSU Mission Valley Project is to be completed. By 2037, people in my generation will likely know if greenhouse gas emissions have been curbed enough to limit climate warming by 1.5 degrees celsius, the "tipping point,"— where our global society will face permanent and destructive change<sup>1</sup>.

I86-2

At this point, mass shifts in society will be the clear and only option to achieve the limited amount of mitigation possible. California State Law holds a history, with Executive Order B-1812 (2012), SB-312 (2016), SB 100 (2018), Executive Order B-55-18 (2018), and SB-1477 (2018)<sup>2</sup>, or responding legitimately to climate impacts. With greater environmental change will come greater legislation, and the University should plan for these changes.

I86-3

**Energy**

According to Section 4.5-19, on "Energy," the SDSU Mission Valley project has plans to use natural gas to power the project site. Natural gas, a *greenhouse* gas, operates under different infrastructure than electric wiring and should not be the default in the plan. More financially feasible is the electrification of the whole site, with electric wiring run to all buildings. Work should be done to ensure all appliances and systems (pools, heaters, stoves, etc.) possible that can be made electric are made electric.

I86-4

<sup>1</sup>V. Masson-Delmotte, et. al. "Global Warming of 1.5°C.An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty." IPCC. 2018.

<sup>2</sup> State of CA qtd. in G. Mack. 2019.

**Building Design**

In Section 4.17-25, "Utilities and Service Systems," the DEIR states how its buildings will be built to achieve LEED Silver level or better. As an efficient and comparatively inexpensive way to reduce greenhouse gas emissions, all buildings should have a LEED Gold Certification *minimum*. The Associated Students organization demonstrates leadership and staggering yearly cost savings margins in their LEED Gold and Double Platinum buildings, showing environmental leadership and benefit.

186-5

I believe this project can be great for the University environment, campus, and community. Thank you for your work on this project, and I urge you, again, to hold students' comments to a high regard. We believe in the future of SDSU and the future of our world. Let's ensure it's done *right*.

186-6

Thank you,

*Courtney Ransom*

Courtney Ransom  
San Diego State University  
Undergraduate— Sustainability & Public Law

Comment Letter I87

From: **Byron Klassen** <[Byron.Klassen@acutus.com](mailto:Byron.Klassen@acutus.com)>  
Date: Wed, Oct 2, 2019 at 8:01 PM  
Subject: [mvcomments] Aztecs new pavilion in mission valley  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

To Whom it May Concern,

I'm writing today in support of SDSU's plan for Mission Valley.

With a new stadium, tech and incubator space, housing on site and a gem of a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. It has the ability to grow the economic impact of SDSU well beyond the \$5.6B that is always quoted. And the opportunities are endless for Aztec athletics and the many outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

Help us make this happen!

Thank you

Byron Klassen

Sent from my iPhone

I87-1

Comment Letter I88

From: **Jeff Smith** <[jsmith@associatesequityfund.com](mailto:jsmith@associatesequityfund.com)>  
 Date: Wed, Oct 2, 2019 at 8:01 PM  
 Subject: [mvcomments] Mission Valley Development Support  
 Letter To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

To Whom it May Concern-

As an alum and supporter of SDSU athletics, I am genuinely excited about the plans and SDSU's vision for the Mission Valley stadium project and related developments. The Aztec football program has needed an updated and state-of-the-art facility for quite some time and no better time for it to occur than during Coach Long's tenure as head coach. I am proud of not only the University but truly proud of the type of individual we have running our football program and how he represents all Aztecs. The fans have dealt with a sub-standard facility and game venue that is not representative of what SDSU and the city of San Diego are to all of us and we all deserve a stadium that highlights the fan experience and representative of our Aztec pride and the direction of the University.

I88-1

SDSU as a whole also could greatly benefit from more student and faculty housing, and the ability to admit more students. SDSU is one of the most popular and applied-to colleges in the country and we are bursting at the seams. The vision and plan make sense and the community support beyond just SDSU is overwhelming. It's time to break ground and get this project going. I can't wait to see the project break ground and to continue to monitor the progress throughout its construction. I could not be more in support of this project and am looking forward to experiencing the excitement at as many home game as I can attend.

I88-2

Sincerely,

**Jeff Smith, Principal**

**Associates Equity Funds**

Direct: 909.373.2909

Private Fax: 909.373.2990

Cell: 949-246-0225

Email: [jsmith@associatesequityfunds.com](mailto:jsmith@associatesequityfunds.com)

Web: [www.associatesequityfunds.com](http://www.associatesequityfunds.com)



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Comment Letter I89

From: **Daniel Schneeweiss** <[DSchneeweiss@flyxo.com](mailto:DSchneeweiss@flyxo.com)>  
 Date: Wed, Oct 2, 2019 at 8:18 PM  
 Subject: [mvcomments] Aztecs Stadium  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

I'm writing in support of the Mission Valley Stadium. As a proud alumni and occasional ticket holder I can tell you that if we built a new stadium I would personally become a season ticket holder. I strongly believe that a new stadium would do for the football team as Viejas did for the Basketball Team. With schools like USC and UCLA struggling to land top recruiting classes the time is now for SDSU and Coach Long to strike and keep the Southern California talent home (SDSU). Qualcomm is a joke. Let's build a new home and take this program to new heights.

I89-1

Alumni, current and future student body, and the San Diego community deserve it.

Daniel Schneeweiss  
 XO  
 949.636.7335 | 415.926.3190  
[dans@flyxo.com](mailto:dans@flyxo.com)

Sent from my iPhone

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Comment Letter I90

----- Forwarded message -----

From: **Alan Dulgeroff** <[adulgeroff@hotmail.com](mailto:adulgeroff@hotmail.com)>  
 Date: Wed, Oct 2, 2019 at 8:50 PM  
 Subject: [mvcomments] SDSU Mission Valley  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To Whom it May Concern,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the two years of public outreach and the leadership to make SDSU one of the best campuses in the world. With a new stadium, innovation and entrepreneurial space, housing on site and a beautiful River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. It has the ability to grow the economic impact of SDSU well beyond the \$5 billion already being delivered. And the opportunities are limitless for Aztec athletics and the numerous outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

I90-1

Sincerely,

Alan Dulgeroff

Sent from my iPhone

Comment Letter I91

From: **Jim Baross** <[jimbaross@cox.net](mailto:jimbaross@cox.net)>  
 Date: Wed, Oct 2, 2019 at 9:17 PM  
 Subject: [mvcomments] Comment regarding DRAFT  
 EIR To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Laura Shinn:

Regarding the DRAFT SAN DIEGO STATE UNIVERSITY MISSION VALLEY CAMPUS MASTER PLAN ENVIRONMENTAL IMPACT REPORT.

I 91-1

I note that a north-south connecting bridge over the San Diego River for pedestrian and bicycling access is included in the draft EIR.

*"A pedestrian and bicycle bridge would also be constructed to connect the San Diego River Trail to Camino del Rio S parallel to and west of I-15. The northern terminus of this new pedestrian bridge would be located within the proposed SDSU Mission Valley Campus area, but the landing area is located within the future River Park area that will be owned by the City of San Diego."*

I 91-2

A bridge would provide for important and more direct Active Transportation access from the neighborhoods to the south - Kensington, Normal Heights, University Heights, North Park, etc. - the communities of Mid City to Mission Valley destinations. I certainly hope that this bridge remains a reality included with the project!

I 91-3

Jim Baross, CABO President  
 3335 North Mountain View Drive  
 San Diego, CA 92116  
 619-280-6908



Comment Letter I92

From: **Larry Emond** <[Larry\\_Emond@gallup.com](mailto:Larry_Emond@gallup.com)>  
Date: Thu, Oct 3, 2019 at 12:20 AM  
Subject: [mvcomments] SDSU West  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU.

SDSU West is a once in a lifetime opportunity to expand our campus. Many of us have been dreaming of this for a long time. I saw the plans the night before the win at UCLA and they are fabulous.

Let's get this party started and get some shovels in the ground!

**Larry Emond**  
Managing Director

Global Leadership Advisory

GALLUP®

+1 949 338 2996

I  
192-1

Ideation Activator Futuristic Maximizer Strategic

Comment Letter I93

From: **Jason Tetley**  
 <[jasontetley@cox.net](mailto:jasontetley@cox.net)> Date: Thu, Oct 3,  
 2019 at 3:53 AM Subject: [mvcomments]  
 Sdsu EIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

To Whom it May Concern,

It is with much anticipation and excitement that I am writing to support the plan for SDSU to build a much needed new stadium that will not only benefit those who play in it, but will be a opportunity to serve the surrounding community throughout the year as well as being an anchor for the University from a National/International focal point.

As my wife and I are Alums (94',97') and are supporters of both the University and Aztec Club, we consider this a step forward that is necessary at the right time (maybe the only time) for our school to embrace a growth opportunity which will be welcomed by many. My opinion is for SDSU to sustain a competitive edge both on the field and in the classroom, the stadium project and SDSU West expansion is imperative. I couldn't be more proud or in support of the proposed project based on the EIR and designs that have been shared to date.

Breaking ground in early 2020 would be monumental to say the least! Let's get it going...

Jason and Jenny Tetley  
 949-922-8606

I93-1

I93-2

Sent from my iPhone

Comment Letter I94

From: **Tom & Marjorie Florio** <[floristar@sbcglobal.net](mailto:floristar@sbcglobal.net)>  
Date: Thu, Oct 3, 2019 at 5:46 AM  
Subject: [mvcomments] Mission Valley  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am a supporter of SDSU athletics, I can't tell you how excited I am about your vision for Mission Valley. Coach Long and his talented teams deserve a quality venue to play in. And fans finally deserve a stadium that highlights the fan experience and makes us proud to be Aztecs. It is for this reason and many others that I can't wait to see you break ground on Mission Valley. It is a bold and exciting plan, and one that I am proud to support.

I  
I94-1

Sincerely,

Tom Florio

Comment Letter I95

From: **Kforde F** <[kfstainedglass@gmail.com](mailto:kfstainedglass@gmail.com)>  
Date: Thu, Oct 3, 2019 at 5:56 AM  
Subject: [mvcomments] Housing  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am against building any more housing in Mission Valley! It's already too crowded! People don't use mass transit now....they won't use it then! I am born and raised here....I do not want this city to turn into another LA...which is the direction it's headed...go build some place else...like the rolling hills of Salinas!

I  
I95-1

Comment Letter I96

From: **Feingold, Daniel L.** <[dfeingol@teksystems.com](mailto:dfeingol@teksystems.com)>  
 Date: Thu, Oct 3, 2019 at 6:51 AM  
 Subject: [mvcomments] Alumni Support  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To Whom it may concern

Dear SDSU,

It is my pleasure to write to you today in support of your plan and vision for Mission Valley. Not only does Aztec football deserve a stadium of their own, but the region deserves the River Park we have always talked about, and a more connected Mission Valley. SDSU as a whole also could greatly benefit from more student and faculty housing, and the ability to admit more students. SDSU is one of the most popular colleges in the country and we are bursting at the seams. The vision and plan make sense and has been vetting across San Diego for nearly two years now. It's time to break ground and get this project going.

I96-1

Sincerely,

Daniel Feingold

Graduating class of Spring 1994

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Comment Letter I97

From: 'Kenny Kirkpatrick' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Thu, Oct 3, 2019 at 9:09 AM  
Subject: [mvcomments] Mission Valley Support  
To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

Dear SDSU,

As an Aztec alum I wanted to send a quick email endorsing the plan and vision for Mission Valley. The fact of the matter is that it's needed if we want SDSU to continue to evolve and stay competitive with other California higher learning institutions. The River Park, housing, new stadium, etc... is just what is needed to take that next step. Let's break ground and watch our school blossom!

I  
I97-1  
I

Class of '96  
Kenny Kirkpatrick

Sent from my iPad

Comment Letter I98

From: **Chip Murphy** <[chip@cdmtechnology.com](mailto:chip@cdmtechnology.com)>  
 Date: Thu, Oct 3, 2019 at 9:32 AM  
 Subject: [mvcomments] SDSU Mission Valley  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To Whom It May Concern Re: New Aztec Stadium in Mission Valley:

As an active alumni within the San Diego community, and a huge fan and supporter of Aztec Athletics, I am incredibly enthused about the plan and vision for the Mission Valley stadium site. It's well over due, not only for the near and far alumni, but for the future of SDSU and it's ability to thrive not only academically but athletically as well. The football program absolutely deserves a quality venue to play in, the soccer teams can host big time college soccer, and the fans like me *\*finally\** deserve a stadium that brings us the fan experience we've all been longing for what feels like 30+ years. I can't emphasize this enough, I am thoroughly excited to see you all break ground down in Mission Valley. It's no small feat, but it's the right thing to do, and along with several other alumni I know, you have all of our full support.

I98-1

If there is anything I can do to help, please do not hesitate to reach out to me at either number below.

Thanks,

-CM

**Chip Murphy**



*Partner*

**CDM Technology**

**2002 Jimmy Durante Blvd.**

**Suite 136**

**Del Mar, CA 92014**

**(O): 858-461-0206 ext. 700**

**(M): 619-200-8078**

**[chip@cdmtechnology.com](mailto:chip@cdmtechnology.com)**

**[www.cdmtechnology.com](http://www.cdmtechnology.com)**

**<https://www.linkedin.com/in/chip-murphy-6361871/>**



Comment Letter I99

From: **Ken Locati**  
 <[sdcougars@gmail.com](mailto:sdcougars@gmail.com)> Date: Thu, Oct 3,  
 2019 at 9:39 AM Subject: [mvcomments]  
 To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>  
 Cc: Ken Locati <[sdcougars@gmail.com](mailto:sdcougars@gmail.com)>

Dear SDSU,

I'm emailing today supporting SDSU's plan for Mission Valley. It shows a vision to help make SDSU one of the best campuses in the country. With a new stadium, tech and incubator space, onsite housing and a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego.

While not an alum, we are strong supporters of SDSU athletics, and I can't tell you how excited I am about your vision for Mission Valley. I've seen first hand how a stadium like the one SDSU has planned can significantly improve the entire dynamic of the athletic department, as well as increase the quality and quantity of students who apply to the school.

Coach Long and his talented teams deserve a quality venue. Look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. Us fans also deserve a stadium that highlights the fan experience. It is for these reasons and many others that I can't wait to see you break ground on Mission Valley. It is a bold and exciting plan, and one that I am proud to support.

Sincerely,

Ken

I99-1



Comment Letter I100

Hello Laura Shinn,

I would like to thank you for giving me the opportunity for me to comment on San Diego State University's (SDSU) Draft Environmental Impact Report (DEIR).

I100-1

**Executive Summary**

The DEIR does not specify if the project site will or will not adhere to San Diego's Multi-Species Conservation Program.

I100-2

Given that Murphy Canyon Creek is in the project site's boundaries, the DEIR fails to provide measures for future plans on Murphy Canyon Creek.

I100-3

The proposed project has an underlying purpose "to support SDSU's academic, educational and cultural mission," and has the slogan "leadership starts here," but the DEIR fails to demonstrate sustainability leadership.

I100-4

**Air Quality**

The DEIR does not provide adequate mitigation measures for construction equipment in relation to cumulative net increase of any criteria pollutant. In the "Noise" section of the DEIR, there were references to the use of electric construction equipment instead of diesel/gasoline powered ones. I think that the construction equipment on site should be electric powered to avoid inhaling exhaust fumes from the outer air ventilation of the construction equipment. Staff on the main SDSU campus in Facilities Services utilize electronic equipment and it is efficient. In the same environmental topic, there is a reference to idling requirements in the mitigation measures. The DEIR fails to provide implementation of this requirement and does not provide any plans to implement this requirement to onsite pedestrian vehicles. I think there should be vehicle idling requirements for pedestrian vehicles at parking locations so that individuals on the project site will be less likely to inhale the pollutants from the tailpipes of pedestrian cars.

I100-5

The DEIR does not provide mitigation measures in relation to the possibility of the project having a cumulative effect on air quality resources, and no acknowledgement of air quality inside buildings. I think there should be mitigation measures, and some I believe that are useful are SDSU's Associated Students' Viejas Arena Green Cleaning Policy and San Diego's Green Building Council (GBC) Leadership in Energy and Environmental Design (LEED) Green Cleaning Policies.

I100-6

The DEIR does not acknowledge the effect of interstate 8 and interstate 15 freeways on the air quality of the project site. It is relatively close to both interstates, and I think that there should be mitigation measures in place. Individuals on the project site who may continue to live in the house units maybe exposed to many pollutants from the tailpipes of the cars and may develop respiratory illnesses.

I100-7

I100-8

**Energy**

The DEIR fails to acknowledge the severity of the environmental impacts that this project site will have energy and does not provide mitigation measures to those impacts. I think the environmental impact that this project site will have on energy is Significant and Unavoidable. The DEIR is non-complacent with state law regarding California's reduction in Greenhouse Gas Emissions. I think that the project site should have all of the buildings be GBC LEED Gold for both non-residential and residential uses. I also think that economic and building efficiency will be achieved if done so.

I100-9

I100-10

I100-11

**Greenhouse Gases**

The DEIR fails to acknowledge the severity of the impacts of the Greenhouse Gas Emissions It also fails to provide mitigation measures.	I 1100-12
<b>Hazardous and Waste Management</b>	
The DEIR fails to provide specific information on decommissioned wells. Also, there are no mitigation measures to deal with current oil spills by King Morgan and potential future oil contamination from the pipes. In addition, there are no mitigation measures provided on hazardous vapor exposure to residents outside the buildings. Finally, the DEIR fails to acknowledge the project impacts that this project has on hazards and hazardous materials.	I 1100-13 I 1100-14 I 1100-15 I 1100-16
<b>Hydrology and Water Quality</b>	
The DEIR fails to acknowledge to severity of the project impacts on Hydrology and Water Quality. It does not provide any mitigation measures.	I 1100-17
<b>Land Use and Planning</b>	
The DEIR fails to acknowledge the severity of the project impacts on Land Use and Planning. It does not provide mitigation measures.	I 1100-18
Referring to the Section 2 Project Objectives, objective 14 states that the project will meet “city’s greenhouse gas emission reduction goals as required by SDMC Section 22.0908” as part of Measure G this past November. But as I analyzed Section 4.10, there is some vagueness as to what Climate Action Plan (CAP) SDSU Mission Valley will adhere to. It states that our own CAP is not applicable because it’s only for the College Area but our own 2017 CAP plans for new building growth. And this section went on to report how SDSU is a state agency and is not bound to local government policies but in the consistency analysis there will be an adherence to the San Diego’s CAP. As I was talking to an expert at the public meeting about this, that person said that no we are not publicly adhering to the city’s CAP, but we will behind the scenes. Since MV will not adhere to SDSU’s CAP produced by sustainability faculty and staff, have those and others been consulted about planning for MV? I think a lot of faculty and staff here on campus can provide helpful information and feedback for the development of MV	I 1100-19
<ul style="list-style-type: none"> <li>o In “<b>Mineral Resources</b>” with the question would the project have a cumulative effect on mineral resources <ul style="list-style-type: none"> <li>▪ The DEIR fails to acknowledge the project impacts and provide mitigation measures</li> <li>▪ Can there be recycled materials possibly</li> </ul> </li> <li>o In “<b>Noise</b>” with the first question and Impact NOI-1 <ul style="list-style-type: none"> <li>▪ The DEIR does not provide detailed information on the incorporation of electric tools and does not provide mitigation measures of alternatives of construction tools</li> </ul> </li> <li>o In “<b>Population and Housing</b>” with the first question <ul style="list-style-type: none"> <li>▪ The DEIR fails to acknowledge the indirect impacts of population growth such as roads and does not provide mitigation measures</li> <li>▪ Also fails to provide mitigation measures for cumulative effect on housing and/or population resources</li> </ul> </li> <li>o In “<b>Public Services and Recreation</b>” with the last question <ul style="list-style-type: none"> <li>▪ The DEIR does not provide mitigation measures on the project having cumulative effects on public services resources</li> </ul> </li> <li>o In “<b>Transportation and Traffic</b>”</li> </ul>	I 1100-20 I 1100-21 I 1100-22 I 1100-23 I 1100-24 I 1100-25

- Specifically, “the proposed campus would include enhanced use of the MTS Green Line Stadium Trolley Station; minimizing vehicular traffic use; and accommodating the planned Purple Line on the project site” I 1100-26
- The DEIR fails to provide on-site traffic mitigation measures I 1100-27
- Does not clarify if funds will be available for road expansions around the project site I 1100-28
- Notes that pedestrian traffic (MM-TRA-6) will be low on sidewalks near the project site and does not provide alternatives I 1100-29
- The DEIR solely focuses on car traffic mitigation but does not provide sustainable transportation (public transit) as another mitigation measure I 1100-30
- In “**Tribal Cultural Resources**”
  - The DEIR fails to acknowledge the level of significance after impact importance I 1100-31
  - Does not reference mitigation measures to the Kumeeyaay people I 1100-32
- In “**Utilities and Service Systems**”
  - The DEIR fails to provide mitigation measures on the result of relocation/construction of new utilities services I 1100-33
  - The DEIR fails to provide plans to combat sufficient water supplies I 1100-34
  - The DEIR fails to provide mitigation measures of a wastewater treatment provider I 1100-35
  - The DEIR fails to acknowledge the level of significance after mitigation of the project generating solid waste I 1100-36
  - The DEIR fails to provide mitigation measures on the cumulative effect on utilities and/or service systems resources I 1100-37
- In “**Wildfire**”
  - The DEIR fails to provide mitigation measures on downstream flooding I 1100-38

Sincerely,  
Gener Abdon

Comment Letter I101

----- Forwarded message -----

From: **Kohls, Norm** <[NKohls@sdge.com](mailto:NKohls@sdge.com)>  
 Date: Thu, Oct 3, 2019 at 9:58 AM  
 Subject: [mvcomments] SDSU Mission Valley EIR- Comments  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>  
 Cc: [jdwick@sdsu.edu](mailto:jdwick@sdsu.edu) <[jdwick@sdsu.edu](mailto:jdwick@sdsu.edu)>

Dear SDSU,

Today, I am writing to express my complete support of your plan and vision for Mission Valley. The plan properly addresses the space constraints facing SDSU as the university strives to meet the growing demand for higher education in the San Diego region. The plan is balanced and properly and reasonably addresses and mitigates environmental and community impacts.

I101-1

The plan will provide great benefit to the region by promoting education, the arts, athletics and the economy for which all citizens in the San Diego region can benefit. The plan will provide for the much anticipated River Park and a more connected community. The expansion of the university at this site will resolve space and congestion concerns for SDSU's primary campus and can be done with efficiency due to existing linkage with public transportation such as the trolley light rail system.

I101-2

The plan also provides for a new stadium that will not only serve as a first class home for Aztec football, but can be utilized for other community events as well. Additional housing for faculty is much needed and the expanded campus will allow for additional students to be admitted to the university so that they can achieve their higher education goals.

The university serves as a catalyst for moving our society forward as we face unparalleled challenges in the future. The vision and plan make sense and has been vetted across San Diego for nearly two years now. It's time to break ground and get this project going.

I101-3

Regards,

*Norm Kohls, PE*

11674 Eastfield Road

Poway, CA 92064

(858) 636-5702

(619) 972-1179 (cell)

[normkohls@gmail.com](mailto:normkohls@gmail.com)

Comment Letter I102

From: **Rung-Kai Tsay** <[rktsay@gmail.com](mailto:rktsay@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 10:18 AM Subject:  
 [mvcomments] SDSU EIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the dozens of outreach meetings, and the bold vision to make SDSU one of the best universities in the country. Building a new stadium, creating vibrant tech and incubator space, and adding to San Diego's much needed housing stock should be enough for any San Diegan to support this vision. However, SDSU's commitment to build a River Park, add bike and pedestrian trails, and do it all without taxpayer money is impressive. SDSU has always been a powerful economic generator for San Diego. This plan has the ability to increase that impact even more. I'm happy to support it.

I102-1

Sincerely,

Rung-Kai Tsay

Comment Letter I103

From: **Jack R**  
<[jackdroybal@gmail.com](mailto:jackdroybal@gmail.com)> Date: Thu,  
Oct 3, 2019 at 10:26 AM Subject:  
[mvcomments] Jack Roybal To:  
<[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the dozens of outreach meetings, and the bold vision to make SDSU one of the best universities in the country. Building a new stadium, creating vibrant tech and incubator space, and adding to San Diego's much needed housing stock should be enough for any San Diegan to support this vision. However, SDSU's commitment to build a River Park, add bike and pedestrian trails, and do it all without taxpayer money is impressive. SDSU has always been a powerful economic generator for San Diego. This plan has the ability to increase that impact even more. I'm happy to support it.

Sincerely,

I103-1

Jack Roybal

Sent from my iPhone

Comment Letter I104

From: **Andrew Schneeweiss** <[andrewschnee12@gmail.com](mailto:andrewschnee12@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 10:35 AM  
 Subject: [mvcomments] West Campus  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I've never been more excited about SDSU. What an opportunity we have. I am especially pumped up about the new stadium. I usually come down from Orange county a couple of times a yr for football games. It hasn't always been easy getting my old college friends to make the trip. But for the first time in decades, apathetic friends are rejuvenated. I just looked into the crystal ball and saw my brother and I with season tickets and our friends battling over who gets the extra tickets for Aztecs Football. We're ready! Let's do this!

I  
 1104-1

Comment Letter I105

Dear Laura Shinn & Team,

I appreciate the opportunity to express comments relating to the planning and construction of SDSU Mission Valley. As a current SDSU Student, I hold a large stake in the future of this campus. To obtain my vote on Measure G, I was marketed an innovative and sustainable new campus. In the year 2037, I will be 38 years old. I hope to still live in San Diego and be a proud Aztec for life. If construction continues with the same amount of carbon emissions and fossil fuel use then I don't believe I will be a proud SDSU alumnus who brings their family to SDSU West. Sustainability *must* be the priority; for the sake of every human on this planet now and in the future. Upon reading the SDSU Mission Valley Draft Environmental Impact Report (DEIR)<sup>1</sup>, I share my major concerns as a fight for my future and for every soul that has been and continues to be impacted by "business-as-usual". The following are my comments regarding the SDSU DEIR:

I. Sustainable Goals & Leadership

A. Not only do we have a moral responsibility to mitigate climate change, but according to CEQA statutes and guidelines, SDSU West *must* "Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment."<sup>2</sup>

1. **Why does the DEIR state "the SDSU Mission Valley Campus Master Plan Design Guidelines are being prepared in order to ensure that SDSU's leadership on sustainability and stewardship issues [are] carried forward to the proposed project", then completely dismiss the SDSU Climate Action Plan?**<sup>3</sup>
2. **Who is the designated sustainability professional on the planning team or review board to ensure these environmental and social issues are carried forward?**
3. **How will the SDSU Mission Valley Planning and Construction team consider and share the "economic and technical factors...to**

<sup>1</sup> [SDSU Public Review Draft EIR](#)

<sup>2</sup> [CEQA Statute 21001\(g\)](#) (codified at PRC § 21000 et seq.)

<sup>3</sup> SDSU DEIR 4.7-20

I105-1

I105-2

I105-3

I105-4



**consider alternatives to proposed actions affecting the environment” with developers and relevant shareholders and stakeholders?<sup>4</sup>**

II. GHG

A. “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.”<sup>5</sup> The SDSU DEIR does not reflect this CSU goal for construction because of minimum efforts to clearly and concretely adhere to LEED certification when “LEED Silver rating or its equivalent”<sup>6</sup> is promised. First, Silver sets the bar low as the least demanding certification next to “certified”<sup>7</sup>. Second, “or its equivalent” is no commitment. I recommend the site aim for a LEED Gold average of all the buildings on site to ensure maximum building resiliency and comfort, with minimum operational costs and environmental impacts . The current plot layout for individual developers does not provide optimum building energy utilization. Based on diagrams from the public forums<sup>8</sup>, most of the walls or windows will be East or West. By naturally reconfiguring the building orientation to decrease heating and cooling with North-South facing walls<sup>9</sup>, less money will be required to fund the heating and cooling of buildings with all that heat penetrating the glass buildings.

1. **What is the benchmark for LEED certification equivalence?**
2. **How will Requests For Proposals include sustainable guidelines?**
3. **Why are the development plots configured vertically, discouraging optimal building orientation for passive solar?**

B. SDSU Mission Valley is the largest plot of developable land available in San Diego<sup>10</sup>. We are in a climate crisis so there is no excuse as to why we are planning for fossil fuels in 18 years. Berkely, CA has already taken the step to

↑ I105-4  
(Cont.)

I105-5

↓ I105-6

<sup>4</sup> [CEQA Statute 21001\(g\)](#) (codified at PRC § 21000 et seq.)

<sup>5</sup> SDSU DEIR 2.3.5

<sup>6</sup> SDSU DEIR 5.3.2

<sup>7</sup> [USGBC](#)

<sup>8</sup> [Public Meeting Presentation 9-12-19](#)

<sup>9</sup> [SDGBC Building orientation for passive solar](#)

<sup>10</sup> [Voice of San Diego](#)

lead in environmental and social sustainability by banning the use of natural gas<sup>11</sup>. SB 100 (De Leon, Chapter 312, Statutes of 2018) requires that 100 percent of California's electricity met by zero-carbon energy resources by 2045<sup>12</sup>. If the site is completed by 2037, more money will be needed to dig up and replace the gas infrastructure that isn't needed in the first place. The DEIR states that "Although nonrenewable resources would be utilized during the construction and operational phases of the proposed project, the commitment of these resources is reasonable and justified under the circumstances, particularly as the proposed project is designed to accommodate the existing and projected demand for student housing"<sup>13</sup>. I am deeply dissatisfied in this decision to overlook climate change and the proven extreme consequences as a result -- global warming, extreme drought, prolonged fire seasons, climate refugees and peace, sea-level rise -- for gas-fueled fireplaces and stoves. Dismissing the significance of fossil fuel use and climate change shows a lack of innovative thinking, research, and social responsibility on behalf of SDSU and our partners. There are feasible alternatives to gas appliances such as an induction oven with virtual flames<sup>14</sup> and the FauxFire that uses steam and lighting to realistically replicate a fireplace<sup>15</sup>. SDSU has the opportunity to certify the on-site hotel as a Green Hotel<sup>16</sup> to elevate the hospitality and tourism management program and can accomplish so without the use of natural gas.

I105-6  
(Cont.)

C.

1. Why is money being allocated to natural gas infrastructure to satisfy a small percentage of energy demand (5% of housing units<sup>17</sup>)?
2. Are there plans to incorporate and/or encourage solar photovoltaic cells with the stadium, parking structures, residential and commercial buildings to increase the amount of on-site renewable energy past 15%?<sup>18</sup>

I105-7

I105-8

<sup>11</sup> [The Guardian](#)

<sup>12</sup> SB 32

<sup>13</sup> SDSU DEIR 5.3.2

<sup>14</sup> [Samsung 5.8 cu. ft. Slide-In Induction Range with Virtual Flame Technology in Stainless Steel](#)

<sup>15</sup> [Technifex FauxFire](#)

<sup>16</sup> [Green Hotels - Resources, EcoLabels, and Standards](#)

<sup>17</sup> SDSU DEIR 4.7-24

<sup>18</sup> SDSU DEIR 4.5-2

3. **Why does the site plan to use gas appliances when alternatives exist such as the technologies listed above?** Not only do they exist but most likely the technology will improve and the product will cheapen over the next 20 years that the site will be developed. **How is the future projected market for green utilities and technologies incorporated into the DEIR and planning decisions?**

1105-9

Thank you,

Taylor Campbell-Mosley, GPRO: O&M  
San Diego State University  
Environmental and Physical Geography Student  
Leadership Minor  
(480) 824-8787  
[taylor.c.mosley@gmail.com](mailto:taylor.c.mosley@gmail.com)

Comment Letter I106

From: **9wexford** <[matt.ongaro@gmail.com](mailto:matt.ongaro@gmail.com)> Date:  
Thu, Oct 3, 2019 at 11:39 AM  
Subject: [mvcomments] SDSU Mission Valley EIR  
To: Sdsu <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

As a proud Aztec, I am in support of the new stadium in Mission Valley. SDSU will benefit enormously from this endeavor. The excitement and value the Mission Valley Stadium will provide for SDSU, it's students, alumni, and the community is invaluable. I remember as a student at SDSU the joy and inspiration the new basketball stadium provided and it is undoubted the football stadium will provide the same. SDSU will be taken to new heights and be given the worth it deserves as one of the top universities in the country. I look forward to continuing to support the Aztec family and seeing this project grow alongside with the university and develop into something truly special.

I106-1

Sincerely,

Matt Ongaro

Sent from my iPhone

Comment Letter I107

From: **Kurston McMurray** <[Kurston.McMurray@nglep.com](mailto:Kurston.McMurray@nglep.com)>  
 Date: Thu, Oct 3, 2019 at 12:08 PM  
 Subject: [mvmcomments] SDSU Mission Valley Plan // SDSU Football  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>  
 Cc: [paigemcmurray@gmail.com](mailto:paigemcmurray@gmail.com) <[paigemcmurray@gmail.com](mailto:paigemcmurray@gmail.com)>

Dear SDSU:

I'm writing today as a former Aztec athlete (1990-94) and alumni in support of SDSU's plan for Mission Valley. I appreciate the two years of public outreach and the bold vision to make SDSU one of the best campuses in the country. With a new stadium, tech and incubator space, housing on site and a gem of a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. The opportunities are endless for Aztec athletics and the many outstanding academic departments and programs – just look at what Viejas Arena did for Aztec basketball and Tony Gwynn Stadium has done for baseball. A new football stadium could do great things for the football program and the university community. Looking forward to celebrating this accomplishment soon.

I107-1

Sincerely,

KPM



**KURSTON P. McMURRAY**

Exec. Vice President, General Counsel & Secretary

6120 South Yale Ave., Suite 805

Tulsa, Oklahoma 74136

Ofc: (918) 236-4785 | [kurston.mcmurray@nglep.com](mailto:kurston.mcmurray@nglep.com)

Fax: (918) 481-5896 | [www.nglenergypartners.com](http://www.nglenergypartners.com)

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Comment Letter I108

From: **Craig Bentley** <[craig@imageworks.tv](mailto:craig@imageworks.tv)>  
 Date: Thu, Oct 3, 2019 at 11:47 AM  
 Subject: [mvcomments] In support of SDSU  
 West To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

Dear SDSU,

As an alum and supporter of SDSU athletics, I can't tell you how excited I am about your vision for Mission Valley. I appreciate the two years of public outreach and the bold vision to make SDSU one of the best campuses in the country. SDSU's plan for Mission Valley is a game changer for all of San Diego, and has the ability to grow the economic impact of SDSU well beyond the \$5.6B that is always quoted. The opportunities are endless for Aztec athletics and the many outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

I108-1

Sincerely,  
 Craig Bentley  
 619-512-3348 • [imageworks.tv](http://imageworks.tv)  
[facebook](https://www.facebook.com/craigbentley) • [twitter](https://twitter.com/craigbentley) • [linkedin](https://www.linkedin.com/in/craigbentley) • [imdb](https://www.imdb.com/name/nm0004844/)

Comment Letter I109

From: **Caroline McKeown** <[caroline.mckeown@gmail.com](mailto:caroline.mckeown@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 12:15 PM  
 Subject: [mvcomments] Connecting neighboring community to SDSU-MV and the River Park  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am writing to submit comments about the SDSU-Mission Valley EIR plan. I live up the hill from the stadium property in neighboring Normal Heights. We can see down into the stadium from the end of my street and as such I believe that qualifies us as a neighboring community and me as a stakeholder and constituent. The Normal Heights Community Plan calls for an urban trail that would connect Normal Heights to Mission Valley. This is something the Normal Heights Community Planning Group has been working toward for decades. Now that you are planning to develop the stadium site and revitalize the riverfront into a public river park, our need to be able to easily access the site is paramount. Even when we complete our urban trail, we will be stuck on the south side of the I-8 freeway. In addition, there is an expensive new bike path that runs down the side of I-15 that also ends abruptly at the I-8 freeway. Both of these public amenities (both real and planned) will not have access to the great public facilities that you are planning on the backs of taxpayer money. It is imperative that you add a pedestrian/bike bridge that traverses the I-8 freeway and connects to the planned river park. The traffic going into and out of the planned development is already going to impact us significantly with increased traffic on the freeways we use daily. Giving your southern neighbors foot access to the site will cut down on car usage and parking issues, and will help neighbors get outdoors and will help meet the goals of the Climate Action Plan. Moreover, it is your civic duty to connect this natural resource to the neighboring communities. I implore you to reconsider adding a bridge across I-8 to allow Normal Heights to access the river park, stadium, and campus. In addition, I hope that you will help advocate for our urban trail in Normal Heights to connect to the bridge.

Thank you,  
 Caroline McKeown, Ph.D.  
 Normal Heights resident since 2000.

I 1109-1  
 I 1109-2  
 I 1109-3  
 I 1109-4  
 I 1109-5

Comment Letter I110

From: **Alex Campbell** <[alex.campbell70@gmail.com](mailto:alex.campbell70@gmail.com)>  
Date: Thu, Oct 3, 2019 at 1:35 PM  
Subject: [mvcomments] support of mission valley  
project To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)  
<[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

Dear SDSU,

I would like to let you know that I support your plan and vision for Mission Valley. We have needed this stadium for decades now and I cannot wait to see it happen. The river park area will be amazing for the region and the expansion of SDSU to mission valley will add so many options for dining, housig and entertainment for students. SDSU will have the ability grow and to admit more students which is a plus for everyone in San Diego. SDSU needs this plan to happen in order to keep up with other rival universities in the country.

I  
I110-1

Thank you,

Alex Campbell

Sent from [Mail](#) for Windows 10



Comment Letter I111

From: 'Shani Wright' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Thu, Oct 3, 2019 at 2:21 PM  
Subject: [mvcomments] Mission Valley Plans  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the dozens of outreach meetings, and the bold vision to make SDSU one of the best universities in the country.

Building a new stadium, creating vibrant tech and incubator space, and adding to San Diego's much needed housing stock should be enough for any San Diegan to support this vision. However, SDSU's commitment to build a River Park, add bike and pedestrian trails, and do it all without taxpayer money is impressive. SDSU has always been a powerful economic generator for San Diego. This plan has the ability to increase that impact even more.

I'm happy to support it.

Sincerely,

Shandra L. Wright

I111-1

Comment Letter I112

----- Forwarded message -----

From: **sammy ferr** <[sammyferr123@gmail.com](mailto:sammyferr123@gmail.com)>  
Date: Thu, Oct 3, 2019 at 2:34 PM  
Subject: [mvcomments] Sustainable Mission Valley campus  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I am a member of the associated Students Green Love Sustainability Commission at SDSU. I urge the project to consider following the multi-species conservation program when building on this new sight. San Diego is home to many unique animals that rely on these spaces to thrive. I would be a shame to the biodiversity efforts of local environmentalists to lose these species for good. Thank you for your consideration.

Regards,

Samantha Ferreira

I  
I112-1  
I

Comment Letter I113

From: **Jose Reynoso** <[jsreynoso@cox.net](mailto:jsreynoso@cox.net)>  
 Date: Thu, Oct 3, 2019 at 2:45 PM  
 Subject: [mvcomments] SDSU West Draft  
 EIR To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

San Diego has the opportunity to invest in itself for the future. Over a century ago the seed (SDSU) for an economic and social engine was planted and has grown into a multi-billion dollar economic engine for the city and the region. Many decades ago, the city saw the opportunity to replicate the success of SDSU by giving the UC system a very large tract of land, and the desired outcome has materialized. The proposed development/expansion of SDSU in Mission Valley can more than promise similar results because the university has already proven itself and is merely planning to expand on its proven track record. Although I believe the process has been illogical, in that the city expects to reap these economic benefits, instead of making an investment to receive the dividends and benefits, it wants the university to pay. In other words you pay me so I can make money, such as from an investment in the real world. I'd like to find a private sector example of that but would probably not find one.

I113-1

I113-2

Regardless, I believe that the draft EIR should be approved because although some issues like traffic may appear to be concerning, one has to take into consideration that; 1.) total build-out will take time and transportation and transit is evolving and will continue to do so, so that any concerns people may have now will be addressed by the development timeline and the aforementioned evolution. 2.) the site already has a massive stadium and parking lot that probably generates more traffic than what the final build-out of SDSU Mission Valley will. 3.) it will be a more aesthetically-pleasing and environmentally-friendly and economy-driving use of all that land. For these reasons, I absolutely support the project and the approval of the draft Environmental Impact Report. In layman's terms, it's a no-brainer.

I113-3

I113-4

I113-5

I113-6

I113-7

Jose Reynoso

San Diego, CA

Comment Letter I114

From: **Cecconi, Kurt** <[Cecconi.Kurt@principal.com](mailto:Cecconi.Kurt@principal.com)>  
 Date: Thu, Oct 3, 2019 at 2:51 PM  
 Subject: [mvcomments] Comments on the Mission Valley project  
 To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

This message was sent securely using Zix®

Dear SDSU,

Being an alum and supporter of SDSU athletics, I can't tell you how excited I am about your vision for the Mission Valley project. Coach Long and his teams deserve a quality venue to play in, and fans finally deserve a stadium that highlights the fan experience and makes us proud to be Aztecs. And the opportunities are endless for Aztec athletics, as well as the many outstanding academic departments and programs. Just look at what Viejas Arena has done for Aztec basketball. I am proud to support SDSU, Go Aztecs!

I114-1

Sincerely,

KURT CECCONI

9330 Scranton Rd. Ste. 250

San Diego, CA 92121

Phone: (858) 964-2103 (note new direct line)

FAX: (858) 554-1106

[www.kurtcecconi.com](http://www.kurtcecconi.com)

Comment Letter I115

From: 'Jwarren216' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
Date: Thu, Oct 3, 2019 at 3:44 PM  
Subject: [mvcomments] Mission Valley/SDSU  
To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To whom this may concern:

Our family is looking forward to this new Mission Valley plan. I have lived in San Diego all my life and our family has seen so much grow and we support our local community. This will bring in so much revenue to our City, inspire our young people to succeed, meet wonderful people from other states visiting San Diego watching their own child playing football with their families and friends while visiting this beautiful city of ours. This is what San Diego is about, and what San Diego needs, It's time for this project to move forward.

I115-1

Thank you

The Warren Family  
Jerry, Areli, and Melissa

Comment Letter I116

From: **Dave Weil** <[dave.weil@sbcglobal.net](mailto:dave.weil@sbcglobal.net)>  
 Date: Thu, Oct 3, 2019 at 3:47 PM  
 Subject: [mvcomments] Comments regarding MV Master Plan DEIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear Ms. Shinn,

Please see below my comments regarding the proposed SDSU MV Master Plan DEIR. Should you have any questions or need any further clarification please do not hesitate in contacting me.

I 1116-1

The Mission Valley project offers a great opportunity for SDSU to showcase how an environmentally sustainable community is feasible both economically and technically. As a teaching institution the University owes it to its students to make this project a true living laboratory to demonstrate how a triple bottom line (people, planet, profit) approach can result in a truly world class project that meets the needs of the people while employing innovative, financially sound, environmentally sustainable practices.

I 1116-2

Unfortunately, this proposed MV Master Plan and supporting DEIR does not demonstrate that this is the approach that is being pursued for the development of the Mission Valley project. Rather than really being a environmental sustainability leader, SDSU appears to be only striving to meet the minimum requirements.

I 1116-3

Specific areas that need further comment or clarification include:

I 1116-4

- It is unclear which statutory requirements are being applied to this project...City, State, or CSU? It should be noted that the CSU sustainability policy and goals are not mentioned in the DEIR. The CSU policy is a public document and as such its applicability should be addressed.
- While the DEIR notes that the campus has a Climate Action Plan, it mentions that an alternate plan will need to be drafted for this project. While this may be a reasonable approach, it would still seem that the campus sustainability goals, especially those regarding energy, GHG emission, carbon neutrality, water conservation and waste should be applied to this project.
- SDSU's CAP requires that all new construction achieve LEED certification. Additionally, all State buildings over 10,000 square feet, including build to suit leases, will be LEED certified. While the DEIR mentions LEED certification, it only requires buildings to achieve LEED equivalency. This is not the same the same as obtaining actual third party LEED certification.
- In addition to LEED requirements, new State buildings are required to be Zero Net Energy. Also, starting in 2030 new commercial buildings will be expected to achieve ZNE. These requirements are not mentioned in the DEIR.
- Along with LEED, attention should be paid to how buildings can impact the health of the people using them. In this regard, it might be appropriate for the WELL building certification to be considered.

I 1116-5

I 1116-6

I 1116-7

I 1116-8

I 1116-9

- While there is some discussion in the DEIR regarding district level thermal capacity, there is no discussion regarding implementation of a district micro-grid. Having a micro-grid would enable grid optimization through increased use of renewable energy resources as well energy storage, which in turn enhances both the financial and environmental value of the proposed solar energy and EV charging infrastructure. Having a micro-grid also helps to ensure that the grid can provide the expected level of reliability, resiliency and redundancy while also providing the flexibility to incorporate new or expanded future clean energy resources.
- The DEIR notes that this project will increase the use of non-renewable energy resources including the use of natural gas. This goes against the State's move away from natural gas and towards electrification of both electrical and thermal loads. This should be addressed in the DEIR.
- While the DEIR does contain some discussion regarding waste, there is no significant discussion regarding the State requirement for all commercial entities to recycle all organic waste. This will need to be addressed in the DEIR. One opportunity for organic recycling that might be considered is the addition of an onsite biodigester that could use the organic waste to produce both biogas for energy production as well as fertilizer (both solid and liquid) that can then be sold.

1116-10

1116-11

1116-12

SDSU has a unique opportunity to take a leadership role in the development of the Mission Valley community. However, in reviewing the actions proposed in the DEIR it appears that SDSU is only at best meeting the minimum requirements. In some cases (as noted above) additional clarification is needed to show that even these are being achieved.

1116-13

Thank you for this opportunity to provide comments on this great project that will serve the San Diego community for many years to come. Hopefully, they are helpful.

1116-14

Dave Weil, PE

SDSU '84

Sent from my iPad

Comment Letter I117

From: **Natalie Mladenov** <[nmladenov@sdsu.edu](mailto:nmladenov@sdsu.edu)>  
 Date: Thu, Oct 3, 2019 at 4:24 PM  
 Subject: [mvcomments] Comment on SDSU Mission Valley  
 EIR To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello and thank you for taking my comments into consideration.

- The analysis done on p 4.7-5 indicates that water demand will only increase and climate change will bring greater uncertainty in terms of water supplies. We are in a water scarce region. SDSU should consider all options to reduce reliance on potable drinking water for irrigation of sports fields and grass areas. Many examples exist of university and tech campuses treating their wastewater (black water) to a level that meets non-potable water reuse regulations (Title 22 in California). Developers have expressed some issues with separating sludge from the rest of the wastewater as a barrier to doing wastewater treatment for water reuse. As an environmental engineer, I am aware that there are many economical options for treating the entire wastewater pool (including the sludge) on site. The technologies exist and I would encourage you to reach out to engineering companies (there are many here in Southern California) who can design an appropriate and cost effective system for our campus.
- The analysis on p4.7.17 indicates that drought and water restrictions "prohibit[ing] irrigation with potable water" are likely to again be something we see in the future. These restrictions were issued during the last drought and surely will come back again.
- On p 4.7.37, the study indicates that " The proposed project would comply with applicable requirements of the California Building Code (24 CCR, Parts 6 and 11), and the City of San Diego's CAP Checklist, which include requirements for water management, efficiency, and conservation." Among these, I would like to see SDSU use gray water systems for dual plumbing (toilet flushing and other non-potable building water use requirements).
- Chapter 4.9
- pg 4.9-25: For parking lots and other impervious surfaces, storm drain inlets should be equipped with trash collection devices (screens and filters, filter socks, etc) to meet the Water Board "trash ban" for particles larger than 5mm. Different inlet filter designs are available that also sorb oil and grease to filter components. And it would be advisable to use/consider the more advanced trash capture devices. Littering of cigarette buttes and other plastics and debris still remains an issue on the main campus and these macroplastics could be captured by such trash capture devices.
- The San Diego River offers many learning opportunities for SDSU students and faculty. State-of-the-art outreach facilities would show that SDSU is a campus of the future. Scripps and UCSD have a number of modern buildings with outreach centers focused on the coastal setting. SDSU should provide modern learning and outreach facilities that focus on our strength, which is the San Diego River. Researchers can request encroachment permits to sample the river and access to the river should be open for those who do intend to use it as a living learning laboratory. An outreach facility in the river park, with room for student groups and rooms for teaching, presentations, hands-on activities, supporting K-12 groups, MESA, and community members (adult education, etc) is something I would like to see. In addition, a small space for researchers to store sampling equipment, sensors, batteries, etc. would make a big difference. Such research and education opportunities can be leveraged

I117-1

I117-2

I117-3

I117-4



- by SDSU faculty in grant proposals, and expenditures would come back to the university in research dollars and impact on undergraduate and graduate education.
- It would be of interest to some faculty to instrument BMPs with sensors or piezometers to collect water samples or measure water levels for education or research opportunities. Existing piezometers or groundwater monitoring wells mentioned in Chapter 4.8 also may serve an educational purpose. Faculty have expressed interest in being part of the conversation to be included in BMPs for educational opportunities.
  - p 4.9-3: It is incredible that smaller storm sewers pass "through" larger sanitary sewers and then continue into the San Diego River for stormwater discharge. " Drainage systems A, B, and C discharge into the San Diego River via 36-inch reinforced concrete pipes. The storm drain lines are reduced to 34-inch steel pipes to pass through the sewer main and are cased in polyethylene to prevent comingling of sewer and stormwater flows. Because of this design, the outfalls cannot be modified." This design really should be revisited, as sanitary sewers (many of which are old and failing) are a potential source of pathogen contamination of the San Diego River.
  - Just a remark about the San Diego River, which has elevated total dissolved solids concentrations. The river is fed by tributaries, such as Alvarado Creek which is brackish and fed by saline groundwater. The USGS groundwater well at the Qualcomm site has high salinity (*The San Diego Hydrogeology website (<http://ca.water.usgs.gov/sandiego>) has information to all the wells and links to the data.* ) and this generally saline groundwater in many parts of San Diego may be an important influence on higher TDS and salinity in the San Diego River.
  - Regarding potential homeless encampments, it would be recommended that SDSU address the issue of affordable housing and dedicate considerable resources to combat the issue of lack of housing for low income San Diegans. For those who do end up unsheltered, many may use areas on the Mission Valley campus. Appropriate sanitation for all individuals both residents of the MV campus and persons visiting or potentially encamping on the property should be considered. Safe, graffiti/vandalism proof toilet designs have been successfully deployed elsewhere and should be considered for 24 hour access to all.
  - Using all building structures for water harvesting, gardens, and energy capture (solar panels) should also be a priority.

Thank you for considering these comments on the draft EIR.

--

Natalie Mladenov, PhD.  
Associate Professor and William E. Leonhard Jr. Chair  
Environmental Engineering  
San Diego State University  
[WIRLab website](#)

1117-4  
(Cont.)  
1117-5  
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1117-8  
1117-9

Comment Letter I118

From: **Linda Vassier** <[lvassier@gmail.com](mailto:lvassier@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 4:29 PM  
 Subject: [mvcomments] Draft EIR  
 Comments To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Laura Shinn,

After attending the Serra Mesa Community Council meeting to hear the update on SDSU West, and after spending hours reading the Draft EIR document online, these are my comments:

I 1118-1

1) With solar PV panels on "available roof space" projecting generation capacity of 14.9% of the project's total electricity demand, that seems extremely low and could be improved upon.

I 1118-2

2) With regard to parking, that also seems inadequate for a 35,000 seating capacity stadium. If the hotel is booked with people driving cars, that decreases the available parking even further.

I 1118-3

3) At the SMCC meeting we were told there would be a grocery store on site, but I do not see that shown on the Site Plan.

I 1118-4

Comment Letter I119

Mike Bullock  
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760-754-8025  
October 3, 2019

SDSU  
5500 Campanile Drive  
San Diego, California 92182-1624  
Laura Shinn  
SCH. No. 2019011042  
Via email at [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)

Subject: **Draft SDSU Mission Valley Campus Master Plan EIR**

**Dear Laura Shinn,**

**Summary Statement**

My summary statement is that the *Draft SDSU Mission Valley Campus Master Plan EIR* (“Draft”) needs a significant rewrite. For example, regarding our anthropogenic climate change (“climate”) crisis, it fails to explain to the readers and decision-makers what is at stake and what is required to give us a chance to avoid human extinction. It also fails to propose a sufficient set of mitigation measures to ensure that this project contributes to climate stabilization. Therefore, the project, as described, would contribute to climate destabilization, leading to human extinction. In this letter, I provide background information and motivations and then propose additions that will fix these two fundamental problems.

I119-1

**My Background**

I have a BSEE, a MSE, and worked 36 years at Lockheed Martin. For all except the first several years at Lockheed Martin, I worked as a satellite systems engineer. The “satellite” focus is not particularly helpful here. However, the “systems engineering” skill and experience is directly applicable to this problem. (It appears to me that CARB needs to hire more systems engineers.) Anthropogenic climate change (“climate”) is a systems-engineering problem. It is also a political problem. For the 12 years I have been retired, I have written and presented peer-reviewed papers at professional conferences, such as Air and Waste Management Association (AWMA) Conferences and the Energy Utility Environment Conferences (EUECs). I have presented papers in Calgary, Guadalajara, downtown Chicago, the DC metro area, a suburb of Chicago, New Orleans, and San Diego. I am also active in the California Democratic Party (CDP), in my local club and as an elected member of my county central committee. I have also gone to state conventions, for the last 10 years, as a delegate. I have

I119-2

worked on many resolutions and improvements to the California Democratic Party (CDP) Platform. I have also volunteered in environmental organizations.

### **California Democratic Party**

I now know that the CDP is by far the most important environmental-advocacy organization in California. I urge you to read its platform. As you probably realize, the CDP is also an important political organization in California.

### **Climate Urgency**

It is still probably possible (though unlikely, sadly) to stabilize the climate at a livable level. To do this, we must achieve large reductions in our greenhouse gas (GHG) emissions by 2030. We can't give up the fight and that is why I am writing this comment letter.

### **Focus on Driving**

Cars and light-duty trucks, or "light-duty vehicles" or "LDVs" are currently the primary source of GHG emissions and it's not even close. This will get more pronounced as time goes on, if projects are not better than what is described in the Draft and if there is no plan (developed and implemented) showing how LDVs could be brought in line with climate-stabilizing requirements. SDG&E tells us that currently its electricity is about 50% renewable. This is a "good news" story. This will continue and we will also phase out most use of natural gas (We will "electrify."). However, there is not much good news regarding LDVs. Our state government has no plan showing how LDVs can achieve climate-stabilizing targets. Given this information, this comment letter will focus on LDVs and primarily on our need to reduce driving, also called vehicle-miles-travelled, or "VMT".

### **Comments on Draft**

In ES.1:

*CEQA Guidelines Section 15123 requires that the summary identify each significant impact, recommend mitigation measures, and identify reasonable and feasible alternatives to the proposed project that would avoid or substantially lessen the proposed project's significant physical impacts on the environment.*

The concept of Cumulative Impact means that we must consider what would happen if all projects were done in the manner proposed in this Draft. The short answer is that the earth's climate would destabilize, resulting in the loss of most life forms, including our own species. This impact is not mentioned.

Table ES.3.3:

I119-2  
Cont.

I119-3

*Discretionary approvals would include certification of the Final EIR under CEQA, and approval of the proposed project by the CSU Board of Trustees.*

↑  
I119-3  
Cont.

The fate of life on the planet is clearly in the hands of the CSU Board of Trustees.

Table ES-2:

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 have a cumulative effect on greenhouse gas emissions?*

I119-4

The answer is given as “less that significant”. This can’t be true because there is not plan showing how LDVs can conform to climate-stabilizing targets. It may be that this project is, in some ways, better than “business as usual”. But that is not proof that it will emit GHG, due to driving, at a rate that is low enough to conform to some plan showing how cars can achieve climate stabilizing targets. The answer to both questions is YES.

Is Section 2.2, project objective, it is often stated that “adequate parking” will be provided, for example (emphasis added):

*Provide an SDSU Mission Valley campus innovation village with up to approximately 1.6 million square feet for academic, office, research and development and technology transfer uses with adequate faculty, staff, student and employee parking.*

I119-5

I would not argue with “adequate” parking. However, how much parking is needed will vary greatly, depending on what kind of car parking system is being used. The authors seem to be unaware of car parking system choices and how much difference they can make in terms of how much parking is needed, economic fairness, and VMT, which must be reduced.

These words are also are problematic:

*Enhance transit ridership through pedestrian and bicycle improvements, and transit connections to the existing Metropolitan Transit System (MTS) Trolley Station and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line.*

I119-6

Reducing VMT should be the goal, not jacking up transit ridership for the sake of increasing transit ridership. However, if the goal was to “enhance” ridership, the best way to do that is by having car parking systems that reverse the harm of bundled-price parking or bundled-benefit parking. That is also the best way to reduce VMT, which should be the focus of mitigation measures. Besides this, the project does not have

very much control over the transit systems; it could have 100% control over car parking systems utilized.

↑ 1119-6  
Cont.

It also says, in 2.2:

*Meet the City's greenhouse gas (GHG) emission reduction goals as required by SDMC Section 22.0908.*

1119-7

It is well known that San Diego's CAP is extremely weak in its efforts to reduce VMT. The narrative that it is a good CAP is because it calls for 100% renewable energy (electricity) by 2035.

It also says, in 2.2:

*Implement a Transportation Demand Management Plan that incorporates land use, employer and resident strategies, to encourage transit use and reduce vehicle miles traveled*

1119-8

What strategies? It is far too late for such comments. We need specific strategies defined now. This is a fundamental and (literally) fatal flaw.

From 2.3.4:

*The residential area would be comprised of up to approximately 16 buildings totaling up to 4,600 residential units and with 5,662 parking spaces.*

If that parking were to be provided by surface parking, it would require about  $5662/120 = 47$  acres. It would help the reader visualize what this parking would look like if this calculation was noted. The 5,662 parking spaces could also be provided in a parking garage, costing, just for the construction,  $5662 \times 20k = \$113M$ . Of course best-looking renderings are when all parking is underground. This would cost about \$500M, or about a half a billion dollars. This shows that more thought about what type of car parking systems should be used is warranted.

1119-9

Likewise we are told that a hotel will have 425 parking stalls, with no concern shown for how the hotel might operate these stalls.

I have said I would stick to VMT. However, please allow me an exception.

In 2.3.4.6:

*Figure 2-10A, Site Utilities – Concept Electrical Utilities Plan depicts the existing and proposed electrical infrastructure relative to the proposed project. Electrical services and natural gas would be provided by San Diego Gas and Electric.*

1119-10  
↓

As Greta (the 16-year-old girl from Sweden who has been addressing the UN about her right to survive her full life given our climate crisis) might say, “how dare we be so out of touch that we are still connecting natural gas!”

Berkeley has an ordinance prohibiting future developments from having any natural gas connection. San Francisco will have the same ordinance soon. This saves construction costs. Electric can now, with the advent of heat pumps, heat water and air more efficiently than NG. With induction cooking it is better than a gas range. And so on. There is no reason to use a fossil fuel when electricity is becoming mostly renewable and will probably be 100% renewable in the next 15 years or so. **This is a feasible mitigation measure and since I have hereby identified it, there is now no choice under CEQA law. Thank you. No gas hook ups.**

1119-10  
Cont.

Section 2.3.4.7 has a subsection with the title of *Access, Circulation and Parking*. It specifies that there will be a lot of parking. There is no information about how it will be operated (what type of system will be used), how much land it might use, whether it is surface parking, parking-garage parking, or underground parking. There is no information about how much this might cost. This section reinforces the misinformation that there is not much we can do about parking and that we should not think about it too much.

1119-11

The figures do show that there is a lot of land being use for parking. However, quantification would be good, so as to show that how parking will be operated is worth considering.

From 3.3:

*To analyze the cumulative impacts of the proposed project with other planned or foreseeable projects in the project's vicinity, it is necessary to determine the type and specifics of the other planned or foreseeable 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”*

That is NOT the definition that any empathetic human being, such as might be on the CSU Board of Trustees, unless they are uninformed of our climate crisis and our need for very large reductions by 2030 or else our planet's climate will destabilize, creating a living hell, and ending in loss of most life forms on the planet. Since the current Draft misinforms all readers about our climate crisis and misunderstanding is widespread, even among our best-educated citizens, the CSU Board of Trustees may not notice that the above definition of cumulative impacts is acceptable, especially since it probably conforms to “(14 CCR 15130(b)).” However, this is not about the fine points of law. This is about survival, which must be rooted in common sense.

1119-12

The common sense definition of considering “cumulative impacts” is this: what if all projects (in San Diego County, in California, in the USA, in the world) that

come after this one are only as good as this one, at reducing VMT? Put another way, does this project's mitigation measures (enforceable measures) conform to an overall plan showing how LDVs will achieve climate stabilizing targets? Of course the authors did not go to the trouble to identify such a plan and they did not write such a plan. I appreciate the work that went into writing Section 3.4, but it will not tell the decision makers what they need to know, which is will this project contribute to climate stabilization or will it contribute to destabilization?

I119-12  
Cont.

Section 4 GHG is of interest. It shows that the authors do not seem to be climate deniers. It has a section called "Potential Effects of Climate Change on Earth". The word "potential" is misleading. It suggests that there might be no effects at all. It is just human nature to believe that God would not threaten us with anything that is too terrible. Here is a statement that I composed, that we might want to consider: ***If there is a God, he or she will not protect us from physics.*** People who believe otherwise should probably not be voting, let alone governing or writing DEIRS.

Section 4 has a long list of "potential" outcomes. There are, for example, 7 bullets, starting with this:

*It is very likely that the Arctic sea ice cover will continue to shrink and thin and that Northern Hemisphere spring snow cover will decrease during the twenty-first century as global mean surface temperature rises. Global glacier volume will further decrease.*

I119-13

This suggests that the summer ice might survive until, say 2090. However, the summer ice is much more likely to be gone in the next 5 years or so. This says nothing about the methane gas that will be released from the melting of our permafrost or the possibility of a large release of methane from the North Pole as ice is lost and water temperatures rise.

There are probably not any false statements in Section 4. However, it does not explain climate destabilization and the fact that this process is, from the human standpoint, unbounded. It will wipe us out. Omitting and not explaining this information is a 'lie by omission.' It is unacceptable and it violates CEQA law, which requires that environmental impacts, such as human extinction, be explained.

Section 4.7.2 is useful but it does not provide the reasoning behind the values. For example "80% below 1990 emission level" was allocated to the industrialize world, in an overall plan to get the slope of atmospheric CO2 to be zero, thus capping atmospheric CO2. (The next step would be to reverse slope.) In 2005, it was thought this could happen in 2050 and we would be OK. That was the basis for S-3-05. Things are now worse. We need to achieve that target by 2030 or the positive feedbacks will probably take over and we will have no chance of stabilizing the climate.

I119-14



Section 4.7.2 covers all of the California mandates. However it does not state whether or not they are sufficient to give us a reasonable chance at stabilizing the climate at a livable level. In fact, the word “stabilization” only appears one time as follows:

In 2005, Governor Schwarzenegger issued Executive Order (EO) S-3-05, which identifies statewide GHG emission reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020; and
- Reduce GHG emissions to 80% below 1990 levels by 2050.

This was thought to be true back in 2005. We now know the “80% below” level is needed by 2030.

Regarding 4.7.3, given our climate crisis, in ALL cases, feasible mitigation measures that will reduce GHG emissions should always be sought after and adopted.

The subsection of is of interest. It does include the *Transportation Demand Management Program* subsection, which does include (emphasis added):

*Parking Policy and Pricing*

- *Unbundled **Residential** Parking*
- *Metered On-Street Parking*
- *Reduced Parking Supply*

This is an unacceptable lack of detail and definition. There is no quantification. There is no guarantee that anything will happen. It has been established, in the Sierra Club suit against the County’s bogus Climate Action Plan, for example, that enforceable measures are needed. Please read the rest of this letter to see what is needed. Please incorporate Dividend Account Parking (DAP) and the other feasible mitigations described below.

The needed level of detail might be provided in the “*Fehr & Peer’s Transportation Impact Analysis (2019) for the proposed project in Appendix 4.15-1.*” However these types of documents, such as the California Air Pollution Control Officers Association (CAPCOA) document looks promising until one reads it in details. What is found is that it lacks the details needed to implement what it is broadly suggesting. Parking is always the worst, in terms of having details. The fact that “**residential parking**” is mentioned in those three bullets above, but there is nothing for **employee parking** is a sure sign that parking has not been thought through. For parking, see the DAP system work, below and in the references to this document.

Later we see:

*The TDM Program, which applies to the proposed project’s campus educational, office, residential and retail uses, is described in Section 4.15, Transportation. To determine the effectiveness of the TDM and the*

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*amount of VMT and trip reduction that would be attributable to the SDSU Mission Valley Campus TDM Program, the proposed program elements were compared to CAPCOA standards. CAPCOA developed the Quantifying Greenhouse Gas Mitigation Measures (August 2010), (CAPCOA Report; CAPCOA 2010) as a set of guidelines for quantifying the environmental benefits of mitigation measures. The CAPCOA Report includes the most comprehensive and up-to-date set of calculations for calculating TDM effectiveness. For those TDM strategies not addressed by the CAPCOA standards, case studies were utilized to estimate vehicle trip and VMT reduction.*

I119-17  
Cont.

Regarding car parking CAPCOA is woefully inadequate. Its “definition” of “unbundling” parking seems to be where car parking is removed from a building and it operated as a separate business. Would this really happen, politically? Again the work proposed below is much more defined and would have a much better chance to be implemented, from a political standpoint. For example, if parking is suddenly taken from employees and turned into a separate business, who could guarantee that the reduced rent for the stand-alone building, compared to the building-parking complex, would be passed along to the employees? DAP would be far better.

#### **Need for Pricing Strategies**

The Draft fails to treat the option of changing pricing with specific measures with the rigor it deserves. Pricing-related measures are critical.

What is needed is, *transportation strategies*, where “strategies” must primarily be those that focus on the conceptualization, definition, design, and implementation of new systems to improve the way we pay for the use of parking and the use of roads. (Of course a system to improve the way we pay for roads is a state issue. However it is so needed that the draft could make the assumption that the state comes through with a good system.) This is found to be true when considering the time urgency and when the fundamental principal of *Induced Traffic* is considered. **Induced Traffic** means that anything done to create space on the road (like all cars being automated, adding lanes, or adding great transit that parallels a freeway) will induce enough additional traffic to fill in that space. Sometimes “creating space on the road” is described a “reducing congestion.” However, “congestion” is no more and no less than the condition that the general public will accept, given the cost of the competing travel modes. This means that, if costs are held constant, expanding freeways, will not reduce congestion. It will only increase VMT. Likewise, expanding transit will not reduce VMT; it will only increase the amount of travel. However, more transit is good if prices change because the price-mode-change elasticity will improve. That is to say that if the price to drive goes up, the VMT will decrease more if there are good alternatives to driving. Note that increasing the price to drive and park is by far the most cost-effective way to reduce VMT. Our anthropogenic climate change crisis (“climate crisis”) is so urgent that we have no hope at achieving climate-stabilizing targets without improving the way we pay for the use of parking and driving. The need

I119-18

for large reductions ASAP and no later than 2030 means that pricing is necessary. Better zoning by itself will accomplish little until projects are built and building projects will take time. Building significant transit will also take time. Both new developments and new transit systems will require money that might not be forthcoming, given that we can't predict economic or political variations. Pricing of parking and roads can be done fast and at relatively low cost. In fact, it may be that good systems to price parking may generate more money than they cost because, with a good system, less parking will be needed and parking is often very expensive to provide. Unused parking can be monetized in various ways. Once a good car-parking system is implemented, it becomes very cheap to expand. Such a system (specifically "Dividend Account Parking", or DAP) will be shown, in detail, in this letter and its references.

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Cont.

For a short definition, here is a bullet from Reference 1 the California Democratic Party's sub-plank on transportation:

*shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking;*

#### **Need for Climate Literacy**

The first thing your draft should provide is *climate literacy*. *Climate literacy* is defined in a CDP resolution, and stated in Slide 2 of Reference 2. It can be taught, from a transportation standpoint, using Reference 2. Reference 2 uses the results of a systems-engineering report which conforms (it is the "state plan") to this, from Reference 1 (emphasis added):

- *Demand a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed fleet efficiency and per-capita driving*

Note that there is one set of enforceable measures to achieve the fleet efficiency. There is another set of enforceable measures (*transportation strategies*) to achieve the reduction in per-capita driving. Reference 3 is the actual report. (Reference 3 relies on pricing strategies.) Reference 4 is the Power Point version of Reference 3. Note that CARB should produce its own version of Reference 3. Until that is done, CARB should use Reference 3, to ensure that it is doing its part to help humanity avoid destabilizing the climate, which would, by the way, end almost all life forms on Earth, including our own species.

I119-19

The Draft either needs to include its own versions of References 3 and 4, or use Reference 3 and Reference 4. All EIRS, including this Draft should point out that a primary feature of climate destabilization will be the "devastating collapse" of our population, to extinction. Under the principle of "cumulative impacts" a discretionary project either contributes to climate destabilization (end of nearly all life forms) or it would contribute to stabilizing the climate at a livable level. Climate stabilization is the

good outcome. Note that this good outcome could still include losing perhaps 6 billion people out of our total current total of about 7.5 billion people. However, in this case, the Earth would eventually cool off and many life forms would continue to exist indefinitely. As shown on Slide 9 of Reference 2, destabilizing the climate would lead to:

*a devastating collapse of the human population*

As the other information on Slide 9 of Reference 2 makes clear, this collapse would be an early outcome of a process that would end human existence.

### **Project Responsibility**

Developers have a responsibility to humanity. The fact that climate destabilization will end most life forms on earth, is never stated. This is a lie by omission. To avoid climate destabilization, anthropogenic emissions must first be reduced enough to stop the level of atmospheric CO<sub>2</sub> from continuing to increase. This needs to happen as soon as possible. If it happens too late, we could still suffer a “devastating collapse of the human population”, regardless of our actions, after the warming feedbacks become dominant. The Draft must explain both “stabilizing the climate at a livable level” and “climate destabilization.”

EIRs must identify the *most* significant impact of all. The extinction of humanity, which would come about if we fail to achieve climate-stabilizing targets, is almost certainly the most significant impact of all. Only identifying such effects as more fires, heat waves, droughts storms, and some amount of sea-level rise, while both true and useful, is insufficient and a violation of CEQA law. CARB needs to work to make us smarter about our climate challenge.

### **California Climate Mandates and Climate-Stabilizing Targets**

Certainly, California Climate mandates are important. However, based on current climate science, they are unfortunately NOT climate-stabilizing. The industrialized world receives its climate-stabilizing targets from the climate scientists, who are allocating larger reductions to the industrialized world than the reductions that they allocate to the developing world. This is discussed in References 2, 3, and 4. Reference 5 is the source that supports the calculation of our first climate-stabilizing target. On Page 21 of Reference 5 is the key statement:

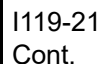
*. . . the required rate of emissions reduction would have been about 3.5% per year if reductions had started in 2005, while the required rate of reduction, if commenced in 2020, will be approximately 15% per year.*

This supports the orange ramp of the Figure 1, from Slide 17 of References 2. The calculation is  $(0.85)^{10} = 0.20$ , where the 0.85 comes from the “15% per year” and the “10” comes from the selected number of years (10 years), from 2020 to 2030.

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Obviously, to do that, fleet (“fleet” means all the cars and Light-duty trucks, AKA “light duty vehicles”, AKA “LDVs”, that are on the roads in California) efficiency must be

taken into account. For example, if we could somehow guarantee that by 2035 all cars on the road would be battery-electric vehicles (BEVs) and if by 2035 electricity were 100% renewable, we could then “double deck” all of our freeways and drive as much as we want. Note: if pricing stayed the same, so-called congestion (exactly what people will accept) would be the same and per-capita VMT would be much larger than even the 2005 (or whatever year was the year of the peak per-capita VMT) amount.

Given that cars last, on average, nearly 15 years and given that even in 2019 many internal combustion engine vehicles are being sold, it is true that we must achieve significant reductions in VMT. This truth needs to be told to the general public, the California Executive Branch, the California legislature, and, most importantly, to the decision makers that may approve this project.

This information needs to be quantified. That is the why it is so important that the Draft include Reference 3 or its own version of Reference 3.

Also, the Draft should make it clear that:

- Cars and light-duty trucks (LDVs) is by far the largest category of GHG emissions<sup>1</sup> and
- This category (LDVs) will not achieve the state’s climate mandates (Executive Order B-55-18 and SB-32), let alone achieve climate-stabilizing targets (which will require larger GHG emission reductions than the state’s climate mandates), without *significantly reducing VMT*.

**Need to Explain and Take into Account the Gravity of Humanity’s Climate Predicament and What it Will Take to Achieve Climate Stabilization**

The following statements are made in light of the well-established legal principle of “cumulative impacts”, meaning that the outcome of a project must be considered under the assumption that other similar projects will be no better and no worse than the project being considered. This is the answer to the illogical statement that the project will be too small to affect the outcome of our anthropogenic climate-change crisis. Given our anthropogenic climate crisis, hereby often denoted by the single word “climate”, this project will literally either support human survival or contribute significantly to human extinction. The words of the current draft unfortunately do not suggest that the stakes are anywhere near that high. The words also do not provide sufficient help to readers.

The evaluation must also show compliance or non-compliance with achieving “climate-stabilizing targets”, where “climate-stabilizing targets” means targets that will, considering cumulative impacts, prevent “climate destabilization”. Briefly, “climate destabilization” is shorthand for having the world go through a so-called climate tipping

<sup>1</sup> From the Energy Policy Initiative Center (EPIC), in San Diego County, the top 3 GHG emission categories were, about 8 years ago, as follows: cars, 41%; electricity, 25%; natural gas, 9%.

I119-22  
Cont.

I119-23

point. Going through a tipping point herein means that the warming feedbacks become dominant and our planet's climate changes into one which will no longer support most of its current life forms, including our own species.

The June, 2008 issue of *Scientific American*<sup>2</sup> wrote of a "devastating collapse of the human population", due to anthropogenic global warming if there is insufficient reductions in our greenhouse gas (GHG) emissions.

Humanity must, as Governor Brown said to the Pope, "reverse course or face extinction."

### **Measures to Reduce VMT**

Which suggested mitigations (ways to reduce GHG emissions) should be ignored and which ones should be implemented? The first *Scoping Plan* says that all mitigations should be implemented if they are "technologically feasible and cost effective". This criterion should be applied to all identified mitigation measures, including those in this letter.

To do this, the authors will have to make assumptions about what California will do regarding LDV (Light Duty Vehicles meaning personal vehicles or, more explicitly, cars and light-duty trucks) fleet efficiency and also what California will do regarding adopting an improved method for having Californians pay for the use of our roads, since that will have a significant effect on per-capita driving. Without such assumptions, the Draft authors can't possibly predict environmental outcomes, or "impacts." It is reasonable to assume that the state will also adopt policies to reduce vehicle-miles travelled (VMT) by LDVs.

The state should take the lead on fleet efficiency and the "road-use charge" ("RUC", as shown in the work to implement SB 1077). The project must take the lead on achieving the needed per-capita driving, assuming the state's RUC, which should help to reduce VMT. The project controls on VMT include land use, complete streets, active-transportation facilities, car-parking policies, and teaching adults how to safely ride a bicycle in traffic.

As stated above, the political party that is the majority political party in California takes the explicit position that many of the above statements are true. For example, the California Democratic Party (CDP) platform (Reference 1) advocates for the following:

*. . . a state plan showing how cars and light-duty trucks can hit climate-stabilizing targets, by defining enforceable measures to achieve the needed fleet efficiency and per-capita driving*

As stated above, Reference 3 is such a state plan.

### **Enforceable and Feasible Mitigation Measures to Achieve Driving Reductions**

<sup>2</sup> *Scientific American, The Ethics of Climate Change*, Professor John Broome, June 2008, Page 100

↑  
I119-23  
Cont.

I119-24

↓ I119-25

### **A Comprehensive Road-Use Charge (RUC), Pricing-and-Payout System to Improve the Way We Pay for the Use of Roads**

All of those working on this project should urge the state to implement this mitigation measure. *Comprehensive* means that, for example, pricing, overall, is sufficient to cover all costs, including road maintenance and externalities such as harm to the environment and health; privacy is defined and achieved; the economic interests of low-income drivers doing necessary driving would be protected; that the incentive to drive fuel-efficient cars would be at least as large as it is under the current fuels-excise tax; and, as good technology becomes available, congestion pricing is used, whenever needed, to protect critical driving from congestion.

The word “*payout*” (from the heading above) means that some of the money collected would go to people that are losing money under the current system.

Currently, user fees (gas taxes and tolls) are not enough to cover road costs. Even though general-fund money is being used to operate and maintain roads, California is not doing maintenance with enough frequency to minimize cost. It is well understood that deferred maintenance will cost more than timely maintenance. Besides this, the improved mileage of the Internal Combustion Engine vehicles (ICEs) and the large number of Zero-Emission Vehicles (ZEVs), both of which are needed to have the fleet efficiency required to achieve climate mandates, mean that gas-tax revenues will drop precipitously over the coming years. In view of these facts, California has passed and has successfully implemented SB 1077, which created a pilot project road user charge (RUC). The Road User Charge Technical Advisory Committee (RUC TAC) visited San Diego twice. The first time, they met in the SANDAG Board Room. The second time, they met at the CALTRANS District 4 office. SANDAG Board Members and SANDAG staff were conspicuously absent from these meetings. (This was during the “bad old days”, before Hasan Ikhata became director.) SANDAG staff did not inform its Board of these meetings. This is unfortunate because a RUC is the future of road funding.

We should all urge California to create an effective RUC pricing-and-payout system. Legislation is needed to get the design and implementation moving. Such a system will play a useful role in reducing per-capita driving.

Reference 6 shows some more detail about why we need a RUC and what features a RUC would need.

1119-25  
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### **Improving the Way We Pay for the Use of Car Parking**

*Bundled-cost parking* increases the cost of everything, from rent to food; *bundled-benefit parking* reduces wages. These unsustainable practices are economically unfair to those that drive less or might like to drive less, if they could receive the fair, market-priced compensation for their effort, considering the high cost of providing parking. Surface parking only provides spaces at a rate of 120 car-spaces per acre of land. Parking garage construction costs are over \$20,000 per space. Underground parking costs from \$80,000 to \$100,000 per space. The fourth bullet of the Transportation Sub-plan of the 2016 California Democratic Party Platform

1119-26



(Reference 1) calls for “*shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking.*” This has been defined as “Dividend Account Parking” (DAP). The word “dividend” is used because it supplies earning to those losing money because the parking is being provided. The word “account” is used because anyone can use DAP parking spaces, as long as they have registered the vehicle and provided an account that will receive the earnings and an account that will provide the charge. DAP could be thought of as the “Uber” (or “Lyft”) of car parking. It is an extension of the shared economy. It would be designed, implemented, and operated by a vendor that would be selected by the first local government that steps up and is willing to administer an RFP (request for proposal) or RFI (request for information) process. Reference 7 is a Power Point presentation defining DAP, with a focus on a local government (Oceanside, CA) providing DAP for their own employees, as part of their CAP. Reference 8 shows that DAP can be used for all types of parking. Note that Reference 8 was written in 2010, back before the name “Dividend Account Parking” was invented. In Reference 8, DAP was called “Intelligent Parking”. Reference 9 is the Power Point file used to present Reference 8. Note that Reference 8 shows a congestion-pricing algorithm. Reference 10 is a draft of an RFI that could be used by a local government (or CARB) to locate a vendor that would do DAP. The ideal vendor would be one that is anxious to expand, knows how to promote its product, knows how to monetize unused parking, knows how to monetize data, and is comfortable with new technology and systems engineering. Reference 11 shows that DAP in downtown Oceanside, for Oceanside employees, would make extra money for many employees, would not cost those employees that drive everyday any money, and would pay the vendor a reasonable amount of money assuming their system is efficient.

This feasible mitigation was ignored by San Diego County in their legally-deficient Climate Action Plan (CAP) which they subsequently rescinded under court order. This is the mitigation measure that was described during oral arguments, in Appellate Court, when a Justice asked the Club to describe a feasible mitigation measure that was ignored by the County.

After hearing the description, the Justice commented, “Sounds like feasible mitigation to me.”

Here is a brief description of this feasible mitigation measure. It should be implemented first for employers in the Project. It is modified to be for Oceanside. This strategy would be a “game-changer”, not only for Oceanside, but for improving our prospects for achieving climate-stabilizing targets, wherever driving is a significant source of GHG emissions and so-called “free parking” at work is common.

***Demonstration Project to Eliminate the Harm of  
Bundled-Benefit Parking at Work***

Oceanside would, by selecting a third-party vendor using a request for proposal (RFP) or request for information (RFI), cause a Demonstration Project to, in effect, Unbundle the Benefit of Parking (“Demonstration Project”) at City Hall (“Proposed Location”). This could also be called the

1119-26  
Cont.

implementation of a “Dividend-Account Parking” (DAP) system at its City Hall location.

BACKGROUND: Currently, Oceanside employees do not have the ability to choose between earnings and driving – employees effectively pay for parking out of their salary, whether or not they use the parking. The Demonstration Project will provide the opportunity for the employees to choose between earnings and driving. This is functionally equivalent to the implementation of the California Air Pollution Control Officers Association (CAPCOA) measure of unbundling the cost of parking.

PROJECT: Parking would be charged at a given rate (for example \$0.02/min – roughly \$10.80/day, considering 8 hours of work and 1 hour for lunch). Funds generated from these parking charges would be distributed as earnings to all employees working at the proposed location in proportion to each employee’s time spent at work, at the proposed location. Those who decide not to drive will not be charged for parking but will still make earnings based on their time spent at work at the location. Implemented correctly, this free-market approach will substantially reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, by reducing the drive-alone mode. Note that this location, Oceanside City Hall, is walking distance from a transit center that has above-average bus service and is served by four different rail lines.

For employees whose parking charges are greater than their parking lot earnings, an “add-in” will be included so that no employee loses money, compared to “free parking”. (Some documentation of this method refers to this payment as a “must-drive bonus”.) With such “add-in” payments, there could be an “Opt in” or “Opt out” choice, meaning that those that “Opt out” will see no changes on their pay check, relative to “free parking”.

This project may be helped by receiving a grant to pay the City for going through the RFP or RFI process. Oceanside would need to apply for such a grant. CARB could also supply financial help to Oceanside. This project may also qualify for a GGRF funded grant, where GGRF stands for Greenhouse Gas Reduction Fund, from Cap and Trade funds.

Based on Table 1 of Reference 8, the driving reduction could be 25%, at places of employment. Table 1 shows driving reductions resulting from introducing a new price differential for parking, for 10 cases. Its average reduction in driving is 25% and its smallest, single-case reduction is 15%. Again, these systems can be set up so that no driver loses money. Grant possibilities include the California Air Resources Board’s *Low Carbon Transportation* program and the Strategic Growth Council’s (SGC’s) *Transformative Climate Community* program.

#### **Good Bicycle Projects and Bicycle Traffic Skills Education**

The best criterion for spending money for bicycle transportation is the estimated reduction in driving per the amount spent. It is hoped that the following

***League of American Bicyclist Certified Instruction of “Traffic Skills 101”***

1119-26  
Cont.

1119-27

Most serious injuries to bike riders occur in accidents that do not involve a motor vehicle. Most car-bike accidents are caused by wrong-way riding, riding on sidewalks, and errors in intersections; the clear-cut-hit-from-behind accident is rare.

After attending *Traffic Skills 101*, students that pass a rigorous written test and demonstrate proficiency in riding in traffic and other challenging conditions could be paid for their time and effort.

As an example of what could be done in San Diego County, if the average class size was 3 riders per instructor and each rider passes both tests and earns \$100 and if the instructor, with overhead, costs \$500 dollars, for a total of \$800 for each 3 students, that would mean that \$160M could teach  $\$160M/\$800 = 200,000$  classes of 3 students, for a total of 600,000 students. This is approaching 20% of the population of San Diego County. If a significant percentage of the graduates become every-day, utilitarian riders, this program would be a very cost-effective mitigation measure. It is certainly technologically feasible.

Members of Oceanside's Bicycle-Pedestrian Committee already are teaching League-Certified classes on how to bicycle in traffic.

This could be set up for those working and living in the project. It could be part of the TDM plan.

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**CEQA Law Requires that the Above Feasible-Mitigation Measures Be Include in this Project**

Under CEQA, those doing discretionary projects, such as this project, must incorporate all identified mitigations into their project if the mitigations are feasible. To show this is true, I have included Reference 12 which is a ruling against San Diego County regarding their 2<sup>nd</sup> attempt to produce a legal Climate Action Plan.

Note these words, on Page 11 of Reference 12:

*As a second example, the Sierra Club suggested that the County "install a car parking system that gives its employees more choice over how they spend their wage" by unbundling free or subsidized parking from employee benefits. AR 16:15048-49. In response, the County stated the suggestion "would be infeasible" and set forth conclusions and argument. Ibid. CEQA requires the County to set forth substantial evidence to support its conclusions and argument that mitigation measures are infeasible. The County has failed to do so.*

The plaintiffs (the Sierra Club) had proposed Dividend Account Parking (DAP) to the County, for their own employees, as a demonstration project, to lead to widespread adoption of the superior, VMT-reducing, car-parking system. The reason the County lawyers attempted to show DAP infeasible is that they knew that the Board of Supervisors did not want to include the feasible mitigation measure of DAP in its CAP. (If you want to see the Sierra Club complaint, please send your request to [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net). It is about 7 Meg in size. It uses and defines the phrase

1119-28

"Dividend Account Parking" (DAP)). Judge Taylor chose to not use that name for the proposed car parking system, because if he did, he would need to define DAP.

**Include, in the Draft, Plots and Explanations of the Plots, to Leave No Doubt About the Validity and Grave Nature of Anthropogenic Climate Change**

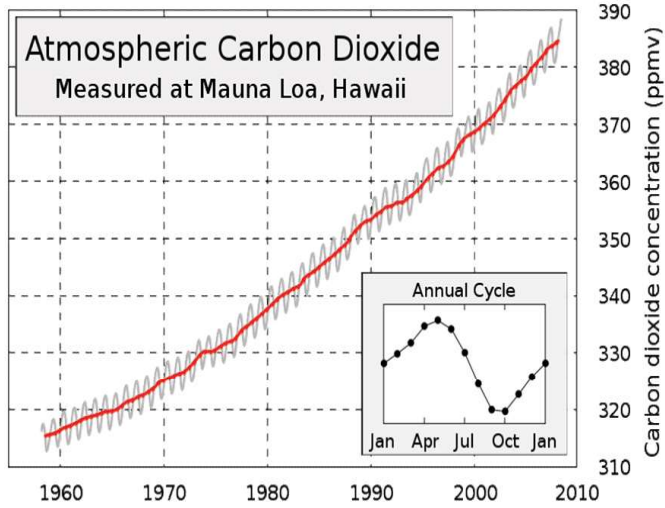
We know that there are still "climate deniers" in the general population and even in leadership positions. The Draft authors have a responsibility to reduce the number of climate deniers because they reduce humanity's chances for survival. Figure 2 shows the rise of the world's atmospheric CO2 over the last 50 years. Figure 3 shows both atmospheric temperature (averaged over a year and averaged over all of the earth, derived from an isotope analysis) and atmospheric CO2 (from a simple spectrum-analyzer analysis of air taken from sampled ice cores), over 800,000 years. (Our species is only around 300,000 years old.) Figure 3 shows that when climate deniers say that our climate is always changing and so therefore climate change is normal, they are correct, except for one important consideration: There is nothing normal about the outrageous run up of atmospheric CO2, to over 400 PPM, in such a short time that it appears to be an instantaneous spike, on the far right side of Figure 3. There is no doubt that the spike is the result of our combustion of fossil fuels. The spike is clearly anthropogenic climate change. Figure 4 covers all of the time of the development of our civilization. By focusing on just 1000 years, the spike's shape is revealed. Everything was normal until about 150 years ago, which is the start of our industrial revolution, when we started to burn fossil fuels. The ominous increase in temperature (in blue) is also shown. By doing extensive calculations we know how much CO2 we have produced from the combustion of fossil fuels. Then, by directly measuring the atmospheric CO2 and the acidity of the oceans, we know where all of that CO2 currently resides. We also know that atmospheric CO2 traps heat. There is no doubt that we have an Anthropogenic Global Warming (AGW) catastrophe in the making. Achieving climate-stabilizing targets is our only hope.

All of this information, or equivalent, must appear in the CARB Draft and must appear in all of the EIRs that will be done for all of the RTPs.

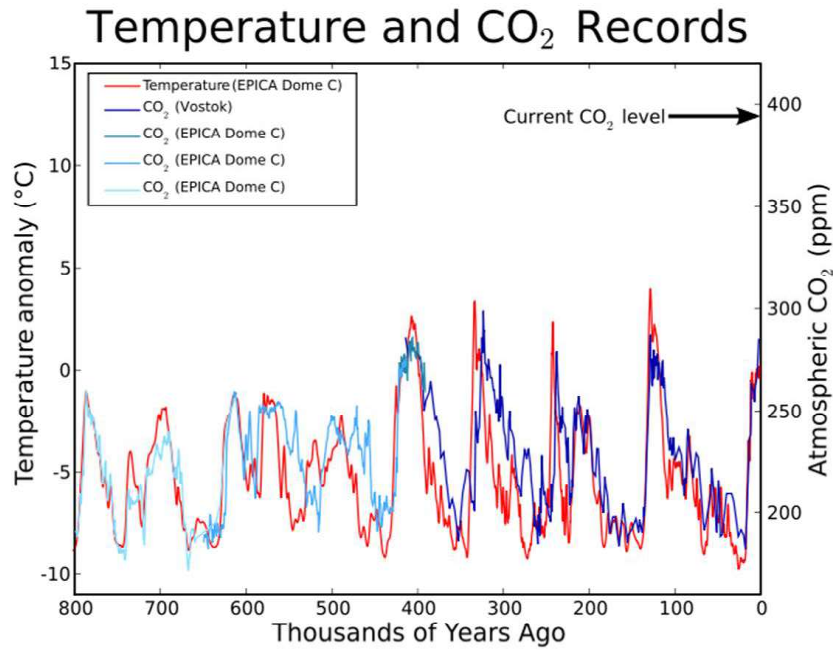
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Cont.

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**Figure 2 Atmospheric CO<sub>2</sub>, Increasing Over Recent Decades**

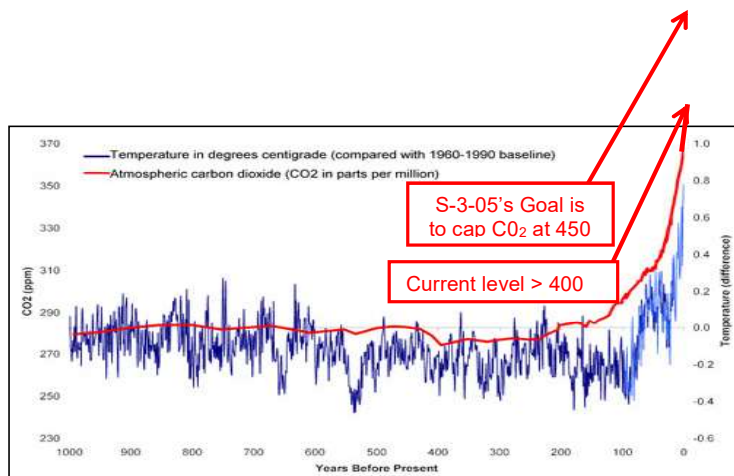


**Figure 3 Atmospheric CO<sub>2</sub> and Mean Temperature, from 800,000 Years Ago, with Current CO<sub>2</sub> PPM Shown**



I119-29  
Cont.

**Figure 4 Atmospheric CO2 and Mean Temperature, Over the Last 1,000 Years**



I119-29  
Cont.

### In Closing

Given the severity of our climate crisis, it is imperative that the Project and Draft include in all of the identified feasible mitigation measures (enforceable measures) that would reduce VMT. This includes those identified in this letter.

Thank you for your leadership in performing your critical work. Thank you for reading this material. Please let me know if you have comments or questions about this letter or related topics.

I119-30

**Highest regards,**

Mike Bullock  
1800 Bayberry Drive  
Oceanside, CA 92054  
760-754-8025

California Democratic Party Delegate, 76 AD (author of 2 adopted resolutions and 5 Platform changes)  
Elected Member of the San Diego County Democratic Party Central Committee (author of 5 adopted resolutions)

Satellite Systems Engineer, 36 years (Now Retired)  
 Air and Waste Management Association published and presented papers:  
 Author, ***The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving***  
 Author, ***A Climate-Killing Regional Transportation Plan Winds Up in Court: Background and Remedies***  
 Co-author, ***A Plan to Efficiently and Conveniently Unbundle Car Parking Cost***

## References

- 1.) Transportation Sub-Plank of the 2018 California Democratic Party (CDP) Platform, attached to the email submission of this letter and available upon request emailed to [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net)
- 2.) Slides used to cover the six elements of the CDP Resolution on Climate Literacy, for the category of cars and light-duty trucks, attached to the email submission of this letter and available upon request emailed to [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net)
- 3.) Bullock, Mike R; *Climate-Stabilizing, California Light-Duty Vehicle Requirements, Versus Air Resource Board Goals*, Paper 881-AWMA, from the Air and Waste Management Association's 109<sup>th</sup> Annual Conference and Exhibition; New Orleans, June 16-25, 2016; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 4.) Slides used to present Reference 3; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 5.) Brief of Scientists, Amicus Group as Amici Curiae in Support of Plaintiffs-Appellants Seeking Reversal, Daniel M. Galpern, Law Offices of Charles M. Tebbutt, P.C., 941 Lawrence Street, Eugene, OR, 97401-2815, 541-344-3505; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 6.) *A Privacy-Protecting, Road-Use-Fee Pricing & Payout System to Help Solve Climate, Congestion, Deferred Road Maintenance, and the Social Inequity of Using General Funds to Maintain Roads, Since that Money is Needed for Such Things as Transit, Food Stamps, and Education*; Resolution of Democratic Club of Carlsbad and Oceanside (DEMCCO), Feb. 25, 2014, available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 7.) *Eliminating the Harm of Bundled-Cost or Bundled-Benefit Parking*, a presentation given to the 2017 Energy-Utility-Environment Conference (EUEC) in San Diego, Feb. 26, 2019; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 8.) *A Plan to Efficiently and Conveniently Unbundle Car Parking Costs*; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103<sup>rd</sup> Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010, M. Bullock & J. Stewart; available upon request from Mike Bullock, [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net). attached to the email submission of this letter

1119-31

- 9.) Slides used to present Reference 8; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 10.) (Draft) *Request for Information (RFI) or a Request for an Indication of Interest (RFIOI) in Responding to an RFI, Design, Install, and Operate a Dividend-Account Car Parking System at Selected Work Locations for Employees*, 2019, Mike Bullock; available upon request from Mike Bullock, [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net). attached to the email submission of this letter
- 11.) *Cash Flow Calculations for Oceanside Parking Garage Using a Dividend-Account Car Parking System for the Economic Benefit of Workers and to Reduce the Frequency of Single-Occupancy Vehicle (SOV) Mode Commuting*, Mike Bullock, March 11, 2019; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter
- 12.) *Minute Order*, Superior Court of California, County of San Diego; Dec. 24, 2018; Case Number: 37-2018-00013324-CU-TT-CTL; Judge Taylor; available upon request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net) and attached to the email submission of this letter

1119-31  
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Comment Letter I120

From: 'Sharon Kramer' via SDSU Mission Valley Comments <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
 Date: Thu, Oct 3, 2019 at 4:52 PM  
 Subject: [mvcomments] The Community of Mission Village and Serra Mesa  
 To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello.

I am a long time resident of Serra Mesa as I grew up in this community and have returned to live here again. I have just been made aware of the deadline for input being today.

I120-1

Unfortunately surrounding developments and now congested freeways are turning our neighborhood into a traffic nightmare as planners route more vehicles and buses to Mission Village Dr. and Murray Ridge Road. I have now understand the community was not given an opportunity to be involved in planning.

I120-2  
I120-3

I would like to ask that added time and consideration be given to review all impacts to our community and neighborhood.

I120-4

Thank you.

Sharon Kramer

Comment Letter I121

From: **Joan Holliday** <[joanholliday@outlook.com](mailto:joanholliday@outlook.com)>

Date: Thu, Oct 3, 2019 at 5:05 PM

Subject: [mvcomments] Traffic on Friars Rd. if the Stadium is left to development of thousands of condos

etc. To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

The traffic on Friars Rd. just gets worst every day, especially in the morning and evening. There is no more room for cars. How will all the people working and living in the stadium foot print get around? They would need more access to 15 and 8 other than what is currently available. It is a big mistake to allow development of this valuable city property.

I I121-1

I I121-2

I I121-3

Joan Holliday Brown

Mission Village

Sent from [Mail](#) for Windows 10

Comment Letter I122

From: **J-K Fowler** <[fowlerfamilysd@gmail.com](mailto:fowlerfamilysd@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 5:14 PM  
 Subject: [mvcomments] SDSU Mission Valley DEIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

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

5500 Campanile Drive  
 San Diego, CA 92182-1624

Dear Ms. Shinn:

I am writing out of concern about the impact of traffic on the Friars Road and Serra Mesa communities. The SDSU Mission Valley Campus DEIR did not sufficiently address a number of significant concerns, namely traffic impact on nearby schools and neighborhoods.

I 1122-1

It is incumbent on SDSU to be good neighbors by anticipating potential problems and taking meaningful steps to address them. Why has there been no consideration to operating a "park & ride" lot on Aero Drive or other locations that might be impacted?

I 1122-2

Why is there no consideration to closing the north exit from the stadium onto MVD, allowing only N/S traffic to go E/W on Friars Road from the MVD access? This would go far to ameliorating traffic impact.

I 1122-3

Thank you for your kind consideration.

Karen Lese-Fowler

Comment Letter I123

From: **Francine Bates** <[francine6069@att.net](mailto:francine6069@att.net)>  
 Date: Thu, Oct 3, 2019 at 5:20 PM  
 Subject: [mvcomments] Traffic Congestion with the possible SDSU plan for the Stadium Solutions??  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello,

My name is Francine Bates and I have lived in Serra Mesa 25 years on Admiral Ave that connects with Mission Village Road one block from Ruffin Road.

I123-1

Games at the stadium always cause MUCH congestion on game days, which has not been a large problem if Serra Mesa residents plan for it, and drive AWAY from the stadium on Mission Village. This is always an inconvenience but once or twice a month it is tolerable. As it is now, we have heavy daily rush hour traffic driving southbound down Mission Village Road. Come visit the intersection of Ruffin Road and Mission Village Road at 5 pm any weekday and you will see a few crazy drivers cutting others off at the light trying to turn left on Mission Village from Ruffin Road.

I123-2

I123-3

My concern for all Serra Mesa residents is if this is to be a DAILY problem. Monday through Friday?, weekends also?? This is not convenient, and not tolerable on a daily basis. Would you want this in your neighborhood? This could also have a negative affect our property values as the area would be less desirable.

I123-4

Could a solution be to close the north exit from the stadium onto Mission Village Drive? This would allow only North / South traffic to go East / West on Friars Road from the north exit from the stadium. This would certainly reduce potential excess traffic in Serra Mesa, but it would require planning to provide other exits in/out of the new SDSU development plan, if it goes forward. Also, could direct access from the stadium to the 15 southbound on ramp be possible? Better entrance and exit routes are NEEDED to reduce the traffic gridlock, extra noise and pollution that this could bring to my neighborhood.

I123-5

I123-6

Thank you for listening to my concerns. They are the same concerns that all Serra Mesa residents have about the traffic impact.

I123-7

Sincerely,

Francine Bates  
 2912 Admiral Ave  
 San Diego, CA 92123

Email: [Francine6069@att.net](mailto:Francine6069@att.net)

Comment Letter I124

From: **Rick Richards** <[rickr46@gmail.com](mailto:rickr46@gmail.com)>  
Date: Thu, Oct 3, 2019 at 5:44 PM  
Subject: [mvcomments] Mission Valley  
To: <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

Dear SDSU,                      Oct 3, 2019

As an alum and supporter of SDSU athletics, I'm excited about Mission Valley project.

As a alum ( Class of 72) and supporter of SDSU we deserve a stadium that makes us proud to be Aztecs. It is for this reason and many others that I can't wait to see you break ground in Mission Valley. Hope nothing gets in the way of fully completing this Project

Sincerely,

Rick Richards  
(619) 954-9934

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1124-1  
I

Comment Letter I125

From: **JAMES R KINNEY** <[jlckinney@sbcglobal.net](mailto:jlckinney@sbcglobal.net)>  
Date: Thu, Oct 3, 2019 at 5:41 PM  
Subject: [mvcomments] Stadium Project  
To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Please do a traffic evaluation before proceeding with project.  
Traffic in this area is already worsening.  
The roads aren't good and we are a community with homes, kids and pets.  
More cars will NOT be a good thing

I  
1125-1

Sincerely,  
Leslie Kinney

Sent from my iPhone

Comment Letter I126

From: **Aria Ryan** <[aria.pounaki@gmail.com](mailto:aria.pounaki@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 5:42 PM  
 Subject: [mvcomments] SDSU Draft EIR Public Comment  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello Laura

Some general comments that I have regarding the EIR in its draft version can be found below:

1. The City should grant authorization to implement improvements as outlined in the Draft EIR for the California State University (CSU)
2. The outdated methodology of Level of Service (LOS) should not be the only methodology used to determine transportation impacts and mitigation, and other methods should be used such as Vehicle Miles Traveled (VMT) that are consistent with the City General Plan and the Climate Action Plan.
3. The SDSU Mission Valley Campus Draft EIR shall match the Mission Valley Community Plan Update that was approved by City Council on 9/10/19 for traffic mitigation and fire safety
4. The following additional recommendations are made for Texas Street/Qualcomm Way:
  - a. Adding protected bike lanes on Texas Street/Qualcomm Way from Camino Del Rio South to Friars Road would improve bicycle utilization
  - b. Adding a northbound right turn lane at Texas St. and Camino Del Rio South would improve traffic flow
5. The following intersections should have synchronized traffic lights to improve traffic flow:
  - a. Texas St. at Camino del Rio South and at I-8 Eastbound Off Ramp
  - b. Qualcomm Way at Camino del Rio North and at Camino de la Reina

I 1126-1

1126-2

A more specific notion that I would like to express regarding the future planning for the site which I would like incorporated into the Final EIR is **providing drastically fewer parking spots on site.** Part of the inspiration for creating this campus is allowing SDSU to grow in a less restrained and better planned setting. We have a once in a lifetime opportunity to create a neighborhood that truly pushes residents to use transit and active transportation. **By providing less than a quarter of the proposed 5,000+ parking spots, paired with a walkable campus and access to transit, there is no need to accommodate users' impulse to rely on private automobiles.** In a traffic prone area such as Mission Valley, it is irresponsible to give into this historic impulse and as we know from the many city districts around the world, depriving an area of parking leads to higher alternative transportation choices. The student population would be "captive" to this constrained parking environment, inducing similar behavioral changes on the new campus resulting in a measurable impact to reducing VMT, the release of GHG's, and overall traffic.

1126-3

Thank you,  
Aria Pounaki



Comment Letter I127

From: Marc <[mzsutty2@san.rr.com](mailto:mzsutty2@san.rr.com)>  
 Date: Thu, Oct 3, 2019 at 8:38 PM  
 Subject: [mvcomments] traffic  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Hello

Sounds like a nightmare for traffic will result with this project for residents who of course get little notice to respond and seldom if ever their concerns are truly listened to when development juggernauts are rolling over us.

We live directly up the hill from the stadium and already with apps like Waze traffic can get stacked all the way up the hill at times at rush hours without any events going on. Many avoid using the already choked freeways cutting through Serra Mesa.

Obviously more traffic will have a ripple effect as several freeways converge in the region as it stands. Trolly is not going to cut it nor is any other public transportation. We moved next to the stadium and went in knowing full well what that meant. This is another animal entirely that nobody would have saw coming 16 years ago when we bought our home. Of course I expect the usual public transportation claims will manage it but of course that is from people that do not live here and have not seen how much worse things have gotten in just ten years. Now this.

During stadium events the neighborhood can be flooded with attendees parking on all our streets. I can't imagine that constantly occurring.

Again, I would be shocked if these concerns were ever addressed with actions *limiting development* because seldom will the little guy be truly listened to. But I must try. Love to be proven wrong on that.

Thanks  
 -Marc Zsutty  
 Serra Mesa

I127-1

I127-2

I127-3  
 I127-4

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I127-6

I127-7

Comment Letter I128

From: **John Riedel** <[jriedel8837@gmail.com](mailto:jriedel8837@gmail.com)>  
 Date: Thu, Oct 3, 2019 at 6:29 PM  
 Subject: [mvcomments] Comments on SDSU Mission Valley Campus Master Plan DEIR  
 To: <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

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

Dear Laura Shinn,

Thanks for the opportunity to comment on the SDSU Mission Valley Campus Master Plan DEIR. As a longtime resident of San Diego and a SDSU alumni I have great interest in the project and the DEIR. My main interest is in the Biological Section and identified significant impacts. The San Diego River gets a lot of attention and rightfully so as protections to its biological resources cannot be compromised in any fashion. Unfortunately, the same cannot be said for biological resources along Murphy Canyon Creek, including the Murphy Canyon Wildlife Corridor. This corridor is in a degraded state and SDSU should partner with local conservation groups to revitalize this important linkage to the San Diego River. In Chapter 2, Section 4.3.1.7, Habitat Connectivity and Wildlife Corridors, it states, "Murphy Canyon Creek, however, does support a linkage function from Murphy Canyon to the San Diego River and would be considered suitable for smaller wildlife species, particular birds and reptiles," Surveys have shown that a more diverse range of wildlife uses this corridor in addition to birds and reptiles. This is the only wildlife corridor in this area that connects wildlife habitat in a north-south direction. At this critical juncture is a once in a lifetime opportunity to get it right to protect and improve the wildlife habitat in the Murphy Canyon Wildlife Corridor. It is stated under Direct Impacts, page 4.3-28, that the project site is not considered important for wildlife movement, but also states that Murphy Canyon Creek provides additional habitat for wildlife traveling to and from the river. Those 2 sentences are in direct contradiction to each other. Wildlife are using the Murphy Canyon Wildlife Corridor; therefore, the project site is important for wildlife movement. In viewing wildlife habitat in the San Diego River and the project site there is more land to create adequate buffer to guard against Edge Effects. This luxury is not afforded to the same degree with the Murphy Canyon Wildlife Corridor as the buffer zone is decreased significantly so Edge Effects like noise, lighting, and other human activity could have more consequential and negative effects to wildlife. The DEIR embraces a connectivity to the San Diego River and acknowledges its significance but mistakenly doesn't afford the same attention to Murphy Canyon Wildlife Corridor. Though they are part of the same system, the same ecosystem, the same environment, the same home to the regions wildlife. They are connected and the project planners should embrace the corridor and take measures to protect and improve the corridor and acknowledge and documents this commitment in the final DEIR. It is such a

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wonderful resource that should be utilized by SDSU as an instrument for educational studies for biological, biochemistry, ecology, and other opportunities. As one of the leading educational institutions and the new steward of this vital wildlife habitat, great leadership is expected. I am hoping SDSU and the project planner take a long look down the road of time and understand the vital and very important decisions made now will have profound impacts to the region's wildlife. Will SDSU and the project planners make a commitment to acknowledge the importance of Murphy Canyon Wildlife Corridor? Will they make a commitment with local conservation groups and San Diego residents to protect and improve it providing leadership? I am hoping I can be proud of SDSU and the new addition to Mission Valley. Thank you.

↑ 1128-8  
 | Cont.  
 | 1128-9  
 | 1128-10  
 | 1128-11

Regards,  
 John Riedel

--  
**Regards,**  
**John Riedel**  
[Jriedel8837@gmail.com](mailto:Jriedel8837@gmail.com)

Comment Letter I129

From: **Brian Sipe** <[sipedesign@hotmail.com](mailto:sipedesign@hotmail.com)>  
Date: Thu, Oct 3, 2019 at 9:38 PM  
Subject: [mvcomments] Mission Valley  
To: [Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu) <[Mvcomments@sdsu.edu](mailto:Mvcomments@sdsu.edu)>

To the SDSU team....

“Fight on and on ye Aztec men...”. Let’s get this thing done! Burn the ships! We will never have this chance again to firmly plant San Diego State on stage with the other great Universities in the West.  
We need your best.  
Brian Sipe...  
Alumni

I  
129-1

Comment Letter I130

From: **Eline Sofie Dahlberg** <[Elinesd@outlook.com](mailto:Elinesd@outlook.com)>  
Date: Fri, Oct 4, 2019 at 10:50 AM  
Subject: [mvcomments] SDSU MV DEIR comment To:  
[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

Dear SDSU Mission Valley Team,

I'm a member of the Associated Students Green Love Sustainability Commission at SDSU. I urge the project to make all the buildings leed gold.

I130-1

Best,  
Eline Dahlberg

Få [Outlook](#) for iOS

Comment Letter I131

**From:** [mvcomments](#)  
**To:** [Sean Kilkenny](#); [Joe Harrison](#); [Michael Masterson](#)  
**Cc:** [gina.jacobs](#)  
**Subject:** Fwd: [mvcomments] Mission Valley EIR  
**Date:** Monday, October 7, 2019 8:52:57 AM

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----- Forwarded message -----

From: **Nikki Clay** <[nclay@carpiclay.com](mailto:nclay@carpiclay.com)>  
Date: Fri, Oct 4, 2019 at 6:50 PM  
Subject: [mvcomments] Mission Valley EIR  
To: [mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu) <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>

I am in support of the SDSU Mission Valley project. This project will be an economic engine for the regional while allowing additional university enrollment opportunities to meet the needs of San Diegan. The site plan which includes a river park is well conceived and will be a great addition to the San Diego River.

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1131-1  
I

Sent from my iPhone

Comment Letter I132

**From:** [mvcomments](#)  
**To:** [Sean Kilkeny](#); [Joe Harrison](#); [Michael Masterson](#)  
**Cc:** [gina.jacobs](#)  
**Subject:** Fwd: [mvcomments] SDSU Mission Valley (SD stadium)  
**Date:** Monday, October 7, 2019 11:44:44 AM

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----- Forwarded message -----

**From:** jms <[jms100@sbcglobal.net](mailto:jms100@sbcglobal.net)>  
**Date:** Mon, Oct 7, 2019 at 10:17 AM  
**Subject:** [mvcomments] SDSU Mission Valley (SD stadium)  
**To:** <[mvcomments@sdsu.edu](mailto:mvcomments@sdsu.edu)>  
**Cc:** <[jms100@sbcglobal.net](mailto:jms100@sbcglobal.net)>

I live in Serra Mesa north of the proposed SDSU development. Serra Mesa is a modest priced family oriented neighborhood. I want it to stay that way. We urge that the project be stopped. We still don't know exactly what is to be built. The impact on the streets from the traffic is more than any neighborhood should have to bear. Please consider the impact of this development on the well being of the residents. Would you like this project in you neighborhood? Please be thoughtful of the consequences to the people that live close by.

I132-1

Thank you.

Jolene Shumilak

Comment Letter I133

October 2, 2019

To: Rachel Gregg

From: A. Stephen Dahms



Re: Possible Algal Blooms in the River Park Region of the Project

I wish to express my concerns regarding the DEIR and the problems caused by the possible blooming of a single-cell blue green alga, *Microcystis aeruginosa*, *Microcystis*, also called a cyanobacterium. This concern extends only to algal blooming in stream or river water environments owned or overseen by SDSU. There are significant liability concerns for SDSU if SDSU does not monitor the presence and level of this organism in the River Park of the DEIR Project, in waters under the control of SDSU. Control of access of people and pets to such algal bloom-prone waters is essential. This includes appropriate restricted access and also appropriate signage.

I133-1

*Microcystis* can proliferate to form dense blooms and mats under certain conditions. When *Microcystis* die, their cells break open the potent toxin molecule microcystin. As pointed out in the recent report of the California of Environmental Health Hazard Assessment "Microcystis: Toxic Blue-Green Alga" ingestion of algal water or cells containing microcystin produces adverse effects on humans and pets. People in contact with dense blooms experience irritation such as skin rashes, burns, or blistering of oral tissue. Ingestion or inhalation of water containing bloom material causes vomiting, nausea, headaches, diarrhea, pneumonia and fever. Ingestion of significant levels of microcystin can cause liver damage and dysfunction in humans and animals. No deaths have been reported in humans, but recent reports across the U.S. have indicated very serious health issues have resulted. The toxicity of this molecule is discussed further below.

I133-2

*Microcystis* blooms occur in warm semi-turbid and, importantly, slow-moving waters. In California, *Microcystis* blooms proliferate in early summer through late autumn and may last up to four months. One of the most common routes of exposure is unintended oral and recreational exposure. Children have the highest risk of exposure since they tend to unintentionally ingest water spray while playing. Dogs can ingest large amounts of *Microcystis* cells when they clean their coats after playing in or near algal-bloomed water.



The most common causation of blooms is nutrient-rich water run-off. It is clear from the River Park Advisory Group meetings that nutrient run-off into the San Diego River will be controlled and ameliorated. Nutrient-laden run-off into Murphy Canyon Creek is not under such control. If SDSU property includes Murphy Canyon Creek, it must control any algal blooms to minimize any potential legal liability. Water agencies can contribute to solving such problems by increasing the flushing of waterways through releases of stored water, but that option may not exist for Murphy Canyon Creek.

I 1133-3

I 1133-4

I 1133-5

The State of California guidelines for exposure to microcystin are:

- Never ingest watercontaining blue-green algal blooma
- Do not allow children or petsnear water that contains algal blooms
- Follow the advice of all postings located at water ways/bodies
- If exposed, wash exposed area with water and contact a physician
- If it is thought that a waterway contains microcystin, it should be reported to the local health agency.

I 1133-6

Further precise information on mycrocystins and their effects can be seen in the 16 pp "2009 California Environmental Protection Agency Ecotoxicology Program Report: Microcystins, A Brief Overview of Their Toxicity and Effects, With Special Reference to Fish, Wildlife and Livestock". Also the extensive data-laden and 36 pp July 22 2017 publication in the journal Toxins by Howard et al., " Microcystin Prevalence Throughout Lentic Waterbodies in Southern California" which report San Diego County data and emphasizes that the algal blooms in California are increasing with climate change. These and other formal reports with data provided by the State of California and the U.S. Environmental Protection Agency point out that the State mandates reporting of water bodies that contain microcystin levels over 0.1 ug/liter. There are data in the Howard publication 12 other sites in the County.

The bottom line is that microcystin detection and quantification must be conducted in routine and systematic monitoring of suspected waterways. Notably, at the last River Park Advisory Group meeting, two slides depicted people standing in the creek where there were clear-cut algal mats.

I 1133-7

**Microcystins Are Such Very Serious Toxic Agents Such That They Are Tightly Regulated by the U.S. Government**

Microcystins are subject to export controls whereby sale or transfer of the organism to any person, institution, country, organization, or researcher outside the U.S. The Congressionally-mandated regulations require the acquisition of a license from the Bureau of Industry Security (BIS) of the U.S. Department of Commerce. Sale or transfer of microcystin to a "bad actor" in a "bad actor" country on

I 1133-8

the BIS Commerce Country List is forbidden and if conducted will result in substantial fines and imprisonment. Microcystin is one of 19 toxins that are export-controlled by the U.S federal government, in addition to 55 viral human and animal pathogens, 22 human or animal bacterial pathogens, 6 plant pathogens, 11 plant fungal pathogens, 2 plant pathogenic viruses, and one human fungal pathogen. These agents, because of their potent actions in purified form, are of such considerable biological warfare and bioterrorism concern to national security and homeland security that they are so regulated. This reality is not generally known by the public. Notably, one waterbody in Southern California has a microcystin level of 36,500 ug/liter. Its location is non-disclosable since it could provide a toxin source for purification for "inappropriate use".

I133-8  
(Cont.)

Lastly, alga breakdown also liberates the potent neurotoxin saxitoxin, one of the 19 regulated toxins. I will not delve further into this toxin since the commentary on microcystin. Notably, saxitoxin has been detected in a Santee waterway at 8ug/l.

In summary, if Murphy Canyon Creek is on SDSU property, the university has an ethical and legal requirement to assure that visitors to the River Park are not exposed to this toxin. Signage and seasonal monitoring of the toxin are essential. The university is advised not to acquire Murphy Canyon Creek and perhaps avoiding the 25-50 ft distance east of the creek, while still proving signage. It is understood that SDSU owned property in the green zone of River Park will end at the trolley line, but also that the green zone of the River Park extends well south of the trolley line which will be retained as city property. If SDSU has specific oversight of the city-owned property in the River Park green zone, it should be made clear to the university that the university might have the additional burden of algal monitoring and treatment of the San Diego River.

I133-9

Comment Letter I134

October 2, 2019

To: Rachel Gregg

From: A. Stephen Dahms 

Re: Toxic Plants in the River Park Region of the Project

I have concerns regarding the presence of toxin-producing native plants in the periphery of the green zone, either on city property or SDSU property. Please insert this Public Commentary into the appropriate section of the DEIR.

I134-1

This especially concerns plant the Castor Bean plant, *Ricinus communis*. This plant seed contains the notoriously-serious and lethal toxin Ricin. This plant has to rigorously eliminated from the River Park territory and any SDSU property to avoid contact with children or pets. Allowing this perennial on accessible university property has legal impacts for SDSU. I have not examined the DEIR for *Ricinus communis* concerns...or concerns regarding other toxin-producing vegetation.

I134-2

Importantly, Ricin is subject to export controls whereby sale or transfer of the partially-purified agent to any person, institution, country, organization, or researcher outside the U.S. The Congressionally-mandated regulations require the acquisition of a license from the Bureau of Industry Security (BIS) of the U.S. Department of Commerce. Sale or transfer of Ricin to a "bad actor" in a "bad actor" country on the BIS Commerce Country List is forbidden and if conducted will result in substantial fines and imprisonment. Ricin is one of 19 toxins that are export-controlled by the U.S federal government, in addition to 55 viral human and animal pathogens, 22 human or animal bacterial pathogens, 6 plant pathogens, 11 plant fungal pathogens, 2 plant pathogenic viruses, and one human fungal pathogen. These agents, because of their potent actions, are of such considerable biological warfare and bioterrorism concern to national security and homeland security that they are so regulated.

I134-3

I have not rigorously examined the DEIR section where this matter might be dealt with. My concern extends to other plants like *Datura* (Jimson Weed) which contain toxins and mind-altering agents like scopolamine.

I134-4

My recommendation is to have the planned native plants reviewed for toxic capability and if such exclude them from the Project.

I134-5

Comment Letter I135

October 1, 2019

To: Rachel Gregg

VP, Strategic Communications and Public Affairs

From: A. Stephen Dahms, PhD



Emeritus Distinguished Professor of Chemistry and Biochemistry, SDSU/UCSD

I have attached my Public Commentary to the DEIR, Section 9.4.2. Valley Fever.

This commentary includes an Appendix. In the Appendix is a 39 pp booklet, "Valley Fever (Coccidioidomycosis) Tutorial for Primary Care Professionals". I have attached 18 copies in case there is a need for such.

I135-1

I135-2

## Commentary on Section 9.4.2 Valley Fever

### Background Commentary on the Human Fungal Pathogen *Coccidioides* and *Coccidioidomycosis*

The text presented in this 9.4.2 section of the DEIR is minimal at best. I have expanded this section to provide further background.

I 1135-3

Valley Fever, or *Coccidioidomycosis* (aka *Cocci*, caused by the fungal pathogen *Coccidioides*), remains an important and substantial public health problem, the true burden of which likely under-recognized, undiagnosed, and under-reported to the health agencies. It has been nationally notifiable to the Centers for Disease Control since 1995. Importantly, it was used as a biowarfare agent in WW 1 and has been labelled by the U.S. Department of Health and Human Services or the U.S. Department of Agriculture as a “biological select agent” or simply select agent for short, an agent that poses a severe threat to public health and safety.

This fungal pathogen is subject to export controls whereby sale or transfer of the organism to any person, institution, country, or researcher outside the U.S. The Congressionally-mandated regulations require the acquisition of a license from the Bureau of Industry Security (BIS) of the U.S. Department of Commerce. Sale or transfer of *Coccidioides* to a “bad actor” in a “bad actor” country on the BIS Commerce Country List is forbidden and if conducted will result in substantial fines and imprisonment. *Cocci* is the only fungal pathogen that is export-controlled by the U.S federal government, in contrast to 55 viral human and animal pathogens, 22 human or animal bacterial pathogens, 6 plant pathogens, 11 plant fungal pathogens, 2 plant pathogenic viruses, and 19 toxins.

*Cocci* causes serious pulmonary problems in about 1/3 of the infected persons who do suffer a clinical illness, an illness similar to community-acquired pneumonia. About 1% of the infections result in a number of very severe and prolonged illnesses outside of the lungs of some patients producing destructive lesions in bones, skin, joints, meninges and virtually any other organ or tissue in the body to which the infection has disseminated or spread. These complications produce a large amount of chronic morbidity and cause ~200 deaths per year. Personally, I have met two women whose husbands succumbed to *Cocci*. Drug therapy exists for many patients but after cessation of drug therapy about a third of the successfully-controlled patients will relapse.

I 1135-4

It is uniformly recognized that under-reporting of *Cocci* occurs. Reported occurrences are estimates. Conversations with area physicians clearly support this reality. Notably, an international group of physicians and biomedical scientists was created in San Francisco in 1956 called the *Coccidioidomycosis* Study Group (*Cocci* Study Group) focusing upon the pathogenesis, mycology and clinical aspects of this pathogen. The organization is designed to study *Cocci* in order to promote the prevention and treatment of this disease. The 64<sup>th</sup> annual meeting will be held in Tucson in April 2020. Several members of the *Cocci* Study Group reside in San Diego and Orange County. One of the San Diego members informed me last year at a *Cocci* Study Group meeting in Palo Alto that years ago there was a breakout of *Cocci* in Lemon Grove attendant with soil movement and construction of a complex of home. I am a

1. Environmental factors (weather, seasonality, temperature, precipitation, aridity, soil composition and alkalinity, wind direction are major factors to be taken into account regarding Cocci .
2. Engineering controls and environmental modification (e.g., wetting of soils) are essential to minimize spread of wind-driven fugitive dust and soil. The DEIR partially recognizes this necessity. Controls during transportation and unloading and covering of soils must be established and maintained,
3. Air and soil monitoring and surveillance of Coccidioides levels must be conducted. The statement in the Project DEIR that there are no commercially-available tests to detect Coccidioides is incorrect. There are in fact now two non-profit organizations that conduct air and soil levels of Coccidioides on a fee-for-service basis. Air and soil must be monitored using base-line measurements before, during and after site modification and soil disturbances. Measurements during on-shore and off-shore air movements must be considered. These measurements and monitoring conducted by the appropriate party for SDSU are ethically-mandated. The university must recognize it has the responsibility to do so. It most certainly will have the financial liability if there is a pathogen-induced medical problem.
4. San Diego medical facilities and hospitals should be alerted to the Cocci concern, increasing the attention and response of area physicians. Importantly, the results of the before, during and after monitoring of soil and air with subsequent publication will be of great interest nationally and perhaps internationally. In essence SDSU will have the chance to establish the best practices regarding Coccidiodes assessment and management. Also, clinical appearance of Cocci can be studied for a 1 year period after completion of the Project...using Cocci data provided by the CDC, the County and the State
5. Protective equipment (N-95 respirator or higher) must be used by workers that might be compromised by the pathogen.
6. Exposure of immunologically-compromised individuals to Cocci-laden dust must be minimized.
7. The health of workers must be of primary concern as well as that of residents in neighboring areas such as Grantville, Allied Gardens, etc. General area residents might be fore-warned to wear appropriate simple masks under certain weather conditions which might only be occasionally for 3-6 months depending upon the deconstruction work cycle and duration.
8. An ad hoc SDSU Cocci Study Group should be formed to advise the university in the above and other Cocci-related matters. As indicated, I am a participant in the Cocci Study Group.

I135-5

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I135-12

Comment Letter I136

8/12/2019

San Diego State University Mail - [mvcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site



Laura Shinn <lshinn@sdсу.edu>

[mvcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site

3 messages

Transition Labyrinth <transitionlabyrinth@gmail.com>  
To: mvcomments@sdсу.edu  
Cc: msimpson@sdсу.edu

Thu, Aug 8, 2019 at 5:01 PM

Hello,

Below is a copy of an email I sent to Dr. Simpson, who was listed as in charge of the beautiful Mediterranean Garden at the SDSU campus, which I sent a few months ago. Unfortunately, I never heard a peep in response. Perhaps the large attachments got it filtered and he never saw it, or I caught him traveling. I've been following your progress on this new site development and I think a labyrinth should definitely be included in your plans. We would be honored to gift our services to shepherd that project to completion.

My name is Jamie Edmonds. My wife, Leslie and I and our families are (almost) all alums of SDSU starting with my dad who graduated in 1961 before getting his doctorate in Physics from Cornell, and my mom returned to SDSU in her 40's to get her degree in English. I grew up a block from where we've lived now for over 23 years--just a mile or so south of SDSU near 54th St. and Adams Ave. (Leslie grew up in Kensington). We all have been intimately connected to SDSU our whole lives. After working ten years in construction in my youth, I am now a happily retired Firefighter/Paramedic (Leslie was a State Park Ranger back in the 1970's) living simply on my modest pension, and we try to live "in the gift" as much as possible. We create labyrinths as a way to continue our lives dedicated to public service, education, and healing people and the planet.

Leslie and I are Veriditas trained labyrinth facilitators, she is a gifted empath and reader of the land, and I am the labyrinth designer, builder, facilitator, wrangler, stylist, etc. ;-) ( see more about labyrinths at: <https://www.veriditas.org/> )

A labyrinth is a continuous walking path laid out on the ground that can be walked as a sort of walking prayer, meditation, mindfulness, or mind calming exercise. I believe what San Diego State University really needs is a permanent labyrinth for the students, faculty and staff to enjoy, and to help them do their work there in a good way, and to bring people together in community. We looked at a few other very nice possible sites on campus, including the stunningly beautiful Mediterranean Garden, but this new space would be ideal!

Unlike a maze, which eclipsed the popularity of the labyrinth in the 17th and 18th centuries in the more formal, manicured gardens that were becoming all the rage across Europe, a labyrinth has only one path with low, or no "walls". There are no tricks, dead-ends, wrong turns--nothing for the left-brain to have to "figure out", and therefore the brain gets a chance to relax and quiet the noise for about 15-20 minutes. Many people use walking a labyrinth as a way to calm the "monkey mind" (as the Buddhists call it), to open a space for insight, or inspiration to enter in, or to communicate with their God/Higher Power. Take a question, challenge, prayer, or vexing problem into the labyrinth with you and often a new insight, answer, or creative avenue is discovered that one would not have otherwise considered. What remains for the labyrinth walker in this silence is simply the deeply meditative and symbolic discipline of setting one foot in front of the other, of honoring the journey itself and what it has to teach us. There has been a huge renaissance in the popularity of walking a labyrinth as more people are (re)discovering its healing and therapeutic potential. Labyrinths are now spreading out from their traditional sites in churches, parks, and hospital settings, into schools, universities, and private homes as people who walk a labyrinth regularly report on its positive effects. See <https://labyrinthociety.org/labyrinths-in-places> and especially the bottom section: "Labyrinths in Universities and Colleges".

Last spring I was asked by a counselor at Coronado High School to install a temporary labyrinth there for the students during Finals Week to help the students deal with the added stress. It was VERY well received and also coincided with World Labyrinth Day (the first Saturday in May). The chalk paint lasted for a few weeks and they also made the campus available to the public to come and "Walk As One At 1:00" for World Labyrinth Day last year ( see: <https://labyrinthociety.org/world-labyrinth-day> ). I was also invited to install a labyrinth for the Children's Cooperative Charter School in Linda Vista last year. This labyrinth started out as just chalk paint on dirt and the staff and students have been continually adding more local river rocks to the lines (the "walls"), landscaping around the perimeter, and adding a Peace Pole, and gravel for the path. After a year of use, the staff and teachers report that they LOVE it (and use it!) just as much as the students! When a student is having a hard time concentrating or starts to act out, instead of disciplining the student, they send them out to walk the labyrinth! By the time they've returned they are centered in their body again and ready to learn without the need for punishment or medications.

Labyrinths can be traced back to between four and SEVEN thousand years ago in Spain, Greece, and Turkey, and they are found on every populated continent, including pre-Columbian North America (the Tohono O'odam [Pima] people of the southwestern USA), and South America (the figures in the Nazca Lines from two thousand years ago are all made from a single path that were walked for hundreds of years). A walking prayer or meditation is part of almost every religious/spiritual tradition in the world and they are part of our shared human DNA. Labyrinths are also representative of a journey or a pilgrimage rich with layers of symbolism of varying sorts, based on the individual's place along their own path in life. Scientists are now carefully studying the healing properties of labyrinths and they are becoming very popular with people who work in mental health fields (shown to be especially helpful with treatments for depression, anxiety and Post

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641345350296770203&siml=msg-f%3A1641345350296770203&...> 1/5

I136-1

8/12/2019

San Diego State University Mail - [mcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site

Traumatic Stress Disorder). I've been working with the San Diego Veterans Hospital for over two years and their labyrinth project is proceeding at a "governmentally appropriate pace". :-)

As humans have done for millennia, we're creating a sacred space out of public space for the people to enjoy, to walk, to meditate, to pray, for problem-solving, for ritual, or to use it however anyone feels moved in that moment. If you were interested in learning more, I would be happy to give a more detailed explanation or even a short presentation to a governing board to explain what I can offer and discover what would best meet your needs. A permanent labyrinth to complement your wonderful new space would be a huge gift to the students, faculty, and staff of SDSU, and literally put you on the map. There is a World Wide Labyrinth Locator site where people can find existing permanent labyrinths that can help to bring more attention and support to SDSU (see: <https://labyrinthlocator.com/>). I spoke to a lady working at the First Unitarian Universalist Church in Hillcrest, where my wife and I created a small labyrinth as a gift for the minister there, and she offered (unsolicited) that finding our labyrinth on the plateau behind their Meeting House was a sign for her that she should take their job offer. :-)

As any gift of love is priceless, there is no price attached to our gifts. If you would like to trial a temporary install, I would be happy to put down a temporary, water-based chalk paint pattern on any appropriate grass surface (or chalk/chalk paint on a hard surface) for free. I could provide some simple explanatory signage to make it more accessible, and you could then solicit feedback, interest, or suggestions from the community. If you were interested in anything more permanent, I would also be happy to work with you to explore options for any needed funding, materials, and/or labor. I would be happy to see any labyrinth vision at SDSU through to fruition in a good way that enhances our SDSU community.

I've attached a few pics of other installations I've done to give you some ideas, and I've created a Facebook page for locals who want to know when the next Transition Labyrinth event will be. <https://www.facebook.com/TransitionLabyrinth> Please feel free to forward this to anyone who might be interested and get in touch with any questions.

Thanks for reading this far and blessings on your path!

Jamie and Leslie Edmonds  
Transition Labyrinth  
5358 Adams Ave.  
San Diego, CA 92115-3503  
619-933-5832 cell  
[TransitionLabyrinth@gmail.com](mailto:TransitionLabyrinth@gmail.com)

11 attachments



1stUUSanDiegoClassicalSmall.jpg  
67K



WorldLabyrinthDay2016small.jpeg  
55K



Acceptance-Camp-Meditation-Labrynth-300x199.jpg  
14K

CountyWaterpark2016small.jpeg  
120K

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641345350296770203&simpl=msg-f%3A1641345350296770203&...> 2/5

1136-1  
(Cont.)



8/12/2019

San Diego State University Mail - [mcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site



SDCountyLabyrinthMay2016small.jpeg  
128K



ScrippsLabyrinthStPaulSmall.jpg  
458K

StPaulsCathedralSanDiegoSml.jpeg  
336K



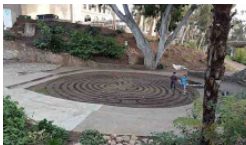
TransitionHoteDelCoronado20180926small.jpg  
150K



TransitionLabyrinthAtBalboaParkSmall.jpg  
322K



WaitsFinalInstallSmall.jpeg  
46K



TransitionLabyrinthZoroGardenSmall.jpg  
32K

1136-1  
(Cont.)

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641345350296770203&simpl=msg-f%3A1641345350296770203&...> 3/5

8/12/2019 San Diego State University Mail - [mvcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site  
**Gina Jacobs** <gina.jacobs@sdsu.edu> Fri, Aug 9, 2019 at 9:00 AM  
 To: Glen Schmidt <gschmidt@schmidt-design.com>, Mark Moss <mmoss@schmidt-design.com>  
 Cc: Laura Shinn <lshinn@sdsu.edu>, Greg Shannon <gregs.spc@att.net>, rschulz <rschulz@sdsu.edu>

Forwarding this along for your information and consideration at Mission Valley.

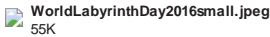
Laura, Bob,  
 They are quite lovely and maybe would be a better fit here on the main campus somewhere.

Gina  
 [Quoted text hidden]  
 --  
 Gina Jacobs '01, '10  
 Associate Vice President  
 Mission Valley Development  
 San Diego State University  
 619-594-4563  
[gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu)

11 attachments



1stUUSanDiegoClassicalSmall.jpg  
 67K



WorldLabyrinthDay2016small.jpeg  
 55K



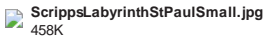
Acceptance-Camp-Meditation-Labyrinth-300x199.jpg  
 14K



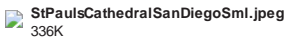
CountyWaterpark2016small.jpeg  
 120K



SDCountyLabyrinthMay2016small.jpeg  
 128K



ScrippsLabyrinthStPaulSmall.jpg  
 458K



StPaulsCathedralSanDiegoSml.jpeg  
 336K



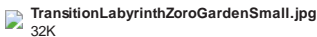
TransitionHoteDelCoronado20180926small.jpg  
 150K



TransitionLabyrinthAtBalboaParkSmall.jpg  
 322K



WaltsFinalInstallSmall.jpeg  
 46K



TransitionLabyrinthZoroGardenSmall.jpg  
 32K

**Michael G. Simpson** <msimpson@sdsu.edu>  
 To: Transition Labyrinth <transitionlabyrinth@gmail.com>  
 Cc: mvcomments@sdsu.edu

Sat, Aug 10, 2019 at 5:16 PM

Saturday, August 10, 2019

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641345350296770203&simpl=msg-f%3A1641345350296770203&...> 4/5

I136-1  
 (Cont.)

8/12/2019

San Diego State University Mail - [mwcomments] A Gift of a Public Labyrinth for the SDSU Mission Valley site

Dear Jamie and Leslie,

Thanks for your offer on this.

I will pass around to a few people, but I have to say I don't think it right for the Mediterranean Garden. One reason is the lack of an area. The only possible area is a patch of grassy lawn just north of the fountain, but I've found that this is commonly used by students to lie or sit, often in small groups in a circle. Sometimes larger classes meet there, all sitting on the grass. The labyrinth would interfere with this already tight patch of grass for that purpose.

You might pursue other parts of campus that have considerably more open space.

All the best,  
Michael Simpson

Dr. Michael G. Simpson  
Department of Biology  
5500 Campanile Drive  
San Diego State University  
San Diego, CA 92182-4614, U.S.A.

Email: [msimpson@sdsu.edu](mailto:msimpson@sdsu.edu)  
Voice: 619-594-4479; Fax: 619-594-5676  
[Personal Website](#)  
[American Amphitropical Disjunction Website](#)  
[Amsinckia \(Boraginaceae\) Website](#)  
[SDSU Herbarium Website \(Life Sciences South 267\)](#)

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<1stUUSanDiegoClassicalSmall.jpg><WorldLabyrinthDay2016small.jpeg><Acceptance-Camp-Meditation-Labrynth-300x199.jpg>  
<CountyWaterpark2016small.jpeg><SDCountyLabyrinthMay2016small.jpeg><ScrippsLabyrinthStPaulSmall.jpg><  
StPaulsCathedralSanDiegoSml.jpeg><TransitionHoteDelCoronado20180926small.jpg><TransitionLabyrinthAtBalboaPar  
kSmall.jpg><WaitsFinalInstallSmall.jpeg><TransitionLabyrinthZoroGardenSmall.jpg>

I136-1  
(Cont.)

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1641345350296770203&siml=msg-f%3A1641345350296770203&...> 5/5

Comment Letter I137

10/1/2019

San Diego State University Mail - [mvcomments] Please add me to your



Laura Shinn <lshinn@sdsu.edu>

**[mvcomments] Please add me to your**

1 message

**R B** <rbalogh@hotmail.com>

Mon, Aug 19, 2019 at 2:08 PM

To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

List to receive emails on the mission valley stadium project.  
Sent from my iPhone

I137-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1642330998291549052&simpl=msg-f%3A1642330998291549052> 1/1

Comment Letter I138

10/3/2019

San Diego State University Mail - [mvcomments] SDSU



Laura Shinn <lshinn@sdsu.edu>

[mvcomments] SDSU

1 message

'Catharine Tomovich' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>

Wed, Oct 2, 2019 at 10:02 PM

Reply-To: ctomovch@yahoo.com

To: mvcomments@sdsu.edu

As a Serra Mesa Resident this is my concerns:

Traffic Impact analysis, page 36, re: Gramercy Drive

- Taft Middle School is located at the intersection of Gramercy Drive, Ruffin Road, and Mission Valley Drive. The speed limit in that area when children are present is 25 mph which is not just during normal school hours; children are present at various times from 6 a.m. to 6 p.m. due to the San Diego City Schools Prime Time Extended Day Program.

That 25 mph speed limit during a large part of the day will severely impact the flow of the additional traffic and slow it down considerably at that intersection all resulting from the SDSU Mission Valley project. Why is that reduced speed limit not mentioned in the DEIR along with a plan to mitigate the resulting backed up traffic?

- The same situation will also exist in the vicinity of Jone Elementary School on Greyling Drive and Angier Elementary School on Hurlbut St. Why was there no traffic impact study done for those two areas?

- It is not sufficient to say that speed limits are under the authority of the City of San Diego because the problem the increased traffic will bring to those areas surrounding the schools is one that will be caused by the SDSU Mission Valley project and a plan should be in place to mitigate it as much as possible. Why was this problem not even mentioned in the DEIR? And please don't answer saying the City controls speed limits because this has more to do with San Diego State University having a responsibility to deeply consider the impact the Mission Valley Campus will have on the Serra Mesa Community and carries with it a responsibility to the Serra Mesa Community, as well as all other surrounding communities, to reduce that impact as much as possible. Why hasn't an SDSU operated "park & ride" lot on Aero Drive with an SDSU operated shuttle to the Mission Valley campus been considered as a way to partially mitigate this problem of increased traffic which will result in the area of schools in Serra Mesa?

Sincerely,  
Cat Stempel

Sent from my iPad

I138-1

I138-2

I138-3

I138-4

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646347126926840802&simpl=msg-f%3A1646347126926840802>

1/1

Comment Letter I139

10/3/2019

San Diego State University Mail - [mvcomments]



Laura Shinn <lshinn@sdsu.edu>

[mvcomments]

1 message

**Kory Kavanewsky** <korykavanewsky@gmail.com>  
 Reply-To: korykavanewsky@gmail.com  
 To: Mvcomments@sdsu.edu

Wed, Oct 2, 2019 at 7:02 PM

To Whom it May Concern,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the two years of public outreach and the bold vision to make SDSU one of the best campuses in the country. With a new stadium, tech and incubator space, housing on site and a gem of a River Park, SDSU's plan for Mission Valley is a game changer for all of San Diego. It has the ability to grow the economic impact of SDSU well beyond the \$5.6B that is always quoted. And the opportunities are endless for Aztec athletics and the many outstanding academic departments and programs. Just look at what Viejas Arena did for Aztec basketball. A new football stadium could do the same for the football program. The time is now. I can't wait to see shovels in the ground.

I139-1

**Kory Kavanewsky**  
 Mobile 619.838.9787

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646335796490624030&simpl=msg-f%3A1646335796490624030> 1/1

Comment Letter I140

10/3/2019

San Diego State University Mail - [mvcomments] SDSU Mission Valley Environmental Impact Review



Laura Shinn <lshinn@sdsu.edu>

[mvcomments] SDSU Mission Valley Environmental Impact Review

1 message

**Dennis Reese** <dreese@financeofamerica.com>  
 Reply-To: dreese@financeofamerica.com  
 To: "Mvcomments@sdsu.edu" <Mvcomments@sdsu.edu>

Thu, Oct 3, 2019 at 11:57 AM

Dear SDSU,

I'm a SDSU alumni and local supporter of the school. I think SDSU is such an important part of our community. I was so excited to see SDSU get involved with providing a long-term solution to the Jack Murphy site. It is my believe that the expansion of SDSU to Mission Valley will be a huge plus for San Diego and SDSU for many decades to come. I'm excited to see what vision can bring to this pivotal site.

I 1140-1

*Dennis*



**Dennis Reese / Reese Team**

*Mortgage Loan Officer*

NMLS - 238230

o: (858) 876-4328

f: (855) 212-0246

[Dennis@DennisReese.com](mailto:Dennis@DennisReese.com)

Encinitas Branch | 527 Encinitas Blvd. | Suite 200 | Encinitas, CA 92024  
[DennisReese.com](http://DennisReese.com)



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1/2

10/3/2019

San Diego State University Mail - [rmvcomments] SDSU Mission Valley Environmental Impact Review

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<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646399659151673830&simpl=msg-f%3A1646399659151673830> 2/2



Comment Letter I141

10/3/2019

San Diego State University Mail - [mvcomments] FW: SDSU Mission Valley EIR Comment



Laura Shinn <lshinn@sdsu.edu>

**[mvcomments] FW: SDSU Mission Valley EIR Comment**

1 message

'Jim Marshall' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>

Thu, Oct 3, 2019 at 4:46 PM

Reply-To: jmsdsu74@aol.com

To: Mvcomments@sdsu.edu

Dear SDSU

I write you today in support of the EIR developed by SDSU and Mission Valley Project.

This is an incredibly positive use of the Mission Valley Land.

Not only does it serve the City and County of San Diego by providing much needed park and recreational amenities, but it also adds value to the local economy in myriad ways through sensible and well thought out development of the site. SDSU is a significant contributor to the area, not only economically, but also by providing educational opportunities. Opportunities that increase and enhance the contributions made to the community by those who attend SDSU.

This expansion of the land locked SDSU campus is vital to the interests and educational needs of the community as a whole.

The addition of a viable river park, a new stadium that serves the entire community, housing on site, and the unlimited value and potential for the university and local economy, by having a Public/Private Technology Incubator (ala UCSD), makes SDSU's plan for Mission Valley an opportunity that provides boundless benefit for all of San Diego

James A Marshall

SDSU '74

I141-1

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646417858230730342&simpl=msg-f%3A1646417858230730342>

1/1

Comment Letter I142

10/3/2019

San Diego State University Mail - [mvcomments] Mission Valley draft EIR Comments



Laura Shinn <lshinn@sdsu.edu>

[mvcomments] Mission Valley draft EIR Comments

1 message

Eunha Hoh <ehoh@sdsu.edu>

Thu, Oct 3, 2019 at 4:21 PM

Reply-To: ehoh@sdsu.edu

To: mvcomments@sdsu.edu

Dear Whom It May Concern:

I have some comments in the draft EIR comments of Mission Valley Campus of SDSU.

1. I encourage to increase the charge stations for EVs in residential parking structure. It is only 3%. Why is it only 3%? EVs have increased rapidly in California. I wonder if this will satisfy the demand even right now.
2. Green house gas emission: the solar energy will contribute approximately 14% of the total. Is it maximized?
3. Water reuse: Will water reuse (recycle) technology be incorporated in the campus?
4. How about indoor temperature? An architecture design (including building materials/shading/landscape) will be incorporated to lower the indoor building temperature without using energy?

Thanks,

Eunha

--

Eunha Hoh, PhD.  
Professor, Environmental Health  
School of Public Health  
San Diego State University  
<https://hoh.sdsu.edu/>

I I142-1

I I142-2

I I142-3

± I142-4

I I142-5

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646416231055257418&simpl=msg-f%3A1646416231055257418>

1/1

Comment Letter I143

10/3/2019

San Diego State University Mail - [mvcomments] New Stadium



Laura Shinn <lshinn@sdsu.edu>

[mvcomments] New Stadium

1 message

**Adam Wasserman** <adamwass@sbcglobal.net>  
 Reply-To: adamwass@sbcglobal.net  
 To: Mvcomments@sdsu.edu

Wed, Oct 2, 2019 at 9:12 PM

Dear SDSU,

As an alum and supporter of SDSU athletics, I can't tell you how excited I am about your vision for Mission Valley. I have donated \$ and had season tickets for football and basketball for many years now, and fans finally deserve a stadium that highlights the fan experience and makes us proud to be Aztecs. It is for this reason and many others that I can't wait to see you break ground on Mission Valley. It is a bold and exciting plan, and one that I am proud to support.

I143-1

Adam Wasserman  
 6199809277

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646343986488097877&simpl=msg-f%3A1646343986488097877> 1/1

Comment Letter I144

'Kevin Reardon' via SDSU Mission Valley Comments <mvcomments@sdsu.edu>  
Reply-To: kreardon88@yahoo.com  
To: "mvcomments@sdsu.edu" <mvcomments@sdsu.edu>

Thu, Oct 3, 2019 at 10:20 AM

Dear SDSU,

I'm writing today in support of SDSU's plan for Mission Valley. I appreciate the dozens of outreach meetings, and the bold vision to make SDSU one of the best universities in the country. Building a new stadium, creating vibrant tech and incubator space, and adding to San Diego's much needed housing stock should be enough for any San Diegan to support this vision. However, SDSU's commitment to build a River Park, add bike and pedestrian trails, and do it all without taxpayer money is impressive. SDSU has always been a powerful economic generator for San Diego. This plan has the ability to increase that impact even more. I'm happy to support it.

I144-1

Sincerely,

Kevin Reardon

<https://mail.google.com/mail/u/0/?ik=e08d076579&view=pt&search=all&permthid=thread-f%3A1646393547403943072&simpl=msg-f%3A1646393547403943072> 1/1

Comment Letter I145

Thu, Oct 3, 2019 at 3:54 PM

**Downie Beckett** <downie.beckett@gmail.com>  
Reply-To: downie.beckett@gmail.com  
To: Mvcomments@sdsu.edu

Dear SDSU,

I am writing today to express my strong support for your plan and vision for Mission Valley. Not only does Aztec football deserve a stadium of their own, but the entire San Diego region deserves the River Park we have always talked about, and a more connected Mission Valley. SDSU will greatly benefit from more student and faculty housing, and the ability to admit more students. SDSU is one of the greatest educational assets in San Diego, and has run out of room for expansion on the current campus site. The vision and plan make sense and has been vetting across San Diego for nearly two years now. It's time to break ground and get this project going, as it will benefit all of San Diego County and its' citizens!

I145-1

Sincerely,

Downie R. Beckett

[1205 Chalcedony St.](#)

[San Diego, CA 92109](#)

858 243-2130

Comment Letter I146

Meeting

SDSU Mission Valley NOP

1                   ISAIAH TITUS: I just think it's great that  
2 they're future-proofing the site to add the purple pipe.  
3 I'm hoping that they decide to go with smart irrigation  
4 technology and to use drip irrigation in combination  
5 with the sprinkler heads where possible.

I146-1

6                   And there should be some policy to deal with  
7 composting and food waste on site, and they should use  
8 zoned air conditioning as much as possible.

I146-2

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25

Meeting

SDSU Mission Valley NOP

1 COURTNEY RANSOM: My question was, for the  
2 water and the river, like trying to figure it out, is --  
3 we have accommodated for a 100-year flood and I wanted  
4 to know what happens when Mission Valley develops and  
5 the impermeable surfaces happen?

6 According to the Mission Valley Community  
7 Plan, a 100-year flood turns into a 40-year flood and we  
8 have a plan for that or projected for the future.

9 And I think that's concerning. I'm a college  
10 student at San Diego State University and I'm a senior.  
11 I am the Commissioner of the Sustainability Commission  
12 here at San Diego State, and I lead a group of students  
13 on environmental initiatives at this campus, and we are  
14 concerned for the future of Mission Valley.

I146-3

I146-4

Comment Letter I147

SDSU MISISON VALLEY COMMENT

Recirculating irrigation system; <sup>some of the</sup> Water from groundwater or rain that is entrained into the BMP system could help feed the irrigation system. Supplementary water not absorbed by plants goes back into the BMP storage to be used for future watering dates.

I147-1

SDSU MISISON VALLEY COMMENT

It is unrealistic to proceed with this project without a universal transit pass for students so that there are no obstacles for different socioeconomic classes to ~~ma~~ get to the SDSU west.

I147-2

SDSU MISISON VALLEY COMMENT

The current subsidized student MTS pass is \$150 per semester, which is an extreme hardship to many students. The implementation of a universal transit pass would be beneficial & necessary w/the completion of this project.

I147-3

SDSU MISISON VALLEY COMMENT

SDSU's Climate Action Plan needs to be followed for transport reduction goals

I147-4



SDSU MISISON VALLEY COMMENT

Student transit passes need to be included for equitable access to campus & reduction of ghg emissions.

1147-5

SDSU MISISON VALLEY COMMENT

focus on biker-pedestrian flow around campus & within. There's a lot of planning for Traffic in terms of a different system accommodating on-site & very local residents. Should work with main campus to obtain Universal Transit Pass.

1147-6

SDSU MISISON VALLEY COMMENT

Trolley connection service between SDSU and Stadium (MV Campus) station that runs in between the regular Green Line Trolley service frequency.

1147-7

SDSU MISISON VALLEY COMMENT

~~Is there consider~~ In land use planning of the DEIR, there is  
some information about a Purple Line trolley running along Murphy  
Canyon, will there be an incorporation of that trolley line for MU?  
~~will there be~~ I believe there should be more impacts of that.

1147-8

SDSU MISISON VALLEY COMMENT

In conjunction with the City of San Diego's carbon  
goals, this project should be carbon neutral from  
inception.

1147-9

SDSU MISISON VALLEY COMMENT

~~the~~ If the plan for Outdoor Air Supply in  
buildings requires ~~per~~ Packaged Rooftop Systems,  
consider choosing equipment with modulating or  
variable speed ~~is~~ components. This will save energy over  
the long run.

1147-10

SDSU MISISON VALLEY COMMENT

zero-net energy goal & Carbon neutrality wanted. How will LEED silver v4 standards ensure optimal air quality. Expand solar over stadium, shade a field or two for play in the shade

1147-11

SDSU MISISON VALLEY COMMENT

We need to ensure all transport to the campus is clean. Trolley / nat gas only. INCREASE SUBSIDY

1147-12

SDSU MISISON VALLEY COMMENT

We need the building to be LEED platinum or net zero energy in order to reflect the values of our campus and university! Thanks

1147-13

SDSU MISISON VALLEY COMMENT

we could use less energy if  
the buildings are orientated not  
letting the most sun in

1147-14

SDSU MISISON VALLEY COMMENT

I don't think there should be ~~any~~ any kind  
of natural gas energy for building operations  
energy.

1147-15

SDSU MISISON VALLEY COMMENT

Solar panels over the car park; provides  
shade for vehicles and supplemental power  
for vehicles or the campus itself.

1147-16

SDSU MISISON VALLEY COMMENT

carbon neutrality is essential  
for all future development  
in order to lead global climate  
mitigation and adaptation

😊  
Thank you!

1147-17

SDSU MISISON VALLEY COMMENT

Students value water reuse and we encourage  
and want all purple pipes, not the Pure  
Water project that produces basically drinking  
water because it is so clean

1147-18

SDSU MISISON VALLEY COMMENT

I think there should be reclaimed water from  
the flood to use for water on site.

1147-19

SDSU MISISON VALLEY COMMENT

PRODUCE PUBLIC OUTREACH FACT SHEET  
EXPLAINING VECTOR ISSUES, IE MOSQUITOS/  
SPRAYING/TOXICITY VS NON TOXICITY ~~FOR~~  
IN LAY PERSON LANGUAGE

1147-20

SDSU MISISON VALLEY COMMENT

~~Here~~ We need to use GRAY WATER  
there is an ample supply given the Showers  
and such on site.

1147-21

SDSU MISISON VALLEY COMMENT

I think that SDSU MV should have a clear commitment  
to San Diego's Climate Action Plan

1147-22

SDSU MISISON VALLEY COMMENT

There should be a Sustainability  
lead from SDSU to help with the  
process.

1147-23

SDSU MISISON VALLEY COMMENT

Increasing the water reuse would be very  
beneficial. Given that, PREPIPING is  
necessary for when there is a source for  
purple piping.

1147-24



SDSU MISISON VALLEY COMMENT

This must be carbon neutral to meet  
the city's climate goals!

1147-25

SDSU MISISON VALLEY COMMENT

Establish a post-consumer compost plan

1147-26

SDSU MISISON VALLEY COMMENT

It's pertinent that this project is carbon neutral to meet  
the City's goals, which includes NOT using natural gas  
from the start. Making this project fully electric and  
carbon neutral is the most essential aspect for the sake of  
the environment.

1147-27

SDSU MISISON VALLEY COMMENT

We must address the displacement of the  
homeless population that currently resides  
near the building site.

1147-28

SDSU MISISON VALLEY COMMENT

Carbon neutrality is essential.

1147-29