

SAN DIEGO STATE UNIVERSITY MISSION VALLEY CAMPUS MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT VOLUME II - RESPONSE TO COMMENTS

Prepared for:



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Responses to Comments

Introduction

A Draft Environmental Impact Report (Draft EIR) for the proposed project was prepared and circulated for public review from August 5, 2019, to October 3, 2019. During that time, CSU/SDSU received 10 Agency comment letters (A1 through A10), 4 Tribal comment letters (T1 through T4), 16 Organization comment letters (O1 through O16), and 145 Individual comment letters, plus dictated and written comments from public meetings (I1 through I147). Due to the number of comments received, two separate volumes have been added to the Final EIR. Within these volumes are “Comment Letters” (Volume I) and “Comment Letter Responses” (Volume II). Each of these has a Table of Contents to direct the reader to the appropriate comment and/or response. The comments have each been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A1 contains 13 comments that are numbered A1-1 through A1-13.

CSU/SDSU’s responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the CEQA Guidelines, CSU/SDSU is not required to respond to all comments on the Draft EIR, but only those comments that raise environmental issues regarding the adequacy of the Draft EIR. In accordance with CEQA Guidelines Sections 15088 and 15204, CSU/SDSU has independently evaluated the comments and prepared the attached written responses describing the disposition of any significant environmental issues raised. CEQA does not require CSU/SDSU to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

Rather, CEQA requires CSU/SDSU to provide a good-faith, reasoned analysis supported by factual information. To fulfill these requirements, CSU/SDSU’s experts in planning and environmental sciences consulted with and independently reviewed analysis responding to the Draft EIR comments prepared by Dudek and other experts, which include experts in aesthetics, air quality, biology, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services and recreation, transportation and traffic, tribal cultural resources, utilities and service systems, and wildfire. Each expert has years of educational and field experience in these categories of environmental sciences; is familiar with the project and the environmental conditions of the project site; and is familiar with the federal, state, and local rules and regulations (including CEQA) applicable to the proposed project. Accordingly, CSU/SDSU’s final analysis provided in the responses to comments is backed by substantial evidence.

In the case of specific comments, CSU/SDSU has responded with specific analysis; in the case of a general comment, or a recurring comment, the reader is referred to a series of “Thematic Responses” where applicable (see Volume II). The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses. Several of the comment letters repeat issues CSU/SDSU addressed in Thematic Responses and other written responses as part of the Final EIR. Due to the repetition, CSU/SDSU relies on those other responses addressing the same or similar issues, even if an individual response does not reference other applicable response(s). This is justified by the voluminous comments provided, and by the same or similar issues raised in such comments. For this reason, each reviewer is encouraged to review the Thematic Responses and the other written responses for further responsive information.

List of Agencies, Tribes, Organizations, and Individuals that Commented on the Draft EIR

Please refer to Final EIR, Volume I for a comprehensive list of all written comments received during the public comment period.

Summary of Changes to the Draft EIR and Appendices

In some cases, comments received on the Draft EIR prompted changes to the final version of the document – i.e., the Final EIR. These are shown in strikeout/underline format. The Final EIR also includes informational updates and clarifications. These, too, are shown in strikeout/underline format. Consistent with CEQA Guidelines Section 15088.5(b), these revisions have been made to clarify text for consistency or revise punctuation as appropriate throughout the document, and these revisions do not result in what constitutes new significant information that would require recirculation of the document.

In addition to the revisions to the Final EIR, several of the Draft EIR appendices were revised based on comments received during public review. Those appendices include:

- Appendix 4.3-1 – Biological Resources Technical Report
- Appendix 4.4-1 – Cultural Resources Technical Report
- Appendix 4.7-2 – City of San Diego Climate Action Plan (CAP) Consistency Memo
- Appendix 4.9-1 – Water Quality Technical Report
- Appendix 4.15-1 – Transportation Impact Analysis

The revisions to these appendices have been completed in strikeout/underline format.

Further, additional or supplemental analysis was provided based on comments received during public review. Those appendices include:

- Appendix 4.2-3 – Additional Information regarding Potential Health Effects of Air Quality Impacts
- Appendix 4.7-3 – Additional Technical Memo on Sustainability Project Design Features
- Appendix 4.14-1 – San Diego Unified High School District Letter on SDSU Mission Valley Campus Project
- Appendix 4.15-2 – TDM Monitoring Plan

Thematic Responses to Comments

Similar comments were received on several topics. In response, Thematic Responses were prepared to comprehensively address these comments. The individual responses refer to the following Thematic Responses, which are listed below and provided below.

- Project Refinements (PD-1)
- Purchase and Sale Agreement (PD-2)

- Mitigation Negotiations (PD-3)
- Murphy Canyon Creek (BIO-1)
- Sustainability Commitments (GHG-1)
- General Increase in Traffic (TR-1)

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Thematic Response PD-1 – Project Refinements

Since distribution of the Draft EIR, the Concept Design Site Plan for the proposed project has been further refined based on comments received during public review, meetings with stakeholders including the River Park Advisory Group, and continuing discussions as part of the negotiations over the Purchase and Sale Agreement (PSA) with the City of San Diego. Attachment PD-1A depicts the refined Concept Design - Site Plan.

As a result of the input received, the proposed project has been refined in the following ways:

1. In response to concerns raised about the proposed project's proximity to Murphy Canyon Creek and to improve the habitat connectivity between Murphy Canyon Creek and the San Diego River, former Street H (which paralleled Murphy Canyon Creek) has been realigned where Rancho Mission Road enters the project site to more directly connect to the residential neighborhoods and away from Murphy Canyon Creek. Additional open space and a trail replace this former circulation roadway along Murphy Canyon Creek, reducing constraints adjacent to the Murphy Canyon Wildlife Corridor and providing an additional buffer.
2. In response to questions about the design of the River Park, SDSU has further refined the site design for the future park to accommodate comments received on the Draft EIR and based on direction from the River Park Advisory Group. These refinements include limiting the amount of active uses in the "East Park" area, moving a road (former Street H) away from Murphy Canyon Creek, creating a low-flow, dry-weather drainage, and providing detailed design of the active and passive areas in response to public workshops and input from the River Park Advisory Group, as shown in Attachment PD-1A.
3. The site plan has been refined to provide two additional residential pads in the southeast portion of the project site development area, and to convert former hotel site (H2) to a residential building (new R1). This allows the 4,600 residential units to be developed with or without high-rise construction in order to provide more affordable construction. The rooms planned for former hotel site (H2) have been added to hotel site (H1), which will remain a high-rise structure.
4. In response to comments asking how the proposed project would increase use of the underutilized Stadium Trolley Station and create a transit hub, the proposed project design has been refined to provide an activated trolley plaza with commercial uses extended further south and space for at least four bus bays. As part of this refinement, CSU/SDSU has met with the Metropolitan Transit System (MTS) and San Diego Association of Governments (SANDAG) to coordinate, including identification of a third optional alignment for the future Purple Line Trolley. (Refer to Attachment PD-1B, and Responses to Comment Letters A5 and A6 for further information regarding coordination with these agencies.)
5. To address questions about connectivity between the existing SDSU campus and the project site, improvements have been identified to fill gaps in an existing "Campus to Campus bike path", which would provide for a continuous bike lane/path between the campuses. This would result in off-site improvements within existing rights-of-way to provide new bike facilities along Rancho Mission Road and Ward Road, east of the project site, to connect to existing off-site bike facilities on Mission Gorge Road, Fairmount Drive, and Montezuma Drive.
6. One of the proposed campus office buildings was eliminated and the remaining 15 buildings were reconfigured and some slightly enlarged to accommodate the same overall square footage. The overall campus/office square footage remains the same as the Draft EIR as 1.565 million square feet.
7. The location of the proposed multipurpose stadium structure has been shifted slightly to the west and south, within the previously identified boundary for the stadium, to create a larger concourse area on the east side of the stadium for additional ancillary stadium buildings/facilities.

8. Based on continuing negotiations with the City of San Diego as part of the PSA, the project site/boundary has been adjusted to anticipate the future vacation of City-owned right-of-way along San Diego Mission Road and Friars Road.
9. As explained in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, a number of additional Project Design Features (PDFs) have been incorporated into the proposed project which, although not reflected in the refined Site Plan, are included in the Final EIR.

The refined site plan is included in the Final EIR as Figure 2.1-1 and is attached hereto for reference as Attachment PD-1A. Table 2-1, Campus Land Use Summary, from the Final EIR (reproduced below) provides a strikeout/underline comparison of the land plan as analyzed in the Draft EIR to the refined land plan presented in the Final EIR.

Table 2-1. Campus Land Use Summary

Proposed Campus Land Uses	Footprint (acres)	No. of Buildings	Stories	Units/ Non-Residential SF	
				Homes	Hotel Rooms/ Non Res SF
Parks, Recreation, and Open Space ^a	86.1 <u>83.2</u>	— ^b	—	—	—
Campus Office (Including Stadium)	28.6 <u>28.1</u>	17 <u>16</u>	3-6	— <u>1,565m</u>	— <u>1,565m</u>
Campus Residential	24.6 <u>31.4</u>	16 <u>18</u>	3-24 <u>5-8^d</u>	4,600 <u>4,529</u>	
Campus Hospitality ^c	5.2 <u>4.0</u>	2 <u>1</u>	3 <u>22</u>	<u>71</u>	400
<u>Campus Commercial</u>	^e				<u>95,000</u>
Circulation	27.4 <u>26.4</u>	—	—	—	
Total	172.0 <u>173.1</u>	34 <u>35</u>	—	4,600	400

Source: Carrier Johnson + Culture 2019.

Notes:

- ^a Includes internal trails and pathways, as well as Murphy Canyon Creek and open space west of Street A not proposed to be impacted by development of the proposed project.
- ^b A dash (—) signifies that the information does not apply for a given category.
- ^c Hotel H1 includes both hotel rooms and 71 residential units.
- ^d While not anticipated to develop at greater than 8 stories, buildings may range up to 24 stories.
- ^e Included in Campus Office and Campus Residential footprint in mixed-use configuration.

Importantly, as shown in revised Table 2-1, Campus Land Use Summary, the number of residential units, number of hotel units, and the total square footage of both residential and non-residential uses (including campus/office and commercial) is the same as analyzed under the Draft EIR. Therefore, the total average daily traffic (ADT) generated by the proposed project, and the associated operational impacts related to ADT and vehicle miles traveled (VMT), are the same as those analyzed in the Draft EIR, even though the proposed project has been refined between the Draft EIR and Final EIR.

The refinements summarized above are incorporated into the proposed project's site plan and statistical summary analyzed in the Final EIR. The Final EIR contemplates the above refinements to the site plan, and this thematic response provides an issue-by-issue analysis of whether these refinements would result in any new significant impacts

or increase the severity of any significant impacts identified in the Draft EIR. Based on the analysis provided below, CSU/SDSU finds that the project refinements are in response to comments on the Draft EIR and do not give rise to any new or more severe significant environmental impacts.

Aesthetics

The Draft EIR determined that impacts to aesthetics would be less than significant because Public Resources Code Section 21099(d)(1) states that “[a]esthetic ... impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered [to have a] significant impact on the environment.” The proposed project would include campus, residential, mixed-use residential and employment opportunities within the campus village and research park, and is located on an infill site, within a Transit Priority Area as identified by the City of San Diego (City of San Diego 2019b). As such, any aesthetics impact the proposed project may produce, including effects to existing scenic views or scenic vistas as measured under the Appendix G threshold outlined above, cannot be considered a significant impact on the environment. Accordingly, the proposed refinements to the site plan would maintain the same campus village and research park in a mixed use configuration in a transit priority area and impacts would be less than significant. However, it is noted that the proposed refinements anticipate reducing the number of 20+ story buildings from five as analyzed in the Draft EIR, to one (Hotel H1, north of the proposed stadium). This would reduce the number of vertical structures viewed from I-15, I-8, Friars Road, Camino del Rio North and South, and other surrounding roadways. However, 20+ stories would not be precluded; thus, no revisions have been made to the Final EIR, and no new or refined analysis is required or provided in the Final EIR.

Air Quality and GHG Emissions

Construction air quality and GHG emissions would be the same under the proposed refinements as the square footage of buildings would be the same as those analyzed in the Draft EIR. While the number of residential buildings would increase to 18, one fewer hotel building would be constructed, one less campus building would be constructed, and, as noted above, the number of 20+ story residential buildings are anticipated to be reduced. Further, the proposed refinements would involve the same amount of grading and earth work, including demolition of the exiting stadium, as analyzed in the Draft EIR. Therefore, construction-related Air Quality impacts and GHG emission would be the same as those analyzed and disclosed in the Draft EIR, and no new analysis is required or provided in the Final EIR.

As to Operational Emissions, as noted under Transportation, below, the total ADT would be the same because the same intensity and density of uses would be implemented under the proposed refinements. The re-alignment of Street H would reasonably have the effect of reducing trip lengths by providing a more direct connection to the southeast; however, to be conservative, it is assumed that VMT would be the same under the proposed refinements as those analyzed in the Draft EIR. Therefore, mobile source emissions would be the same as those disclosed in the Draft EIR. However, as summarized above and elaborated in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, a number of additional project design features have been incorporated into the refined project. These PDFs would reduce GHG emissions and Air Quality impacts from operation of the proposed project as described in Appendix 4.7-3, Additional Technical Information on Sustainability Commitments Memo, to the Final EIR. Tables PD-1-1 and PD-1-2 below summarize the reductions in criteria air pollutants and carbon dioxide equivalent (CO₂e) as a result of the refinements to the proposed project.

Table PD-1-1. Operational Emissions Compared to Thresholds with Project Design Features

Emission Source	Maximum Daily Unmitigated Emissions Estimates					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	(lbs/day)					
DEIR Area	210	8.19	281	0.04	2.42	2.42
<i>Updates to Residential Hearth PDF</i>	-0.4	-3.8	-1.6	0.0	-0.3	-0.3
DEIR Energy	3.0	26.8	19.0	0.16	2.08	2.08
<i>Updates to Building and Cooling PDF</i>	-2.1	-18.7	-13.2	-0.1	-1.4	-1.4
DEIR Mobile	86.1	382	1,168	5.35	639	172
DEIR Stationary	0.5	2.1	1.2	0.0	0.1	0.1
Total Daily Emissions	297	397	1,554	5	641	175
SPAPCD Significance Thresholds	137	250	550	250	100	67
Exceeds Threshold?	YES	YES	YES	NO	YES	YES

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen oxide; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Table PD-1-2. Summary of GHG Emissions Inventory (With Project Design Features)

Emissions Category	Project GHG Emissions
	MT CO ₂ e/yr
Draft EIR Area Sources	240
<i>Final EIR Updates to Residential Hearth PDF</i>	-182
Draft EIR Energy Usage	15,735
<i>Final EIR Updates to Solar PV Panels PDF</i>	-13
<i>Final EIR Updates to Building Heating and Cooling PDF</i>	-1,410
<i>Final EIR Updates to Naturally Ventilated Parking Structures PDF</i>	-1,904
Draft EIR Water	2,772
Draft EIR Waste Disposed	2,253
Draft EIR Traffic	46,653
<i>Final EIR Updates to EV Ready Infrastructure and EV Chargers PDF</i>	-1,604
Draft EIR Stationary	40
Draft EIR Operational Subtotal	67,693
<i>Updates to Final EIR PDFs</i>	-5,113
Updates to Final EIR Operational Subtotal	62,580
Draft EIR Construction Amortized	1,077
Draft EIR Vegetation	-26
Updates to Final EIR TOTAL	63,630

Note: MT CO₂e/yr = metric tons carbon dioxide equivalent per year.

Accordingly, the operational analyses presented in Sections 4.2, Air Quality, 4.5 Energy, and 4.7, Greenhouse Gas Emissions, have been revised to account for these additional PDFs and the corresponding reduced emissions. Impacts to Air Quality would remain significant and unavoidable, but would be less than the Draft EIR. Impacts to Greenhouse Gas Emissions would be reduced and would remain less than significant.

Lastly, with respect to health risks, the proposed refinements would not locate sensitive receptors closer to I-15 and/or the KMEP MVT facility and the associated health risks and cancer risks impacts would remain less than significant, as analyzed and disclosed in the Draft EIR.

Biological Resources

The proposed refinements would increase the development footprint by approximately 1.1 acres as compared to the site plan analyzed and disclosed in the Draft EIR. The additional 1.1 acres of proposed development footprint are in areas that are currently disturbed by development and ornamental landscaping; as such, impacts would be less than significant and no additional mitigation measures would be required. Further, while the number of 20+ story buildings is anticipated to be reduced under the refined site plan, because 20+ story buildings would not be precluded, these potentially significant impacts would not necessarily be reduced or avoided. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Cultural and Tribal Cultural Resources

The proposed refinements would increase the development footprint by approximately 1.1 acres, to areas that are currently disturbed by development. The impacts would be less than significant because the additional 1.1 acres of development footprint would occur in areas that are already heavily disturbed and developed. Further, as explained in Section 4.4 of the Draft EIR, there are no known surface manifestations of cultural and/or tribal cultural resources within the area of potential effect. The same mitigation measures (MM-CUL-4 and MM-CUL-5 from the Draft EIR, or MM-TCR-1 and MM-TCR-2 from the Final EIR) would be implemented to ensure impacts to tribal cultural resources and unknown archaeological resources, or the disturbance of human remains, would remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR to address the cultural and tribal cultural resources impacts of the refined project.

Energy

Construction energy usage would be the same under the proposed refinements as grading and earth work, including demolition of the exiting stadium, would be the same under the proposed refinements as analyzed in the Draft EIR. Further, while the number of residential buildings would increase to 18, one fewer hotel building would be constructed, one less campus building would be constructed, and, as noted above, the number of 20+ story residential buildings would be reduced; therefore, the square footage of buildings would be the same as those analyzed in the Draft EIR. Therefore, construction-related energy usage would be the same as analyzed and disclosed in the Draft EIR, and no new analysis is required or provided in the Final EIR.

As to operational emissions, diesel usage would be the same as those disclosed in the Draft EIR as explained under Air Quality and GHG Emissions. However, as explained in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, additional PDFs have been incorporated into the refined project. These PDFs would reduce natural gas and gasoline usage and increase electrical energy usage from operation of the proposed project as described in Appendix 4.7-3. Table PD-1-3 below summarizes the changes to consumption of electricity, natural gas, gasoline, and diesel as a result of the refinements to the proposed project.

Table PD-1-3. Energy Consumption Associated with Project Operation

Energy Resource	Electricity Consumption (kWh/yr)	Natural Gas Consumption (kBtu/yr)	Gasoline Consumption (gallons/yr)	Diesel Consumption (gallons/yr)
Draft EIR Consumption	61,900,937	102,012,852	4,120,682	1,014,587
<i>EV Ready Infrastructure and EV Chargers PDF</i>	2,269,844	--	-271,953	--
<i>Updates to Solar PV PDF</i>	-76,182	--	--	--
<i>Building Heating and Cooling PDF</i>	16,939,981	-70,876,351	--	--
<i>Naturally Ventilated Parking Structures PDF</i>	-11,489,244	--	--	--
Updated Total	69,545,336	31,136,501	3,848,729	1,014,587

Notes: kWh/yr = kilowatt hours per year; kBtu/yr = thousand British thermal units per year; EV = electric vehicle; PDF = project design feature.

Accordingly, the operational analyses presented in Section 4.5, Energy, is revised to account for these additional PDFs and the corresponding energy usage. Impacts to energy would remain less than significant because this conversion from natural gas and gasoline usage to electrical energy usage would not be wasteful or inefficient, and would reduce the usage of natural gas by over 70 million kBtu/year. Further, the new project design features also include additional on-site nonrenewable energy generation on the stadium land use, and would also encourage additional energy efficiency through the request for proposals process when selecting development partners.

Geology and Soils

The proposed refinements would increase the development footprint by approximately 1.1 acres compared to the site plan analyzed and disclosed in the Draft EIR. These impacts would occur in areas that are currently already disturbed, and would occur within similar geologic and soils conditions as those analyzed in the Draft EIR. The same mitigation measures (MM-GEO-1 through MM-GEO-3 from the Draft EIR) would be implemented to ensure impacts remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Hazards and Hazardous Materials

The proposed refinements would increase the development footprint by approximately 1.1 acres compared to the site plan analyzed and disclosed in the Draft EIR. The same mitigation measures (MM-HAZ-1 through MM-HAZ-9 from the Draft EIR) would be implemented to ensure impacts remain less than significant. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Hydrology and Water Quality

Construction under the proposed refinements would be subject to the same Construction General Permit (CGP) requirements as analyzed under the Draft EIR, including filing a Notice of Intent to the State Water Resources

Control Board in order to obtain approval to complete demolition and construction activities under the CGP. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction would be a required component of the SWPPP, as would construction-phase best management practices.

The proposed refinements would maintain the water quality treatment system analyzed in the Draft EIR, with refinement to the locations of stormwater facilities to address comments received and further park planning objectives. Specifically, stormwater from the project site will be treated with BMPs including Low Impact Development BMPs, biofiltration basins, proprietary biofiltration devices, and enhanced site design BMPs. A combination of BMPs is proposed for treatment of the overall site, but the majority of the project area will drain to regional biofiltration basins located near the downstream portions of the project, as analyzed in the Draft EIR. See Attachment PD-1C.

The Concept Design – Site Plan has undergone design refinements during the preparation of the construction drawings and plans for the proposed project. Some of these refinements include changes to the sizing and design of the BMPs, such as the consolidation of two biofiltration basins to one large biofiltration basin in the Concept Design – Site Plan in the Final EIR. The two largest BMPs will be built with the first phase of grading.

In response to comments received on the Draft EIR, these biofiltration basins have been designed to protect the basin berms from floodplain impacts. Previously the basin berms were set below the floodplain elevations. The refinements to the Site Plan include the basin berm elevations having been elevated so that they are now higher than the floodplain to ensure floodwaters do not scour into the basin during the 100-year flooding event for the San Diego River. The basins may have a backwater condition for the 100-year event where water could back up through the outfall pipe into the basin during a 100-year San Diego River flooding event, but the basin berms will be elevated above the floodplain so that the river does not scour or wash out the basins. To achieve the basin berm elevations side slopes were changed in order to accommodate the required berm elevation and the required bottom area size.

The same Phase II Small Municipal Separate Storm Sewer System (MS4) Permit requirements would be achieved and the refined proposal would similarly elevate the campus office, stadium, hospitality, and residential uses above the Federal Emergency Management Agency 100-year floodplain. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Land Use and Planning

While the proposed refinements would result in minor changes to the locations of certain land uses within the project site (most notably by converting former hotel H2 to campus residential), the overall density and intensity of development would remain the same as analyzed in Section 4.10 of the Draft EIR. Accordingly, the proposed refinements to the site plan would maintain the same campus uses in a transit priority area. The additional 1.1-acres of development footprint is within existing road right-of-way and would not divide an established community. Impacts to land use and planning would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Mineral Resources

The proposed refinements would increase impacts to areas previously disturbed by development by approximately 1.1 acres compared to the impacts analyzed and disclosed in the Draft EIR. These impacts would occur within

similar Mineral Resources Zones as those analyzed in the Draft EIR and would be less than significant because these areas have already been precluded from future extraction by their existing use within road rights-of-way. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Noise

The proposed refinements would not change any of the anticipated construction techniques as those analyzed in the Draft EIR or result in construction closer to sensitive receptors than the nearest noise sensitive land uses analyzed in the Draft EIR (which are northwest of the project site while the refinements would be limited to the central and eastern northern perimeter of the project site). Therefore, construction-related noise impacts would remain the same as those analyzed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Relative to operational noise levels, the same land uses would be implemented as those analyzed in the Draft EIR; therefore, impacts related to Stationary Noise Sources would be the same and no new or refined analysis is required or provided in the Final EIR. However, off-site traffic noise may increase on Rancho Mission Road as a result of the realignment of Street H to the southeast providing a more direct connection to Ward Road.

The re-distribution of 1,527 ADT would increase noise levels above those predicted in the Draft EIR for the Horizon Year Plus Project (but without stadium event) at two studied segments as follows:

- Rancho Mission Road between San Diego Mission Road and Ward Road (as represented by assessment location ST8) by 0.5 A-weighted decibels (dBA), changing the predicted difference between the Horizon Year with and without Project (both without stadium event) from a 1.1 dBA increase to a 1.6 dBA increase, and resulting in 69.6 dBA for the Plus Project condition.
- Rancho Mission Road west of Ward Road (as represented by assessment location ST2) by 1.0 dBA, changing the predicted difference between the Horizon Year with and without Project (both without stadium event) from a 0.1 dBA increase to a 1.1 dBA increase, and resulting in 76.8 dBA for the Plus Project condition.

Both of these upward adjustments to the predicted traffic noise level remain less than significant increases because the project-related noise increase would remain less than 3 dBA. Therefore, impacts would remain less than significant, and no additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Population and Housing

The proposed refinements would not change the number of dwelling units or amount of square footage of campus office, hotel, or commercial uses compared to those analyzed in the Draft EIR. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Public Services and Recreation

The proposed refinements would not change the number of dwelling units or amount of square footage of campus office, hotel, or commercial uses compared to those analyzed in the Draft EIR. Therefore, the proposed refinements would not increase demand for fire and emergency medical services, law enforcement services, school services, library services, or parks and recreation facilities. The configuration of the River Park has been refined and the total

acreage is revised to 83 acres, compared to 86 acres as analyzed in the Draft EIR. This total would still exceed the required 23.8 acres of park demand. Accordingly, the impacts would be the same as those disclosed in the Draft EIR and no new or refined analysis is required or provided in the Final EIR.

Transportation and Traffic

While the proposed refinements would result in minor changes to the locations of certain land uses within the project site (most notably by converting former hotel H2 to campus residential) the overall density and intensity of development would remain the same as analyzed in Section 4.15 of the Draft EIR and the total ADT would be the same. However, based on the refinement to the alignment of Street H providing a more direct connection to the southeast, project traffic has been re-distributed to increase the number of trips to this connection from 13,301 ADT analyzed in the Draft EIR, to 14,828 ADT in the Final EIR. This increase of 1,527 ADT represents an 11.5% increase. A corresponding decrease of 1,527 ADT would be realized on Mission Village Road. Table PD-1-4 below shows how this increase would potentially effect intersections southeast of the project site.

TABLE PD-1-4. HORIZON YEAR (2037) PLUS PROJECT CONDITIONS INTERSECTION LEVEL OF SERVICE WITH 4-LANE FENTON BRIDGE

Intersection	Traffic Control	Peak Hour	Horizon Year Plus Project after Mitigations – Street I Alignment (presented in TIA Table 50)		Horizon Year Plus Project after Mitigations – w New Street H Alignment		Delay Delta
			Delay (sec/veh) ¹	LOS ^{2,3}	Delay (sec/veh) ¹	LOS ^{2,3}	
14. Street D & Street 4	Signalized	AM	23.7	C	23.6	C	-0.1
		PM	40.9	D	39.0	D	-1.9
15. Street F & Street 4*	Signalized	AM	27.0	C	24.7	C	-2.3
		PM	35.1	D	31.8	C	-3.3
16. Street F/San Diego Mission Rd & Street 6	Roundabout	AM	8.1	A	7.6	A	-0.5
		PM	9.3	A	8.8	A	-0.5
26. Rancho Mission Rd & San Diego Mission Rd	Signalized	AM	46.0	D	47.0	D	1.0
		PM	48.4	D	50.8	D	2.4
32. Ward Rd & Rancho Mission Rd	Signalized	AM	4.2	A	4.7	A	0.5
		PM	6.3	A	7.1	A	0.8

Source: Fehr & Peers, 2020

Notes:

¹ Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized intersections, the all-way-stop-controlled (AWSC) intersection, and the roundabout intersection. Worst movement delay reported for the side-street-stop-controlled (SSSC) intersection.

² LOS calculations performed using the *Highway Capacity Manual (HCM)* method.

³ Below-standard seconds of delay per vehicle and LOS highlighted in **bold**.

* Existing or proposed signal phasing prevents the use of *HCM* 6 at this intersection. The *HCM* 2000 method was applied instead.

As shown in Table PD-1-4, this redistribution of trips would not result in any new or significantly greater impacts to roadway segments or intersections as those analyzed and disclosed in the Draft EIR. Therefore, no new mitigation measures would be required of the refined project. See Attachment PD-1D for additional detailed analysis.

While this shift in trips to the southeast on Street H accessing Rancho Mission Road would reduce trips at other access points to the project site, to be conservative, it is assumed that the same impacts would occur and the same mitigation measures would be required as those analyzed in the Draft EIR. Therefore, impacts would be the same as those presented in the Draft EIR, and no additional analysis is provided or required.

While this redistribution of trips to the southeast would likely reduce overall VMT by providing a more direct connection compared to the VMT presented in the Draft EIR, to be conservative, it is assumed the overall VMT would remain the same under the refined project. Impacts would be the same as those presented in the Draft EIR, and no additional VMT analysis is provided or required.

Lastly, with respect to non-motorized transportation, the proposed refinements would improve such facilities through the provision of bicycle facilities on Rancho Mission Road to connect to existing off-site bike lanes which provide a continuous connection to the existing SDSU campus. Further, the refined project would activate the trolley plaza and provide space for at least four bus bays, which would facilitate access to transit within the project site.

Utilities and Service Systems

Construction of the proposed refinements would be the same as construction analyzed in the Draft EIR, including demolition of the existing stadium. The proposed refinements would not change the number of dwelling units or amount of square footage of campus office, hotel, or commercial uses. Therefore, the total water demand, sewer generation, and solid waste generation would be the same as analyzed in the Draft EIR, and no new facilities, the impacts of which may result in significant impacts to the environment, would be required compared to the proposed project. Further, all storm drains would be designed to accommodate the anticipated runoff, which would be similar to the volumes presented in the Draft EIR. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.

Wildfire

The proposed refinements would increase the development footprint, in areas previously disturbed by development, by approximately 1.1 acres compared to the site plan analyzed and disclosed in the Draft EIR. These impacts would occur within similar fire hazard severity zones as those analyzed in the Draft EIR and would be subject to the same mitigation measures as required by the Draft EIR. No additional mitigation measures would be required. Accordingly, the impacts would be the same as those disclosed in the Draft EIR, and no new or refined analysis is required or provided in the Final EIR.






Summary

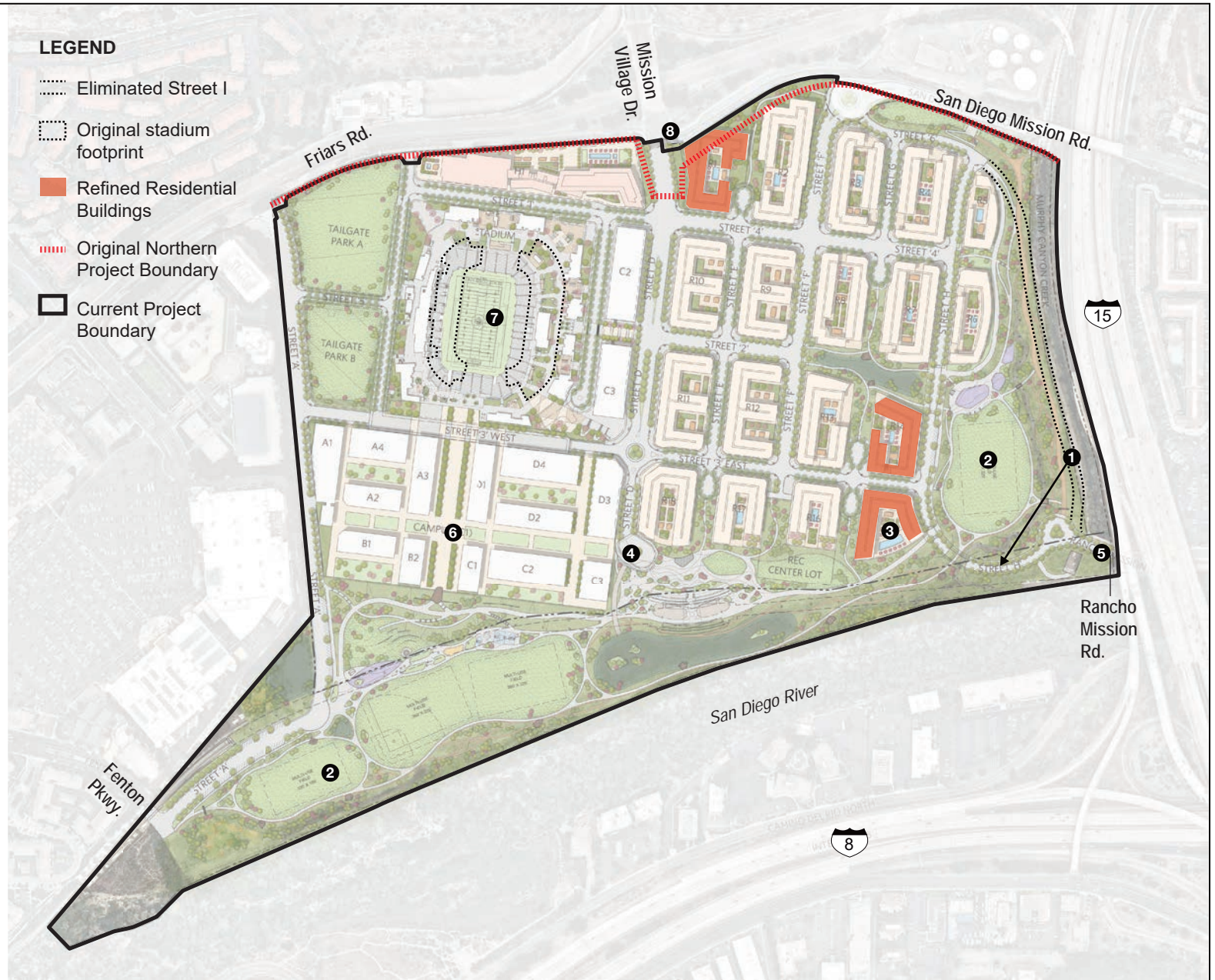
As discussed above, the refinements to the proposed project Concept Design Site Plan do not give rise to any new or more severe significant environmental impacts.

Refinements

- 1 Re-aligned Street H and eliminated Street I to widen Murphy Canyon Creek Corridor
- 2 Revised River Park design based on input from River Park Advisory Group and public comments
- 3 Increased number of residential pads to allow for more mid-rise development
- 4 Refined Trolley Plaza to create potential Transit Center with at least four bus bays
- 5 Campus to Campus Bike Path improvements to Rancho Mission Road
- 6 Reduced number of Campus/Office Buildings
- 7 Stadium Configuration revised with more precise architecture
- 8 Project Boundary Refined for ROW vacations along San Diego Mission Road

LEGEND

-  Eliminated Street I
-  Original stadium footprint
-  Refined Residential Buildings
-  Original Northern Project Boundary
-  Current Project Boundary



SOURCE: 2/9/19 CARRIER JOHNSON

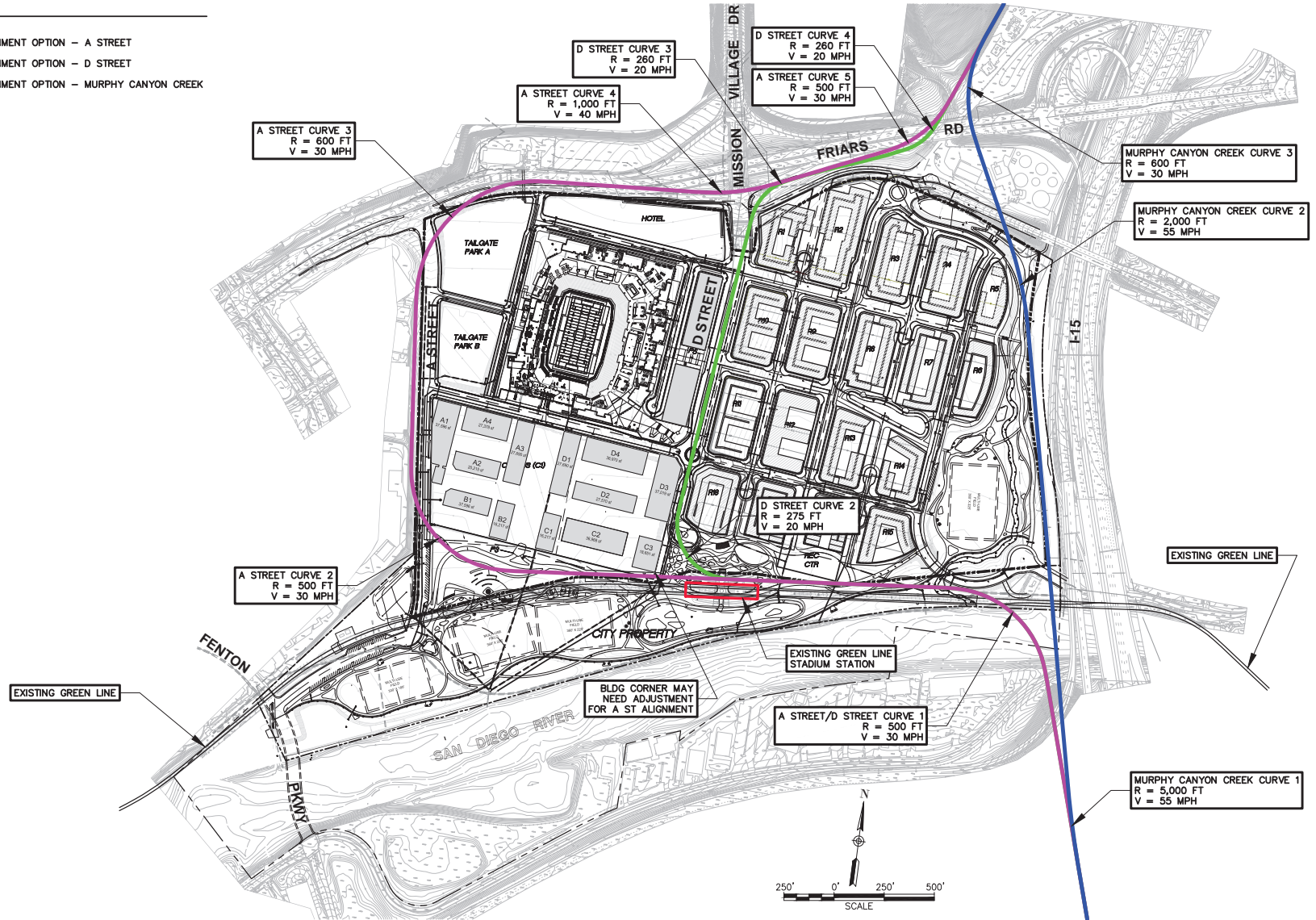
SDSU Mission Valley Campus Master Plan EIR



Attachment PD-1A

LEGEND

- ALIGNMENT OPTION - A STREET
- ALIGNMENT OPTION - D STREET
- ALIGNMENT OPTION - MURPHY CANYON CREEK



RailPros

401 B STREET, SUITE 2020
SAN DIEGO, CA 92101
WWW.RAILPROS.COM

E-MAIL: INFO@RAILPROS.COM
PHONE: (619) 795-0325

**SDSU MV CAMPUS
PURPLE LINE ALTERNATIVES**

SCALE: 1" = 250' DATE: 12-12-2019 SHEET: 1 OF 1



PROJECT DESIGN CONSULTANTS

DATE: 12/13/19 **FILE:** 4264.30

TO: SDSU Mission Valley Campus EIR Team

FROM: Chelisa Pack, Project Design Consultants

SUBJECT: SDSU Mission Valley Campus: Drainage and Stormwater Quality Approach Summary for Refined Site Plan

The purpose of this memo is to summarize the drainage and stormwater quality approach from a CEQA perspective as it relates to the evolution of the site plan from the “Design Development site plan” to the “Current site plan” for the SDSU Mission Valley Campus project. The Design Development site plan was analyzed with the EIR and recent improvements to the site plan have resulted in a new site plan. The current land use plan and project site layout has been updated with River Park changes, circulation improvements, and other refinements. The current land use plan is currently undergoing design refinements with the ongoing design phase for the preparation of the construction drawings and plans for the project.

The previous site plan was analyzed from a CEQA drainage and stormwater quality perspective with the project EIR with various technical reports that were a part of the EIR appendices. They include the following:

- A preliminary Drainage Report entitled *Drainage Study for SDSU Mission Valley Campus (Onsite Improvements)*, prepared by Rick Engineering Company, and dated February 12, 2019.
- A preliminary Water Quality Report entitled *Water Quality Report for SDSU Mission Valley Campus (Onsite Improvements)*, prepared by Rick Engineering Company, and dated February 12, 2019.
- A preliminary Water Quality Report entitled *Water Quality Technical Report for SDSU Mission Valley Campus Project*, prepared by Geosyntec Consultants, and dated August 2019.

The reports prepared by Rick Engineering were prepared to support the design development drawings, and the Geosyntec report was prepared to do a CEQA analysis on the design that Rick Engineering prepared. Subsequent to the preparation of the Design Development drawings, Project Design Consultants and the rest of the design team has developed the “Current site plan.” Project Design Consultants reviewed the previous reports prepared by Rick Engineering and Geosyntec and have implemented a similar drainage and water quality approach for the Current site plan. The proposed imperviousness and proposed land use plan of the Current site plan is similar to the Design

Development site plan and both site plans utilize the same existing drainage facilities for discharge, therefore, the overall post-project hydrology of the two site plans are generally consistent with each other. Due to site plan refinements in the Current Site plan, changes include enlarged proposed storm drain facilities, revised street alignments and profiles, revisions to storm drain layouts, revisions to BMP locations, and updates to BMP sizing calculations. The proposed BMP approach for the Current site plan is similar to the BMP approach proposed with the Design Development site plan. The stormwater from the site will be treated with Low Impact Development BMPs, biofiltration basins, and proprietary biofiltration devices. In addition, additional pre-treatment BMPs have been added to the site plan to further bolster the pollution prevention measures of the site. The Current site plan shows different BMP locations for some of the BMPs originally proposed with the Design Development plans. The new BMP configurations have been updated to reflect the required sizing to be consistent with local stormwater regulations.



MEMORANDUM

Date: January 6, 2020
From: Cecily Taylor and Sohrab Rashid
Subject: **SDSU Mission Valley Campus – On-Site Street H Alignment**

SD18-0276

The draft transportation impact analysis (TIA) for the proposed SDSU Mission Valley Campus project, dated July 29, 2019, was completed based on a previous site plan where Rancho Mission Road would connect to the site from the east and continue as Street I, located immediately west of Murphy Canyon Creek with fronting park uses only on the west side of this street. The current site plan eliminates Street I adjacent to the creek to minimize potential environmental issues, and the direct connection of Rancho Mission Road to Street H provides a more direct connection to site uses at the southeast corner of the site. This reconfiguration makes the Rancho Mission Road connection point more accessible to all site users, and will therefore change the local circulation. This memorandum summarizes the results of this change on the traffic analysis presented in the TIA.

TRAFFIC REDISTRIBUTION WITH STREET H ALIGNMENT

With Rancho Mission Road now connecting to Street H and providing a more direct east-west connection through the project site, more site traffic is expected to use Rancho Mission Road than originally estimated. With the new connection, it is estimated that approximately 25% of project trips previously forecast to use the Street 4/Street F/San Diego Mission Road connection to/from the east will shift to the Street H/Rancho Mission Road alignment. This will result in the addition of 39 outbound / 84 inbound trips in the AM peak hour, and 58 outbound / 97 inbound trips in the PM peak hour. These trips were then routed north or south on Rancho Mission Road/Ward Road to continue on their previously assigned route. Therefore, only the trip assignments on-site through Street 4/Street F and Street F/San Diego Mission Road and off-site at the Rancho Mission Road/Ward Road and Rancho Mission Road/San Diego Mission Road intersections will be affected by this network change.

To assess the potential changes in impacts and mitigation, we used volumes forecast for the anticipated Horizon Year Plus Project Without Event after mitigations scenario as described in the TIA. This scenario was used to determine if the proposed project mitigation would be sufficient to accommodate the anticipated change in volumes with the new roadway network. Note that this scenario includes a new signal installed

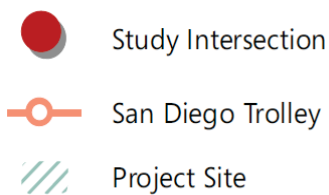
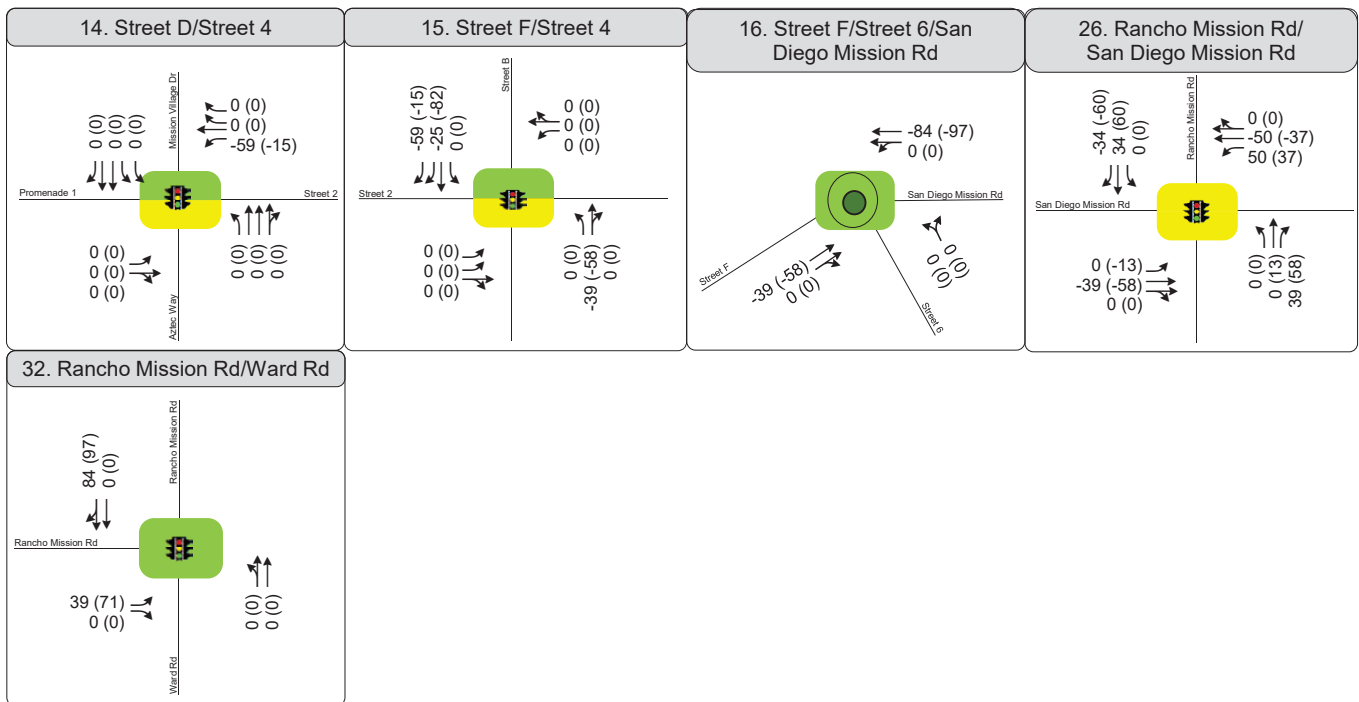
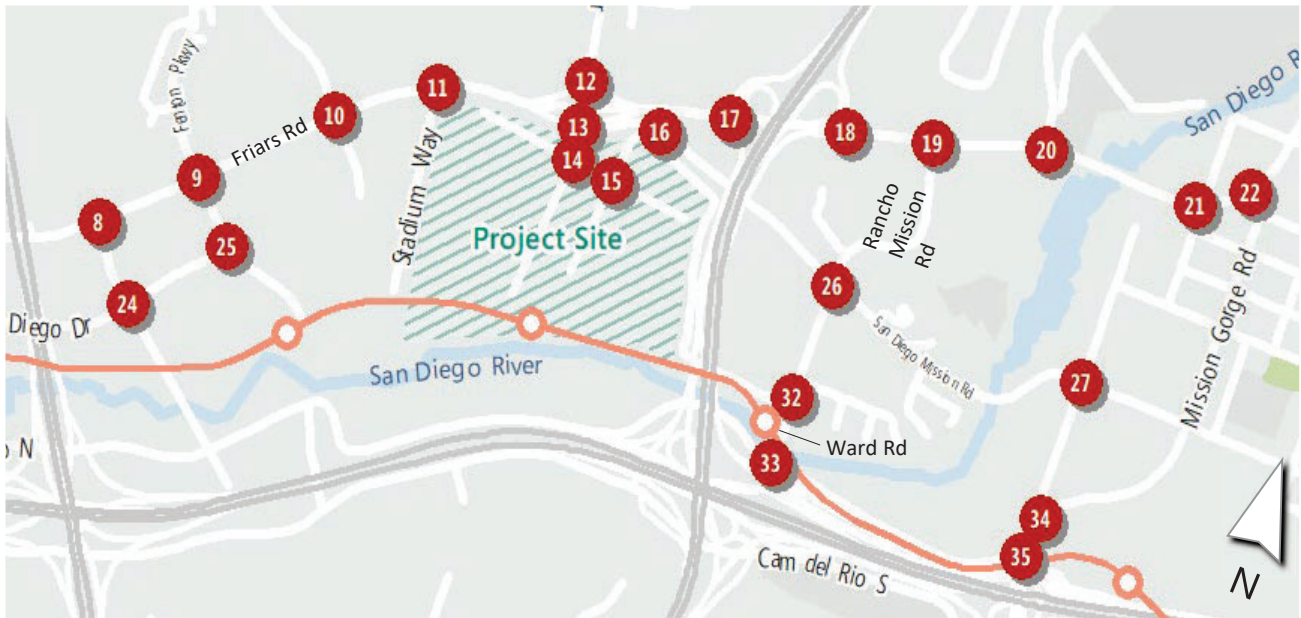


at Ward Road/Rancho Mission Road. The change in trip assignment and the total resulting volumes at the five affected (5) intersections are presented on **Figures A and B**, respectively.

INTERSECTION ANALYSIS

The traffic volumes shown on **Figure B** were used to analyze intersection operations using the lane configurations and traffic control devices included under the Horizon Year Plus Project Without Event with mitigation scenario. The results of the traffic reassignment are summarized below in **Table 1**. The corresponding LOS calculation sheets for these intersections are included in the **Appendix** to this memorandum.

As shown, all affected intersections are expected to operate acceptably with minor changes to the average delay (less than five seconds). Therefore, the revised site plan does not substantially change the findings of the TIA, and it is not projected to result in any new operations impacts.



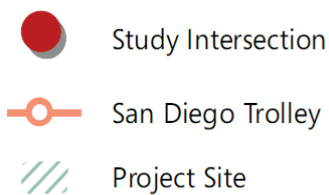
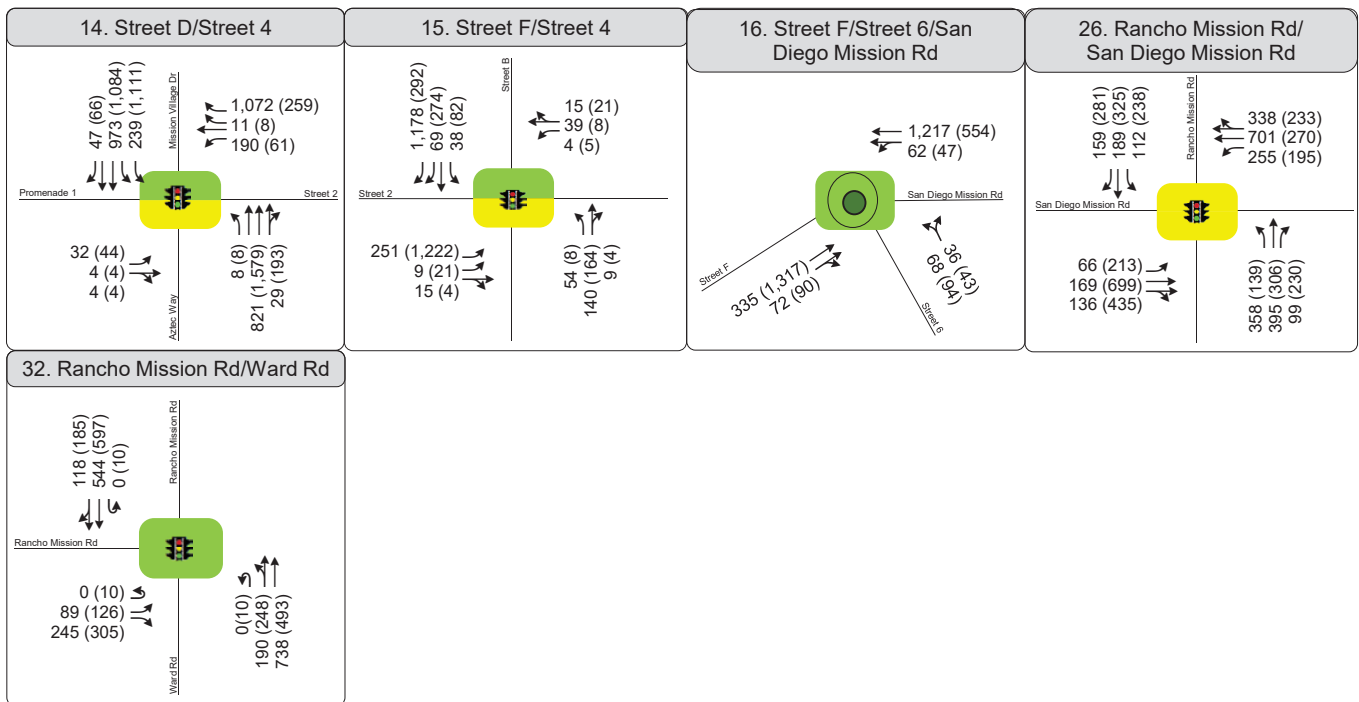
AM (PM) Peak Hour Volumes



Figure A

Horizon Year Plus Project Without Event After Mitigations
 Street H Alignment Project Traffic Redistribution
 Traffic Volumes, Lane Configurations, and LOS





AM (PM) Peak Hour Volumes



Figure B

Horizon Year Plus Project Without Event After Mitigations
 Street H Alignment Resulting Traffic Volumes
 Traffic Volumes, Lane Configurations, and LOS





TABLE 1 – HORIZON YEAR (2037) PLUS PROJECT CONDITIONS INTERSECTION LEVEL OF SERVICE WITH 4-LANE FENTON BRIDGE

Intersection	Traffic Control	Peak Hour	Horizon Year Plus Project after Mitigations – Street I Alignment (presented in TIA Table 50)		Horizon Year Plus Project after Mitigations – w New Street H Alignment		Delay Delta
			Delay (sec/veh) ¹	LOS ^{2,3}	Delay (sec/veh) ¹	LOS ^{2,3}	
14. Street D & Street 4	Signalized	AM	23.7	C	23.6	C	-0.1
		PM	40.9	D	39.0	D	-1.9
15. Street F & Street 4*	Signalized	AM	27.0	C	24.7	C	-2.3
		PM	35.1	D	31.8	C	-3.3
16. Street F/San Diego Mission Rd & Street 6	Roundabout	AM	8.1	A	7.6	A	-0.5
		PM	9.3	A	8.8	A	-0.5
26. Rancho Mission Rd & San Diego Mission Rd	Signalized	AM	46.0	D	47.0	D	1.0
		PM	48.4	D	50.8	D	2.4
32. Ward Rd & Rancho Mission Rd	Signalized	AM	4.2	A	4.7	A	0.5
		PM	6.3	A	7.1	A	0.8

Source: Fehr & Peers, 2020

Notes:

¹ Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized intersections, the all-way-stop-controlled (AWSC) intersection, and the roundabout intersection. Worst movement delay reported for the side-street-stop-controlled (SSSC) intersection.

² LOS calculations performed using the *Highway Capacity Manual (HCM)* method.

³ Below-standard seconds of delay per vehicle and LOS highlighted in **bold**.

* Existing or proposed signal phasing prevents the use of *HCM 6* at this intersection. The *HCM 2000* method was applied instead.























**APPENDIX: LOS Worksheets
with Street H Alignment**



HCM 6th Signalized Intersection Summary 14: Aztec Way/Mission Village Dr & Road A

HY+P with Mitigation - Street H Alignment

AM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	32	4	4	190	11	1072	8	821	29	239	973	47
Future Volume (veh/h)	32	4	4	190	11	1072	8	821	29	239	973	47
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	35	4	0	207	12	1165	9	892	28	260	1058	29
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	53	8	0	668	662	1634	19	1076	34	801	1536	685
Arrive On Green	0.03	0.00	0.00	0.38	0.35	0.35	0.01	0.21	0.21	0.46	0.86	0.86
Sat Flow, veh/h	1781	1870	0	1781	1870	2790	1781	5086	159	3456	3554	1585
Grp Volume(v), veh/h	35	4	0	207	12	1165	9	597	323	260	1058	29
Grp Sat Flow(s),veh/h/ln	1781	1870	0	1781	1870	1395	1781	1702	1842	1728	1777	1585
Q Serve(g_s), s	2.1	0.2	0.0	9.0	0.5	32.7	0.6	18.4	18.5	5.2	11.0	0.3
Cycle Q Clear(g_c), s	2.1	0.2	0.0	9.0	0.5	32.7	0.6	18.4	18.5	5.2	11.0	0.3
Prop In Lane	1.00		0.00	1.00		1.00	1.00		0.09	1.00		1.00
Lane Grp Cap(c), veh/h	53	8	0	668	662	1634	19	720	390	801	1536	685
V/C Ratio(X)	0.66	0.51	0.00	0.31	0.02	0.71	0.46	0.83	0.83	0.32	0.69	0.04
Avail Cap(c_a), veh/h	100	595	0	668	774	1800	81	826	447	801	1536	685
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	2.00	2.00	2.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	0.86	0.86	0.86
Uniform Delay (d), s/veh	52.8	54.7	0.0	24.3	23.1	16.2	54.1	41.5	41.5	24.1	5.0	4.2
Incr Delay (d2), s/veh	13.0	43.4	0.0	0.3	0.0	1.2	16.1	6.3	11.2	0.2	1.1	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	0.2	0.0	3.8	0.2	10.0	0.3	8.1	9.3	1.9	2.1	0.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	65.8	98.1	0.0	24.5	23.1	17.4	70.2	47.8	52.6	24.3	6.1	4.3
LnGrp LOS	E	F	A	C	C	B	E	D	D	C	A	A
Approach Vol, veh/h		39			1384			929			1347	
Approach Delay, s/veh		69.1			18.5			49.7			9.6	
Approach LOS		E			B			D			A	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	30.0	28.3	46.3	5.5	5.7	52.6	7.8	44.0				
Change Period (Y+Rc), s	4.5	5.0	5.0	* 5	4.5	5.0	4.5	5.0				
Max Green Setting (Gmax), s	12.6	26.7	16.7	* 35	5.0	34.3	6.2	45.5				
Max Q Clear Time (g_c+I1), s	7.2	20.5	11.0	2.2	2.6	13.0	4.1	34.7				
Green Ext Time (p_c), s	0.4	2.8	0.3	0.0	0.0	7.3	0.0	4.3				

Intersection Summary

HCM 6th Ctrl Delay	23.6
HCM 6th LOS	C






















Notes

* HCM 6th computational engine requires equal clearance times for the phases crossing the barrier.

HCM Signalized Intersection Capacity Analysis 15: Road B/San Diego Mission Rd & Road A

HY+P with Mitigation - Street H Alignment

AM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	251	9	15	4	39	15	54	140	9	38	69	1178
Future Volume (vph)	251	9	15	4	39	15	54	140	9	38	69	1178
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.5	4.5		4.5	4.5		4.5	4.5		4.5	2.1	4.5
Lane Util. Factor	0.97	1.00		1.00	1.00		1.00	1.00		1.00	1.00	0.88
Frt	1.00	0.91		1.00	0.96		1.00	0.99		1.00	1.00	0.85
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	3433	1691		1770	1786		1770	1845		1770	1863	2787
Flt Permitted	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	1.00
Satd. Flow (perm)	3433	1691		1770	1786		1770	1845		1770	1863	2787
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	273	10	16	4	42	16	59	152	10	41	75	1280
RTOR Reduction (vph)	0	6	0	0	14	0	0	3	0	0	0	0
Lane Group Flow (vph)	273	20	0	4	44	0	59	159	0	41	75	1280
Turn Type	Prot	NA		Prot	NA		Prot	NA		Prot	NA	custom
Protected Phases	7	4		3	8		5	2		1	6 9	7 9
Permitted Phases												
Actuated Green, G (s)	56.0	67.7		1.0	12.7		4.0	18.2		5.1	19.3	68.5
Effective Green, g (s)	56.0	67.7		1.0	12.7		4.0	18.2		5.1	19.3	68.5
Actuated g/C Ratio	0.51	0.62		0.01	0.12		0.04	0.17		0.05	0.18	0.62
Clearance Time (s)	4.5	4.5		4.5	4.5		4.5	4.5		4.5		
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0		
Lane Grp Cap (vph)	1747	1040		16	206		64	305		82	326	1735
v/s Ratio Prot	0.08	0.01		0.00	c0.02		c0.03	c0.09		0.02	0.04	c0.46
v/s Ratio Perm												
v/c Ratio	0.16	0.02		0.25	0.21		0.92	0.52		0.50	0.23	0.74
Uniform Delay, d1	14.4	8.2		54.1	44.1		52.8	41.9		51.2	39.0	14.5
Progression Factor	1.21	0.21		1.00	1.00		1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	0.2	0.0		8.1	0.5		84.8	1.6		4.7	0.1	1.7
Delay (s)	17.6	1.7		62.2	44.6		137.7	43.6		55.9	39.1	16.2
Level of Service	B	A		E	D		F	D		E	D	B
Approach Delay (s)		16.3			45.8			68.7			18.6	
Approach LOS		B			D			E			B	
Intersection Summary												
HCM 2000 Control Delay			24.7			HCM 2000 Level of Service				C		
HCM 2000 Volume to Capacity ratio			0.68									
Actuated Cycle Length (s)			110.0			Sum of lost time (s)				20.1		
Intersection Capacity Utilization			60.8%			ICU Level of Service				B		
Analysis Period (min)			15									
c Critical Lane Group												























Intersection					
Intersection Delay, s/veh	7.6				
Intersection LOS	A				
Approach	EB		WB		NB
Entry Lanes	2		2		1
Conflicting Circle Lanes	2		2		2
Adj Approach Flow, veh/h	442		1390		113
Demand Flow Rate, veh/h	451		1417		115
Vehicles Circulating, veh/h	68		75		371
Vehicles Exiting, veh/h	1424		411		148
Ped Vol Crossing Leg, #/h	0		0		0
Ped Cap Adj	1.000		1.000		1.000
Approach Delay, s/veh	4.3		8.9		4.5
Approach LOS	A		A		A
Lane	Left	Right	Left	Right	Left
Designated Moves	LT	TR	LT	TR	LR
Assumed Moves	LT	TR	LT	TR	LR
RT Channelized					
Lane Util	0.470	0.530	0.470	0.530	1.000
Follow-Up Headway, s	2.667	2.535	2.667	2.535	2.535
Critical Headway, s	4.645	4.328	4.645	4.328	4.328
Entry Flow, veh/h	212	239	666	751	115
Cap Entry Lane, veh/h	1268	1340	1260	1332	1036
Entry HV Adj Factor	0.979	0.980	0.981	0.981	0.983
Flow Entry, veh/h	208	234	653	736	113
Cap Entry, veh/h	1242	1313	1235	1307	1018
V/C Ratio	0.167	0.178	0.529	0.564	0.111
Control Delay, s/veh	4.3	4.2	8.8	9.1	4.5
LOS	A	A	A	A	A
95th %tile Queue, veh	1	1	3	4	0

HCM 6th Signalized Intersection Summary

26: Rancho Mission Rd & San Diego Mission Rd

HY+P with Mitigation - Street H Alignment

AM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	66	169	136	255	701	338	358	395	99	112	189	159
Future Volume (veh/h)	66	169	136	255	701	338	358	395	99	112	189	159
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		0.99	1.00		1.00	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	74	190	64	287	788	350	402	444	54	126	212	66
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	95	721	235	316	952	422	427	571	482	153	284	234
Arrive On Green	0.05	0.28	0.28	0.18	0.40	0.40	0.24	0.31	0.31	0.09	0.15	0.15
Sat Flow, veh/h	1781	2621	852	1781	2383	1056	1781	1870	1577	1781	1870	1541
Grp Volume(v), veh/h	74	127	127	287	587	551	402	444	54	126	212	66
Grp Sat Flow(s),veh/h/ln	1781	1777	1696	1781	1777	1663	1781	1870	1577	1781	1870	1541
Q Serve(g_s), s	4.9	6.6	7.0	18.9	35.4	35.6	26.5	25.8	2.9	8.3	13.0	4.5
Cycle Q Clear(g_c), s	4.9	6.6	7.0	18.9	35.4	35.6	26.5	25.8	2.9	8.3	13.0	4.5
Prop In Lane	1.00		0.50	1.00		0.64	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	95	489	467	316	710	664	427	571	482	153	284	234
V/C Ratio(X)	0.78	0.26	0.27	0.91	0.83	0.83	0.94	0.78	0.11	0.82	0.75	0.28
Avail Cap(c_a), veh/h	522	744	710	522	818	765	447	783	660	447	783	645
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	55.8	33.8	33.9	48.2	32.2	32.2	44.6	37.8	29.8	53.7	48.4	44.9
Incr Delay (d2), s/veh	5.1	0.4	0.5	8.1	7.1	7.7	27.3	2.2	0.0	4.1	1.5	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	2.9	2.9	8.9	16.0	15.1	14.7	12.0	1.1	3.9	6.1	1.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.9	34.2	34.4	56.2	39.3	39.9	72.0	40.0	29.9	57.8	49.9	45.1
LnGrp LOS	E	C	C	E	D	D	E	D	C	E	D	D
Approach Vol, veh/h		328			1425			900			404	
Approach Delay, s/veh		40.3			42.9			53.7			51.6	
Approach LOS		D			D			D			D	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	25.2	38.4	32.6	23.3	10.4	53.2	14.3	41.6				
Change Period (Y+Rc), s	4.0	5.5	4.0	5.1	4.0	* 5.5	4.0	* 5.1				
Max Green Setting (Gmax), s	35.0	50.0	30.0	50.0	35.0	* 55	30.0	* 50				
Max Q Clear Time (g_c+I1), s	20.9	9.0	28.5	15.0	6.9	37.6	10.3	27.8				
Green Ext Time (p_c), s	0.3	2.3	0.1	0.9	0.1	10.1	0.1	1.8				

Intersection Summary











HCM 6th Ctrl Delay	47.0
HCM 6th LOS	D

Notes

* HCM 6th computational engine requires equal clearance times for the phases crossing the barrier.

HCM 6th Signalized Intersection Summary 32: Ward Rd & Rancho Mission Rd

HY+P with Mitigation - Street H Alignment
AM Peak Hour























						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	89	245	190	738	544	118
Future Volume (veh/h)	89	245	190	738	544	118
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	0.99			0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	93	49	198	769	567	94
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	211	187	417	1379	1723	285
Arrive On Green	0.12	0.12	0.57	0.57	0.57	0.57
Sat Flow, veh/h	1781	1585	416	2516	3131	502
Grp Volume(v), veh/h	93	49	448	519	331	330
Grp Sat Flow(s),veh/h/ln	1781	1585	1230	1617	1777	1763
Q Serve(g_s), s	1.4	0.8	3.1	5.9	2.8	2.9
Cycle Q Clear(g_c), s	1.4	0.8	5.9	5.9	2.8	2.9
Prop In Lane	1.00	1.00	0.44			0.28
Lane Grp Cap(c), veh/h	211	187	879	917	1008	1000
V/C Ratio(X)	0.44	0.26	0.51	0.57	0.33	0.33
Avail Cap(c_a), veh/h	1121	997	1549	1865	2049	2033
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	11.7	11.5	3.7	3.9	3.3	3.3
Incr Delay (d2), s/veh	1.5	0.7	0.5	0.6	0.2	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.5	0.2	0.3	0.4	0.2	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	13.2	12.2	4.2	4.5	3.5	3.5
LnGrp LOS	B	B	A	A	A	A
Approach Vol, veh/h	142			967	661	
Approach Delay, s/veh	12.9			4.4	3.5	
Approach LOS	B			A	A	
Timer - Assigned Phs	2			4		6
Phs Duration (G+Y+Rc), s	20.7			7.9		20.7
Change Period (Y+Rc), s	4.5			4.5		4.5
Max Green Setting (Gmax), s	33.0			18.0		33.0
Max Q Clear Time (g_c+I1), s	7.9			3.4		4.9
Green Ext Time (p_c), s	7.8			0.3		4.3
Intersection Summary						
HCM 6th Ctrl Delay			4.7			
HCM 6th LOS			A			

HCM 6th Signalized Intersection Summary

HY+P with Mitigation - Street H Alignment

14: Aztec Way/Mission Village Dr & Promenade 1/Street 2

PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	44	4	4	61	8	259	8	1579	193	1111	1084	66
Future Volume (veh/h)	44	4	4	61	8	259	8	1579	193	1111	1084	66
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		0.95	1.00		0.98	1.00		0.97
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	46	4	0	64	8	273	8	1662	192	1169	1141	47
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	59	156	0	64	160	1250	14	1719	198	1269	2596	1125
Arrive On Green	0.03	0.08	0.00	0.04	0.09	0.09	0.01	0.37	0.37	0.61	1.00	1.00
Sat Flow, veh/h	1781	1870	0	1781	1870	2640	1781	4631	533	3456	3554	1540
Grp Volume(v), veh/h	46	4	0	64	8	273	8	1220	634	1169	1141	47
Grp Sat Flow(s),veh/h/ln	1781	1870	0	1781	1870	1320	1781	1702	1760	1728	1777	1540
Q Serve(g_s), s	3.6	0.3	0.0	5.0	0.5	8.8	0.6	49.2	49.5	42.1	0.0	0.0
Cycle Q Clear(g_c), s	3.6	0.3	0.0	5.0	0.5	8.8	0.6	49.2	49.5	42.1	0.0	0.0
Prop In Lane	1.00		0.00	1.00		1.00	1.00		0.30	1.00		1.00
Lane Grp Cap(c), veh/h	59	156	0	64	160	1250	14	1263	653	1269	2596	1125
V/C Ratio(X)	0.77	0.03	0.00	1.01	0.05	0.22	0.59	0.97	0.97	0.92	0.44	0.04
Avail Cap(c_a), veh/h	115	468	0	64	414	1609	89	1264	654	1269	2596	1125
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.67	1.67	1.67
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	0.51	0.51	0.51
Uniform Delay (d), s/veh	67.1	59.0	0.0	67.5	58.8	23.4	69.2	43.2	43.3	25.3	0.0	0.0
Incr Delay (d2), s/veh	18.9	0.1	0.0	114.5	0.1	0.1	34.4	17.7	27.8	6.3	0.1	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.0	0.1	0.0	4.3	0.3	2.8	0.4	23.6	26.4	14.8	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	86.1	59.0	0.0	182.0	58.9	23.5	103.6	60.9	71.0	31.6	0.1	0.0
LnGrp LOS	F	E	A	F	E	C	F	E	E	C	A	A
Approach Vol, veh/h	50			345			1862			2357		
Approach Delay, s/veh	83.9			53.7			64.5			15.7		
Approach LOS	F			D			E			B		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	56.4	57.0	10.0	16.6	6.1	107.3	9.7	17.0				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	28.0	52.0	5.0	35.0	7.0	73.0	9.0	31.0				
Max Q Clear Time (g_c+I1), s	44.1	51.5	7.0	2.3	2.6	2.0	5.6	10.8				
Green Ext Time (p_c), s	0.0	0.4	0.0	0.0	0.0	12.2	0.0	1.1				






















Intersection Summary

HCM 6th Ctrl Delay	39.0
HCM 6th LOS	D

HCM Signalized Intersection Capacity Analysis 15: Street B/San Diego Mission Rd & Street 2

HY+P with Mitigation - Street H Alignment

PM Peak Hour












												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	1222	21	4	5	8	21	8	164	4	82	274	292
Future Volume (vph)	1222	21	4	5	8	21	8	164	4	82	274	292
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.5	4.5		4.5	4.5		4.5	4.5		4.5	2.1	4.5
Lane Util. Factor	0.97	1.00		1.00	1.00		1.00	1.00		1.00	1.00	0.88
Frpb, ped/bikes	1.00	0.99		1.00	0.98		1.00	1.00		1.00	1.00	1.00
Flpb, ped/bikes	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	1.00
Frt	1.00	0.98		1.00	0.89		1.00	1.00		1.00	1.00	0.85
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	3433	1807		1770	1622		1770	1854		1770	1863	2787
Flt Permitted	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	1.00
Satd. Flow (perm)	3433	1807		1770	1622		1770	1854		1770	1863	2787
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	1328	23	4	5	9	23	9	178	4	89	298	317
RTOR Reduction (vph)	0	1	0	0	20	0	0	1	0	0	0	0
Lane Group Flow (vph)	1328	26	0	5	12	0	9	181	0	89	298	317
Confl. Peds. (#/hr)			10			10			10			
Confl. Bikes (#/hr)			3			3			3			3
Turn Type	Prot	NA		Prot	NA		Prot	NA		Prot	NA	custom
Protected Phases	7	4		3	8		5	2		1	6 9	7 9
Permitted Phases												
Actuated Green, G (s)	73.3	87.7		1.0	15.4		1.0	23.0		10.3	32.3	85.2
Effective Green, g (s)	73.3	87.7		1.0	15.4		1.0	23.0		10.3	32.3	85.2
Actuated g/C Ratio	0.52	0.63		0.01	0.11		0.01	0.16		0.07	0.23	0.61
Clearance Time (s)	4.5	4.5		4.5	4.5		4.5	4.5		4.5		
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0		
Lane Grp Cap (vph)	1797	1131		12	178		12	304		130	429	1696
v/s Ratio Prot	c0.39	0.01		0.00	c0.01		0.01	0.10		c0.05	c0.16	0.11
v/s Ratio Perm												
v/c Ratio	0.74	0.02		0.42	0.06		0.75	0.60		0.68	0.69	0.19
Uniform Delay, d1	25.9	9.9		69.2	55.8		69.4	54.2		63.3	49.3	12.1
Progression Factor	0.88	0.25		1.00	1.00		1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	1.1	0.0		21.8	0.2		128.3	3.1		13.9	3.9	0.1
Delay (s)	23.8	2.4		91.0	56.0		197.6	57.3		77.2	53.2	12.2
Level of Service	C	A		F	E		F	E		E	D	B
Approach Delay (s)		23.4			60.7			63.9			37.8	
Approach LOS		C			E			E			D	
Intersection Summary												
HCM 2000 Control Delay			31.8			HCM 2000 Level of Service			C			
HCM 2000 Volume to Capacity ratio			0.67									
Actuated Cycle Length (s)			140.0			Sum of lost time (s)			20.1			
Intersection Capacity Utilization			70.9%			ICU Level of Service			C			
Analysis Period (min)			15									
c Critical Lane Group												

Intersection					
Intersection Delay, s/veh	8.8				
Intersection LOS	A				
Approach	EB		WB		NB
Entry Lanes	2		2		1
Conflicting Circle Lanes	2		2		2
Adj Approach Flow, veh/h	1530		653		149
Demand Flow Rate, veh/h	1561		666		152
Vehicles Circulating, veh/h	52		104		1461
Vehicles Exiting, veh/h	718		1509		152
Ped Vol Crossing Leg, #/h	0		0		0
Ped Cap Adj	1.000		1.000		1.000
Approach Delay, s/veh	9.7		5.3		16.0
Approach LOS	A		A		C
Lane	Left	Right	Left	Right	Left
Designated Moves	LT	TR	LT	TR	LR
Assumed Moves	LT	TR	LT	TR	LR
RT Channelized					
Lane Util	0.470	0.530	0.470	0.530	1.000
Follow-Up Headway, s	2.667	2.535	2.667	2.535	2.535
Critical Headway, s	4.645	4.328	4.645	4.328	4.328
Entry Flow, veh/h	734	827	313	353	152
Cap Entry Lane, veh/h	1287	1359	1227	1300	410
Entry HV Adj Factor	0.980	0.981	0.980	0.980	0.980
Flow Entry, veh/h	719	811	307	346	149
Cap Entry, veh/h	1261	1333	1203	1274	402
V/C Ratio	0.570	0.609	0.255	0.272	0.371
Control Delay, s/veh	9.4	9.9	5.3	5.2	16.0
LOS	A	A	A	A	C
95th %tile Queue, veh	4	4	1	1	2

HCM 6th Signalized Intersection Summary 26: Rancho Mission Rd & San Diego Mission Rd

HY+P with Mitigation - Street H Alignment

PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	213	699	435	195	270	233	139	306	230	238	325	281
Future Volume (veh/h)	213	699	435	195	270	233	139	306	230	238	325	281
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		1.00	1.00		0.98	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	224	736	407	205	284	162	146	322	63	251	342	199
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	251	815	449	232	797	441	173	367	304	278	478	397
Arrive On Green	0.14	0.37	0.37	0.13	0.36	0.36	0.10	0.20	0.20	0.16	0.26	0.26
Sat Flow, veh/h	1781	2189	1206	1781	2202	1220	1781	1870	1548	1781	1870	1555
Grp Volume(v), veh/h	224	597	546	205	228	218	146	322	63	251	342	199
Grp Sat Flow(s),veh/h/ln	1781	1777	1619	1781	1777	1645	1781	1870	1548	1781	1870	1555
Q Serve(g_s), s	15.9	40.8	41.1	14.5	12.1	12.6	10.4	21.5	4.4	17.8	21.4	14.0
Cycle Q Clear(g_c), s	15.9	40.8	41.1	14.5	12.1	12.6	10.4	21.5	4.4	17.8	21.4	14.0
Prop In Lane	1.00		0.75	1.00		0.74	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	251	662	603	232	643	595	173	367	304	278	478	397
V/C Ratio(X)	0.89	0.90	0.91	0.88	0.35	0.37	0.85	0.88	0.21	0.90	0.72	0.50
Avail Cap(c_a), veh/h	485	691	629	485	760	703	415	727	602	415	727	605
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	54.3	38.1	38.2	55.0	30.0	30.2	57.1	50.2	43.3	53.3	43.6	40.9
Incr Delay (d2), s/veh	4.3	15.2	16.9	4.3	0.5	0.6	4.3	2.7	0.1	12.7	0.8	0.4
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	7.3	20.0	18.6	6.7	5.2	5.0	4.8	10.2	1.7	8.9	9.9	5.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	58.6	53.4	55.1	59.3	30.6	30.8	61.4	52.8	43.4	66.1	44.4	41.2
LnGrp LOS	E	D	E	E	C	C	E	D	D	E	D	D
Approach Vol, veh/h	1367				651				531			
Approach Delay, s/veh	54.9				39.7				54.1			
Approach LOS	D				D				D			
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	20.8	53.4	16.5	38.0	22.1	52.0	24.1	30.4				
Change Period (Y+Rc), s	4.0	5.5	4.0	5.1	4.0	* 5.5	4.0	* 5.1				
Max Green Setting (Gmax), s	35.0	50.0	30.0	50.0	35.0	* 55	30.0	* 50				
Max Q Clear Time (g_c+I1), s	16.5	43.1	12.4	23.4	17.9	14.6	19.8	23.5				
Green Ext Time (p_c), s	0.2	4.8	0.2	1.6	0.3	4.7	0.3	1.3				

Intersection Summary






HCM 6th Ctrl Delay	50.8
HCM 6th LOS	D

Notes

* HCM 6th computational engine requires equal clearance times for the phases crossing the barrier.

HCM 6th Signalized Intersection Summary 32: Ward Rd & Rancho Mission Rd

HY+P with Mitigation - Street H Alignment
PM Peak Hour

									
Movement	EBU	EBL	EBR	NBU	NBL	NBT	SBU	SBT	SBR
Lane Configurations									
Traffic Volume (veh/h)	10	126	305	10	248	493	10	597	185
Future Volume (veh/h)	10	126	305	10	248	493	10	597	185
Initial Q (Qb), veh		0	0		0	0		0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		0.99				0.96
Parking Bus, Adj		1.00	1.00		1.00	1.00		1.00	1.00
Work Zone On Approach		No			No		No		
Adj Sat Flow, veh/h/ln		1870	1870		1870	1870		1870	1870
Adj Flow Rate, veh/h		133	172		261	519		628	142
Peak Hour Factor		0.95	0.95		0.95	0.95		0.95	0.95
Percent Heavy Veh, %		2	2		2	2		2	2
Cap, veh/h		295	263		493	1046		1724	389
Arrive On Green		0.17	0.17		0.60	0.60		0.60	0.60
Sat Flow, veh/h		1781	1585		533	1817		2949	644
Grp Volume(v), veh/h		133	172		304	476		390	380
Grp Sat Flow(s),veh/h/ln		1781	1585		648	1617		1777	1723
Q Serve(g_s), s		2.6	4.0		11.8	6.4		4.4	4.4
Cycle Q Clear(g_c), s		2.6	4.0		16.2	6.4		4.4	4.4
Prop In Lane		1.00	1.00		0.86				0.37
Lane Grp Cap(c), veh/h		295	263		563	977		1073	1040
V/C Ratio(X)		0.45	0.65		0.54	0.49		0.36	0.36
Avail Cap(c_a), veh/h		821	730		746	1366		1501	1455
HCM Platoon Ratio		1.00	1.00		1.00	1.00		1.00	1.00
Upstream Filter(I)		1.00	1.00		1.00	1.00		1.00	1.00
Uniform Delay (d), s/veh		14.7	15.3		7.5	4.3		3.9	3.9
Incr Delay (d2), s/veh		1.1	2.8		0.8	0.4		0.2	0.2
Initial Q Delay(d3),s/veh		0.0	0.0		0.0	0.0		0.0	0.0
%ile BackOfQ(50%),veh/ln		1.0	1.4		1.2	0.9		0.7	0.6
Unsig. Movement Delay, s/veh									
LnGrp Delay(d),s/veh		15.8	18.0		8.3	4.7		4.1	4.1
LnGrp LOS		B	B		A	A		A	A
Approach Vol, veh/h		305				780		770	
Approach Delay, s/veh		17.0				6.1		4.1	
Approach LOS		B				A		A	
Timer - Assigned Phs		2		4		6			
Phs Duration (G+Y+Rc), s		28.1		11.0		28.1			
Change Period (Y+Rc), s		4.5		4.5		4.5			
Max Green Setting (Gmax), s		33.0		18.0		33.0			
Max Q Clear Time (g_c+I1), s		18.2		6.0		6.4			
Green Ext Time (p_c), s		5.4		0.8		5.1			
Intersection Summary									
HCM 6th Ctrl Delay			7.1						
HCM 6th LOS			A						
Notes									
User approved ignoring U-Turning movement.									

Thematic Response PD-2 – Purchase and Sale Agreement

Comments received on the Draft EIR expressed questions regarding the status of the Purchase Agreement between CSU and the City of San Diego.

The California State University (CSU) and the City of San Diego (City), by and through their respective governing bodies, are negotiating the terms of a purchase and sale agreement (Purchase Agreement) for:

- (i) CSU's acquisition of an approximately 135-acre portion of the project site; and,
- (ii) an approximately 34-acre river park that the City would continue to own, and CSU would improve and maintain.

CSU and the City have not finalized the Purchase Agreement, but the parties agree that San Diego Municipal Code (SDMC) Section 22.0908 (Section 22.0908), adopted pursuant to a voter-sponsored ballot initiative called "Measure G," will govern the key terms of their agreement. Section 22.0908 details the specific development components required as part of the Purchase Agreement, which serve as a sufficient basis for the meaningful environmental review contained in the EIR. The provisions of SDMC Section 22.0908 are stated in Section 4.10.2, Land Use and Planning, of the Draft EIR, and the proposed project's consistency with the provisions of Section 22.0908 are analyzed Table 4.10-2, San Diego Municipal Code Section 22.0908 Consistency Analysis.

Following SDMC Section 22.0908's adoption, CSU and the City engaged in due diligence efforts that set the stage for negotiations. In March 2019, the parties announced selection of their respective negotiation teams. Following selection of their teams, CSU and the City met regularly to deliberate over items critical to negotiations.

On October 14, 2019, CSU presented and submitted an offer to purchase approximately 135 acres of the project site during a public meeting before the City Council (Attachment PD-2A). After receiving City Council feedback, CSU submitted a revised offer to the City on October 28, 2019 (Attachment PD-2B). CSU's offer is consistent with the requirements set forth in SDMC Section 22.0908.

The City Attorney and the City's Independent Budget Analyst issued reports evaluating the October 28, 2019, purchase offer. The City Attorney's report contained a two-page analysis of CSU's offer, as well as two worksheets requesting input and direction for the preparation of a draft Purchase Agreement.

CSU and City representatives discussed CSU's revised offer during the City Council meeting held on November 18, 2019. At that meeting, the City Council directed the City Attorney to prepare a draft Purchase Agreement. The City Attorney requested policy direction during the November 18, 2019, City Council meeting and a response to the two worksheets submitted prior to the meeting. On November 25, 2019, the City's Chief Operating Officer, Kris Michell, submitted the requested input and direction (see Attachment PD-2C). CSU provided responses to the worksheets as well. (see Attachment PD-2D.)

Through the negotiations described in the preceding paragraphs, CSU and the City agreed upon the Property's purchase price at \$86,200,000.¹ This purchase price was informed by a jointly commissioned appraisal of the property prepared by David F. Davis dated October 11, 2019 (see Attachment PD-2E).

¹ CSU's offer includes a time value adjustment on the Public Utilities Department's 37% portion of the Property, using a 2.149% annual index factor from September 30, 2017 through the actual close of escrow.

As noted above, CSU's October 28, 2019, offer is consistent with, and commits to construct, the development components required by and in some cases exceed the requirements of SDMC Section 22.0908, the environmental effects of which are evaluated in the Draft EIR. (See Draft EIR, Chapter 4.) Specifically, CSU's offer proposes, among other things:

- (i) To acquire most of Murphy Canyon Creek (excluding the portion included within the 34-acre River Park);
- (ii) To assume maintenance, upkeep, and demolition costs for the existing Stadium, effective as of the closing date;
- (iii) To design, construct, and maintain the 34-acre River Park within 7 years of the Effective Date of the Purchase Agreement and before occupancy of any buildings other than the new Stadium;
- (iv) To design, construct, and maintain at least 22 acres of population-based park facilities that will be available for general community use and enjoyment;
- (v) To reserve an approximately 1-acre site upon which the City may construct and operate a recreation center in the future, as called for in the Mission Valley Community Plan;
- (vi) To require private developers to pay development impact fees to the City; and
- (vii) To set aside 10% of the planned 4,600 housing units as affordable housing.

Pursuant to CSU's offer, CSU would provide an additional \$5 million in transportation improvements as community benefits, which are not required as and are in addition to mitigation proposed in the EIR (Additional Transportation Improvements). These Additional Transportation Improvements include:

- (i) **Campus-to-Campus Bicycle Connection** – Install/construct new buffered bike lanes (with a short segment of standard bike lanes) on Rancho Mission Road from the Mission Valley site to Ward Road. Once complete, there will be continuous bicycle facilities between SDSU's College Area and Mission Valley campuses. As planned, the improvements would all be located within the existing curb-to-curb roadway section and would be designed and constructed in accordance with City of San Diego public road standards.
- (ii) **Friars Road Corridor Improvements** – Implement adaptive signal equipment, new detection cameras, and supporting communications technology along Friars Road at the following six intersections: River Run Drive/Friars Road, Fenton Parkway/Friars Road, Northside Drive/Friars Road, Santo Road/Friars Road, Riverdale Street/Friars Road, and Mission Gorge Road/Friars Road.
- (iii) **Ruffin Road/Aero Drive Intersection** – Upgrade detection camera systems and supporting communications technology at this intersection to enhance traffic flow operations.
- (iv) **Rio San Diego Drive** – Re-stripe Rio San Diego Drive (Qualcomm Way to Fenton Parkway) to remove two existing vehicle lanes and provide buffered bike lanes.
- (v) **Rancho Mission Road/Ward Road** – Modify Rancho Mission Road/Ward Road from Camino Del Rio North to Friars Road to provide a Two-Lane Collector roadway with a Two-Way Left-Turn Lane (TWLTL), and a one-way cycle track on each side of the road. The Draft EIR already describes the Friars Road Corridor Improvements and recommended that the proposed project contribute a fair share to these improvements. (Draft EIR, p. 4.15-154 through 4.15-157)
- (vi) **Additional Transportation Projects** – Pay the City of San Diego an amount equal to the difference between the actual cost of the preceding Community Benefit Improvements, listed above, and Five Million Dollars (\$5,000,000), which amounts shall be placed into a capital improvement fund used by the City of San Diego to fund capital improvement projects in the Mission Valley, Serra Mesa and Navajo communities.

Additionally, in coordination with the City of San Diego through the Response to Comments process, CSU would provide the Friars Road Corridor Improvements at its sole cost, rather than just fund a fair share. The EIR provides an analysis of these other Additional Traffic Improvements and demonstrates that they do not constitute “significant” new information. Refer to Final EIR, Section 4.15.10.5 pg. 4.15-178 through 4.15-179.

Further, as part of its October 28, 2019, offer, CSU agreed to support the City’s long-standing desire to construct the Fenton Parkway Bridge. As described in Section 4.15, Transportation, the Fenton Parkway Bridge is not a component of, or required mitigation for, the proposed project (Draft EIR, P. 4.15-175 through 4.15-223). Rather, the Fenton Parkway Bridge is a separate facility with independent utility that is part of the City’s long-term traffic circulation plan for the Mission Valley Community Plan area.

When the City pursues the Fenton Parkway Bridge as a future, separate City project, CSU has agreed to advance fund the environmental review and permitting for the Fenton Parkway Bridge. When the City obtains all required permits, then CSU further agrees to construct the Fenton Parkway Bridge prior to occupancy of more than 65% of equivalent dwelling units for the proposed project as a benefit to the community, and not as part of the proposed project. As part of the Purchase Agreement negotiations, the City agrees to make development impact fees previously collected for the Fenton Parkway Bridge in the amount of approximately \$1,300,000 available to CSU, and to set aside \$8,500,000 of the purchase price towards the cost of constructing the Fenton Parkway Bridge. CSU agrees to pay 25% of Fenton Parkway Bridge costs as its allocated contribution of the proposed project’s share of total daily traffic at buildout. (See Attachment PD-2F) The City agrees to provide development impact fee credits to CSU to the extent CSU funding for the Fenton Parkway Bridge exceeds 25%.

CSU believes that the terms of the Purchase Agreement are sufficiently definite for environmental review and that the EIR adequately analyzes the transaction and development that ultimately would be described in the Purchase Agreement.

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Tom McCarron
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SDSU Mission Valley Development

OFFER TO PURCHASE
MISSION VALLEY STADIUM SITE

This offer identifies fair and equitable terms upon which San Diego State University ("SDSU")¹ proposes to purchase the stadium site in Mission Valley from the City of San Diego ("City"). Terms with initial capital letters that are not otherwise defined in this offer have the meaning given in San Diego Municipal Code section 22.0908 (the "Code"), the law that governs the City's sale of the Existing Stadium Site to SDSU. SDSU believes the terms of this offer are consistent with the Code, which codified the Measure G Initiative that was approved by a majority of the electorate. SDSU looks forward to implementing the mandate of our mutual constituents by completing the purchase and sale of the Existing Stadium Site so that SDSU can proceed with timely development of the Project described below.

1. **Property:** Approximately 132.63 acres out of the approximately 232.77 acres Existing Stadium Site (see attachment). This includes the portion of Murphy Canyon Creek running along the eastern perimeter of the site adjacent to Interstate 15. The City will retain ownership of approximately 34.6 acres of River Park land and a portion of the Murphy Canyon Creek land.
2. **Purchase Price.** Sixty-Eight Million Two Hundred Thousand Dollars (\$68,200,000). This is the appraised fair market value of the Property.
3. **Existing Stadium Maintenance and Capital Costs:** Concurrent with the closing of the transaction, SDSU will take responsibility for the ongoing maintenance and upkeep of the Existing Stadium estimated at an annual cost of \$5mm-\$10mm. From and after the Closing Date, the City shall not be required to pay for any Joint Use Existing Stadium operating costs, Joint Use Existing Stadium maintenance costs or Joint Use Existing Stadium capital improvement expenses. The City shall continue to provide public safety, fire and emergency management services to the Project as required by Applicable Law.
4. **Fenton Parkway Bridge:** The Draft Environmental Impact Report ("DEIR") does not include the Fenton Parkway Bridge as a Project component. Nevertheless, SDSU understands the City desires the Bridge as a separate facility that is part of its long-term traffic circulation plan for the Mission Valley Community Plan area, and the City therefore believes that the Bridge has independent utility without regard to the Project. SDSU does not have detailed information from the City at this time regarding the Bridge. With the

¹ San Diego State University, a California State University, with authority delegated by the Board of Trustees of the California State University, which is the State of California acting in its higher education capacity

cooperation/collaboration/support of SDSU, the City will pursue the Fenton Parkway Bridge as a separate City facility in the future and the Bridge must be and remain a separate City project for CEQA and all other purposes. Subject to the necessary CEQA compliance having been completed by or through the City and all other necessary parties, SDSU will construct the 2-lane, all weather, at grade with the trolley crossing (with turn lane) Bridge and fund its environmental review, design, permitting and construction (est. cost \$22mm). SDSU believes that the Project's share of future traffic under the DEIR's "with bridge" scenario is approximately 25%, and on that basis, SDSU's allocated contribution for Bridge costs would be approximately 25% of the total costs. SDSU will receive development impact fee credits or other reimbursement from the City to the extent it incurs costs exceeding the approximately 25% share. SDSU will also be entitled to use the City's existing Capital Improvement Project funds allocated to the Bridge (est. \$1.3mm) for Bridge costs. The City will grant SDSU an easement, license and/or other rights necessary for SDSU to construct the Bridge. SDSU agrees that it will construct the Bridge before occupancy of more than 65% of planned equivalent dwelling units for the Project.

5. **Murphy Canyon Creek:** As discussed in the DEIR, the Project does not impact Murphy Canyon Creek. However, at the City's request, SDSU will acquire the approximately 2.6-acre Murphy Canyon Creek property owned by the City, provided the City remains responsible to perform any deferred maintenance and agrees to design, permit and construct any previously identified capital improvements at its cost. The capital improvements will be completed in a manner that does not negatively impact any proposed Project improvements. SDSU will maintain the Murphy Canyon Creek property on a go-forward basis at an estimated annual cost of \$125,000 (after the City's completion of the deferred maintenance and capital improvement obligations).
6. **No New or Additional City Taxes:** The Sale will not raise or impose any new or additional taxes on City residents.
7. **Possessory Interest and Other Taxes:** SDSU's non-state private development partners constructing improvements in the Project solely for private use and not for the benefit of or in support of SDSU's governmental mission ("Non-SDSU Facilities") will be required to pay sales tax, possessory interest tax, and/or transient occupancy tax, as required by applicable law. SDSU and other publicly developed property will be exempt from paying property or possessory interest taxes.
8. **Project.** SDSU will construct the following project ("Project") to further its educational mission: (i) a new multi-use stadium for SDSU Division I collegiate football and other sports; (ii) a River Park; (iii) other shared parks and open space; (iv) facilities for educational, research, entrepreneurial and technology programs; (v) residential housing for faculty and staff, graduate and undergraduate students and the local community; (vi) campus and neighborhood serving retail; (vii) hotels for campus uses, conferences, programs, and other community uses, and (viii) other uses as further described in the Code and the San Diego State University Mission Valley Campus Master Plan Draft

Environmental Impact Report (“DEIR”). The new stadium will be completed within 7 years after execution of the PSA.

9. **River Park Construction and Maintenance.** SDSU will design and construct the 34-acre River Park (est. cost \$30mm). The River Park will be completed no later than 7 years after execution of the PSA and prior to occupancy of any building in the Project other than the stadium. SDSU will also maintain the River Park in perpetuity (annual cost \$578k). The River Park will contain storm water retention and bioswales serving the Project, which SDSU will also maintain. The City will retain ownership of the River Park after the closing and will grant SDSU an easement to construct and maintain the River Park.
10. **Other Recreation Space:** SDSU will design, improve and maintain at least 22 additional acres of parkland/recreation space. This additional park space will be owned by SDSU, but made available for general community use and enjoyment.
11. **Future City Recreation Center Site:** SDSU will reserve an approximately one-acre site upon which the City may construct and operate a Recreation Center in the future, as called for in the Mission Valley Community Plan.
12. **Additional Traffic Improvements.** As described in the DEIR, SDSU intends to provide approximately \$21,000,000 in off-site and major on-site traffic improvements, pursuant to the mitigation measures identified in the DEIR. SDSU will also provide \$5,000,000 in additional traffic improvements as an accommodation to the City, provided SDSU does not become responsible for other traffic improvements.
13. **Development Impact Fees.** SDSU’s non-state private development partners constructing Non-SDSU Facilities will pay development impact fees (“DIFs”) (excluding park DIFs, as discussed in the next sentence), but SDSU and other publicly developed and occupied facilities will be exempt. The Project will contain parks in excess of the City’s requirements and therefore no party constructing any improvements in the Project will be required to pay park DIFs. A credit against all other DIFs will be given to the extent SDSU incurs costs for the Fenton Parkway Bridge exceeding its approximately 25% contribution amount.
14. **Affordable Housing:** At least ten percent (10%) of housing units, which may include student housing units, will be set aside as affordable housing and built on site (no in-lieu fee option) as follows: Rental Units- for a period of 55-years to tenants with an average household income that is 65% of the area median income (“AMI”); For-Sale Units- an initial buyer whose household income does not exceed one hundred percent (100%) of AMI, or an initial buyer whose household income does not exceed 150% of AMI for units containing two or more bedrooms; For Student Housing - students eligible for Cal Grant A or Cal Grant B awards (similar to what is provided in State Density Bonus Law, Government Code section 69519(b)(1)(F)), and students who were previously in the foster care program, or students enrolled in a job training program receiving assistance under the

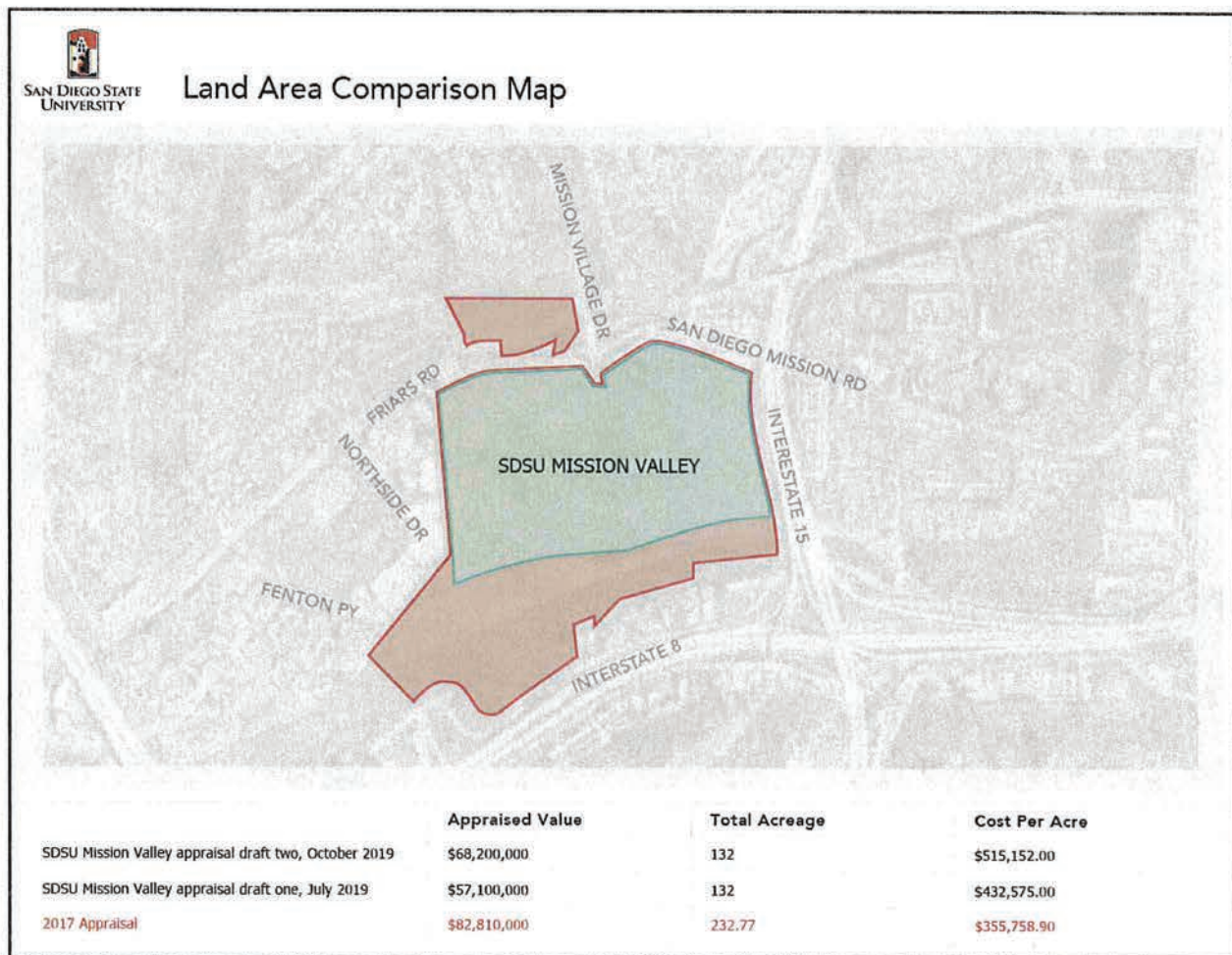
Job Training Partnership Act or under other Federal, State or local laws, or other metric as the parties may agree.


15. **Groundwater Wells for Pure Water.** City will be permitted to install groundwater wells within a predetermined area of the Property that will not impact Project development or improvements.
16. **Monitoring and Extraction Wells:** City will remove and close, or cause the removal and closure of all monitoring and extraction wells and related facilities existing on the Property on a timeline and in a manner reasonably acceptable to SDSU.
17. **Environmental:** SDSU will not assume liability for existing environmental contamination of a nature similar to that which was previously the subject of on-site remediation.
18. **City Cooperation Commitments:** Although SDSU will be the party issuing grading, building and all other permits for the Project, the City agrees to timely cooperate with SDSU in all of its efforts to facilitate and implement the terms of this offer. In particular, the City will actively cooperate on the following: (i) expedited Development Services Department Review and Permitting for Non-SDSU Facilities (SDSU and other publicly developed improvements will not require any City permits), (ii) River Park Right of Entry Access and Operational Agreement, and (iii) the relocation of existing onsite utility lines and recordation of associated easements.
19. **Connection Fees:** SDSU will receive a credit against water and sewer connection fees and charges for all existing facilities.
20. **Compliance with CEQA:** The execution and closing of the PSA is conditioned upon compliance with CEQA, which will include the Board of Trustee's certification of the Mission Valley Campus Master Plan Final EIR and the City's making of Responsible Agency findings under the Final EIR, among other things. SDSU, by delivering this offer, and the City, by accepting this offer, are not bound or committed to a definite course of action with respect to the PSA or the Project. Consistent with CEQA Guidelines 15004(b)(4), nothing in this offer shall commit or be interpreted to commit SDSU or the City formally or as a practical matter to a definite course of action, to preclude the consideration of feasible mitigation measures and alternatives, or to restrict denial of the PSA or the Project, prior to the certification or approval of said Final EIR. The terms proposed in this offer are subject to CEQA compliance through the DEIR and Final EIR, and do not constrain meaningful consideration during the CEQA review process of all feasible mitigation measures or alternatives, including the "No Project" alternative required by CEQA.

21. **Code Compliance:** In addition to the items described above, SDSU will comply with all other Code requirements, including GHG reduction goals and applicable prevailing wage laws consistent with SDSU's policies.

Please note this offer assumes the following: (i) SDSU and City staff will finalize negotiating the terms of a purchase and sale agreement ("PSA") by November 2019, (ii) the Board of Trustees will review, approve and certify the Final EIR for the Project and approve the PSA in January 2020, (iii) the City will make responsible agency findings under the Final EIR and approve the PSA shortly after the Board of Trustees' certification and approval, and (iv) the closing will occur in February 2020. The economics of SDSU's offer are greatly impacted if the above scheduling milestones are not achieved. SDSU is fully committed to working with the City beginning this week to meet this schedule.

SDSU believes these terms proposed above are fair and equitable. We look forward to working with City staff on a PSA that implements these terms as soon as possible.



 10/14/2019
Tom McCarron, Senior Vice President, SDSU Mission Valley Development



San Diego State University
5500 Campanile Drive
San Diego, CA 92182-8000
Tel: 619 594 · 5201
Fax: 619 594 · 8894

THE PRESIDENT

October 28, 2019

Mayor Kevin Faulconer
City of San Diego
202 C Street
11th Floor
San Diego, CA 92101

Subject: Proposed Sale of the Mission Valley Stadium Property

(Please note an earlier version of this letter had a clerical error, which has been fixed in this updated version.)

Dear Mayor Faulconer,

San Diego State University (“SDSU”) wants to thank you and your staff for a tremendous amount of work since the passage of Measure G. SDSU has listened to the comments of the City Council and greatly values the input of our City leaders. SDSU believes a great opportunity awaits the citizens of San Diego with the transformation of the Mission Valley stadium site into a vibrant campus community. SDSU’s proposed Mission Valley Campus Master Plan project (“Project”) has the opportunity to provide our region with increased educational access, advance our innovation economy and realize a vision that will serve San Diego for generations to come.

It is with these thoughts in mind, that SDSU offers the following revisions to the terms of the “Offer to Purchase Mission Valley Stadium Site” delivered to the City on October 14, 2019.

- **Parties:** The City of San Diego, as seller, and San Diego State University/California State University (“CSU”),¹ as buyer.
- **Property:** Contains 135.12 acres, as generally depicted on the map attached to the Measure G initiative and in the appraisal from David Davis dated October 11, 2019 (“Property”).
- **Purchase Price:** \$86,200,000, plus a time value adjustment on the Public Utilities Department 37% portion of the Property, using a 2.149% annual index factor from 9/30/17 through the actual close of escrow (“Closing Date”) (estimated adjustment of \$1,500,000).
- **Murphy Canyon Creek:** The Murphy Canyon Creek parcel will be included in the sale “as is”, and SDSU will not be required to make any improvements to Murphy Canyon Creek.

¹ The Board of Trustees of the California State University, the State of California acting in its higher education capacity, on behalf of San Diego State University.

- Stadium Demolition and Maintenance: Upon the Closing Date, SDSU will assume responsibility for ongoing maintenance, up-keep and demolition of the existing stadium.
- Fenton Parkway Bridge: The Draft Environmental Impact Report (“DEIR”) does not include the Fenton Parkway Bridge (“Bridge”) as a Project component. Nevertheless, SDSU understands the City desires the Bridge as a separate facility, that is part of its long-term traffic circulation plan for the Mission Valley Community Plan area, and the City therefore believes that the Bridge has independent utility without regard to the Project. SDSU does not have detailed information from the City regarding the Bridge. With the cooperation, collaboration and support of SDSU, the City will pursue the Fenton Parkway Bridge as a separate City facility in the future and the Bridge must be and remain a separate City project for CEQA and all other purposes. Subject to the necessary CEQA compliance having been completed by or through the City and all other necessary parties, SDSU will construct a 2-lane, all weather, at grade with the trolley crossing (with turn lane) Bridge and fund its environmental review, design, permitting and construction. SDSU believes the Project’s share of future traffic under the DEIR’s “with bridge” scenario is approximately 25%, and on that basis, SDSU’s allocated contribution for Bridge costs would be approximately 25% of the total costs. SDSU will receive development impact fee credits. SDSU will also be entitled to use the City’s existing capital improvement project funds allocated to the Bridge (approximately \$1.3 million) for Bridge costs. The City will grant SDSU an easement, license and/or other rights necessary for SDSU to construct the Bridge. SDSU agrees it will construct the Bridge before occupancy of more than 65% of planned equivalent dwelling units for the Project. SDSU requests that the City allocate a maximum \$8.5 million of the purchase price proceeds towards construction of the Bridge. This represents the maximum City contribution for the bridge apart from applicable DIF credits.
- Additional Project Improvements: SDSU requests that the City allocate \$1.5 million of the purchase price proceeds in a separate account jointly controlled by the City and SDSU to be held for other related Project improvements.
- Transportation Improvements: In addition to the transportation mitigation responsibilities under the Final Environmental Impact Report (“FEIR”), SDSU will provide \$5,000,000 for additional traffic improvements in coordination with the City.
- River Park: SDSU will design, construct and maintain in perpetuity, the 34-acre River Park, and pay 100% of those costs. The River Park improvements will be completed no later than seven (7) years after the Purchase and Sale Agreement’s (“PSA”) effective date and prior to occupancy of any building on the Property, other than the new stadium.
- Additional 22 Acres of Parks: SDSU will design, construct and maintain at least 22 acres of population-based park facilities, owned by SDSU and available for general community use and enjoyment.
- Future City Recreation Center Site: SDSU will reserve an approximately one-acre site upon which the City may construct and operate a recreation center in the future, as called for in the Mission Valley Community Plan.

- Development Impact Fees: SDSU's non-state private development partners constructing non-SDSU facilities will pay development impact fees ("DIF"), but SDSU and other publicly developed and occupied facilities will be exempt. Because of the timing of construction of the River Park and the additional park improvements, it is anticipated the Project will contain completed parks in excess of the City's requirements and therefore it is anticipated no party constructing any improvements in the Project will be required to pay park DIF fees. SDSU shall be entitled to cash reimbursement or DIF credits for the reimbursable costs expended by SDSU and approved by the City in accordance with the PSA and the Mission Valley Impact Fee Study.
- Affordable Housing: SDSU will provide onsite, 10% of the total number of housing units developed to be set aside as affordable housing units, which may include student housing units. Affordable housing units will be reasonably phased in to coincide with market-rate units.
- Groundwater Management: SDSU will grant appropriate easements to the City, without expense to the City, to install groundwater wells and related facilities within the agreed upon easement location on the Property, and to allow retention of two existing monitoring wells. SDSU will also acknowledge the City's continued retention of its Pueblo water rights.
- Removal of Kinder Morgan Wells: The City will use reasonable efforts to cause Kinder Morgan to timely remove and close all monitoring and extraction wells and related facilities on the Property.
- Environmental Contamination: SDSU will purchase the Property "as is", with all faults. SDSU will defend and indemnify the City against all claims regarding Property's condition and waive all environmental claims against the City. Without incurring any expense or liability, the City will tender written claims to Kinder Morgan for reimbursement of any Property remediation costs arising from Kinder Morgan's environmental contamination.
- Compliance with CEQA: The execution and closing of the PSA is conditioned upon compliance with CEQA, which will include the Board of Trustees of the California State University's certification of the Mission Valley Campus Master Plan FEIR and the City's making of responsible agency findings under the FEIR, among other things. SDSU, by delivering this offer, and the City, by accepting this offer, are not bound or committed to a definite course of action with respect to the PSA or the Project. Consistent with CEQA Guidelines 15004(b)(4), nothing in this offer shall commit or be interpreted to commit SDSU or the City formally or as a practical matter to a definite course of action, to preclude the consideration of feasible mitigation measures and alternatives, or to restrict denial of the PSA or the Project, prior to the certification or approval of said FEIR. The terms proposed in this offer are subject to CEQA compliance through the DEIR and FEIR, and do not constrain meaningful consideration during the CEQA review process of all feasible mitigation measures or alternatives, including the "No Project" alternative required by CEQA.
- Possessory Interest and Other Taxes: SDSU's non-state private development partners constructing improvements in the Project solely for private use and not for the benefit of or in support of SDSU's governmental mission will be required to pay sales tax, possessory interest tax, and/or transit occupancy tax, as required by applicable law. SDSU and other publicly developed property will be exempt from paying property or possessory interest taxes.

- Legal Challenges: SDSU will defend and indemnify the City for all legal challenges with respect to approval of the FEIR, PSA, and Campus Master Plan.
- Sovereignty: Consistent with SDMC section 22.0908 and CSU's status as a sovereign state public agency, nothing in the PSA will abrogate the authority of the California State University Board of Trustees. CSU alone will issue all development related permits and collect all DIFs (for disbursement to the City if required by SDMC section 22.0908) for all aspects of the Project.
- Measure G Compliance: The PSA will incorporate all other conditions and requirements as required by SDMC section 22.0908 and related Measure G campaign promises.

Other proposed PSA details will include:

- CSU Approval: The California State University Board of Trustees must accept and approve if at all, the FEIR, Campus Master Plan and PSA. The target date for such California State University Board of Trustees action is January 28, 2020.
- Council Approval: The City Council must accept and approve if at all, the Final EIR findings and related mitigation measures, and PSA. The target month for such City Council action is February 2020. Such action will require the introduction and adoption of a Charter section 221 ordinance.
- Closing Date: The closing will occur shortly after the parties enter into the PSA with a target Closing Date of no later than March 27, 2020.
- Potential Delay in Closing: If the Closing Date does not occur by June 30, 2020, through no fault (including unreasonable delays) of either party, (a) the City will lease the Property to SDSU for \$1.00 per month; (b) SDSU will assume all ongoing costs of maintaining and operating the Property, including the stadium; and (c) unless the delay is the City's fault, the purchase price will increase on prorated basis, applying an index factor of 2.149% from July 1, 2020 until the Closing Date.

SDSU is truly excited about the opportunity to purchase the Property and develop this transformational Project. We are hopeful the changes we are proposing to our offer will be acceptable. We stand ready to move forward and again, we appreciate all the hard work you, the Council and the City staff have provided to get us to this point.

Sincerely,



Adela de la Torre, Ph.D.
President
San Diego State University

cc:

Honorable Council President Georgette Gómez
Council President Pro-Tem Barbara Bry
Councilmember Jennifer Campbell
Councilmember Chris Ward
Councilmember Monica Montgomery
Councilmember Mark Kersey
Councilmember Chris Cate
Councilmember Scott Sherman
Councilmember Vivian Moreno
Mara Elliott, City Attorney
Aimee Faucett, Chief of Staff
Kris Michell, Chief Operating Officer
Mike Hansen, Director, Planning Department
Cybele Thompson, Director, Real Estate Assets
Kevin Reisch, Senior Chief Deputy City Attorney
Melissa Ables, Deputy City Attorney

WORKSHEET A

**RECOMMENDATIONS FROM REPORTS ISSUED BY
CITY ATTORNEY AND/OR INDEPENDENT BUDGET ANALYST**

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation
4. Murphy Canyon Creek	<p>(a) If SDSU does not acquire ownership of the entire channel, require that SDSU be required to maintain the entire channel, including its southernmost portion which will be part of the River Park.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p> <p>(b) Require strong indemnification and hold harmless protections for the City in the PSA related to the channel.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p>
5. Stadium Demolition and Maintenance	<p>(a) Clarify in the PSA that, in addition to SDSU's commitment to maintain and then demolish/remove the existing stadium, SDSU is accepting the existing stadium in its "as-is" condition and will be responsible at its own cost for all rehabilitation/repair of the stadium and all new stadium capital improvements.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p> <p>(b) Include language in the PSA addressing each specific requirement of Municipal Code section 22.0908(n), such as SDSU's obligation to reimburse the City for its reasonable costs in providing public safety and traffic management-related activities for game or other events.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p>
8. Transportation Improvements	<p>Identify, and secure the performance of, SDSU's commitment to complete specific on-site and off-site traffic improvements, including specific trolley and other public transportation improvements.</p> <p>City Staff Response: CEQA requires implementation of feasible on-site and off-site traffic improvements to mitigate traffic impacts. Request exhibit from SDSU's legal counsel listing all such improvements.</p>

9. River Park	<p>(a) Identify, and secure the performance of, SDSU's commitment to complete specific elements within the River Park and to maintain the River Park in perpetuity.</p> <p>City Staff Response: Agree, the River Park is a requirement of Measure G. Provide language in the draft PSA for Council's consideration to secure performance of the completion and maintenance of the River Park.</p> <p>(b) Include language ensuring that SDSU's promise to maintain the park in perpetuity is enforceable and complies with State law, and that SDSU has the requisite authority to bind the State in this manner.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p>
10. Additional 22 Acres of Parks	<p>(a) Identify the precise location of the park facilities;</p> <p>City Staff Response: Agree, request exhibit from SDSU's legal counsel.</p> <p>(b) Confirm that the park facilities will be publicly-accessible active recreation space in perpetuity; and</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p> <p>(c) Provide an enforceable mechanism to ensure SDSU's successful long-term maintenance and management of the park facilities.</p> <p>City Staff Response: Agree, the additional 22 acres of parks are required by Measure G. Provide language in the draft PSA for Council's consideration to secure performance of the completion and maintenance of the additional 22 acres of parks. City staff has sent the City Attorney's Office several examples of agreements that ensure park obligations for facilitation in providing relevant language in the draft PSA.</p>
13. Affordable Housing	<p>(a) Confirm details regarding the product type and targeted income levels applicable to the affordable restricted units in the PSA.</p> <p>City Staff Response: Agree, request exhibit from SDSU's legal counsel.</p> <p>(b) Identify a specific phasing plan for construction and occupancy of affordable units relative to market-rate units in.</p> <p>City Staff Response: Agree, request exhibit from SDSU's legal counsel.</p> <p>(c) Include one or more effective mechanisms to secure SDSU's completion of its affordable housing development obligations.</p> <p>City Staff Response: Agree, provide language to ensure completion of the affordable housing development obligations in Measure G .</p>

14. Groundwater Management	<p>(a) Include language in the PSA to ensure, to the extent possible, that the Project does not adversely impact the City’s groundwater management activities and Pueblo water rights, and vice versa.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council’s consideration.</p> <p>(b) Determine a process for the City’s future removal of two monitoring wells to be retained by the City upon the closing, if the City eventually opts to remove them.</p> <p>City Staff Response: Agree, provide “reasonable cooperation” language in the event the monitoring wells are ever removed language in the draft PSA for Council’s consideration.</p>
15. Removal of Kinder Morgan Wells	<p>(a) Clarify in the PSA that the City will use reasonable efforts, but has limited ability, to “cause” well removal.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council’s consideration.</p> <p>(b) Clarify in the PSA that the current plan is to remove certain existing wells, vaults, and facilities from the Property and to abandon in place other existing facilities.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council’s consideration.</p>
Attachment 2, Nov. 13 Report Additional Deal Points for Council’s Consideration	<p>Include in the PSA the additional deal points discussed in Attachment 2 to the City Attorney Report dated November 13, 2019, as follows: (a) project elements; (b) environmental design features; (c) security for performance of obligations; (d) development costs; (e) reduction of greenhouse gas emissions; (f) prevailing wage compliance; (g) as-is sale; (h) indemnity and release language; (i) no new taxes; (j) easements; (k) privatization of the sewer system; (l) wetland mitigation plan; and (m) evidence of financing.</p> <p>City Staff Response: See comments in Attachment 2 herein.</p>
IBA Nov. 13 Report, Pg. 6	<p>Include strongly-worded indemnification provisions that explicitly provide the City protection for any and all circumstances related to the property.</p> <p>City Staff Response: Agree, provide language consistent with standard City legal protections in the draft PSA for Council’s consideration.</p>
IBA Nov. 13 Report, Pg. 7	<p>Require SDSU to accept complete responsibility for the Property and fully indemnify the City for any liability related to the Property or operations thereon while it is under their control as Lessee.</p> <p>City Staff Response: Agree, provide language consistent with standard City legal protections in the draft PSA for Council’s consideration.</p>

IBA Nov. 13 Report, Pg. 8	<p>Establish a worst case outside close date of no later than December 31, 2020 to provide SDSU with a contractual incentive to effectuate an expeditious close.</p> <p>City Staff Response: Consistent with the City Council's direction, provide language in the draft PSA for Council's consideration.</p>
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WORKSHEET B

DEAL POINTS IN SDSU'S REVISED OFFER REQUIRING POLICY INPUT, AS IDENTIFIED BY CITY ATTORNEY AND/OR INDEPENDENT BUDGET ANALYST

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:
2. Property	<p>Should the City negotiate with SDSU to require that SDSU acquire the entire Murphy Canyon Creek Channel, including its southernmost portion south of Rancho Mission Road?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. As such, provide language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p>
3. Purchase Price	<p>(a) Is the base Purchase Price of \$86,200,000 acceptable?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. As such, provide language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p> <p>(b) Should the time value of money index factor be applied to the entire Purchase Price (including not only the Water Utility Fund's 37% portion, but also the General Fund's 63% portion) from September 30, 2017?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. As such, provide language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p>
6. Fenton Parkway Bridge	<p>(a) Should the City pursue a non-binding agreement related to the construction and funding of the Fenton Parkway Bridge as described by SDSU in the Revised Offer? If so, what will be the time frame for completion of the non-binding agreement and for completion of the bridge construction?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The Draft EIR does not include the Fenton Parkway Bridge as a project component or mitigation measure. Neither the Mission Valley Community Plan nor the Mission Valley Draft Impact Fee Study include a time frame requirement for completion of the bridge. Provide language for the draft PSA to memorialize the proposed terms in the SDSU offer dated</p>

	<p>10/28/19 related to the bridge that ensures consistency with applicable laws and regulations.</p> <p>(b) Is the construction of the two-lane bridge, as opposed to the four-lane bridge contemplated in planning documents, acceptable?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The Mission Valley Community Plan and Draft Impact Fee Study include the Fenton Bridge as a four-lane facility. Construction of a two-lane facility is not inconsistent with the four-lane facility in those plans as long as no project component precludes the future potential for a four-lane facility.</p> <p>(c) Is SDSU's proposal acceptable with respect to SDSU's contribution of approximately 25% of the total bridge costs?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. Based on the Draft EIR, SDSU's proposed 25% contribution is not required mitigation resulting from the traffic impact analysis performed in accordance with CEQA.</p> <p>(d) Is SDSU's proposal acceptable with respect to the City's funding contributions, including up to \$8.5 million in the General Fund's portion of the Purchase Price proceeds, \$1.3 million in existing capital improvement project funds, and an unspecified amount of DIF credits assuming SDSU meets DIF eligibility requirements?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. We request legal advice on including by reference in the PSA a nonbinding agreement such as a Memorandum of Understanding, and to provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p> <p>(e) Should the City negotiate to require SDSU to conduct the environmental review, design, permit and construct the bridge?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. We request legal advice on including by reference in the PSA a nonbinding agreement such as a Memorandum of Understanding, and to provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p>
7. Additional Project Improvements	<p>(a) Is the City's General Fund contribution of \$1.5 million toward additional related Project improvements acceptable?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City could establish a CIP for this amount, once a project has been mutually identified by the City and SDSU, but the account could not be jointly controlled with SDSU and approval of this deal term will ultimately be decided by City Council.</p>

	<p>(b) If yes, should the related Project improvements be identified in the PSA with a timeline for their construction, and be subject to appropriate controls to ensure that the City's money is being spent for a valid public purpose?</p> <p>City Staff Response: The draft PSA should outline a process for City Council direction on the allocation of these funds for improvements.</p>
8. Transportation Improvements	<p>Should the City negotiate to require SDSU's payment of 100% of the cost of all improvements listed in a recent memo provided by SDSU to the City and estimated by SDSU to total \$22 million (see Attachment H to the Staff Report), as necessary to mitigate direct environmental impacts of SDSU's project?</p> <p>City Staff Response: Any proposed mitigation will be required pursuant to the Final EIR Mitigation Monitoring and Reporting Program. Provide applicable language in the draft PSA for Council's consideration.</p>
9. River Park	<p>(a) Is the Council willing to waive Council Policy 600-33 (including the City's General Development Plan process) for SDSU's design and construction of the River Park?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. If the City Council chooses to waive the council policy, this should be one of the action items when the PSA is presented to Council for their consideration. Provide applicable language in the draft PSA for Council's consideration.</p> <p>(b) Should the City negotiate with SDSU to require the three storm water treatment facilities, or basins, to be relocated to SDSU's own development parcel?</p> <p>City Staff Response: Since relocation of these basins to the SDSU development parcel would interrupt planned park facilities on the development site, SDSU, at a minimum, should indemnify the City for placement of these basins on the City-owned River Park property and maintain the basins at its own expense and Council can consider this when they review the PSA in January. Provide applicable language in the draft PSA for Council's consideration.</p> <p>(c) If no, should the City negotiate to require that SDSU indemnify the City and maintain (at its own expense) the basins?</p> <p>City Staff Response: Please see above response.</p>
11. Future City Recreation Center Site	<p>(a) Should SDSU reserve a one-acre site for the City's future construction of a recreation center, consistent with the Mission Valley Community Plan?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. As such, provide applicable language in</p>

	<p>the draft PSA for Council’s consideration based on SDSU’s offer dated 10/28/19.</p> <p>(b) If yes, should the City negotiate for SDSU to raise the footprint for the recreation center site to an elevation outside of the 100-year flood level?</p> <p>City Staff Response: SDSU should be responsible for all stormwater and flooding mitigation on their development site and the River Park site and for any financial consequences resulting from those decisions, consistent with relevant City and state law and regulations. Provide applicable language in the draft PSA for Council’s consideration.</p> <p>(c) Also, if yes, should the PSA include appropriate long-term management, maintenance, and protection of the recreation center site?</p> <p>City Staff Response: Please see above response in section 11(b).</p>
12. Development Impact Fees	<p>(a) Should certain public improvements on the Property be exempt from DIF, and if so, how broadly or narrowly should the exempt improvements be defined?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. There may not be a need for the City to collect DIF so long as the improvements identified in Measure G are ensured by the PSA to City standards, and that the cost to SDSU of the improvements is equal to or exceeds the amount of the DIF payment or waiver. As such, provide applicable language in the draft PSA for Council’s consideration based on SDSU’s offer dated 10/28/19.</p> <p>(b) Should the City reduce or waive the park component of DIF in an amount equal to the cost of the park projects, if certain requirements are met such as compliance with the City’s development standards?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. There may not be a need for the City to collect DIF so long as the improvements identified in Measure G are ensured by the PSA to City standards, and that the cost to SDSU of the improvements is equal to or exceeds the amount of the DIF payment or waiver. As such, provide applicable language in the draft PSA for Council’s consideration based on SDSU’s offer dated 10/28/19.</p> <p>(c) Should a Park Development Agreement be included as an attachment to the PSA, or alternatively, should the PSA state that future completion of a PDA is a condition to SDSU’s receipt of any reduction or waiver in the park component of DIF?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. Based on information available to staff at this time, if the PSA ensures that SDSU will construct the park improvements identified in Measure G to City standards, there is no requirement or obligation to finalize a Park Development Agreement</p>

	<p>prior to finalization of the PSA, or to prepare one at all. Similarly, there may not be a need for the City to collect DIF, or grant waivers so long as the improvements identified in Measure G are ensured by the PSA to City standards, and that the cost to SDSU of the improvements is equal to or exceeds the amount of the DIF payment or waiver. As such, provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p>
16. Environmental Contamination	<p>Should the City agree to tender a written claim to Kinder Morgan for reimbursement of environmental remediation costs, if the PSA is carefully drafted to ensure that, by doing so, the City is not incurring any expense or liability whatsoever?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. As such, provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p>
17. Compliance with CEQA	<p>Should a negotiated non-binding term sheet, based on the Council's input, be brought back to the Council, prior to the parties drafting and negotiating a PSA?</p> <p>City Staff Response: This would contradict Council's direction at open session on 11/18/19 to proceed directly to preparing a PSA.</p>
18. Possessory Interest and Other Taxes	<p>(a) Should certain governmental use portions of the Property be deemed exempt from paying taxes?</p> <p>City Staff Response: SDSU must pay any tax imposed by applicable law. The State and County regulate property and possessory interest tax collection, not the City of San Diego. As such, provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p> <p>(b) If yes, should the PSA include provisions confirming that (1) sales tax will apply to specified elements of the Project; (2) possessory interest tax will apply to SDSU's lease of any portion of the Property to a third party for specified private uses; and (3) the City's transient occupancy tax and tourism marketing district assessment will apply to specified elements of the Project, such as hotel uses and short-term rentals?</p> <p>City Staff Response: Please see above response.</p> <p>(c) Also, if yes, should the City negotiate SDSU's payment in lieu of taxes to fully or partially compensate the City for the anticipated loss of future tax revenue?</p> <p>City Staff Response: Please see above response.</p>

20. Sovereignty	<p>(a) Should SDSU have unilateral permitting authority with respect to all aspects of the Project, including the River Park which will remain in the City's fee ownership?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. In keeping with this direction, regardless of how City Council ultimately decides policy question relating to permitting authority of the River Park, SDSU should build and maintain the River Park consistent with all applicable City plans and regulations and provide for a process for City input in design and maintenance. As such, provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p> <p>(b) If yes, should SDSU be allowed to collect DIF from Project developers on the City's behalf?</p> <p>City Staff Response: Please see above response.</p> <p>(c) Also, if yes, does the Council agree with the recommendation that the PSA include a reliable mechanism for collection and payment to the City of all applicable fees that the City typically charges to commercial development and new residential development?</p> <p>City Staff Response: Please see above response.</p> <p>(d) Should the PSA require that land use covenants, enforceable by the City, be recorded on the Property to hold SDSU accountable to deliver the Project in a manner consistent with Measure G and related campaign promises?</p> <p>City Staff Response: Agree, this is consistent with Measure G. Provide applicable language in the draft PSA for Council's consideration.</p>
25. Potential Delay in Closing	<p>(a) Should any conditions precedent to the closing be allowed, such as the final resolution of any litigation filed in opposition to the Project or the PSA, recognizing that a litigation resolution could take many years?</p> <p>City Staff Response: The City Council provided direction at open session on 11/18/19 that the outside closing date would be 12/31/20. As such, provide applicable language in the draft PSA for Council's consideration.</p> <p>(b) Should the PSA establish an outside Closing Date?</p> <p>City Staff Response: Please see above response.</p> <p>(c) If yes, what is the outside Closing Date that the Council believes is fair and equitable and in the public interest? (Note: The IBA has recommended an outside Closing Date of December 31, 2020, and this</p>

	<p>Office has suggested that the outside Closing Date could potentially extend to December 31, 2023, without violating the terms of Measure G.)</p> <p>City Staff Response: Please see above response.</p> <p>(d) Should the City lease the Property to SDSU at a rent of \$1.00 per month if the closing extends beyond June 30, 2020, understanding that the City's General Fund will be required to compensate the Water Utility Fund for the interim use of its portion of the Property? If no, should the rent be increased to an amount that is either based on market rent or based on an amount that will fairly compensate the Water Utility Fund without any fiscal impact to the General Fund?</p> <p>City Staff Response: This is a policy question that will ultimately be decided by the City Council. The General Fund already pays the Water Utility Fund \$15,000 per year for its use of the stadium site. The City Council provided direction at open session on 11/18/19 that the City's interests be generally protected in the PSA. As such, provide applicable language in the draft PSA for Council's consideration based on SDSU's offer dated 10/28/19.</p> <p>(e) Should a pre-negotiated lease be included as an attachment to the PSA with provisions confirming that: (i) SDSU would be responsible to complete and pay for any rehabilitation costs and capital improvements related to the safe operation of the existing stadium; and (ii) SDSU would defend and indemnify the City against any claims related to the condition of the Property, including the stadium and the creek channel?</p> <p>City Staff Response: Establish a process to negotiate a lease, including major terms and indemnifications, should a lease be necessary. Provide applicable language in the draft PSA for Council's consideration.</p>
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ATTACHMENT 2 TO CITY ATTORNEY REPORT

Additional Deal Points for the Council's Consideration

Topic	Potential Additional Deal Point and Related Analysis
<u>Project Elements</u>	<p>Measure G states that the sale of the Property must provide for the development of a number of specific uses, including: the development of the Joint Use Stadium; the River Park; an additional minimum of 22 acres of publicly-accessible active recreation space on the Property; demolition, dismantling, and removal of the Existing Stadium; facilitating daily and efficient use of the Green Trolley Line transit station, accommodating the Purple Trolley Line, and enhancing the pedestrian connection to the existing light rail center; and facilities for educational, research, entrepreneurial, and technology programs with a “vibrant mixed-used campus village and research park.” SDMC § 22.0908(c), (i), (j), (k). In addition, SDSU’s campaign promises included a commitment to “build a world-class university research and innovation campus” on the Property.</p> <p>Unlike deal point 8 in SDSU’s earlier, October 14 offer, SDSU’s revised, October 28 offer does not identify the required elements of the Project in accordance with Measure G. To be consistent with Measure G, the PSA must provide for the development of each of the specific uses listed in Municipal Code sections 22.0908(c), (i), (j), and (k) and ensure SDSU’s compliance with all other applicable requirements of the Municipal Code.</p> <p>According to City staff, the Draft EIR did not reflect the regional efforts to incorporate the recommended trolley alignment for the Purple Line into the Project to ensure that the site plan integrates two trolley stations and provides for a bus transit center and mobility hubs. City staff would need to evaluate whether the proposed trolley alignment may adversely impact recreational uses within the park areas of the Project.</p> <p>City Staff Response: Agree, provide project element language in the draft PSA for Council’s consideration. See City of San Diego comment letter on Draft EIR for SDSU Mission Valley West Campus Master Plan, dated October 3, 2019, for analysis on transportation and recreational impacts of the project. For questions on how planned transportation improvements impact SDSU’s project, request information from SDSU legal counsel.</p>
<u>Environmental Design Features</u>	<p>SDSU made commitments during and after the Measure G campaign to incorporate certain environmental design and environmentally-friendly operational features into the Project, including, but not limited to: (a) the new stadium will be constructed to a standard of LEED Version 4 Silver or better; (b) all other construction activities on the Property will meet a standard of LEED Version 4 Silver or better; (c) the Project will include effective bio-</p>

	<p>retention basins with native shrubs and trees (no invasive plants); (d) the Project will apply best practices for bird-safe windows; (e) design guidelines will be established and enforced for architectural, park, and ecological design elements of the Project; (f) all lighting of recreational fields will follow current San Diego River guidelines; (g) to the maximum extent possible, trails through the bioswale area will be elevated; (h) the Project will include at least 80 acres of project open space; (i) SDSU will ensure that certain park areas adjacent to the San Diego River will be completed before SDSU completes the vertical construction of any building structures within the Project, other than the joint use stadium and ancillary facilities; and (j) the Murphy Canyon Creek corridor will be enhanced to increase the ecological function of the creek buffer. We recommend including all of these development commitments in the PSA, with appropriate security to ensure that SDSU and/or its lessees eventually fulfill the commitments (see next item).</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council’s consideration.</p>
<u>Security for Performance of Obligations</u>	<p>We recommend including provisions in the PSA to ensure that SDSU is accountable to complete all of its development obligations under Measure G and related campaign promises made to local voters. To ensure SDSU remains accountable in fulfilling voter expectations, we recommend that the PSA secure completion of all development obligations by SDSU and/or its lessees through a combination of performance bonds, monetary endowments, recordable covenants, and/or other long-term protections. If the PSA does not contain adequate security for performance of SDSU’s development obligations, and if the City relies solely on the components in SDSU’s Final EIR, SDSU could exercise its sovereign power to unilaterally modify its Campus Master Plan in the future, without the City’s consent, thereby depriving local voters of their reasonable expectations in approving Measure G and likely depriving the City of anticipated future tax revenue.</p> <p>City Staff Response: Agree, provide language consistent with standard City legal protections in the draft PSA for Council’s consideration.</p>
<u>Development Costs</u>	<p>To ensure consistency with Measure G, we recommend that the PSA include a broadly-worded provision confirming that SDSU has the sole responsibility and liability, at its sole cost, for all development and construction activities on the Property and the River Park site in accordance with all applicable laws, as well as for all mitigation measures associated with such development and construction activities.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council’s consideration.</p>
<u>Reduction of GHG Emissions</u>	<p>Measure G states: “Such sale and ultimate development shall require development within the [Property] to comply with the City’s greenhouse gas (GHG) emission reduction goals.” SDMC § 22.0908(m). SDSU’s offer includes its commitment to comply with all applicable Municipal Code requirements, but does not expressly mention GHG</p>

	<p>reduction goals – a high priority for the Council in light of the City’s Climate Action Plan. The Council may wish to ask SDSU to identify precisely how the City’s GHG emission reduction goals, including compliance with the City’s Climate Action Plan, will be met through the Project. The PSA could memorialize SDSU’s obligation to achieve those goals through recordable covenants or other adequate security.</p> <p>City Staff Response: Request exhibit ensuring consistency with City and state law from SDSU’s legal counsel in order to provide language in the draft PSA for Council’s consideration.</p>
<u>Prevailing Wage Compliance</u>	<p>Measure G sets forth certain requirements related to prevailing wage compliance and worker protections during construction of the Project. SDMC § 22.0908(w). SDSU’s offer includes its commitment to comply with all applicable Municipal Code requirements, but does not expressly mention compliance with prevailing wage laws and worker protections. We recommend that the PSA confirm SDSU’s commitment to comply with those specific requirements, and also confirm as follows: (i) the City’s approval of the PSA is not an award of a construction contract with respect to any portion of the Project on the Property or the River Park site; (ii) the City will not be responsible for compliance with any prevailing wage requirements with respect to the Project, including the River Park improvements; and (iii) SDSU will indemnify and defend the City (with legal counsel of the City’s choice) as to any alleged noncompliance with prevailing wage requirements. Moreover, if the final PSA includes any direct or indirect City financial subsidy toward SDSU’s acquisition or development of the Property or the River Park site, the City will need to revisit whether additional prevailing wage language is needed in the PSA.</p> <p>City Staff Response: Provide language ensuring consistency with City and state law in the draft PSA for Council’s consideration.</p>
<u>As-is Sale</u>	<p>We anticipate that the PSA will include broadly-worded language to confirm the “as-is” nature of the transaction. Measure G does not require the City to make any representations or warranties regarding the Property. The City normally includes detailed language in a PSA confirming that the buyer has conducted extensive due diligence, the sale will occur on an “as-is, where-is” basis, and the City has not made any representations, warranties, or guaranties of any kind except as expressly set forth in the PSA. This detailed language also includes the buyer’s representation and warranty that it is a knowledgeable and sophisticated purchaser of real property and that it is relying solely on its own expertise and the expertise of its consultants and advisors and has made and relied upon its own inspections of all aspects of the Property. The detailed language also confirms that the City has furnished any due diligence materials to the buyer as a convenience only and that the City makes no representation or warranty as to the truth, accuracy, or completeness of any materials, data, or information delivered by or on behalf of the City in connection with the sale of the Property. We recommend that the PSA include these typical provisions for the City’s protection. We also note that, if SDSU completes due diligence and is not satisfied with</p>

	<p>the physical condition of the Property or the suitability of the Property for SDSU's intended purposes, SDSU is under no obligation to acquire the Property.</p> <p>City Staff Response: Agree, provide language consistent with standard City legal protections in the draft PSA for Council's consideration.</p>
<u>Indemnity and Release Language</u>	<p>In a typical transaction, the PSA will state that the buyer indemnifies the City and defends the City (with legal counsel of the City's choosing) for all claims resulting from or related to the buyer's breach of the terms of the PSA and any claims related to the Property that arise on or after the Closing Date, including those related to defects of the Property, even where the defects existed prior to the Closing Date. The typical PSA also will include the buyer's general release of claims against the City and a related Civil Code section 1542 waiver, including for all claims related to environmental contamination on the Property. We recommend that the PSA include these typical provisions for the City's protection.</p> <p>City Staff Response: Agree, provide language consistent with standard City legal protections in the draft PSA for Council's consideration.</p>
<u>No New Taxes</u>	<p>Measure G states: "Such sale shall not raise or impose any new or additional taxes on City residents." SDMC § 22.0908(q). We recommend that the PSA include a confirmation to this effect.</p> <p>City Staff Response: Agree, provide language in the draft PSA for Council's consideration.</p>
<u>Easements</u>	<p>To the extent not already addressed in this Office's analysis of SDSU's deal points, the PSA will need to provide for SDSU's conveyance of easements in the City's favor to ensure the City's successful operation and maintenance of any public facilities within or under the Property that will continue in effect after the Closing Date, as well as to ensure ongoing public access through any private streets within the Property so that the public enjoys the benefits of important public assets, such as trolley improvements and River Park improvements.</p> <p>City Staff Response: On 11/22/19, City Staff provided the City Attorney substantially complete draft plat maps and legal descriptions for PUD easements. Request exhibit from SDSU's legal counsel of a plat map and legal description of the entire stadium site in order to provide language in the draft PSA for Council's consideration.</p>
<u>Privatization of Sewer System</u>	<p>Representatives of SDSU and the City have recently discussed SDSU's proposal to privatize the sewer system within the Property. SDSU believes its proposal would reduce its development costs and simplify its development of the Property. SDSU's proposal is unprecedented based on the City's experience because it would privatize sewers downstream of public sewers, meaning that if SDSU fails to properly maintain its sewers, sewer service to</p>

	<p>upstream City customers could be compromised. SDSU’s proposal would require careful analysis to protect the interests of the City and its customers, and could cause a significant delay in documenting the PSA transaction.</p> <p>City Staff Response: SDSU has now proposed an option to redirect and segregate (public) sewer flow to Murphy Canyon TS. <u>This is instead of the previously proposed privatization option.</u> The new diversion line is still within the stadium parcel to be purchased, but it is running along the northern parcel boundary. SDSU should grant the City a new easement in exchange for the current easement which would need to be completed post closing. Provide language in the draft PSA for Council’s consideration.</p>
<u>Wetland Mitigation Plan</u>	<p>The City has existing obligations with respect to the Wetland Mitigation Project located immediately south of the Property to be acquired by SDSU. The Wetland Mitigation Project has been installed, and is being monitored and maintained, in accordance with an existing mitigation plan and regulatory authorizations granted by resource agencies, such as the Regional Water Quality Control Board, the U.S. Army Corps of Engineers, and the California Department of Fish and Wildlife. The City will need to carefully evaluate the applicable regulatory documents and the negotiated purchase terms to avoid any circumstance that could place the City in violation of its obligations with respect to the Wetland Mitigation Project.</p> <p>City Staff Response: Agree, provide standard covenants to ensure SDSU complies with terms of the Wetland Mitigation Project in the draft PSA for Council’s consideration.</p>
<u>Evidence of Financing</u>	<p>To ensure that SDSU fulfills all of its Measure G obligations and related campaign promises as memorialized in the PSA and for the public benefit, we recommend that the Council consider requiring SDSU to provide a financing plan reasonably acceptable to the City and included in the PSA. The financing plan would identify SDSU’s source of funds to fulfill all of its financial obligations under the PSA and ancillary documents, including acquisition of the Property and construction and ongoing maintenance of various improvements. If SDSU cannot demonstrate its financial ability to fulfill all of its obligations, the Council may wish to consider whether it is prudent, and in the public interest, to dispose of the Property – a valuable public asset – to SDSU.</p> <p>City Staff Response: Agree, request exhibit from SDSU’s legal counsel in order provide language ensuring consistency with standard City legal protections in the draft PSA for Council’s consideration.</p>
<u>Apportionment of Purchase Price Proceeds</u>	<p>Whether in the PSA or in a separate document, the City will need to determine how to apportion the purchase price proceeds equitably between the General Fund and the Water Utility Fund, in a manner that makes the Water Utility Fund whole on its 37% ownership. The City could attribute a per-acre monetary value to each acre of the Property and also could attribute a monetary value to easements and aquifer-related rights retained by the City for</p>

	<p>the benefit of water and sewer ratepayers. We recommend that the City retain a qualified appraiser to provide a fair, objective basis for the apportionment of purchase price proceeds.</p> <p>City Staff Response: Agree, provide language ensuring consistency with standard City legal protections in the draft PSA for Council’s consideration.</p>
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WORKSHEET A

RECOMMENDATIONS FROM REPORTS ISSUED BY CITY ATTORNEY AND/OR INDEPENDENT BUDGET ANALYST

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation	Responsive PSA Provision
4. Murphy Canyon Creek	<p>(a) If SDSU does not acquire ownership of the entire channel, require that SDSU be required to maintain the entire channel, including its southernmost portion which will be part of the River Park.</p> <p>(b) Require strong indemnification and hold harmless protections for the City in the PSA related to the channel.</p>	<p>SDSU will maintain the portions of Murphy Canyon Creek channel located within the Property and within the River Property in compliance with Applicable Laws.</p>
5. Stadium Demolition and Maintenance	<p>(a) Clarify in the PSA that, in addition to SDSU's commitment to maintain and then demolish/remove the existing stadium, SDSU is accepting the existing stadium in its "as-is" condition and will be responsible at its own cost for all rehabilitation/repair of the stadium and all new stadium capital improvements.</p> <p>(b) Include language in the PSA addressing each specific requirement of Municipal Code section 22.0908(n), such as SDSU's obligation to reimburse the City for its reasonable costs in providing public safety and traffic management-related activities for game or other events.</p>	<p>(a) SDSU agrees that from and after the Closing Date, the City shall not be required to pay for any Existing Stadium rehabilitation, demolition or removal costs, Existing Stadium cost overruns, Joint Use Stadium operating costs, Joint Use Stadium maintenance costs or Joint Use Stadium capital improvement expenses.</p> <p>(b) SDSU believes all elements of the Municipal Code are addressed with respect to public safety and traffic management.</p>

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation	Responsive PSA Provision
8. Transportation Improvements	Identify, and secure the performance of, SDSU's commitment to complete specific on-site and off-site traffic improvements, including specific trolley and other public transportation improvements.	SDSU's obligations to complete these improvements will be covered by covenants recorded against the property, FEIR mitigation requirements and contractual rights contained within the PSA.
9. River Park	<p>(a) Identify, and secure the performance of, SDSU's commitment to complete specific elements within the River Park and to maintain the River Park in perpetuity.</p> <p>(b) Include language ensuring that SDSU's promise to maintain the park in perpetuity is enforceable and complies with State law, and that SDSU has the requisite authority to bind the State in this manner.</p>	SDSU's obligations to complete these improvements will be covered by covenants recorded against the property, FEIR mitigation requirements and contractual rights contained within the PSA.
10. Additional 22 Acres of Parks	<p>(a) Identify the precise location of the park facilities;</p> <p>(b) Confirm that the park facilities will be publicly-accessible active recreation space in perpetuity; and</p> <p>(c) Provide an enforceable mechanism to ensure SDSU's successful long-term maintenance and management of the park facilities.</p>	<p>(a) The SDSU Mission Valley Campus Master Plan will identify the location of the park facilities. They can also be seen on the site plan attached as Exhibit B to the PSA.</p> <p>(b) SDSU proposes including this as part of the recorded covenants.</p>
13. Affordable Housing	(a) Confirm details regarding the product type and targeted income levels applicable to the affordable restricted units in the PSA.	(a) SDSU has proposed targeted income levels for affordable restricted units consistent with the intent and goals of City policy, which may include student housing units.

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation	Responsive PSA Provision
	<p>(b) Identify a specific phasing plan for construction and occupancy of affordable units relative to market-rate units in.</p> <p>(c) Include one or more effective mechanisms to secure SDSU's completion of its affordable housing development obligations.</p>	<p>(b) SDSU is willing to commit to a phasing program with proposed details to follow.</p> <p>(c) SDSU's affordable housing development obligations will be covered by covenants recorded against the property and contractual rights contained within the PSA.</p>
14. Groundwater Management	<p>(a) Include language in the PSA to ensure, to the extent possible, that the Project does not adversely impact the City's groundwater management activities and Pueblo water rights, and vice versa.</p> <p>(b) Determine a process for the City's future removal of two monitoring wells to be retained by the City upon the closing, if the City eventually opts to remove them.</p>	<p>(a) SDSU proposes granting City an easement over the agreed-upon area permitting the future construction of Pure Water groundwater wells following the City's completion of environmental review in compliance with CEQA.</p> <p>(b) Proposed recorded covenants will recognize City's continued retention of any pueblo water rights it may have with respect to the property.</p>
15. Removal of Kinder Morgan Wells	<p>(a) Clarify in the PSA that the City will use reasonable efforts, but has limited ability, to "cause" well removal.</p> <p>(b) Clarify in the PSA that the current plan is to remove certain existing wells, vaults, and facilities from the Property and to abandon in place other existing facilities.</p>	<p>(a) SDSU understands this and has proposed language. SDSU will work with the City Attorney's office to finalize mutually acceptable language.</p> <p>(b) City will be asked to provide reasonable cooperation and permit the relocation, realignment and modification of City's facilities on and around the Property.</p>

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation	Responsive PSA Provision
Attachment 2, Nov. 13 Report Additional Deal Points for Council's Consideration	Include in the PSA the additional deal points discussed in Attachment 2 to the City Attorney Report dated November 13, 2019, as follows: (a) project elements; (b) environmental design features; (c) security for performance of obligations; (d) development costs; (e) reduction of greenhouse gas emissions; (f) prevailing wage compliance; (g) as-is sale; (h) indemnity and release language; (i) no new taxes; (j) easements; (k) privatization of the sewer system; (l) wetland mitigation plan; and (m) evidence of financing.	See Worksheet 2
IBA Nov. 13 Report, Pg. 6	Include strongly-worded indemnification provisions that explicitly provide the City protection for any and all circumstances related to the property.	SDSU will provide the indemnification and will work with the City Attorney's office to finalize mutually acceptable language.
IBA Nov. 13 Report, Pg. 7	Require SDSU to accept complete responsibility for the Property and fully indemnify the City for any liability related to the Property or operations thereon while it is under their control as Lessee.	SDSU will provide the indemnification and will work with the City Attorney's office to finalize mutually acceptable language.
IBA Nov. 13 Report, Pg. 8	Establish a worst case outside close date of no later than December 31, 2020 to provide SDSU with a contractual incentive to effectuate an expeditious close.	Unless the Closing is enjoined from occurring due to litigation filed pre-Closing, SDSU has agreed to close escrow and deal with litigation issues as the owner of the property. SDSU has proposed December 31, 2023 as the outside Closing Date in order to provide adequate time to resolve litigation restricting transfer of property, while leasing the property and relieving the City of the financial burden of owning and operating the existing stadium site

SDSU's Proposed Deal Point	City Attorney/IBA Recommendation	Responsive PSA Provision
		and increasing the purchase price by a 2.149% annual inflationary factor from the lease commencement date through Closing.

WORKSHEET B

DEAL POINTS IN SDSU'S REVISED OFFER REQUIRING POLICY INPUT, AS IDENTIFIED BY CITY ATTORNEY AND/OR INDEPENDENT BUDGET ANALYST

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
2. Property	Should the City negotiate with SDSU to require that SDSU acquire the entire Murphy Canyon Creek Channel, including its southernmost portion south of Rancho Mission Road?	SDSU will acquire the Murphy Canyon Creek Channel located within the Property boundaries, but not within or adjacent to the River Park. However, SDSU will maintain the southernmost portion south of Rancho Mission Road, which is within the City's River Park property.
3. Purchase Price	(a) Is the base Purchase Price of \$86,200,000 acceptable? (b) Should the time value of money index factor be applied to the entire Purchase Price (including not only the Water Utility Fund's 37% portion, but also the General Fund's 63% portion) from September 30, 2017?	(a) Resolved by City Council 11/18/19 (b) No; resolved by City Council 11/18/19
6. Fenton Parkway Bridge	(a) Should the City pursue a non-binding agreement related to the construction and funding of the Fenton Parkway Bridge as described by SDSU in the Revised Offer? If so, what will be the time frame for completion of the non-binding agreement and for completion of the bridge construction?	(a) SDSU has offered to advance fund the costs of designing, permitting and constructing the City's bridge project conditioned upon environmental review and compliance with CEQA. (b) City staff has previously communicated that a two-lane bridge is adequate to support

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
	<p>(b) Is the construction of the two-lane bridge, as opposed to the four-lane bridge contemplated in planning documents, acceptable?</p> <p>(c) Is SDSU's proposal acceptable with respect to SDSU's contribution of approximately 25% of the total bridge costs?</p> <p>(d) Is SDSU's proposal acceptable with respect to the City's funding contributions, including up to \$8.5 million in the General Fund's portion of the Purchase Price proceeds, \$1.3 million in existing capital improvement project funds, and an unspecified amount of DIF credits assuming SDSU meets DIF eligibility requirements?</p> <p>(e) Should the City negotiate to require SDSU to conduct the environmental review, design, permit and construct the bridge?</p>	<p>the traffic identified in the Mission Valley Community Plan.</p> <p>(c) Data provided in SDSU's Draft EIR validates this percentage as an acceptable contribution.</p> <p>(d) As part of the overall negotiation, City staff has agreed these terms are acceptable.</p>
7. Additional Project Improvements	<p>(a) Is the City's General Fund contribution of \$1.5 million toward additional related Project improvements acceptable?</p> <p>(b) If yes, should the related Project improvements be identified in the PSA with a timeline for their construction, and be subject to appropriate controls to ensure that the City's money is being spent for a valid public purpose?</p>	<p>(a) yes, resolved by City Council 11/18/19</p> <p>(b) SDSU will work with the City Attorney's Office to identify a process for the City's approval to use of the funds. In addition, SDSU will agree that certain improvements be excluded from consideration for use of these funds(i.e. Stadium and River Park costs).</p>

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
8. Transportation Improvements	Should the City negotiate to require SDSU's payment of 100% of the cost of all improvements listed in a recent memo provided by SDSU to the City and estimated by SDSU to total \$22 million (see Attachment H to the Staff Report), as necessary to mitigate direct environmental impacts of SDSU's project?	SDSU has discussed with City staff the proposed improvements in the Draft Environmental Report and has agreed to fund 100 percent of all the improvements identified in Attachment H to staff report. The Northside Drive/Friars Road widening improvement will not be included as City staff has said it is not consistent with the Mission Valley Community Plan Update and therefore will remain infeasible.
9. River Park	<p>(a) Is the Council willing to waive Council Policy 600-33 (including the City's General Development Plan process) for SDSU's design and construction of the River Park?</p> <p>(b) Should the City negotiate with SDSU to require the three storm water treatment facilities, or basins, to be relocated to SDSU's own development parcel?</p> <p>(c) If no, should the City negotiate to require that SDSU indemnify the City and maintain (at its own expense) the basins?</p>	<p>(a) SDSU has proceeded with the planning of the River Park with the waiver of CP 600-33 in mind. The process undertaken by SDSU with their River Park Advisory Group and community outreach programs, allowed for much greater community and stakeholder group input than the Council Policy 600-33 requires. The intent and goals of the Policy have thus been met and exceeded. Additional planning and design review will only delay construction of the facility.</p> <p>(b) SDSU's desire is to create the best facilities for active and passive recreation, while providing for the necessary storm water mitigation. Care has been given to achieve</p>

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
		<p>both goals in a way that complement each other rather than compete. The relocation of these facilities would result in impacts that may reduce the availability of space for the improved trolley plaza, the recreation center site, and the housing density that the City desires on the site.</p> <p>(c) SDSU will remain responsible for the stormwater detention basins located in the River Park and subject to the indemnity clauses and a recorded covenant that will be included in the PSA.</p>
11. Future City Recreation Center Site	<p>(a) Should SDSU reserve a one-acre site for the City's future construction of a recreation center, consistent with the Mission Valley Community Plan?</p> <p>(b) If yes, should the City negotiate for SDSU to raise the footprint for the recreation center site to an elevation outside of the 100-year flood level?</p> <p>(c) Also, if yes, should the PSA include appropriate long-term management, maintenance, and protection of the recreation center site?</p>	SDSU has set aside an approximately 1-acre site on the property as a future recreation center site that is at an elevation outside the 100-year flood level. SDSU agrees it will maintain the property until the City elects to construct the recreation center.

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
12. Development Impact Fees	<p>(a) Should certain public improvements on the Property be exempt from DIF, and if so, how broadly or narrowly should the exempt improvements be defined?</p> <p>(b) Should the City reduce or waive the park component of DIF in an amount equal to the cost of the park projects, if certain requirements are met such as compliance with the City's development standards?</p> <p>(c) Should a Park Development Agreement be included as an attachment to the PSA, or alternatively, should the PSA state that future completion of a PDA is a condition to SDSU's receipt of any reduction or waiver in the park component of DIF?</p>	<p>(a) As part of the PSA, SDSU will identify which of the planned development features are non-exempt university facilities that will be required to pay DIF and which will be exempt.</p> <p>(b) The River Park and the 22 acres of population-based parks will be constructed by SDSU, therefore a DIF credit option consistent with existing City practice, should be available for all the facilities constructed in compliance with City park standards.</p> <p>(c) The PSA and recorded covenants provide similar protection therefore a Park Development Agreement is not necessary.</p>
16. Environmental Contamination	Should the City agree to tender a written claim to Kinder Morgan for reimbursement of environmental remediation costs, if the PSA is carefully drafted to ensure that, by doing so, the City is not incurring any expense or liability whatsoever?	The protection of the taxpayer funds is one of the most important functions of government, be it local or state government. Relieving a private third party from its existing obligations related to environmental contamination that it caused clearly puts those taxpayer funds at risk.

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
17. Compliance with CEQA	Should a negotiated non-binding term sheet, based on the Council's input, be brought back to the Council, prior to the parties drafting and negotiating a PSA?	No. City Council directed City Attorney to proceed with PSA drafting.
18. Possessory Interest and Other Taxes	<p>(a) Should certain governmental use portions of the Property be deemed exempt from paying taxes?</p> <p>(b) If yes, should the PSA include provisions confirming that (1) sales tax will apply to specified elements of the Project; (2) possessory interest tax will apply to SDSU's lease of any portion of the Property to a third party for specified private uses; and (3) the City's transient occupancy tax and tourism marketing district assessment will apply to specified elements of the Project, such as hotel uses and short-term rentals?</p> <p>(c) Also, if yes, should the City negotiate SDSU's payment in lieu of taxes to fully or partially compensate the City for the anticipated loss of future tax revenue?</p>	<p>(a) State law defines which property uses are deemed exempt for paying property or possessory taxes.</p> <p>(b) No. The Project will generate substantial tax revenue for the City, approximately \$21 million per year in tax revenue based upon SDSU's economic analysis included in the project's Draft EIR. Beyond that, SDSU is serving an educational mission for the San Diego region and the economic impact of higher education more than compensates for the negligible loss of property tax revenue. For every 10,000 additional graduates, an estimated \$200 million in annual economic output is generated for the regional economy.</p>
20. Sovereignty	<p>(a) Should SDSU have unilateral permitting authority with respect to all aspects of the Project, including the River Park which will remain in the City's fee ownership?</p> <p>(b) If yes, should SDSU be allowed to collect DIF from Project developers on the City's behalf?</p>	(a) Because the River Park Restoration is part of the SDSU Mission Valley Campus Master Plan and will be subject to a park entry permit to be granted to SDSU through the PSA, it can appropriately rely on SDSU in its sovereign capacity as it relates to permitting

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
	<p>(c) Also, if yes, does the Council agree with the recommendation that the PSA include a reliable mechanism for collection and payment to the City of all applicable fees that the City typically charges to commercial development and new residential development?</p> <p>(d) Should the PSA require that land use covenants, enforceable by the City, be recorded on the Property to hold SDSU accountable to deliver the Project in a manner consistent with Measure G and related campaign promises?</p>	<p>and construction of the River Park. Additionally, SDSU agrees to confer in good faith with the City with respect to its plans for the River Park and to fairly consider any comments, suggestions or concerns raised.</p> <p>(b) SDSU will collect and transmit DIF to the City on a standard agreed upon schedule. SDSU will consider including a dispute resolution procedure to resolve any disagreements about DIF.</p> <p>(c) SDSU will allow recorded covenants that will reflect Project obligations that survive closing including River Park maintenance, Murphy Canyon Creek, affordable housing, DIF, transportation improvements, pueblo water rights, etc.</p>
25. Potential Delay in Closing	<p>(a) Should any conditions precedent to the closing be allowed, such as the final resolution of any litigation filed in opposition to the Project or the PSA, recognizing that a litigation resolution could take many years?</p> <p>(b) Should the PSA establish an outside Closing Date?</p>	<p>(a) Unless the Closing is enjoined from occurring due to litigation filed pre-Closing, SDSU has agreed to close escrow and deal with litigation issues as the owner of the property. SDSU has proposed December 31, 2023 as the outside close date.</p>

Deal Point	Further Policy Direction Needed to Assist the Negotiating Team in Bringing Back a Negotiated Term Sheet and/or PSA that the Council Considers Fair and Equitable and in the Public Interest:	Responsive PSA Provision
	<p>(c) If yes, what is the outside Closing Date that the Council believes is fair and equitable and in the public interest? (Note: The IBA has recommended an outside Closing Date of December 31, 2020, and this Office has suggested that the outside Closing Date could potentially extend to December 31, 2023, without violating the terms of Measure G.)</p> <p>(d) Should the City lease the Property to SDSU at a rent of \$1.00 per month if the closing extends beyond June 30, 2020, understanding that the City's General Fund will be required to compensate the Water Utility Fund for the interim use of its portion of the Property? If no, should the rent be increased to an amount that is either based on market rent or based on an amount that will fairly compensate the Water Utility Fund without any fiscal impact to the General Fund?</p> <p>(e) Should a pre-negotiated lease be included as an attachment to the PSA with provisions confirming that: (i) SDSU would be responsible to complete and pay for any rehabilitation costs and capital improvements related to the safe operation of the existing stadium; and (ii) SDSU would defend and indemnify the City against any claims related to the condition of the Property, including the stadium and the creek channel?</p>	<p>(b) Since the stadium property operates in an extremely negative cash flow manner today, the relief of negative cash flow and \$1 per month is a significant rental amount. Upon lease commencement, SDSU will assume all ongoing costs of maintaining and operating the Property, including the Existing Stadium.</p>

A P P R A I S A L R E P O R T

FAIR MARKET VALUE OF EXISTING STADIUM SITE

135.12 acres of land primarily being used as SDCCU Stadium
located on the south side of Friars Road at Mission Village Drive
(9449 Friars Road)
San Diego, CA 92108

A P P R A I S E D F O R

The Board of Trustees of the California State University
c/o San Diego State University
Business & Financial Affairs
5500 Campanile Drive
San Diego, CA 92182-1620

City of San Diego
Real Estate Assets Department
1200 Third Avenue, Suite 1700, MS 51A
San Diego, CA 92101-4199
AP 631304

D A T E O F V A L U A T I O N

September 30, 2017 (retrospective)

D A T E O F R E P O R T

October 11, 2019

A P P R A I S E D B Y

D.F. Davis Real Estate, Inc.
David F. Davis, MAI
860 Jamacha Road, Suite 206
El Cajon, CA 92019
File No. 19-14

October 11, 2019

The Board of Trustees of the California State University
c/o Mr. Tom McCarron
Senior Vice President, SDSU Mission Valley Development
San Diego State University
Business & Financial Affairs
5500 Campanile Drive
San Diego, CA 92182-1620

Ms. Jean V.G. Catling, MAI
Principal Appraiser/Program Manager/Valuation
City of San Diego – Real Estate Assets Department
1200 Third Avenue, Suite 1700, MS 51A
San Diego, CA 92101-4199

Re: Fair Market Value of Existing Stadium Site
135.12 acres of land primarily being used as SDCCU Stadium
9449 Friars Road
San Diego, CA 92108

Dear Mr. McCarron and Ms. Catling:

At your request and authorization, the above-referenced property and its environs were inspected for the purpose of formulating an opinion of the fair market value of the subject property as of the retrospective effective date of valuation of September 30, 2017.

The subject property was valued as if the existing stadium is no longer operational and no stadium expenses were deducted from the appraised value. The subject property was appraised in fee simple interest, at the highest and best use and disregarding any leases. These requirements represent hypothetical conditions and extraordinary assumptions. Highest and best use is defined as:

"The reasonably probable and legal use of vacant land or an improved property, which is physically possible, appropriately supported, financially feasible, and that results in the highest value."

The intent of this appraisal is that it reflects the residual value of a hypothetical third-party market-rate project and not the SDSU Mission Valley project. Of the three traditional valuation approaches, Cost, Sales Comparison and Income Capitalization, the valuation utilizes the Income Approach via Discounted Cash Flow Analysis which, in this case, reflects the value of the subject property in its present condition by hypothetically forecasting its development in to finished lots for sale to third-parties and deducting the commensurate costs.

Discounted Cash Flow Analysis begins with a projection of revenue over the analysis period. Expense items must then be deducted to arrive at net cash flows which are discounted for entrepreneurial incentive to arrive at a present value indication which is the market value estimate. The Sales Comparison Approach was used to estimate the value of the different components that comprise the projected revenue in the Discounted Cash Flow Analysis. The Sales Comparison Approach to value involves the comparison of the subject property with recent sales of comparable properties and then isolating pertinent units of comparison which can be applied to the subject. The sale price per acre, lot/unit or per square foot are typically the units of comparison utilized. The Cost Approach is based on the proposition that the informed purchaser would pay no more than the cost of producing a substitute property with the same utility as the subject property. The Cost Approach was not completed as the residual land value exceeds the value as improved.

The following report, of which this letter is a part, describes the facts and reasoning upon which the opinions are supported. The valuations were based on market data and economic trends present before the retrospective effective date of value and projected as of the date of value, and is subject to the attached Assumptions and Limiting Conditions.

At the request of the clients, the definition of fair market value used for this appraisal is:

Appraiser's opinion of the Fair Market Value of the Existing Stadium Site shall be based on the Municipal Code and these Instructions and shall reflect the most probable price which the Existing Stadium Site should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and the seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Appraiser shall assume the conveyance of title in the Existing Stadium Site from the seller to the buyer under conditions whereby: (a) the seller and the buyer are typically motivated; (b) both the seller and the buyer are well informed or well advised, and acting in what they consider their own best interests; (c) a reasonable time is allowed for exposure in the open market; (d) payment is made in terms of cash in U.S. dollars or comparable financial arrangements; and (e) the price represents the normal consideration for the property sold, unaffected by special or creative financing or sales concessions granted by anyone associated with the sale.

This appraisal values the fee simple interest in the 135.12 acres but includes the cost of constructing a 34.6 acre River Park adjacent to the south. A requirement for development of the 135.12 acres at highest and best use is the construction of a regional River Park on the 34.6 acres. The River Park land is contemplated for long term lease by the developer from the City of San Diego.

Based upon investigation and analysis, the estimated fair market value of the fee simple interest of the subject property, as of September 30, 2017, subject to the attached assumptions and limiting conditions, was:

\$68,200,000

The value reflects the cost of major items, entitlement expenses, including demolition of the existing stadium, grading and flood plain remediation, on and off-site work, developing the river park, an allowance for deep foundation costs, and other development expenses. (These major items are shown on Page 2 and further discussed in the Income Approach – Discounted Cash Flow Analysis section.)

Very truly yours,



David F. Davis, MAI
President
#AG002752
DFD/sts

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ADDENDUM

- A. PwC Real Estate Survey Excerpt
- B. Subject Property Photographs – April 3, 2017
- C. SDDS Geo Hazards Maps (Earthquake Faults)
- D. Comparable Land Sales – Location Maps – Multi-Family Residential
- E. Comparable Land Sales – Location Maps – Supplemental Multi-Family Residential
- F. Comparable Land Sales – Location Maps – Retail
- G. Comparable Land Sales – Location Maps – Hotel
- H. Comparable Land Sales – Location Maps – Office
- I. Certification
- J. Qualifications of David F. Davis, MAI

EXISTING STADIUM SITE



SUMMARY OF SALIENT FACTS AND CONCLUSIONS

Owner:	City of San Diego
Property Appraised:	135.12 acres of land primarily being used as SDCCU Stadium
Location:	The south side of Friars Road at Mission Village Drive (9449 Friars Road), San Diego, CA, 92108
Thomas Map Code:	1249-E/F-7; 1269 E/F-1
Purpose of the Appraisal:	To estimate the market value of the subject property at its highest and best use.
Intended User/Intended Use of the Appraisal:	For exclusive use of the clients and authorized users (The Board of Trustees of the California State University and the City of San Diego on behalf of the Real Estate Assets and Public Utilities Departments), for internal purposes.
Property Rights Appraised:	Fee simple estate
Date of Valuation:	September 30, 2017 (retrospective)
Date of Report:	October 11, 2019
Estimated Fair Market Value:	\$68,200,000

The estimated value above is net of deductions of the following major items:

Item	Estimated Cost
Entitlement Expenses	-\$8,000,000
Demolition Cost	-\$10,481,111
Remediate Floodway Elevation	-\$6,018,479
Other On-Site Costs	-\$133,912,565
Off-Site Costs	-\$36,111,082
River Park	-\$25,947,330
Allowance For Foundation Costs	-\$32,746,385
Total	-\$253,216,952

ASSUMPTIONS AND LIMITING CONDITIONS

This appraisal is made expressly subject to the assumptions and limiting conditions, as follows:

General:

1. The appraiser assumes no responsibility for matters legal in character; title is assumed to be good and marketable.
2. Unless otherwise specified in this report, the property is valued as a fee simple title, free and clear of all liens and encumbrances except easements and rights of way of record. On this basis, the property is assumed free and clear of all leases and financing and under responsible ownership and competent management.
3. Any sketches, maps, and photographs in this report are included to assist the reader in visualizing the property. There has been no survey of the property by or under the direction of the appraiser, and the appraiser assumes no responsibility in these matters.
4. Information furnished by others is believed to be reliable, but the appraiser assumes no responsibility for its accuracy.
5. Except as noted, this appraisal assumes the land to be free of adverse soil conditions which would prohibit development of the property to its highest and best use.
6. This appraisal is made of surface rights only. No analysis has been made of subsurface rights, if any.
7. Disclosure of the contents of this appraisal report is governed by the by-laws and regulations of the Appraisal Institute. Neither all nor any part of the contents of this report shall be disseminated to the public through advertising media, public relations media, news media, sales media or any other public means of communication without prior written consent and approval of D.F. Davis Real Estate, Inc.
8. The submission of this report does not obligate the appraiser to give testimony or attend any court, governmental or other agency proceedings, without prior arrangements having been made for such additional employment.
9. Assume a land area of 135.12 acres pursuant to information submitted for review by the clients.
10. The City of San Diego Public Utilities Department will retain water rights on and under a portion of the property and those rights were not valued.
11. Regarding the Murphy Canyon Creek portion of the subject property, there are deferred maintenance costs and future estimated maintenance costs that are being quantified by the City of San Diego. Also, past capital expenditures are unknown. As these costs are being reviewed and quantified they were not considered in the appraisal which is subject to review and revision accordingly.

Pursuant to USPAP Standards Rule 2-2(a)(xi), the use of hypothetical conditions and/or extraordinary assumptions conditions might have affected the assignment results.

Hypothetical Conditions:

1. The subject property fee simple interest was appraised disregarding existing leases.
2. At the request of the clients, the subject property was valued assuming that the existing stadium is no longer operational and no stadium expenses were deducted from the appraised value.

Hypothetical conditions are defined as that which is contrary to what exists but is supposed for the purpose of analysis. A hypothetical condition may be used in an assignment only if:

- use of the hypothetical condition is clearly required for legal purposes, for purposes of reasonable analysis, or for purposes of comparison;
- use of the hypothetical condition results in a credible analysis; and
- the appraiser complies with the disclosure requirements set forth in USPAP for hypothetical conditions.

Extraordinary Assumptions:

1. It is assumed that the historical existence of environmental contamination at the site will not adversely impact the site's value because any known contamination has been remediated to the satisfaction of the applicable regulatory agencies.
2. Any potential for soil subsidence resulting from the injection and withdrawal of underground water pursuant to the City's Pure Water program was not considered.
3. There are two future groundwater production wells that may interfere with development if the subject property as they will require easements for access. It is assumed that these wells may be relocated a reasonable distance to accommodate future right of ways for streets or to facilitate access in the River Park portion.

Extraordinary assumptions are defined as assumptions, directly related to a specific assignment, which, if found to be false, could alter the appraiser's opinions or conclusions. Under USPAP, an appraisal may be predicated on extraordinary assumptions only under certain conditions, specifically:

- the use of the extraordinary assumption is required to properly develop credible opinions and conclusions;
- the appraiser has a reasonable basis for the extraordinary assumption;
- use of the extraordinary assumption results in a credible analysis; and
- the appraiser complies with the appropriate disclosure requirements (as proscribed elsewhere in USPAP).

DISCLOSURE OF COMPETENCY

Over the past 42 years, David F. Davis has completed over 2,500 appraisals or consulting assignments on residential, retail, office, R&D, industrial and special purpose properties and land in southern California.

The subject property was previously appraised as of March 2, 2017. As of that date, the property was contemplated for a potential sale or lease to FS Investors pursuant to its initiative, Measure E (SoccerCity), which qualified for the November 2018 ballot. A rival initiative, Measure G (SDSU Mission Valley), also qualified and was passed. Information provided on both initiatives has been reviewed and may be discussed or referred to in this appraisal. The intent of this appraisal is to estimate the market value of the subject property as of the retrospective effective date of valuation and not the SDSU Mission Valley project.

However, the SDSU Mission Valley project development plan is being solidified coterminous with the preparation of this appraisal and information being provided regarding the property and development constraints is informative.

The following market participants were interviewed or provided information during preparation of this appraisal:

Tom McCarron, Senior Vice President, SDSU Mission Valley Development (client)

Robert Schulz, Associate Vice President, SDSU Real Estate, Planning and Development (SDSU Team)

John Kratzer, President & CEO, JMI Realty (developer, property owner and consultant to SDSU Team)

Neil Murphy, Senior Vice President, OCMI, (construction cost estimator and consultant to SDSU Team)

Gina Jacobs, Associate Vice President, Mission Valley Development, San Diego State University (SDSU Team)

Jean Catling, Principal Appraiser/Program Manager, City of San Diego Real Estate Assets Department (client and appraiser)

Nancy Graham, Senior Planner, City of San Diego (community planner, Mission Valley)

Jeffrey A. Petersen, Development Project Manager, City of San Diego Development Services Department (city official)

Marco Sessa, Senior Vice President Land Development/Residential, Sudberry Properties (developer and owner)

David Cattle, Vice President and Construction Executive, Turner Construction (contractor)

Paul Rooney, Construction Executive, Turner Construction (contractor)

Ralph Hicks, Turner Construction (contractor)

George Elum, Holland Partner Group (developer and property owner)

Fred Pierce, President and CEO, Pierce Education Properties (student housing developer and owner)

Peter Reeb, Principal, John Burns Real Estate Consulting (market analyst)

Kipp Gstettenbauer, Voit Private Client Group (broker)

Mike Neal, President/CEO, H.G. Fenton Company (developer and property owner)

Paul Braun, Managing Director, Healthcare Practice Group, JLL (broker)

Paul Twardowski, Senior Managing Director, Hines (owner and developer)

Eric Hepfer, Director, Hines (owner and developer)

Ben Swift, Hines (owner and developer)

Andrew Malik, Malik Infill Development (developer, property owner and consultant)

Dan Floit, Floit Properties (developer and property owner)

Joe Brady, Senior Associate, Colliers International (broker)

Todd Majcher, Senior Vice President, Lowe Enterprises (developer and property owner)

Tom Tomlinson, Assistant Director, City of San Diego Planning Department (City official)

Mark Nassar, Deputy Director, Engineering and Parks, City of San Diego (City official)

Jeff Zimmer, Civic San Diego (City official)

Rob Weber, President, Infrastructure Engineering Corporation, (civil engineer)

Jason Moore, Project Engineer, Group Delta (soils and environmental engineers)

Alan Lewis, Diversyfund, Inc., (property owner and developer)

Mark Silverman, Principal, NAI San Diego (broker)

J. Scott Brown, Project Development and Acquisitions, Chelsea Investment Corporation (developer and property owner)

Joe Brady, Senior Associate, Colliers International, (broker)

Chris Vonk, Project Engineer, Group Delta (soils and environmental engineers)

Andy Field, Interim Director, City of San Diego Parks and Recreation Department (City official)

Josh Vasbinder, West Coast Partner, Dinerstein Company

Eva Stresemann, MAI, Project Manager, DGS Real Estate Services Division – Valuation, County of San Diego (appraiser)

Rob Stroop, Associate Engineer, Group Delta (soils engineer)

Anthony Gordon, Director, Real Estate, Port of San Diego (Port District official)

Kevin Held, Senior Director, Cushman & Wakefield (broker)

Gary Rasmuson, MAI, SRA, Rasmuson Appraisal Services (appraiser and author of ground rent studies)

Preston Fetrow, Senior Vice President, CBRE (broker)

John Read, First Vice President, CBRE (broker)

Shaun Moothart, First Vice President, CBRE Capital Market/Debt & Structured Finance (loan broker)

Steve Wylder, Senior Vice President, iStar & Safehold (ground lease financing and REIT)

Stephen D. Roach, MAI, SRA, AI-GRS, Principal, Jones, Roach & Caringella, Inc. (appraiser)

Ricardo Calzada, Associate Civil Engineer, City of San Diego Public Utilities Department (City official)

Michael Rosenberg, Deputy Director of Wastewater Collection Division, City of San Diego Public Utilities Department (City official)

Marcela Escobar-Eck, Principal, Atlantis Group (consultant and entitlement expert)

Jeff Brazel, Principal, JVB Real Estate Advisors (consultant and entitlement expert)

Jeff A. Peterson, Development Project Manager, City of San Diego Development Services Department (City official)

Charles E. Black, President, CEO, CB Urban Development (consultant and entitlement expert)

Lars Eisenhauer, Vice President, CBRE Advisory & Transaction Services (broker)

Tony Pauker, Senior Director, Land and Housing, Brookfield Residential (developer)

Jimmy Ayala, Division President, San Diego, Pardee Homes (developer)

The following market participants were interviewed or provided information during preparation of the previous appraisal:

Russ Valone, President and CEO, MarketPointe Realty Advisors (consultant)

Steve Black, Chairman, Cisterra Partners, (developer and property owner)

Jason Wood, Project Principal, Cisterra Partners (developer and property owner)

Dennis Cruzan, Founding Partner, Cruzan (developer and property owner)

Tim Winslow, Broker, DZT (commercial land, investments and value add property sales)

John Kratzer, President & CEO, JMI Realty (developer and property owner)

Steve Scott, former Senior Vice President, Kilroy Realty, now with Cisterra Partners (developer and property owner)

Richard Goner, Jones Lang LaSalle, broker (office leasing)

Paul Twardowski, Senior Managing Director, Hines (owner and developer)

Tom Blake, Founder and President, Coast Income Properties (developer and property owner)

Dana Kuhn, Real Estate Consultant, (residential land, entitlement and project management)

Rick Gusman, Estimating Manager, Silverado Contractors (demolition, Candlestick Park)

Nancy Graham, Senior Planner, City of San Diego

Doug Matheson, Senior Vice President, CBRE (broker)

Rod Apodaca, Senior Vice President, CBRE Hotels (broker)

Marco Sessa, Senior Vice President Land Development/Residential, Sudberry Properties (developer and owner)

Lisa Lind, Senior Planner, City of San Diego

Alan Nevin, Director of Economic and Market Research, Xpera Group (consultant)

Mark Luckardt, Senior Project Manager, FivePoint (developer and owner)

Vicki Nyland, Chief Financial Officer, FivePoint (developer and owner)

Mark McEwan (demolition and grading contractor)

Fred Pierce, President and CEO, Pierce Education Properties (student housing developer and owner)

Steve Avoyer, President, Flocke and Avoyer (broker)

Franco Macklis, LLJ Ventures (owner and developer)

Chuck Wasker, Colliers International (broker)

James Duncan, Kidder Mathews (broker)

Kelly Souza, Senior Vice President, Wells Fargo (lender)

Perry Dealy, President, Dealy Development, Inc. (developer and consultant)

Peter Reeb, Principal, John Burns Real Estate Consulting (market analyst)

Paul Gherini, Protea Properties and Gafcon, Inc. (acquisitions and development)

Mike Paris, U.S. Bank (lender)

Dennis Visser, Managing Director, Cushman & Wakefield (broker)

Darrell Fullbright, Design Director, Gensler (architect)

Tim Bruning, Principal, The Carlyle Group (owner and developer)

Sean Paver, Environmental Biologist, City of San Diego Public Utilities Department

Michael Crews, Michael Crews Development (owner and developer)

Tammy Lawhead, J. Whalen Associates, Inc. (land use consultant)

Brandon Myers, Owner, Mitigation Credit Services, LLC (mitigation land consultant)

Ray Hrenko, Vice President, Environment, Southern California, AECOM (consultant)

Keith McCoy, Senior Project Manager, AECOM (consultant)

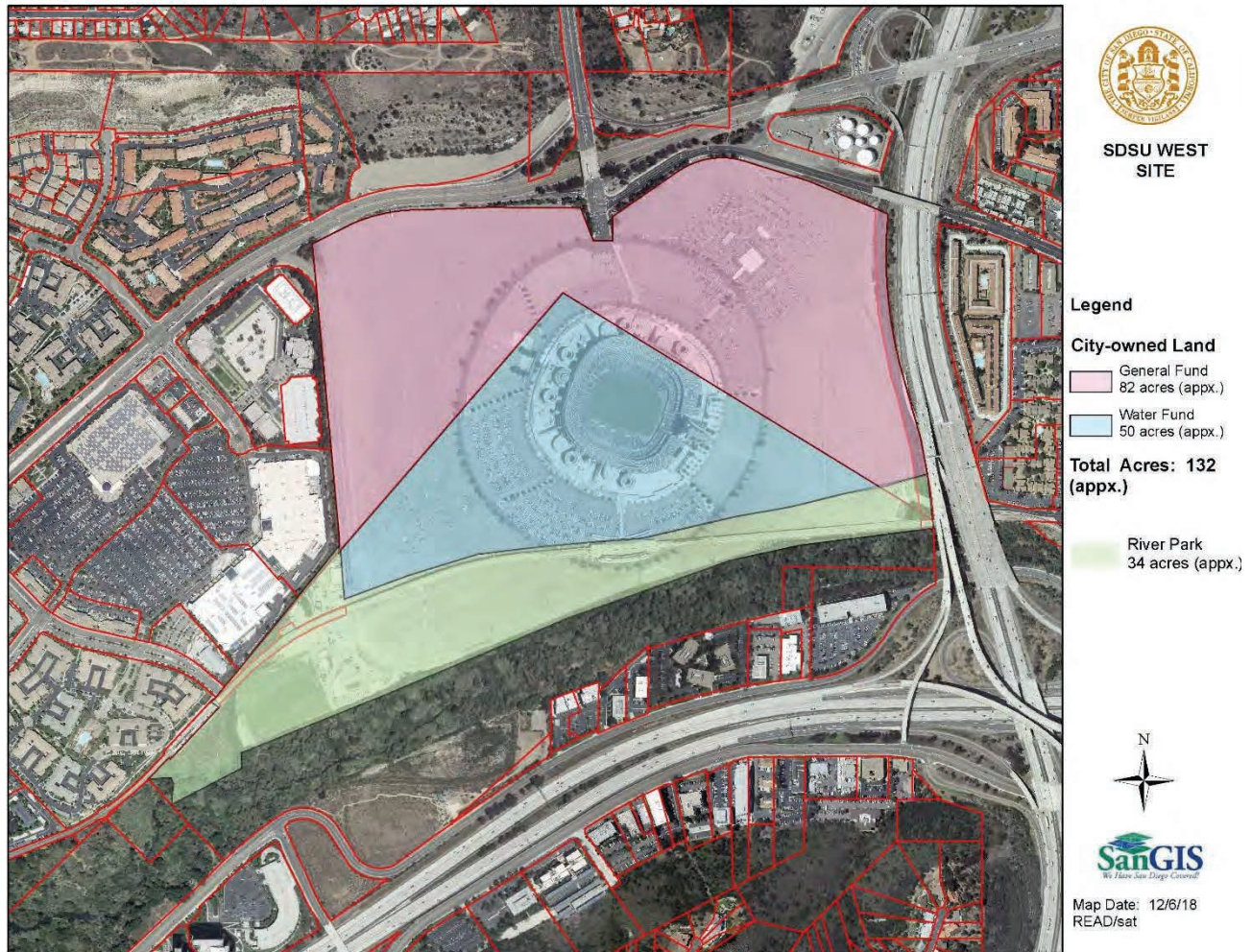
Joanne Rodriguez, Mitigation Land Specialists (mitigation land broker)

Carrie McCabe, Consultant/Paralegal (mitigation consultant)

INTRODUCTION

This satellite map shows the Qualcomm Stadium area in San Diego, California. The stadium is a large, circular structure with a green field in the center. Surrounding the stadium are various roads and landmarks. Labeled roads include Questor Pl, Friars Rd, Northside Dr, Mission Village Dr, San Diego Mission Rd, Qualcomm Way, Escondido Fwy, Kumeyaay Hwy, and Camino Del Rio N. A scale bar at the bottom indicates 3000 feet. The Google Earth logo and copyright information are visible in the bottom left corner.

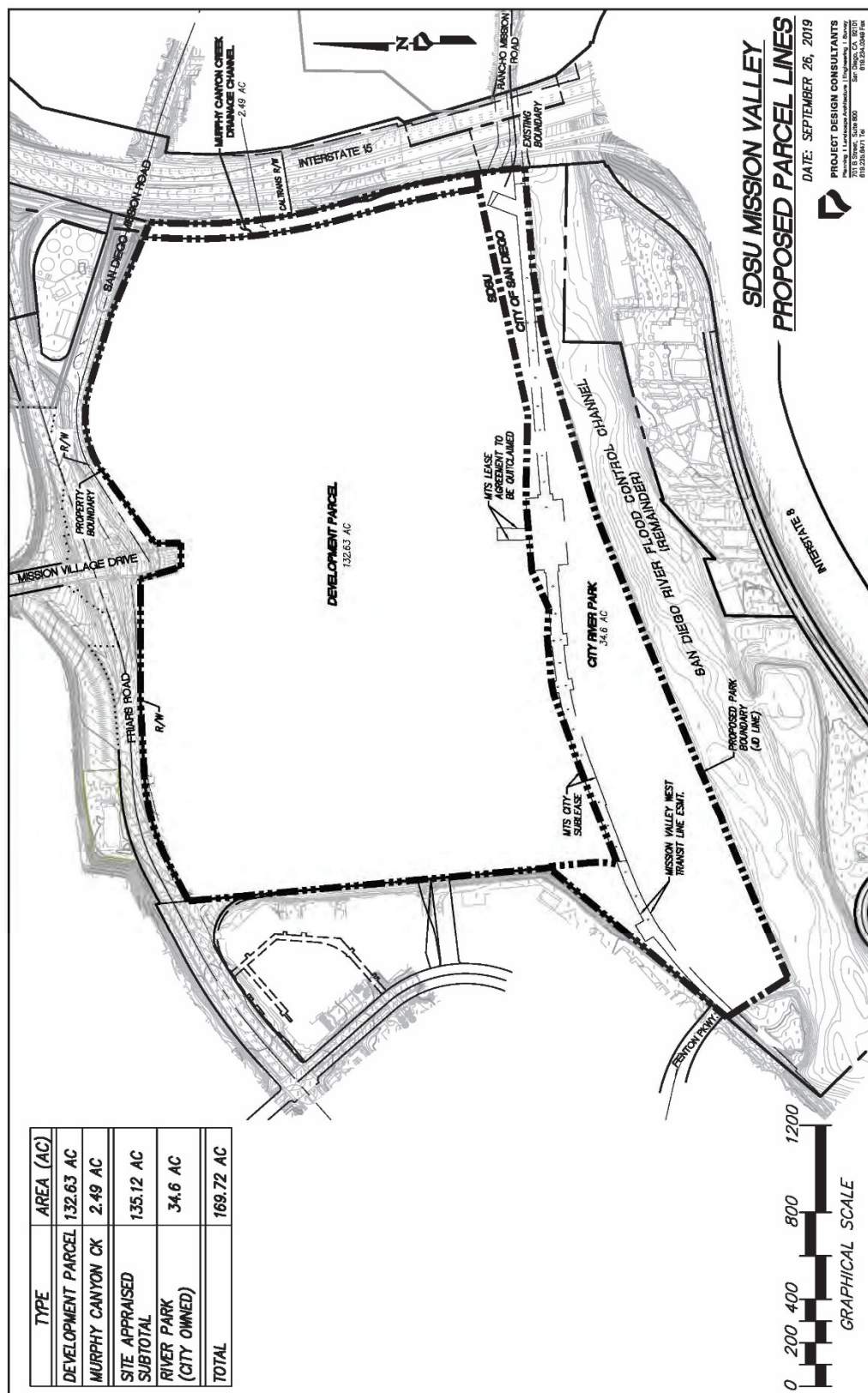
The subject property consists of two City of San Diego ownerships that depict the gross land area:



The subject property consists of all or portions of the following Assessor's Parcels:

APN	Street Address	Ownership Allocation	APN Gross Acreage	Assumed/Allocated Gross Acreage	Assumed/Allocated Net Acreage
433-250-13	Friars Road (no address)	City General Fund	81.52	82.00	79.40
433-250-14	Murphy Canyon Creek	City General Fund	2.60	2.60	2.60
433-250-16	9449 Friars Road	City Water Fund	131.51	84.00	84.00
Total			215.63	168.60	166.00

Map of Proposed Parcel Lines



Representatives of San Diego State University report that their engineers have further refined the land area to 135.12 acres pursuant to refining the SDSU Mission Valley proposed development plan as follows:

Component	Acres
Development Parcel	132.63
Murphy Canyon Creek	2.49
Sub-Total	135.12
River Park	34.60
Grand Total Development Area	169.72

Stadium History

The existing stadium site is now named San Diego County Credit Union Stadium. It was formerly Qualcomm Stadium. Prior to that, it was known as San Diego Stadium and San Diego Jack Murphy Stadium; a.k.a. "The Q" and "The Murph." It is a multi-purpose stadium in the Mission Valley area. The stadium's naming rights, owned by Qualcomm Incorporated, expired in 2017, shortly before the effective date of valuation of this appraisal.

It was the home of the National Football League's (NFL) San Diego Chargers and is the current home of the San Diego State University Aztecs college football team. It hosts the Holiday Bowl and Poinsettia Bowl college football games every December. Through the 2003 baseball season, it served as the home of the Major League Baseball's (MLB) San Diego Padres.

The stadium has hosted three Super Bowl games: Super Bowl XXII in 1988, Super Bowl XXXII in 1998, and Super Bowl XXXVII in 2003. It also hosted the 1978 and 1992 Major League Baseball All-Star Games, the 1996 and 1998 National League Division Series, the 1984 and 1998 National League Championship Series, and the 1984 and 1998 World Series. It is the only stadium ever to host both the Super Bowl and the World Series in the same year (1998). It is one of three stadiums to host the World Series, MLB All-Star Game, and Super Bowl.

The stadium is located immediately northwest of the interchange of Interstate 8 and Interstate 15. The neighborhood surrounding the stadium is known as Mission Valley, in reference to the Mission San Diego de Alcalá, which is located to the east, and its placement in the valley of the San Diego River. The stadium is served by the San Diego Trolley station, accessible via the Green Line running toward Downtown San Diego to the west, and Santee to the east.

In the early 1960s, local sportswriter Jack Murphy began to build up support for a multipurpose stadium for San Diego. In November 1965, a \$27 million bond was passed, allowing construction to begin on a stadium. When completed, the facility was named San Diego Stadium.

The Chargers (then a member of the American Football League) played the first game ever at the stadium on August 20, 1967. San Diego Stadium had a seating capacity of around 50,000; the three-

tier grandstand was in the shape of a horseshoe, with the east end low (consisting of only one tier, partially topped by a large scoreboard). The Chargers were the main tenant of the stadium until 1968, when the AAA Pacific Coast League San Diego Padres baseball team played its last season in the stadium, following their move from the minor league sized Westgate Park. Due to expansion of Major League Baseball, this team was replaced by the current San Diego Padres major-league team beginning in the 1969 season. (The Padres moved out of Qualcomm Stadium following the 2003 season.)

After Jack Murphy's passing in 1980, San Diego Stadium was renamed San Diego Jack Murphy Stadium. In 1983, over 9,000 bleachers were added to the lower deck on the open end of the stadium raising the capacity to 59,022. The most substantial addition was completed in 1997, when the stadium was fully enclosed, with the exception of where the scoreboard is located. Nearly 11,000 seats were added in readiness for Super Bowl XXXII in 1998, bringing the capacity to 70,561. Also in 1997, the facility was renamed Qualcomm Stadium after Qualcomm Incorporated paid \$18 million for the naming rights. Qualcomm's naming rights expired in mid-2017. In order to continue to honor Murphy, the city named the stadium site Jack Murphy Field. However, as part of the naming agreement, Jack Murphy Field was not allowed to be used alongside the name, Qualcomm Stadium.

The seating capacity for football went from 52,596 from 1967-1983 and, after several increases, has been at least 70,561 from 1999-present (reported as 71,500 more recently).

With the departure of the Padres following the 2003 season and even beforehand, there has been much talk of replacing the increasingly obsolete (by NFL standards) stadium with a more modern, football-only one. Also, the NFL has demanded a new stadium if San Diego is to host another Super Bowl. There have been many problems with this project, the most obvious one being the city's inability to fund such a stadium.

In January 2016, majority owner Dean Spanos announced that the Chargers would stay in San Diego for the 2016 NFL season after the Chargers agreed to share a stadium with the Rams. In February 2016, the Chargers announced that their new stadium efforts would be focused on the East Village portion of Downtown San Diego and an initiative was launched. However, despite vigorous campaigning and millions of dollars spent, voters rejected the ballot plan 57%-43%, placing serious doubt about the team's future at the stadium. Subsequently, the Chargers announced they were moving to Los Angeles for the 2017 season.

As the Chargers prepared to depart, a group of La Jolla investors said they hoped to purchase a Major League Soccer (MLS) expansion franchise. They offered to purchase the Stadium site from the City of San Diego if their application for a soccer franchise was approved, and to construct a smaller, soccer-specific stadium outside the footprint of the current stadium along with a very ambitious mixed-use project. This stadium was initially intended to be shared with the San Diego State University football program. In January 2017 the group announced its detailed proposal, known as SoccerCity, with the stadium site to be leased from the city and developed with private funding. The proposed partnership with SDSU fell apart over disagreement about design and land control issues. The SoccerCity group launched a successful signature drive to gain voter approval, and their proposal was placed on the November 2018 ballot as Measure E.

San Diego State was still interested in the stadium property, and in October 2017 a group of local SDSU supporters announced a redevelopment proposal for the stadium site called SDSU Mission

Valley. Under it the majority of the stadium property would be bought from the city and used for a mix of purposes including a stadium, academic facilities, student and faculty housing, retail uses, and hotels. After a successful signature drive it was also placed on the November 2018 ballot as Measure G. In the November election, voters rejected the SoccerCity proposal with a "No" vote of nearly 70%. The SDSU Mission Valley proposal was narrowly approved with 54% voting "Yes".

SDSU then began negotiations with the city about a purchase of the property. In February 2019, the university named Clark Construction as the contractor to build a new multi-use \$250 million stadium on the site. The stadium as proposed will have capacity for 35,000 attendees and will support events including college football, NCAA championship games, professional soccer, and special events such as concerts.

TYPE AND DEFINITION OF VALUE

This appraisal was prepared to communicate the results of an estimate of fair market value pursuant to the following definition provided by the clients:

The subject property was valued as if the existing stadium is no longer operational and no stadium expenses were deducted from the appraised value. The client also requested that the subject property be appraised in fee simple interest, at the highest and best use and disregarding any leases. These requirements represent hypothetical conditions and extraordinary assumptions.

At the request of the clients, the definition of fair market value used for this appraisal is:

Appraiser's opinion of the Fair Market Value of the Existing Stadium Site shall be based on the Municipal Code and these Instructions and shall reflect the most probable price which the Existing Stadium Site should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and the seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Appraiser shall assume the conveyance of title in the Existing Stadium Site from the seller to the buyer under conditions whereby: (a) the seller and the buyer are typically motivated; (b) both the seller and the buyer are well informed or well advised, and acting in what they consider their own best interests; (c) a reasonable time is allowed for exposure in the open market; (d) payment is made in terms of cash in U.S. dollars or comparable financial arrangements; and (e) the price represents the normal consideration for the property sold, unaffected by special or creative financing or sales concessions granted by anyone associated with the sale.

Market rent is defined in *The Dictionary of Real Estate Appraisal, 6th Edition*, as follows:

"The most probable rent that a property should bring in a competitive and open market reflecting all conditions and restrictions of the lease agreement including permitted uses, use restrictions, expense obligations, term, concessions, renewal and purchase options, and tenant improvements (TIs); the lessee and lessor each acting prudently knowledgeably, and assuming consummation of a lease contract as of a specified date and the passing of the leasehold from lessor to lessee under conditions whereby:

1. Lessee and lessor are typically motivated.
2. Both parties are well informed or well advised, and acting in what they consider their best interests.
3. A reasonable time is allowed for exposure in the open market.
4. The rent payment is made in terms of cash in United States dollars, and is expressed as an amount per time period consistent with the payment schedule of the lease contract.
5. The rental amount represents the normal consideration for the property leased unaffected by special fees or concessions granted by anyone associated with the transaction."

PROPERTY RIGHTS APPRAISED

The property rights appraised are those of the fee simple estate or interest. These terms are defined in the Appraisal of Real Estate (14th Edition, 2013), as follows:

Fee Simple Estate:

"Absolute ownership unencumbered by any other interest or estate, subject only to the limitations imposed by the governmental powers of taxation, eminent domain, police power, and escheat."

DATE OF VALUATION

As specified by the clients, the date of valuation of this appraisal is September 30, 2017. The subject property was inspected and photographed on April 3, 2017, pursuant to completion of the prior appraisal, and inspected and photographed on June 5, 2019 for this appraisal.

INTENDED USE/INTENDED USER OF THE APPRAISAL

For exclusive use of the clients and authorized users (The Board of Trustees of the California State University and the City of San Diego on behalf of the Real Estate Assets and Public Utilities Departments), for internal purposes.

SCOPE OF WORK

This appraisal report is intended to be an Appraisal and an Assignment intended to produce Appraisal Results, as defined in the Standards of Professional Appraisal Practice of the Appraisal Institute; i.e., it is intended that the appraisal service be performed in such a manner that the results of the analysis, opinion, or conclusion be that of a disinterested third party. It is intended that all appropriate data deemed pertinent to the solution of the appraisal problem be collected, confirmed, and reported in conformity with the Uniform Standards of Professional Appraisal Practice of the Appraisal Foundation and the Code of Professional Ethics of the Appraisal Institute. The scope of the analysis is intended to be appropriate in relation to the significance of the appraisal problem.

Specifically, the scope included a comprehensive survey of data necessary to complete the Sales Comparison Approach (to value the individual land uses) and the Income Approach via Discounted Cash Flow Analysis (to value the property overall).

Comparable data, researched through CoStar Group, Inc., brokers and public records, was verified with parties to obtain prices, terms and units of comparison. The subject property was inspected (appraisal inspection).

PROPERTY IDENTIFICATION

Legal Description

A legal description was not submitted for review:

The subject property is Assessor's Parcels 433-250-13, 14 and a portion of 16.

Location

The subject property is located in the Mission Valley neighborhood/district of San Diego. More specifically, the site is situated on the south side of Friars Road and San Diego Mission Road, the west side of Interstate 15, east and north of Stadium Road (an onsite circulation street) and north of the San Diego River. The location is approximately 10 miles northeast of the San Diego Civic Center.

Owner of Record - History

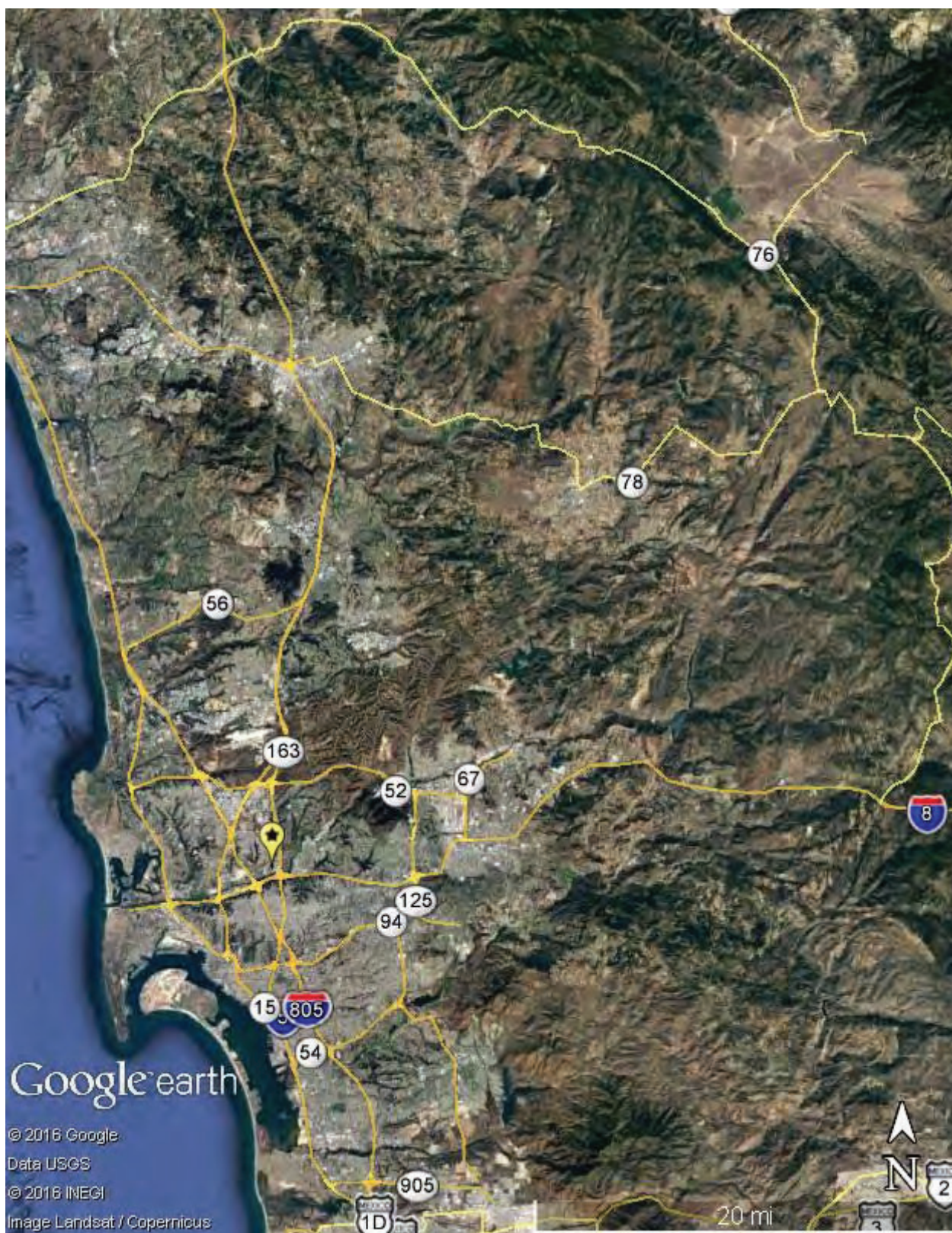
The following is a summary of the subject property ownership and acquisition dates:

APN	Street Address	Ownership Allocation	Legal Owner
433-250-13	Friars Road (no address)	City General Fund	City of San Diego
433-250-14	Murphy Canyon Creek	City General Fund	City of San Diego
433-250-16	9449 Friars Road	City Water Fund	City of San Diego

There have been no sales or transfers of any of the subject parcels in the past three years.

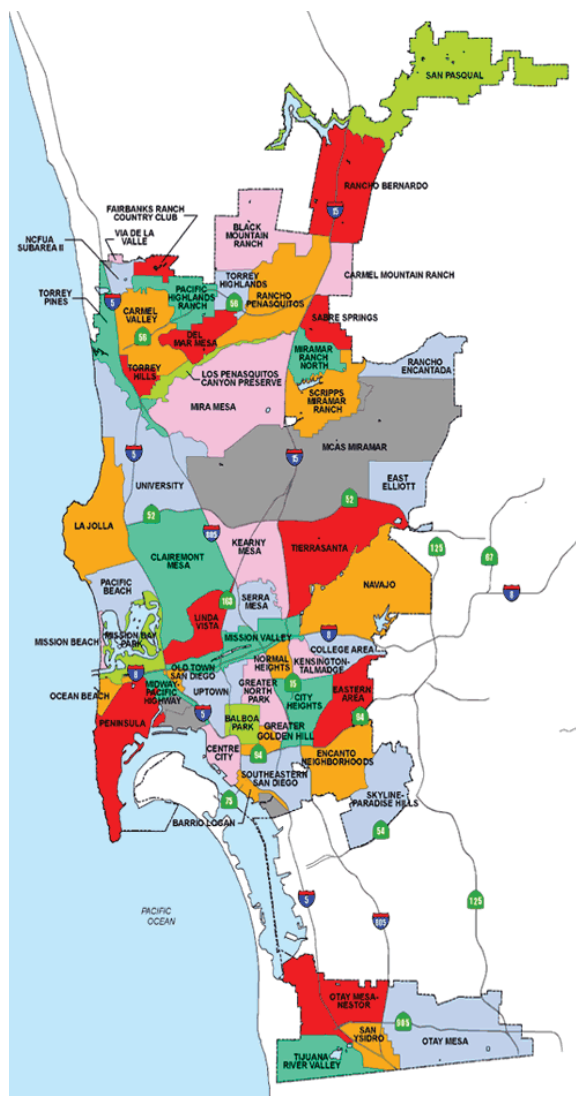
There are approximately 18 other possessory interest tax parcel numbers, ostensibly for stadium operational support. As previously noted, the subject property is being appraised in fee simple interest disregarding any leases and assuming the stadium is non-operational.

AREA MAP



San Diego is a major city in California, on the coast of the Pacific Ocean in Southern California, approximately 120 miles (190 km) south of Los Angeles and immediately adjacent to the border with Mexico. San Diego is the eighth largest city in the United States and second largest in California and is one of the fastest growing cities in the nation. San Diego is the birthplace of California and is known for its mild year-round climate, natural deep-water harbor, extensive beaches, long association with the U.S. Navy, and recent emergence as a healthcare and biotechnology development center. The population of the City of San Diego was estimated to be 1,391,676 as of January 2016 and was ranked the second largest city in California (Department of Finance).

The population of the County of San Diego was estimated to be 3,288,612 (Department of Finance) as of January 2016, a 0.8% increase from 2015. San Diego is rated No. 4 among Top Life Science and Biosciences locations (Jones Lang LaSalle 2015) and No. 1 in concentration of military/defense assets in the world (San Diego Military Advisory Council). It is rated No. 2 as the Most Inventive City in the World (Forbes 2013) and No. 1 most-patented Sports and Active lifestyle sector with 1,200-plus companies in the region (San Diego Regional EDC). It is the only North American city named among National Geographic's "World Smart Cities" (2015) and called "Best Place to Launch a Startup" (Forbes 2014).



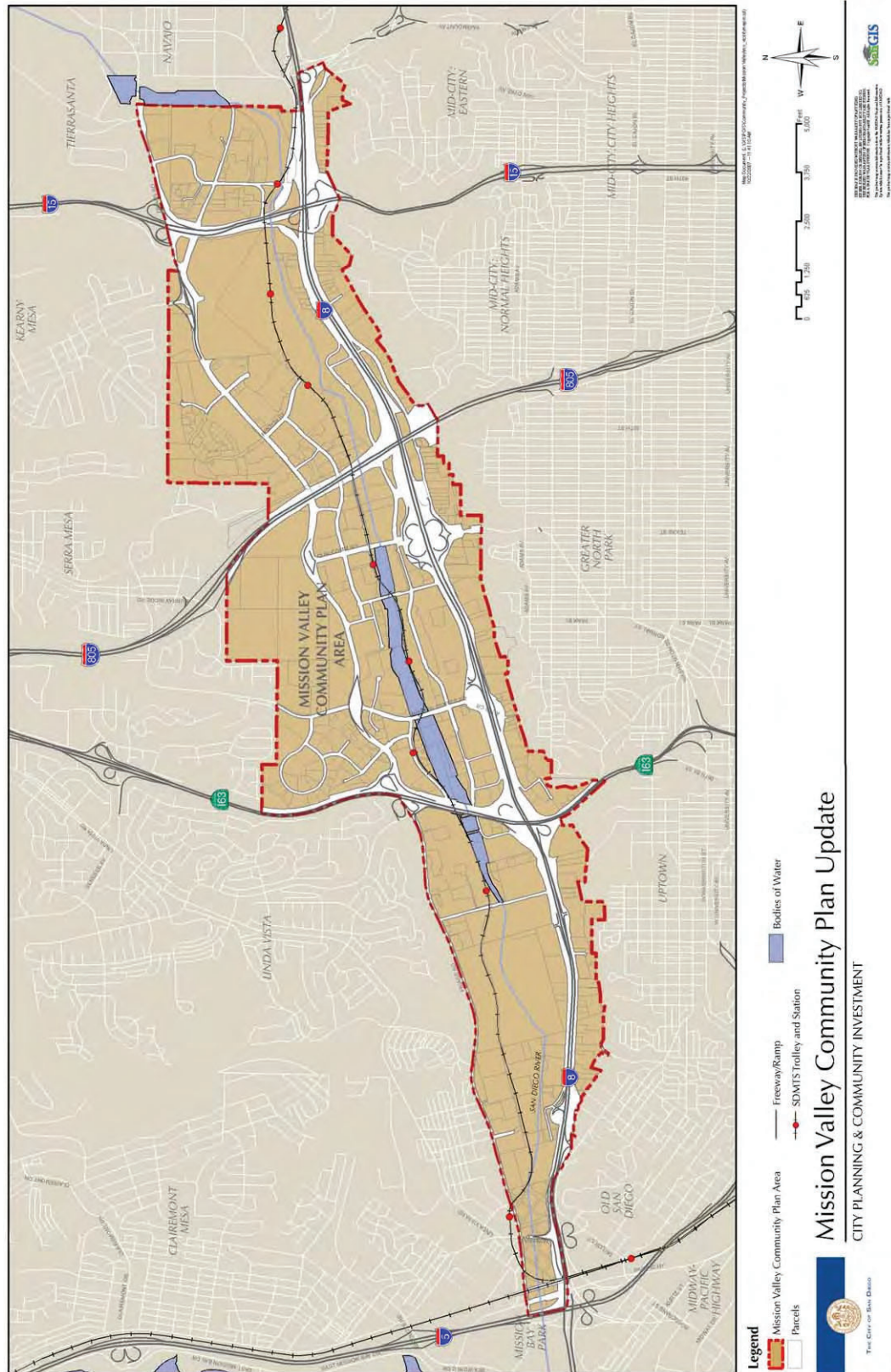
The following four base sectors constitute the backbone of San Diego's economy: international trade, manufacturing, military, and tourism. The traditional reliance on the military and defense related industries have been reduced over the past 30 years; however, those portions of the local economy are still significant. The regional economic diversification and natural amenities, such as the weather and attractive coastal characteristics, will continue to attract people to the area. The city, county and state governments are no longer demonstrating policies towards controlling leapfrog growth, but they continue to work to preserve the area's agreeable lifestyle, attracting clean industries and address the local and regional water shortage.

San Diego County is a good place to own property, which will continue to grow and prosper over the long term, and as it does, property owners will be rewarded with appreciation of both values and incomes.

NEIGHBORHOOD MAP



Mission Valley Community Plan Update Map



NEIGHBORHOOD/DISTRICT DESCRIPTION – AS OF 2017

The subject property is located in the Mission Valley neighborhood/district within the city of San Diego. The two dominant features of Mission Valley, the San Diego River and Interstate 8, run parallel to one another through its entire length. The neighborhood/district is bounded by hillsides north of Friars Road and south of Camino del Rio South and Hotel Circle South. To the east the boundary is the San Diego River as it turns to the north. The westerly boundary is formed by Interstate 5 and the neighborhoods of Bay Park and Old Town. To the south are older communities of Kensington, Normal Heights, while Hillcrest and Mission Hills are to the southwest. To the north lies Tierrasanta, Serra Mesa, Clairemont Mesa and Kearney Mesa. To the west is Ocean Beach, Mission Bay and the Pacific Ocean. To the east is Allied Gardens.

Mission Valley is located in the central portion of the San Diego Metropolitan area. The community is located approximately five miles north of Downtown and seven miles east of the Pacific Ocean. The subject property has regional access to four major freeways. Interstate 15 is adjacent to the east; Interstate 8 is approximately .25 mile to the south; Interstate 805 is less than one mile west; and State Route 163 is accessed via Friars Road approximately 2.4 miles west.

Mission Valley is a major floodplain for the San Diego River. A large portion of the subject property is located within the 100- and 500-year Federal Emergency Management Agency (FEMA) flood zones and drains to the south into the San Diego River.

The subject property is in a developed area and is surrounded by major roadways, interstate freeways, existing development and the River. Higher density multifamily residential land uses are located to the northwest, southwest, and east across I-15. Friars Road, Mission Village Road and San Diego Mission Road are located to the north. The San Diego River, which flows east to west, is located south of the River Park site. South of the San Diego River are additional office uses and Interstate 8. To the north of Friars Road are steep, undeveloped hillsides. To the west are office and large commercial retail uses. Murphy Canyon Creek, a partially earthen and concrete line channel that conveys flow into the San Diego River, is located along the easterly property line, adjacent to Interstate 15. The Kinder Morgan Energy Partners Mission Valley terminal is located to the northeast. Murphy Canyon Creek is part of the subject property per the map contained in Measure G.

With the size and the numerous amounts of goods, services and venues that are offered, Mission Valley can be broken down into three distinct sections. The first is in the eastern portion, between Interstates 15 and Interstate 805. This is primarily known as the stadium area.

Main roadways from the stadium in the eastern section are Interstate 8 via Qualcomm Way, and Friars Road. Before and after stadium events there can be significant congestion along this thoroughfare which was alleviated somewhat by completion of a San Diego Trolley Station in the southerly portion of the stadium property in 1997. When the stadium was built, this area was primarily gravel and rock quarries. Over the past 40+ years, the area has boomed with office buildings lining both the north and south side of Interstate 8, hotels and large shopping areas that are community related, as well as the construction of over 10,000 multi-residential units.

Approximately two miles west of the stadium are two of the eight regional shopping centers in San Diego County. Mission Valley Center is located approximately 1.6 miles west of the stadium on the

north side of Interstate 8, between Interstate 805 and State Route (SR) 163. Costco, Ikea and Lowe's are situated adjacent to the southwest corner of the subject property. Opening in 1961, it was expanded in 1995 to approximately 1,308,400 square feet, to include a twenty-theater cinema complex, numerous boutiques and shops and upscale restaurants. The neighboring regional mall to the west is Fashion Valley, located on the west side of SR 163. It was built in 1969 and has been expanded twice, most recently in 1998, to approximately 1,715,000 square feet, making it the largest shopping center in the region. There are three smaller shopping areas, two of which have trolley stop access.

The third section of Mission Valley is known as Hotel Circle, which is located west of SR 163 and east of Interstate 5. Hotels, motels and motor lodges take up the majority of the area and contain over 5,000 rooms. It is an ideal place for visitors to stay with close proximity to the airport, all freeway systems, tourist attractions, downtown San Diego, sports venues, shopping and dining. In addition to the hotels, there are also many more office buildings and the Riverwalk golf course. Multi-family residential complexes are a more recent addition in this portion the neighborhood/district.

Since its construction, Interstate 8 has been the most-heavily traveled artery in San Diego County. Interstate 5 connects the west end of the Valley with downtown San Diego, approximately three miles south. State Route 163 runs north from Downtown to the central part of the valley and beyond to Kearny Mesa. Interstate 805, which crosses SR 163 in Kearny Mesa, is elevated over Mission Valley. Its only interchange in the neighborhood is at Interstate 8. Finally, Interstate 15 is the easternmost freeway in the area.

Development from 1960 to 1985 was rapid and not well planned. Infrastructure needs were not properly anticipated. In addition, the development took place during a cycle of dry weather. Then, in 1978, 1979, and 1980, three consecutive seasons of above-average precipitation brought floods that inundated the low-lying developments and surface streets. These occurrences, plus mounting traffic flow problems, forced the city to press forward in its creation of a Mission Valley Community Plan.

Adopted in June 1985, the major focus of the plan was to limit development based on traffic generation. The valley was divided into several "Development Intensity Districts." Each has its own limit of "average daily trips" per gross acre of land area. The plan also defined what the expected number of trips generated by a given use would be. This system of linking density to traffic generation replaced the "floor area ratio" as the density constraint. Generally, potential density for a given parcel was nearly halved with adoption of the plan. An update to the Plan kicked-off in June 2015 in an anticipated three-year process that was scheduled to go before the City Council for approval in late 2018 (ultimately approved in September 2019).

The 1985 plan also embraced a deepened, narrowed, soft-bottom flood channel. The massive improvements would be financed with 20-year assessment district bonds placed against the affected properties. Now in place, First San Diego River Improvement Project (FSDRIP) is proving to be capable of handling large volumes of water while maintaining an attractive presence during dry periods. It looks like a legitimate river rather than a sprawling, marshy maze. Walkways and bike paths have been created. And the historic rains of February 1998 caused less flooding in Mission Valley than used to be typical in a wet year.

Meanwhile, new projects that had been arrested at first by FSDRIP, and then by the recession, have been redefined and built. The new projects have substantially less office space than were once

proposed. The delays caused by FSDRIP turned out to be a blessing for some property owners as they avoided being caught with excess product. Mission Valley's office market suffered mightily during the downturn of the first half of the 1990s. The exodus of wealth to North San Diego County, overbuilding in downtown San Diego, and severe cutbacks in the kinds of businesses that rented office space in the Valley and Downtown all combined to create peak vacancy in both markets of about 20%. Subsequently, market conditions improved and are in their second cycle since.

In addition to the Stadium, another dominant land use in the area is the Fashion Valley shopping mall, which is the largest in the City of San Diego at over 1.7 million square feet. This mall is west of the Stadium at the southwest corner of Friars Road and Ulric Street. Other large-scale retail development in the area to the east, includes Mission Valley Center and Hazard Center. These three properties combined encompass more than 4.5 million of the over 5.0 million square feet of shopping center space and makes Mission Valley the dominant shopping destination for many miles.

Other recent developments in Mission Valley include the Fenton Marketplace and the re-built Riverwalk golf course. The Fenton Marketplace is a 550,000 square foot power center built on a former gravel extraction site along the south side of Friars Road. Located adjacent to the Stadium, the project was completed in 2000 and is anchored by Ikea, Costco, and Lowes. Parallel to the river east of Fashion Valley Road, the 200-acre Riverwalk golf course was completed on the site of the former Stardust Country Club. That property was being entitled as the Levi-Cushman Specific Plan and is now planned for a re-entitlement submission for a new project of 4,000 multi-family residential units, between 750,000 and 1,000,000 square feet of office space and 175,000 square feet of retail space.

The most significant new project in the area is Civita, which is located on the north side of Friars Road west of Interstate 805. Formerly the site of gravel extraction operations, the Specific Plan for the 230.5 gross acre and 150.2 net acre project calls for development of 4,780 mostly attached multi-family residential units, 510,000 square feet of retail space and 390,000 square feet of office space in addition to parks, open space and a community recreation center and civic center. The entitlement was approved in 2008 and the initial construction has been multi-family residential.

The Mission Valley neighborhood includes a notable historical San Diego landmark, the Mission San Diego de Alcalá. It is the first of the California missions and located northeast of the Stadium.

The subject property consists of 135.12 acres in a prime location. Adjacent to the subject property is:

- | | |
|---------|--|
| North - | Friars Road |
| East - | Interstate 15 |
| West - | Stadium Road, the Mission City office project, the Fenton Marketplace retail center, a fire station and Camino del Rio North |
| South - | The San Diego River, office buildings, Camino del Rio North and Interstate 8 |

The proximity to amenity facilities such as regional shopping, companion high quality professional buildings, the onsite San Diego Trolley Station, and the subject's high visibility-identity and the ease of freeway access to the metropolitan area, makes this area very attractive. The subject has long term excellence of location.

MARKET CONDITIONS

Community Plan Update

As of the effective date of valuation, an update of the Mission Valley Community Plan was underway and Phase 3 of 6, Alternatives Development, was in progress. Subsequent phases are: Community Review (Spring 2017 to Summer 2017); Community Plan, EIR and Facilities Financing Plan Development (Fall 2017 to Winter 2018); and City Hearings on Final Plans (Spring to Fall 2018). As of the date of value, input had been gathered on existing conditions, current policies, and the community's vision for Mission Valley for 20 to 30 years into the future. Phase 3 involved looking at identified issues in the community as well as possible solutions in order to develop and select a preferred land use plan. A Notice of Preparation of the EIR was released by the City on July 28, 2017. The preferred plan was supported by the Mission Valley community at an open house on August 12, 2017.

The last overhaul of the Community Plan was in 1985 with the most recent amendment in 2013. The purpose of the plan is to provide recommendations to guide development in Mission Valley until the projected population of 24,558 is approached. As of 2014, the population in Mission Valley was 21,303 persons, so the plan is reaching the end of its functional lifecycle. With increasing development pressure in Mission Valley as it becomes an alternative to Downtown living and a regional destination for shopping, a new plan is needed to direct growth and better promote transit use.

The Community Plan Update process will provide an opportunity for residents, business owners, property owners, developers, and visitors to shape the future of Mission Valley via data and a community-input driven process that culminates into the updated Mission Valley Community Plan. Upon adoption, this plan will be utilized to regulate land use and guide local decision making as well as public investments.

At the February 10, 2017 community planning group subcommittee meeting, conceptual land use alternatives for the Mission Valley community plan update were presented. The project objectives are to guide the future growth and development based on: current and future demands; focusing growth into pedestrian friendly, mixed-use activity centers and improving and promoting regional transit systems; and celebrating the San Diego River. The land uses and density of the proposed SDSU Mission Valley plan and the hypothetical market rate project at highest and best use are both consistent with the draft Community Plan Update. The following is the development summary presented at that meeting:



Development Summary

	Development as of 2012	Estimated Build Out at 2035	Without CPAs to Current Plan
Residential Units	10,974	20,333	15,000
Hotel Rooms	6,495	8,411	9,800
Office	7.8 million square feet	8.9 million square feet	17 million square feet
Retail	6.0 million square feet	7.6 million square feet	4.3 million square feet

Three development alternatives were presented. They are:

(1) String of Pearls, (2) Vibrant Core and (3) Campuses and Clusters.

As these alternatives relate to the area east of Interstate 805 and the subject property, the goals are:

(1) String of Pearls - Hotel and office uses surrounding a potential major sports stadium; mixed-use core adjacent to trolley stops and open spaces; enhance connection between the trolley stop in the commercial core.

(2) Vibrant Core - future potential public use (SDSU campus and/or major sports facility); office/commercial facing Friars Road; and mixed-use and residential development facing the San Diego River and the future park.

(3) Campuses and Clusters - commercial and office uses facing Friars Road; mixed-use campus orients toward the river; and high density residential surrounding the mixed-use campus.

The preference is that proposed development at the subject property reflects one of the above themes or an amalgamation of all three. These alternatives are generalizations and the highest and best use conclusion set forth in this appraisal generally best fits Alternative 3.

There are approximately 3,260 acres in Mission Valley, or 2,418 acres excluding utilities and rights of way. The majority of the subject property is still designated Sports/Recreation Facilities, as at the time the plan update process commenced, the future plans of the Chargers relative to the stadium were not solidified.

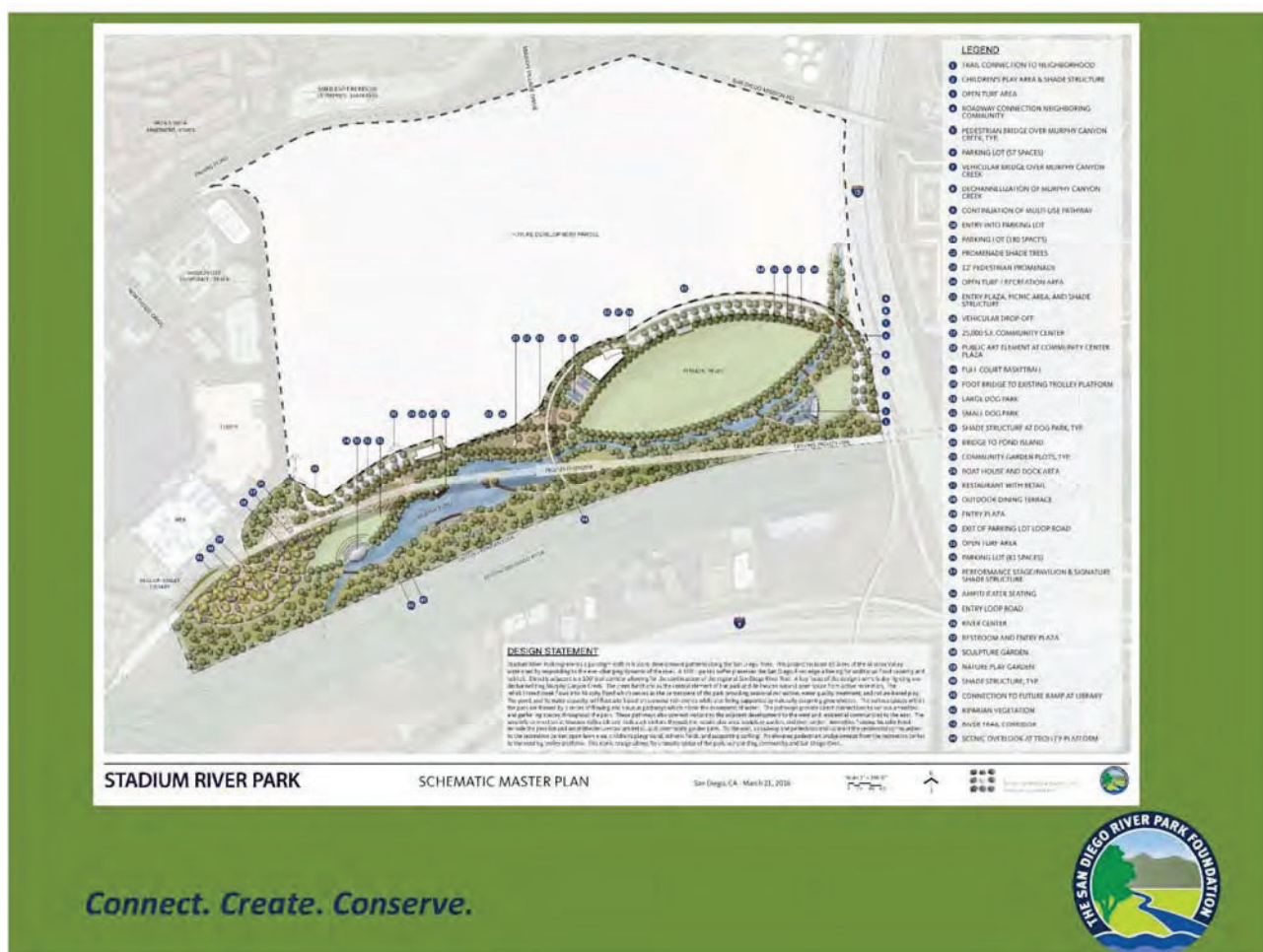
It would be advantageous for the subject property to be planned for redevelopment concurrent with the community plan update, or at least begin the process during the update. At the time of publication of the plan update, there was ambiguity about the future of the subject property, including whether or not it would continue to be used for professional football. Hence, it is not designated for future development and must go through the full entitlement process.

The intent of the Update is to provide guidance to create a “new Mission Valley”. Since 1985, there have been 20 amendments to the Community Plan. Higher densities of residential development are strongly encouraged. Specifically, the target density for a project in a transit zone is an average of 70 units per acre. The pending re-entitlement of the Riverwalk project proposes a residential density of 77 units per acre.

There are minimum requirements for passive park acreage based on the number of residents anticipated (using the City’s guideline of 1.85 residents per unit), additional parks and open space, and a buffer zone along the north side of the San Diego River. Also part of the City of San Diego General Plan, the current Mission Valley Community Plan, and the Mission Valley Public Facilities Financing Plan issued in fiscal year 2013 is a requirement for a 20-acre regional park. An additional 10 acres of regional park land is required in the Navajo Community Plan for a total of 30 acres and that total 30 acres has been earmarked for the subject property since it is owned by the City. Placing such a large amount of additional park acreage at the subject property does not represent the highest and best use. However, this requirement was assumed in this appraisal to the current 34.6 acres.

San Diego River Park

The San Diego River Park Foundation issued a schematic Master Plan for the Stadium River Park area, as a policy document, as of March 21, 2016. It calls for reclaiming 65 acres of the San Diego River by responding to the ever-changing dynamics of the river. It also encompasses a large swath of the southeast corner of the subject property area north of the San Diego trolley line for athletic fields.



As this is a policy document, it was interesting and informative, but it was not adopted as a requirement for use in this appraisal as it does not represent the highest and best use. However, the 30 acres of regional park land (discussed above in the Community Plan Update section) reportedly does not have to be plotted in a contiguous manner but was included as 34.6 acres in this appraisal.

Environmental Impact Report

A draft Environmental Impact Report (EIR) was prepared and given public notice of its completion as of August 11, 2015. This report was prepared mindful of the then existing Stadium being replaced with a new NFL football stadium. Hence, it is not precisely on point with redevelopment of the property at highest and best use but still identifies many of the opportunities and constraints that are applicable to the current valuation.

Potential Uses

The majority of the land is zoned Mission Valley Planned District: MV-CV (MVPD-MV-CV) as discussed in the Zoning section of this report. In addition, zone designations accommodate open space (and floodplain), residential, regional-serving auto-oriented and high-intensity pedestrian-oriented commercial uses. These zoning designations act as guides under the current Community Plan, but

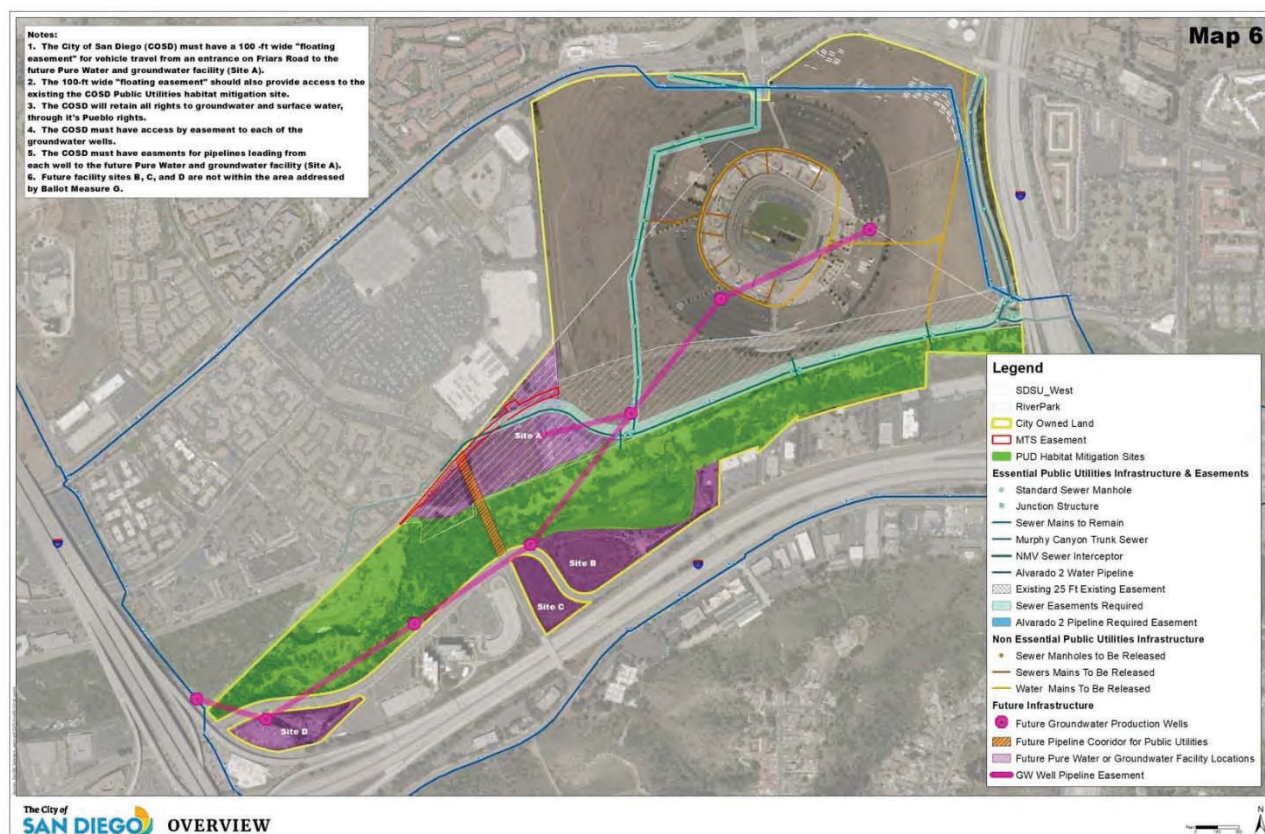
entitlement of the subject property during the community plan update was projected to alter the zoning to Specific Plan to accommodate mixed-use development.

Research completed during preparation of this appraisal indicates that the following uses represent the highest and best use of the subject property:

Use	Units	Acres	Estimated Building Square Feet
Multi-Family Residential and Ground Floor Retail	4,125	55.00	3,712,500
Retail (not included ground floors of other buildings)		2.75	30,000
Retail (included ground floors of other buildings)		included	30,000
Hotel - 300 Rooms		7.00	216,493
Class A Office		12.60	450,000
Class A Medical Office PPO/HMO		2.30	50,000
<hr/>			
Total Net Developable		79.65	4,488,993
Parks Required for Multi-Family Residential		21.37	
Circulation, Plaza, Common Area, Open Space,			
Trolley Station, Parking (for River Park and Trolley)		31.07	
Assessor's Parcel 433-250-14 (Murphy Canyon Creek)		2.49	
City Pure Water Program Wells/Facilities/Structures		<u>0.54</u>	
Total Developable		135.12	
River Park		<u>34.60</u>	
Total Gross		169.72	

Pure Water Program Wells/Facilities/Structures

The above summary includes a deduction of .54 acres for land area for future use by the City of San Diego for its Pure Water Program. The City Water Department intends to develop new wells on the subject property, two north of the trolley tracks and one to the south in the proposed River Park area. Inquiries were made as to the feasibility of relocating two wells north of the proposed River Park area. A map showing the future wells is on the next page.



According to City of San Diego Associate Civil Engineer Ricardo Calzada, there are two wells (plus connecting pipelines) that were sited so their location coincides with an underground channel of naturally occurring and water-bearing basal gravels. If the wells are relocated to a position outside of the area which has these basal gravels then water production at the water wells might be compromised. It is possible to move the wells north or south about fifty (50) feet. However, for any relocation beyond fifty (50) feet, the City would have to look at area geology to see if the new well sites would work.

The wells can be located adjacent to the right of way (streets) and installed in building enclosures. The area around wells would be 7,854 square feet per well, or 23,562 square feet for the three wells. The perimeter per well is 315 feet per well, or 942 feet for three wells. An estimated twenty-four (24) foot wide easement would be needed for the pipes. All water wells shall be located an adequate horizontal distance from known or potential sources of pollution and contamination. The standard lists as potential pollution and contamination sources: "sanitary, industrial, and storm sewers; septic tanks and leachfields; sewage and industrial waste ponds; barnyard and stable areas; feedlots; solid waste disposal sites; above and below ground tanks and pipelines for storage and conveyance of petroleum products or other chemicals; and, storage and preparation areas for pesticides, fertilizers, and other chemicals." The standard also mentions that sewer lines should not be built within a minimum of fifty (50) feet radius horizontal separation from well.

For the two wells within the developable property, each well will require a minimum 7,854 square feet (or 23,562 square feet for three), area within which no sewers should be built. The water wells will need to be accessed at least once a year for major cleaning and maintenance. The wells will also need

to be accessed for water quality sampling, at a frequency to be determined during the permitting process. For planning purposes, staff estimates a minimum of monthly access to the well may be required. If the well is completed above-ground, the equipment may look like this:



The equipment would be housed within a structure like this:



The well casing may extend anywhere from three (3) to six (6) feet in height, not counting electrical, control and SCADA equipment. Once equipped with this equipment, the equipment may be around eight (8) feet in height. The height of the building to house the well and equipment may vary depending on applicable codes and conditions. For estimating purposes, fifteen (15) in height was used.

Literature notes that depth-to-water is forty (40) feet below ground surface.

The following is a brief summary of market conditions for the most likely potential uses:

Office and Retail

CoStar Group

Information from CoStar Group, developed for the previous appraisal, as of April 2017 as well as September 2017, indicates the following for the Mission Valley markets that comprise some of the components for which the land would likely be put to its highest and best use:

As of March 2, 2017

Market	No. of Bldgs.	Total Sq. Ft.	Direct Vacancy	Sublease Availability	Total Availability	Average Direct Asking Rent PSF
All Office	142	7,329,929	12.4%	0.9%	14.5%	\$2.41
Class A Office	14	2,171,441	15.3%	2.0%	18.9%	\$2.83
Medical Office	8	178,856	0.5%	0.0%	7.0%	\$1.20
Flex	13	314,689	0.7%	0.0%	2.2%	\$1.63
Retail	111	5,897,311	0.6%	0.1%	0.6%	\$2.72
Retail-In Shopping Center	63	5,225,593	0.4%	0.1%	0.4%	\$2.57

As of September 30, 2017

Market	Direct Vacancy	Average Direct Asking Rent PSF
All Office	9.4%	\$2.35
Class A Office	15.5%	\$2.75
Medical Office	3.5%	\$2.24
Flex	2.0%	\$1.67
Retail	0.6%	\$2.60
Retail-In Shopping Center	0.4%	\$2.35

The office markets have improved recently. New development at the subject site would be of Class A quality and that segment of the office market has improved significantly over the past several years, (yes, high double digit availability is an improvement).

There is also a dearth of Class A quality medical office space. According to the Third Quarter 2017 report prepared by Jones Lang LaSalle (JLL), San Diego County medical office occupancy was essentially flat only posting an increase of 3,555 square feet of positive net absorption. The County-wide direct vacancy rate was 6.8%. The 12-month average rent growth was 2.6% (\$3.20 psf average up from \$3.12 psf in 2106). There were three construction projects totaling 240,800 square feet. JLL combines the Mission Valley and Kearny Mesa submarkets which had the following results:

Total Sq. Ft.	Net Absorption Sq. Ft.	12-Month Net Absorption Sq. Ft.	Direct Vacancy	2016 Direct Availability	Average Asking Rent PSF	2016 Average Asking Rent PSF
1,429,312	(2,825)	16,400	4.4%	5.5%	\$3.62	\$3.22

The retail market is typically very strong, but in 2017 there was a lot of retail and Class A office space planned in existing and future projects as follows:

Civita – 390,000 square feet (no construction date set)

Riverwalk – 1,000,000 square feet (still in the entitlement process)

The 14 Class A quality office properties in Mission Valley have an average floor area ratio of 82%. A reasonable floor area ratio for medical group space is 50% (based on a three or four-story building that can be primarily surfaced parked).

Owners of retail space enjoy high rents and low vacancy rates. However, there is a significant amount planned in future projects as follows:

Civita – 510,000 square feet (Phase 1 of 175,000 square feet is planned for 2018-19)

Riverwalk – 175,000 square feet (still in the entitlement process)

Appraiser's Comments/Conclusion: A relatively modest projection of 500,000 square feet of Class A office (450,000 general and 50,000 medical) and 55,000 square feet of retail space are considered appropriate for the site. Mission Valley has plenty of destination retail space, so the 55,000 square feet is targeted to neighborhood-serving uses, 30,000 square feet in a freestanding center near the trolley station and 25,000 square feet embedded in the ground floors of the residential and office buildings.

Apartments**CoStar Group**

According to information from CoStar Group, developed for the previous appraisal, as of April 2017, the apartment market statistics for the one mile radius and two mile radius around the subject property had the following results:

Mission Valley Apartment Market	No. of Units	Vacancy	12 Month Construction Starts	Under Construction	12 Month Deliveries
One Mile Radius					
All Units	6,826	3.5%	66	79	198
Market Rate Units	6,246	3.5%	66	79	198
Affordable Rate Units	129	0.8%	0	0	0
.5 Mile Radius					
All Units	1,897	2.5%	66	66	0
Market Rate Units	1,577	2.6%	66	66	0
Affordable Rate Units	129	0.8%	0	0	0

Apartments have been the hot development commodity over the past several years and that trend is expected to continue as the issuance of building permits has not kept up with housing demand.

San Diego Apartment Association**Spring 2017**

According to the San Diego County Apartment Association (SDCAA) Spring 2017 Vacancy and Rental Rate Survey, the San Diego region's overall apartment rental vacancy stood at 3.7%, down from 5.4% in the Fall of 2016. South Bay was unchanged from 3.7%.

For the first time since Spring 2014, the overall weighted average rent in the region dropped. Led by a decline in rental rates for 1 and 2 bedroom units, the weighted average rent fell from \$1,719 in Fall 2016 to \$1,658 in Spring 2017. In a breakdown of average rents for each unit type, studio units rose from \$1,129 to \$1,158 while 1-bedroom units fell from \$1,531 to \$1,432, and 2-bedroom units decreased from \$1,789 and \$1,763; rental units with three or more bedrooms inched upwards from \$2,323 in Fall 2016 to \$2,330 in the new survey.

The relative low vacancy rate is indicative of the ongoing tight rental market in the San Diego region. It is difficult to forecast if the decrease in the countywide rental rate is indicative of a longer term reduction that some are predicting nationwide. The spike in rents for studio apartments could indicate that more singles or childless couples are searching for small-sized units. Recent reports still show that statewide and in San Diego, residential building permits are well below historic averages.

Notable is that the figures developed by SDCAA are from survey results of their member properties who respond to survey requests. The total units surveyed was 21,174 in San Diego County and of those, 6,576 or 31.1% were located in San Ysidro, Otay Mesa and Chula Vista.

Fall 2017

According to the San Diego County Apartment Association (SDCAA) Fall 2017 Vacancy and Rental Rate Survey (most recent issue published), the San Diego region's overall apartment rental vacancy stood at 3.4%, down from 3.7% in the Spring 2017. The County's vacancy rate was 7% in the Fall 2016. The weighted average rents rose for studio, one and two-bedroom units but dropped slightly for three-bedroom units.

SDCAA's survey data could be validating the conclusion drawn from other economic reports that an expanding economy, continued job growth, high demand, and a limited supply of available housing in San Diego are contributing to low vacancies and higher rents. More individuals and families are moving out in search of their own place to live as their personal finances are improved. Reports indicate that more Baby Boomers and Millennials, for the time being, are choosing to rent rather than purchasing a home. Thus, the survey data could suggest these factors are increasing demand for single and multi-family rental units, pushing rents higher and vacancies lower. Survey results showing the continued rise in rents among studio apartments, and one and two bedroom units could indicate that singles, childless couples, and small families are looking for smaller sized units.

Market conditions have been strong in the multi-family segment and it is illogical that rents have gone down between quarters but are up annually in the County. A representative of SDCAA reports that their figures are subject to which owners answer the call to report and for how many units are reported. For the Mission Valley postal zip code, the owners/managers of only 200 units reported.

The figures developed by SDCAA are from survey results of their member properties who respond to survey requests. The total units surveyed was 21,361 in San Diego County and of those, only 200 or .9% were located in the Mission Valley postal zip code. The vast discrepancy between the sample size between CoStar Group and SDCAA indicates that the data from SDCAA's data is not as reliable. Information from both CoStar Group and SDCAA was useful in forming the basis of the adjustments used for changes in market conditions and location shown later in this report.

Mission Valley	Fall 2016	Fall 2017	Per Unit Change	PSF Change
Total Units	625	868		
Vacancy	3.0%	4.1%		
Studio	\$0	\$0	0.0%	
PSF	\$0.00	\$0.00		0.0%
1 Bedroom	\$1,761	\$2,019	14.7%	
PSF	\$2.51	\$2.66		6.0%
2 Bedroom	\$2,232	\$2,390	7.1%	
PSF	\$2.03	\$2.16		6.4%
3+ Bedroom	\$2,558	\$2,949	15.3%	
PSF	\$1.93	\$2.20		14.0%

Notable is that the figures developed by SDCAA are from survey results of their member properties who respond to survey requests. The total units surveyed was 21,174 in San Diego County and of those, 625 were located in Mission Valley.

MarketPointe Realty Advisors

Russ Valone, of MarketPointe Realty Advisors, provided information from his 2017 Rental Trends publication:

Rental Trends (March 2017)

This March 2017 audit surveyed 131,762 units contained within 833 rental projects in San Diego County. Average rent rates marched upward and vacancies have tightened. The most recent audit saw only one new project added to the database. The average vacancy was 2.22%, the average monthly rent was \$1,748, the average square footage was 878 square feet and the average monthly rent was \$1.99 per square foot.

A key to rental rate increases is in the diversity of product types released to the marketplace. Unlike past years when most the new product offering were traditional garden and/or three-story stacked flat apartments, in recent years an increasing percentage of the new units released have been high-density low-to-high rise rental condominiums coupled with an increasing number of townhome rentals, all of which command markedly higher rents. Rental rates have continued to increase over the past several years to an average of \$1,748 per month, reflecting an 8.01% increase over the past year.

There are expectations of continued low vacancy rates in the coming years as an improving for-sale housing market sees distressed single-family homes that entered the rental market during the recession converted back to owner-occupied units as investors sell off those single-family rental units, forcing many of these single-family rental household back into the institutional rental market.

The countywide apartment vacancy rate remained relatively stable over the past several years with averages in the mid-4.0% range; however, the last seven audits saw the vacancy rate dipping below 3.00% for the first time since 2008.

Since mid-1998 there have been 35,249 new rental units added to the San Diego County rental marketplace since 1988. Of those, 33,148 units or 94% have been absorbed. Not all of these units remain in the rental inventory however, as some have been converted for sale. Additionally, some projects, both condominium conversions and newly constructed units, entered the rental market after unsuccessful sales programs were discontinued. Despite the well above average rental rates among newer projects, new units continue to lease quickly, demonstrating the strong demand for new rental housing.

The March 2017 audit revealed that two new projects entered the market, adding 370 units of which 353 were absorbed. The other 523 units shown absorbed in the last audit were from projects still in their initial leasing absorption period. One new project opened with 475 units of which 237 were absorbed. The other 304 units absorbed this audit were from projects that opened earlier and still in their initial leasing absorption period.

A total of 8,747 proposed units contained within 43 projects have been identified as future market rate rental housing developments in San Diego County. This represents the third audit in a row that fewer than 10,000 designed rental units have been in the entitlement process. Improving economic conditions in San Diego County brought about increases in land costs that have limited new rental projects entering the entitlement process as apartment builders are finding it increasingly difficult to compete with for sale condominium builders.

The San Diego Central submarket (which includes Mission Valley) will be the most active submarket with 4,101 units in the entitlement process.

“For Sale” Product

MarketPointe Realty Advisors

Russ Valone, of MarketPointe Realty Advisors, also provided information from his 2017 Residential Trends publication:

Residential Trends (1st Quarter 2017)

New attached home prices have fluctuated based upon the available stock. The end of last year saw the average top \$681,000 before averaging in the mid-\$550,000's for several quarters. Last quarter the average topped \$632,000, but this quarter, with 36% of sales under \$600,000, the average was just over \$556,000.

With five new attached projects opened this quarter providing 570 new units and with sales to just 308 this quarter, inventory rose to 1,308 units. Based upon sales volumes over the past four quarters, there are 17.8 months of supply in the attached sector.

New projects were up notably in the first quarter of 2015, nearly double the levels seen in the previous two quarters. Builder confidence remained strong in the second quarter as nearly 1,500 units came to

the market. Since then new market entries have declined, with less than 600 new homes added to the market in three of the past six quarters. The closing quarter of 2016 and the first quarter of 2017 saw a notable increase in new project openings. There were five new attached projects adding 570 homes to the region.

Many hoped that 2015 would be a breakout year for San Diego's new home market. Although there was a first quarter bump in sales, it was only to a modest 541 net sales. The first quarter of 2016 stirred optimism with a 15.5% gain in sales volumes over the previous quarter of 647 net sales, the best quarterly showing since the first quarter of 2013. With sales in the second and third quarters averaging 657, 2016 year-to-date sales through the third quarter were 12% ahead of the prior year. The fourth quarter of 2016 was the worst quarter in over two years, which stopped 2016 from breaking the 2,500 mark in annual sales. This quarter however, the market saw sales climb to 733, the best quarterly showing since the first quarter of 2013.

In 2015 new attached project openings outpaced projects selling out and competition levels increased quarterly. This quarter, three attached projects sold out but five new projects opened thus attached competition levels edged up to 41 projects. With increased sales in both the attached and detached sectors, the average absorption rates increased. Absorption rates in the attached sector rose to 3.59 sales per month per development.

Even though sales volumes in the attached sector were up 37.5% to a net 308 and the 570 new units brought to the market in the attached sector increased that base by 20% to 1,558 units.

New homes sales volumes in the detached sector were up 35.8% to 425 net sales.

At current sales rates, offered and unsold attached inventory represent 2.9 months of supply while unreleased inventory in future phases of development add an additional 15.0 months of supply in the attached sector.

Many of the new attached projects opened in recent quarters featured luxury product, and this results in 39% of the attached inventory being positioned above \$700,000. The biggest change to attached inventory noted over the past few quarters had been the rise in supply under \$400,000, as more affordably priced attached developments have entered the market.

Of the meager 558 total units of offered and unsold inventory in the region, roughly 23% is standing inventory, while 77% are in some phase of construction.

The overall average price of a new attached home sold in San Diego County fluctuated over the past few years. One quarter the average was reflective of several luxury condo projects selling well and others it was reflective of market dominance by smaller more affordable priced projects. For most of 2014 the average price of a new attached home has been focused in the upper \$490,000's. In the first quarter of 2015 several luxury projects with water orientation dominated and the average climbed to nearly \$658,000. Prices remained focused in the mid-\$500,000's throughout most of 2015 and into 2016. This quarter the average is \$556,205.

Of the 308 net attached sales the first quarter, 43% were priced between \$400,000 and \$500,000; while 22% were priced above \$600,000. While 31% of attached sales occurred under \$400,000 in the second

quarter of 2016, this quarter, 14% of the sales were concentrated in the entry-level price range under \$400,000.

Appraiser's Comments/Conclusion: Multi-family residential has been the hot development commodity for years and this is expected to continue. A density range of between 45 and 105 units per acre with an average density of 75 units per acre (4,125 units total).

A brief summary of the future additions to supply, as of the date of valuation, are:

Civita – under development, approximately 3,500 units remaining

Riverwalk – 4,000 units proposed at an average density of 77 units per acre

LandCap – 275 units to be approved later this year

Dinerstein (Former Bob Baker Ford site) – 305 units approved and under construction; 4,000 square feet of retail space

Alexan Fashion Valley (former Union Tribune Property) – 281 units planned

Friars Road Mixed-Use Project – 319 units (townhomes, apartments, shopkeeper units)

Town & Country Hotel – remodel and new construction with 840 residential units by Holland Partner Group

Recovering market conditions have resulted in developers once again building “for sale” residential condominiums and townhomes or variations other than traditional single family residences. However, the subject property is not as good as a “for sale” housing site as for a “for rent” site.

Hotel

Robert A. Rauch

The following is an excerpt from a 2017 report prepared by hospitality industry consultant, Robert A. Rauch:

San Diego's occupancy and average rates have been growing steadily. San Diego benefits from having a “drive” market so it does not typically get hit as hard as other major markets that rely on air traffic.

In 2017, San Diego will maintain the highest occupancy levels in the last 30 years achieved in 2016 and reach the highest average rates ever.

While 2017 and 2018 will add new hotel supply, San Diego will remain a strong market for the foreseeable future and should be able to hold its overall 77% occupancy for the next few years.

In 2016, occupancy in San Diego County increased 1% to 77% and the average daily room rate grew 3% to \$155. Revenue per available room (RevPAR) moved up 4% to \$120. New hotels that were added in 2016 included 1,017 rooms but based on their opening dates, the 2016 impact (rooms opened)

was less as indicated below; the 2017 impact of properties opening (or already opened) this year is also listed below.

Hotels Opened in 2016	Rooms	Opened in 2016
Springhill Suites Downtown	253	42
Residence Inn Downtown	147	25
Springhill Suites Mission Valley	135	23
Homewood Suites Downtown	160	93
Hilton Garden Inn Downtown	204	119
Homewood Suites San Diego Mission Valley/Zoo	118	30
TOTAL	1,017	332*

* plus 378 rooms from hotels opened in 2015 for a total of 710

Hotels Opening in 2017	Rooms	Opened in 2017
Pendry Hotel Downtown	317	317
Fairfield Inn & Suites San Diego North/San Marcos	116	87
Springhill Suites Carlsbad	103	9
Homewood Suites San Diego Hotel Circle/Sea World	245	143
Residence Inn Chula Vista	148	74
Courtyard by Marriott El Cajon	115	86
TOTAL	1,044	716

The Mission Valley submarket saw occupancy levels of 78% in 2016, up .5% from 2015. Average rates were \$120, up 4% from 2015 and RevPAR was \$94, up by 4.5%. The Mission Valley submarket has seen a fundamental shift away from the older Hotel Circle hotels of the 1970s and 1980s to branded, strong limited-service products and mostly renovated full-service hotels. Demand is driven largely by groups and leisure but has been increasingly gathering corporate business. Mission Valley hotels opened in 2016 included the Springhill Suites and Homewood Suites, opened in early Q2.

In 2017, the Homewood Suites San Diego Hotel Circle/Sea World Area will add 245 rooms to Mission Valley. Demand will exceed this near zero new supply to boost occupancy to 79% with rates up 3% to \$124. RevPAR will increase 4% to \$97.

Hotel Horizons (CBRE Hotels) March – May 2017

According to CBRE:

- ❖ Occupancy will decrease to 75.8%, a decline over the past 4 quarters' rate of 77.1%, but above the long run average of 68.8%
- ❖ ADR growth expectations are weakening, 2.7% vs. the past 4 quarters' rate of 2.8%, and are below the long run average of 3.4%
- ❖ RevPAR growth projections are falling to 1.1% as compared to the past 4 quarters' rate of 3.8%, and are lower than the long run average of 3.8%

- ❖ Supply growth is climbing, 1.5% vs. the past 4 quarters' rate of 1.4%, though it is under the long run average of 1.9%
- ❖ Forecast demand change is falling, negative 0.2% vs. the past 4 quarters' rate of positive 2.4%, and is below the long run average of positive 2.3%

In 2016, San Diego hotels finished the year with a RevPAR gain of 3.8%. This was the result of an increase in occupancy of 1.0% and a 2.8% gain in average daily room rates (ADR). The 3.8% advance in San Diego RevPAR was better than the national average of 3.2%.

San Diego's lower-priced properties finished 2016 ahead of its upper-priced properties in terms of RevPAR growth. The properties in this category attained a 5.0% gain in ADR and saw a 1.2% increase in occupancy. Upper-priced hotels experienced an ADR growth rate of 1.3%, along with a 0.8% gain in occupancy.

Looking towards 2017, San Diego RevPAR is expected to grow 1.1%. Occupancy is forecast to drop 1.6%, while average room rates are projected to increase 2.7%. Revenue is expected to continue to climb in 2018.

San Diego Forecast Summary

YEAR	OCC	Δ OCC	ADR	Δ ADR	REVPAR	Δ REVPAR
2012	70.5%	2.8%	\$132.01	4.5%	\$93.01	7.4%
2013	71.5%	1.5%	\$135.58	2.7%	\$96.96	4.3%
2014	74.5%	4.2%	\$141.92	4.7%	\$105.78	9.1%
2015	76.3%	2.4%	\$150.66	6.2%	\$114.98	8.7%
2016	77.1%	1.0%	\$154.82	2.8%	\$119.33	3.8%
2017F	75.8%	-1.6%	\$159.03	2.7%	\$120.59	1.1%
2018F	75.7%	-0.1%	\$163.22	2.6%	\$123.59	2.5%
2019F	76.0%	0.4%	\$167.13	2.4%	\$127.06	2.8%
2020F	76.0%	-0.1%	\$172.36	3.1%	\$130.96	3.1%
2021F	76.1%	0.1%	\$176.82	2.6%	\$134.55	2.7%

Source: CBRE Hotels' Americas Research, STR, Q4 2016

San Diego Forecast - All Hotels

YEAR	PERIOD	OCC	Δ OCC	ADR	Δ ADR	REVPAR	Δ REVPAR	Δ SUPPLY	Δ DEMAND
2012	Annual	70.5%	2.8%	\$132.01	4.5%	\$93.01	7.4%	-0.4%	2.4%
2013	Annual	71.5%	1.5%	\$135.58	2.7%	\$96.96	4.3%	0.6%	2.1%
2017F	Annual	75.8%	-1.6%	\$159.03	2.7%	\$120.59	1.1%	1.5%	-0.2%
2018F	Annual	75.7%	-0.1%	\$163.22	2.6%	\$123.59	2.5%	2.4%	2.2%
2019F	Annual	76.0%	0.4%	\$167.13	2.4%	\$127.06	2.8%	2.0%	2.4%
2020F	Annual	76.0%	-0.1%	\$172.36	3.1%	\$130.96	3.1%	1.8%	1.7%
2021F	Annual	76.1%	0.1%	\$176.82	2.6%	\$134.55	2.7%	1.8%	2.0%

Source: CBRE Hotels' Americas Research, STR Inc., Q4 2016

San Diego Forecast - Upper-Priced Hotels

YEAR	PERIOD	OCC	Δ OCC	ADR	Δ ADR	REVPAR	Δ REVPAR	Δ SUPPLY	Δ DEMAND
2017F	Annual	77.6%	-2.3%	\$197.64	2.1%	\$153.28	-0.2%	2.2%	-0.2%
2018F	Annual	77.3%	-0.4%	\$202.80	2.6%	\$156.72	2.2%	2.3%	2.0%
2019F	Annual	78.4%	1.5%	\$207.42	2.3%	\$162.66	3.8%	2.3%	3.8%
2020F	Annual	79.0%	0.8%	\$213.66	3.0%	\$168.85	3.8%	2.4%	3.2%
2021F	Annual	79.2%	0.2%	\$219.37	2.7%	\$173.71	2.9%	2.7%	2.9%

Source: CBRE Hotels Americas Research, STR Inc., Q4 2016

San Diego Forecast - Lower-Priced Hotels

YEAR	PERIOD	OCC	Δ OCC	ADR	Δ ADR	REVPAR	Δ REVPAR	Δ SUPPLY	Δ DEMAND
2017F	Annual	73.6%	-0.7%	\$105.95	4.2%	\$77.95	3.5%	0.6%	-0.2%
2018F	Annual	73.7%	0.2%	\$109.13	3.0%	\$80.42	3.2%	2.5%	2.6%
2019F	Annual	72.9%	-1.1%	\$110.27	1.0%	\$80.37	-0.1%	1.6%	0.5%
2020F	Annual	71.9%	-1.3%	\$111.96	1.5%	\$80.53	0.2%	0.9%	-0.4%
2021F	Annual	71.9%	0.0%	\$113.12	1.0%	\$81.33	1.0%	0.6%	0.6%

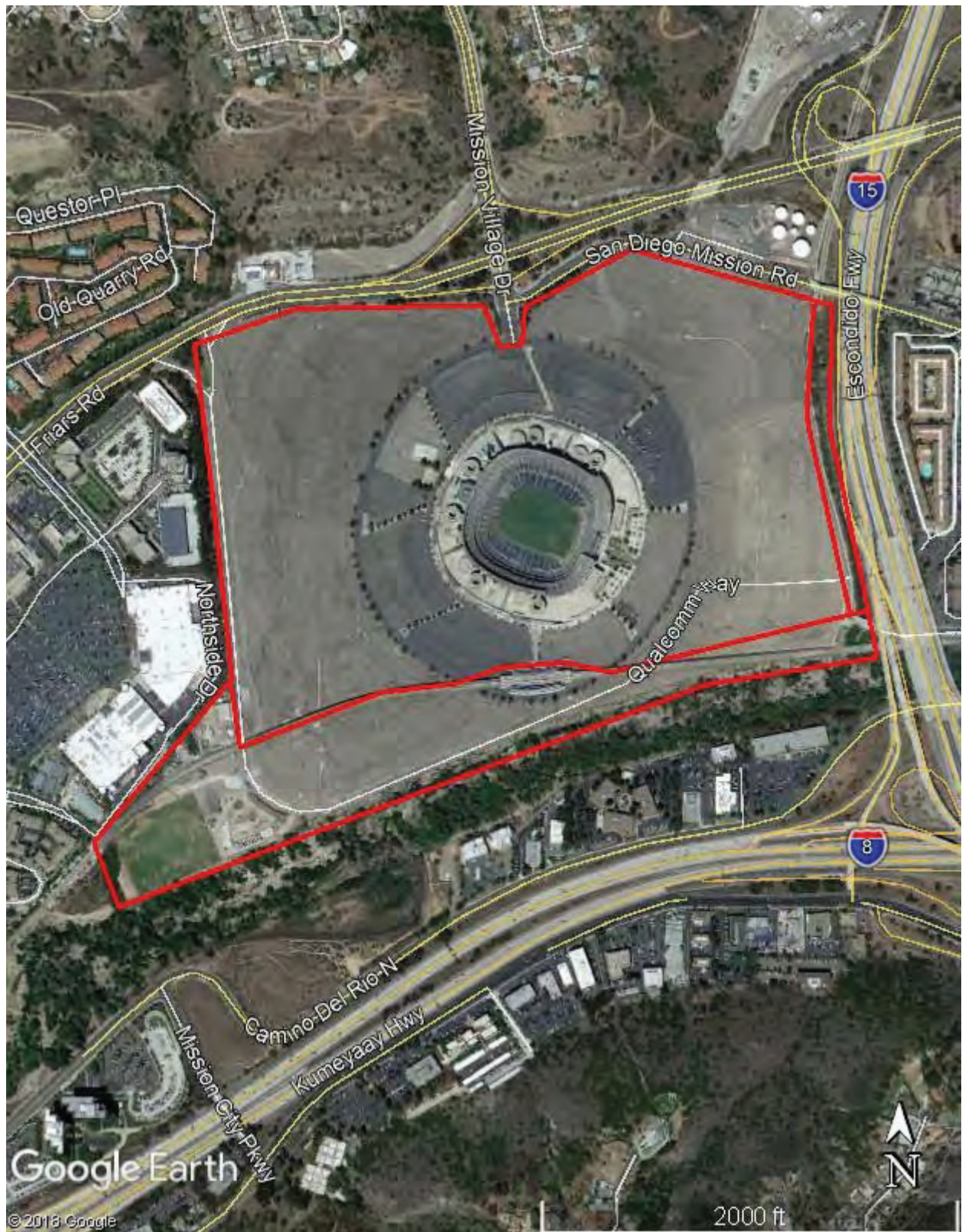
Source: CBRE Hotels Americas Research, STR Inc., Q4 2016

Appraiser's Comments/Conclusion: Mission Valley is an excellent location for hotels and that will continue long term. Although the rate of growth and demand has slowed somewhat, a portion of the subject property is a good site for hotel use. A total of 300 rooms is a reasonable projection consisting of a combination of full service and extended stay formats.

Appraiser's Comments

The subject property is a very large, prominent property of local, regional, national and international notoriety.

AERIAL MAP



SUBJECT PROPERTY PHOTOGRAPHS



Southerly at main entrance



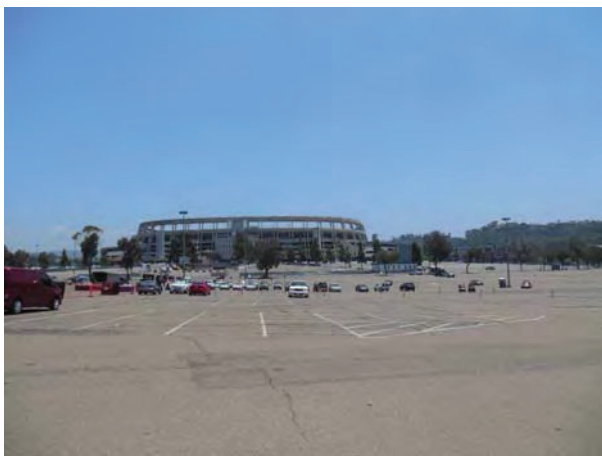
Easterly from under trolley structure



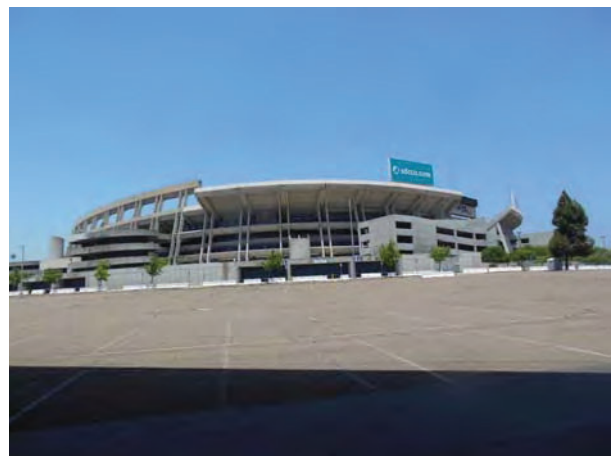
Easterly from Section F



Northeasterly from the southerly portion



Easterly from Section F



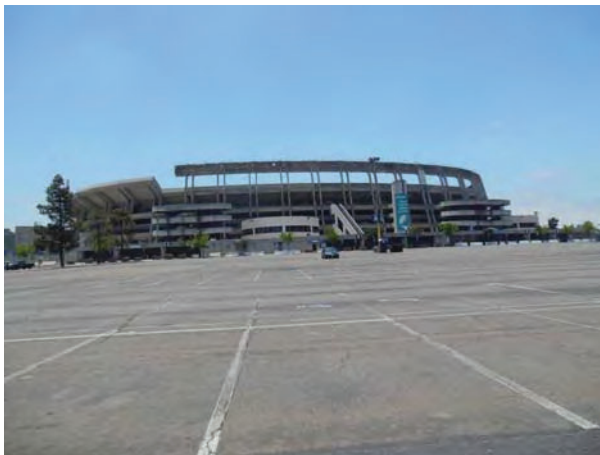
Northerly from under trolley structure



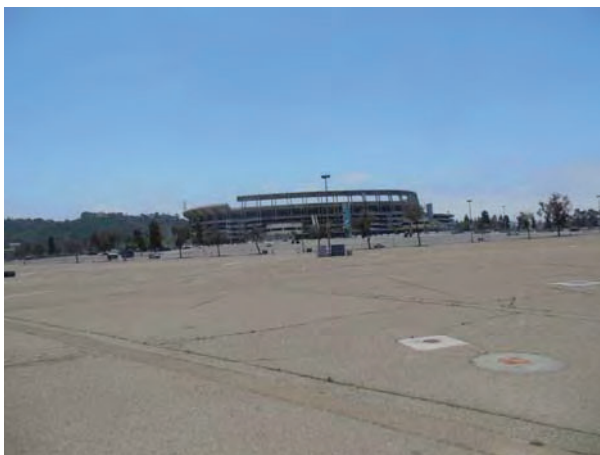
Northwesterly from parking lot



Southwesterly from parking lot



Southwesterly from parking lot

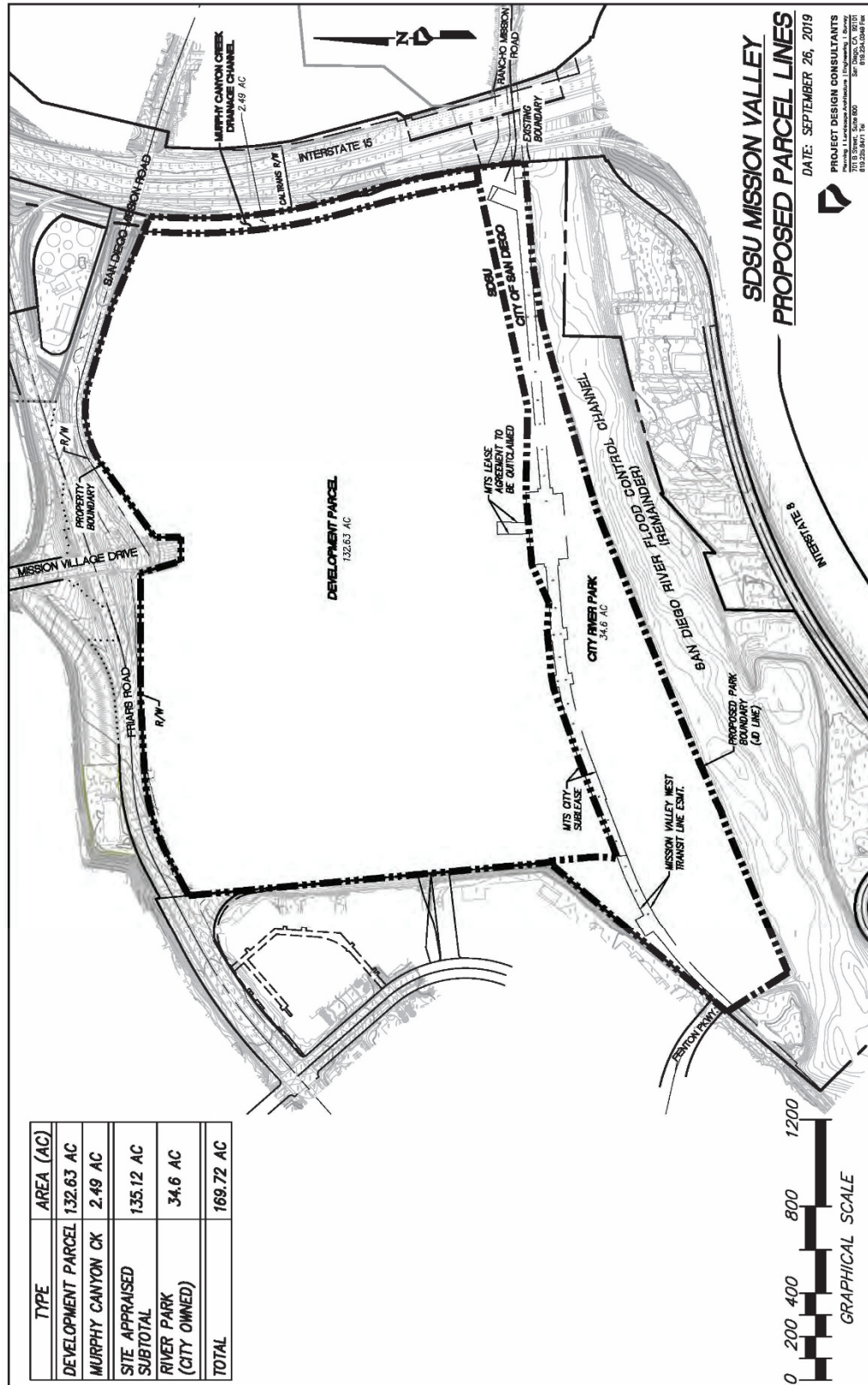


Southwesterly from parking lot

[illegible]

MAP 6837 - STATE FARM SERVICE CENTER
SCC 348 - PHO MISSION REFEREES PARTITION
LS 348 - ROS 4575.6289

25-74
SAN DIEGO COUNTY ASSESSOR'S MAP
BK 433 PG 25



SITE DESCRIPTION

On the previous page, the subject property was shaded in two colors. The light blue shaded portion is the subject property and the purple shaded portion is the River Park.

Physical Characteristics

Land area:	As previously shown, the subject property consists of 135.12 acres.								
Shape:	Irregular (see the plat map on page 48).								
Topography:	The topography of the subject property portion situated below Friars Road generally slopes down from east to west and north to south with the perimeter around the stadium building being built-up to create adequate drainage to the circular road.								
Drainage:	The subject property appears to and is assumed to have an adequately engineered drainage system via slope and storm drains in the streets. No drainage problems were observed during the physical inspection. However, a large portion of the property is situated below the level of the 100-year flood plain (see Flood Hazard Zone section). Also notable is that portions of the subject property have flooded in the past during heavy rains, largely due to blocked drainage channels.								
Off-Sites:	Friars Road is a six-lane major street with asphalt paving, concrete curbs and gutters. San Diego Mission Road is a four lane street with asphalt paving, concrete curbs and gutters and partial sidewalks.								
On-Sites:	On-site utilities primarily consist of sewer, water, electrical and telephone lines (and the easements for such), to service the stadium. These services will have to be relocated to accommodate proposed development (see Utilities section below).								
Utilities:	<p>The utilities are existing in the area, are underground and provided as follows:</p> <table><tr><td>Gas & Electric:</td><td>San Diego Gas & Electric</td></tr><tr><td>Telephone and Cable:</td><td>AT&T and others</td></tr><tr><td>Sewer:</td><td>City of San Diego</td></tr><tr><td>Water:</td><td>City of San Diego</td></tr></table>	Gas & Electric:	San Diego Gas & Electric	Telephone and Cable:	AT&T and others	Sewer:	City of San Diego	Water:	City of San Diego
Gas & Electric:	San Diego Gas & Electric								
Telephone and Cable:	AT&T and others								
Sewer:	City of San Diego								
Water:	City of San Diego								

The existing water system is fed from a 16-inch city of San Diego public water main located in Friars Road west of the site. It enters the site in the northeastern portion and continues southerly near the eastern site boundary. Twelve-inch and 10-inch lines come off this main line and tie into multiple services. Replacement of the on-site distribution system will occur with redevelopment due to the materials and age of the infrastructure.

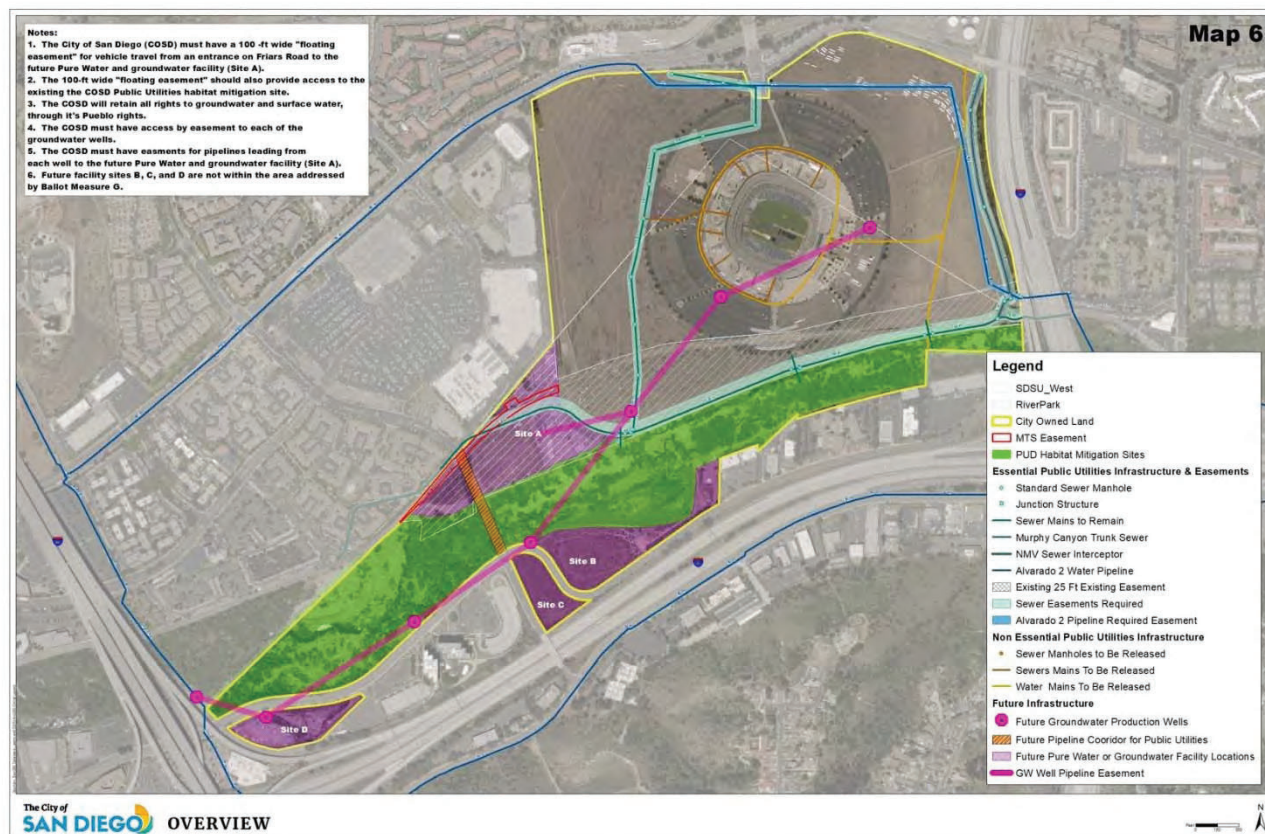
The existing wastewater system exits the subject property at seven locations through eight-inch and six-inch pipes which feed into an 18-inch pipeline on the west side of the existing stadium. Rerouting and installation of new pipes would be required for development.

The existing electrical service is fed from two, 12-kilovolt electrical services which come into the site from the north and an alternate, or backup service, comes in from the southwest. It is unknown, but doubtful whether or not, these services would be adequate for future development and they will likely be upgraded during redevelopment construction.

The existing natural gas service to the subject property is fed from one, two-inch high-pressure gas line that is fed from a 3-inch high-pressure gas line located in Friars Road. This line enters on the west side.

Existing communication systems include telephone facilities owned by AT&T and fiber-optic facilities owned by AT&T and Cox Communications. They will likely be upgraded and extended during development.

As previously noted, the feasibility of utility relocations into the proposed on-site street right of ways is an important concern. In addition to the proposed Clean Water program wells, there are existing sewer lines which will need to be abandoned and relocated via new construction. A study of the feasibility of such was not submitted for review. The sewer lines are also depicted on the following drawing:



Soil Conditions:

An executive summary from a soils report prepared by Group Delta as of May 6, 2019 was submitted for review. The conclusions reference the need for deep foundations due to the potential for liquefaction (see previous discussion). The appraisal assumes that there are no undisclosed environmental and/or adverse subsoil conditions or contaminants that will have any impact on development cost, use, marketability, or value of the property.

Access & Exposure:

Onsite ingress and egress is provided from Friars Road and San Diego Mission Road. Freeway access is nearby but is somewhat complicated (see Aerial Photograph).

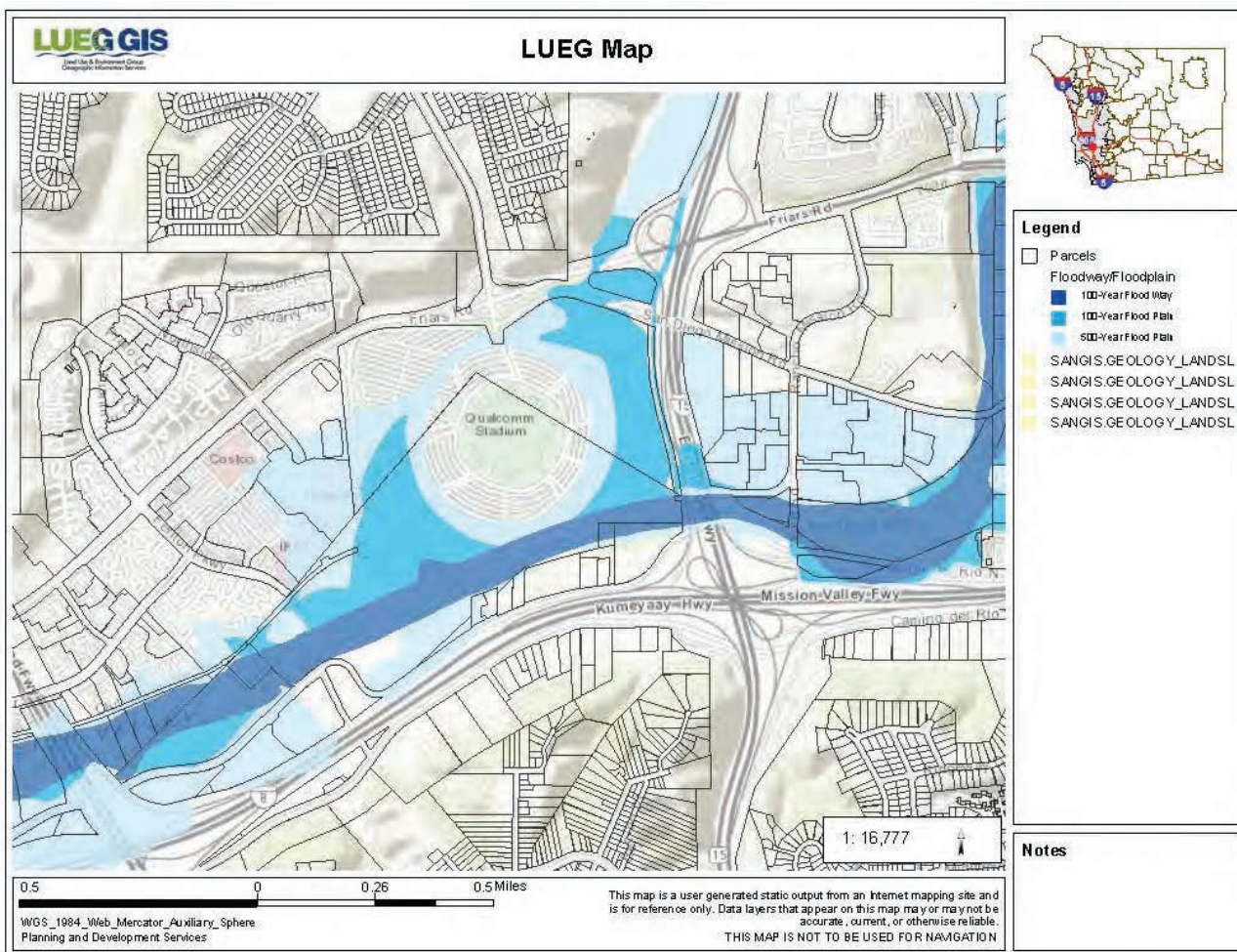
The sheer size of the site makes it visible from Interstate 15 and Interstate 8 and from perimeter streets.

Existing Improvements:

A 71,500 seat stadium and commensurate support facilities. There are also several other small buildings and improvements at the southwest corner near a practice field (see photographs).

Legal Characteristics

- Tax Data:** The subject property is owned by the City of San Diego, a public agency not subject to property taxes. The property tax rate for one of the Mission City office buildings to the west (APN 433-280-16) indicates that the subject property is in tax rate area 08217 with a tax rate of \$1.17432 per \$100 of assessed value for 2016-17 fiscal year. That property is also subject to the standard County-wide special assessments for Mosquito Surveillance, Vector Disease Control, MWD Water Standby and CWA Water Availability.
- Flood Hazard Zone:** At least 50% of the subject property main site area is located in a flood hazard area, zones AE and X, according to the flood insurance maps prepared by the National Flood Insurance Program. Zone AE areas have a 1% probability of flooding every year (also known as the "100-year floodplain"), and have predicted flood water elevations above mean sea level that have been established. Properties in Zone AE are considered to be at high risk of flooding under the National Flood Insurance Program (NFIP). Zone X are areas have a 0.2% probability of flooding every year (also known as the "500-year floodplain") and are considered to be at moderate risk of flooding. The Community Panel No. is 06073C-1636-H, dated May 16, 2012. The portions in the flood zone are located along the southern portion and up into the east and westerly portions. For future development, portions of the site will have to be raised at least two feet above the level of the floodplain (see previous discussion).



Earthquake Zone: The property is not located in an earthquake study zone, as indicated under the Alquist-Priolo Earthquake Fault Zone, as determined by the State Geologist. However, according to the State of California Earthquake Fault Zone Map, the subject property is situated in close proximity to fault lines and concealed fault zones as shown on the maps in the Addendum, Exhibit C.

Toxic Hazards: A toxic hazard site assessment report was not submitted for review. Therefore, it is assumed that there are no toxic hazards on site that inhibit development of the property to its highest and best use or have any impact on the development cost, use, marketability or value of the property.

However, the property has a long history of contamination-remediation issues from the nearby Kinder-Morgan owned tank farm north of the easterly portion and miscellaneous spills. There were numerous groundwater monitoring wells associated with this case that are installed in the Stadium parking lot. It is an assumption of this appraisal that there is no environmental contamination.

Existing drainage is directed into three separate on-site storm drain systems. One system drains the western half of the parking lot, one system drains eastern

half of the parking lot and one system drains the internal footprint of the existing stadium. Modifications would be required during development. There would also be storm water runoff issues pursuant to state and local regulations.

Demolition of the Stadium would require abatement for asbestos-containing materials, lead-based paint, and other hazardous materials. The 2015 environmental impact report recommends that the implosion method be used, but that was in consideration of a new football stadium being already completed nearby. The implosion method saves time and has also been used as a marketing and promotional tool. However, the implosion method creates significant dust and potential environmental issues, especially considering the proximity to the San Diego River and its habitat.

An executive summary from an environmental investigation report prepared by Group Delta as of May 7, 2019 was submitted for review. The conclusions reference the need for additional testing during grading, import and compaction and the need for vapor barriers under slabs. Also mentioned was the abandonment of monitoring wells pursuant to the closure of the Kinder Morgan remediation.

Encroachments: There were no signs of visible encroachments on the subject property during the field inspection. However, the appraiser is not a qualified surveyor or engineer and it is assumed that no encroachments exist and the property boundaries coincide with those shown on plans and documents provided for review.

Easements: A preliminary title insurance report was not submitted for review. Therefore, the appraisal assumes that there are no covenants, conditions, restrictions, liens or easements that will have any impact on the development cost, use, marketability or value of the property.

Notable is that there is an easterly-westerly easement for the San Diego Trolley along the southerly portion of the property (easement square footage unknown).

Additional access, road and utility easements are shown on a preliminary A.L.T.A.-N.S.P.S. property survey prepared by Rick Engineering as of March 20, 2019. It is assumed that these easements can be relocated to facilitate development.

Zoning and Community Plan: The majority of the land is zoned Mission Valley Planned District: MV-CV (MVPD-MV-CV). In addition, zone designations accommodate open space (and floodplain), residential, regional serving auto oriented and high intensity pedestrian oriented commercial uses. These zoning designations act as guides under the current Community Plan, but entitlement of the subject property during the community plan update will likely alter the zoning to accommodate mixed-use development. An update to the Plan kicked-off in June 2015 in what

was anticipated to be a three-year process and, as of the effective date of valuation, was scheduled to go before the City Council for approval in November 2018. (The City Council voted to approve the Community Plan Update on September 10, 2019).

On the basis of highest and best use and given that the Community Plan is being updated, the subject could begin its entitlement track as part of that effort, which would change the applicable zoning designation to Specific Plan. (See previous discussion on page 27.)

The subject property is zoned MV PD-MV-CV which is consistent with the current Mission Valley community plan and is intended to provide for office, hotel and retail commercial uses. According to the Mission Valley Planned District ordinance (MV PDO), the MV-CV zone is applied to properties within the commercial recreational land use designation to primarily accommodate lodging, dining and shopping needs of visitors and to provide recreational uses. A small section at the southwest corner is zoned Multi-Use/Specific Plan (MV PD-MV-M/SP). This zone is to provide for pedestrian oriented projects containing at least three functional and physically integrated land uses.

The subject property is also located within the Transit Area Overlay Zone which reduces off-street parking requirements in areas that receive a high level of transit service properties within the transit area overlay zone are subject to supplemental parking regulations.

The City of San Diego has an onsite park requirement of 2.8 acres per 1,000 people in the community. Theoretically, a new residential project will add people to the community at the same rate. The Mission Valley Community has 1.85 persons per household as shown in the San Diego Association of Government's (SANDAG) most recent estimates. The amount of park space required onsite is based on the following formula:

$$((\text{average number of persons per household} \times \text{projected number of units}) \times 2.8 \text{ acres}) / 1,000$$

Also required is a buffer zone on the north side of the San Diego River, which can be part of a passive park (the River Park). There will also be a community recreation center of 20,000 square feet and a swimming pool also situated on park land, which will be constructed by the City in the future.

The subject property is located within the Airport Influence area identified in the Airport Land Use Compatibility Plan (ALUCP) for the Montgomery Field general aviation airport. It is located in Review Area 2 which involves a review of air space protection or overflight compatibility. Montgomery Field is approximately two miles north of the subject property and nearly 360 feet higher in elevation. The subject is also within the Federal Aviation Administration (FAA) Notification Area for Montgomery Field. However, the subject property is not in a safety zone.

HIGHEST AND BEST USE

Highest and best use is defined in the Appraisal of Real Estate, (14th Edition, 2013) as:

"The reasonably probable and legal use of vacant land or an improved property, which is physically possible, appropriately supported, financially feasible, and that results in the highest value."

Proper appraisal practice requires that estimate be made of the highest and best use as vacant, and improved.

As If Vacant

The sheer size of the site presents significant challenges as, physically, it is one of the largest sites in central San Diego and more than large enough to accommodate a wide variety of uses including all permitted under the zoning regulations. The current zoning provides for mixture of uses and, under an entitlement effort that would begin during a Community Plan update, a broad array of other uses could also be permitted, including eating and drinking establishments, hotels, offices, residential uses, live/work spaces, and parking facilities. A buyer would consider the Community Plan Update in process.

Residential

Apartments are the hot item and have been for the past eight years. Single family residential is not a use that would support a sufficient residual land value when compared to multi-family. Mission Valley is a great location for multi-family residential for which increased density is not only encouraged but a practical reality based on the dwindling land supply. The continued lack of new construction to keep pace with population growth is supporting the planning of new units. Also, the subject property is three San Diego Trolley stops away from San Diego State University so student housing is also a potential residential use. Attached multi-family for sale housing was also becoming viable as of the effective date of valuation.

In 2017, the multi-family residential market was increasing and planning officials began to encourage higher density. In 2018, such encouragement was more formalized with revisions to the zoning regulations and reduced parking requirements. In March 2019, the City Council voted to remove minimum parking requirements for multi-family projects near public transit. Although the subject property is in a public transit location, the market has not yet accepted the increased density available in 2019 let alone having accepted it as of September 2017.

To achieve the target density of 75 units per acre, the likely density range would be 50 to 110 units per acre. A density of 75 units per acre is an increase in the density of current projects in Mission Valley but is still well below the typical density for new projects downtown. Recreating downtown densities is not financially feasible in Mission Valley, but increased density was being encouraged by the City planning staff in 2017.

Office

Economically, market conditions continue to improve for office uses, especially the Class A segment. Research and development and creative space is a potential use, but the subject location is not as good

for such uses as other neighborhoods/districts such as Sorrento Mesa and, more recently, Downtown. There have been no new office additions to the Mission Valley Class A submarket since 2007 and only one under renovation (Ampersand-former Union Tribune site). Class A office space is definitely a viable use in the future. A planned community project such as the subject warrants construction of a Class A quality office project estimated to be 450,000 in a 15-story building featuring 30,000 floor plates or two, 225,000 square foot buildings of seven and eight stories.

A Class A quality medical office use of 50,000 square feet in the form of a PPO or HMO-type health care provider facility is also needed in Mission Valley and would likely be constructed on a build to suit basis.

Retail

Retail space is often constructed at ground level as part of mixed-use projects (like in Downtown), and that is a necessity at the subject property. However, the zoning requirement that mandates ground floor retail space in Downtown has resulted in some market saturation. Mission Valley has a plethora of destination oriented regional, community and big box retail and there will be significant competition from retail space proposed at Civita and Riverwalk. Community serving retail is the appropriate choice to handle the needs of the residential community onsite and the convenience needs of those working onsite. The River Park is also a retail demand generator. The main concentration of this element was projected as a 30,000 square foot center near the trolley stop and an additional 30,000 square feet would likely be situated on the ground floors of selected office and residential buildings elsewhere in the project.

Hotel

A hotel is also a must have element for a mixed-use project on the subject's scale due to the central location, access and proximity to amenities and meeting facilities. Although the full service segment is somewhat out of vogue now, knowledgeable market participants report that a hotel element of approximately 300 rooms split into two segments, full service and extended stay would be appropriate. The two projects could be developed by the same company or by different companies. The full service hotel could contain retail space and restaurants that could add to the overall project appeal.

Non-Revenue Producing Uses

As with any large, mixed-use development, there will be a significant amount of open space, parks and uses benefitting the community. Some of this is due to the requirements of the San Diego River Conservancy Master Plan and economics regarding how much of the site to raise above the level of the flood plain. A relatively low net to gross yield of 58.8% results in 89.75 acres for such uses, which was considered adequate.

Conclusion

After considering legal, physical, political and economic characteristics and influences, the highest and best use of the subject property, as if vacant, is for construction of a mixed-use project featuring residential, retail, office and hotel components and commensurate onsite parking and amenities. The highest and best uses conclusion meets the four tests as follows:

Legally Permissible:

Multi-family residential, office, retail and hotel uses would be approved under a specific plan zoning designation pursuant to a community plan amendment or a proposed mixed-use project at the subject property as identified in the community plan and designated as such during processing.

Physically Possible:

There are numerous other nearby properties improved with or proposed for similar uses in standalone form or in mixed-use projects.

Financially Feasible:

All the uses permitted under the existing zoning regulations and those needed to facilitate mixed-use development are financially feasible.

Maximally Productive:

Of the uses that are legally permissible, physically possible, and economically feasible, the maximally productive use is to construct a mixed-use project, phasing development timing to accommodate market conditions.

As Improved

The subject site is improved with a 71,500 seat multi-purpose stadium and related improvements initially completed in 1967 (and remodeled over the subsequent years). The Stadium is assumed to be non-operational in this appraisal. Other improvements are also assumed to be inconsequential in the valuation except that they are considered in the demolition and site preparation estimate. The highest and best use as improved is to secure the stadium and hold for demolition to begin redevelopment of the site.

VALUATION SECTION

VALUATION METHODOLOGY

The subject property valuation will be accomplished by using the Sales Comparison Approach and the Income Approach (Development Method).

In the Sales Comparison Approach recent comparable sales are analyzed on a comparative unit basis. Typically, residential land is analyzed on the basis of price per acre, lot or unit basis and non-residential properties on the basis of price per square foot or acre. After consideration of the individual comparable sale unit price indications, concluded unit prices are applied to the subject property components for indications of value.

The Development Method is, typically, a residual approach for estimating the value of land. The usual application is to raw, un-subdivided land by deducting the direct expense of development such as cost of streets, utilities, sales, advertising, and overhead (taxes, carrying charges, inspection) from the estimated gross selling price. Profit and "time lag" (interest on the money invested for the time needed to complete the project) are also deducted, after which the land value is indicated.

The Sales Comparison Approach was used to value the various uses that will ultimately comprise the revenue component of the stadium site portion of the property. Subsequently, the Development Method was used to value the 135.12 acre property.

The Income Approach has its foundation in the principle of anticipation, which states that value is created by the anticipated benefits (income) to be derived in the future. Typically, the Income Approach utilizes Direct Capitalization in which the net operating income is divided by the appropriate overall capitalization rate and/or Discounted Cash Flow Analysis in which a discount rate is applied to the projected net income stream. The Development Method utilized Discounted Cash Flow Analysis.

The Cost Approach is based on the proposition that the informed purchaser would pay no more than the cost of producing a substitute property with the same utility as the subject property. The Cost Approach was not completed as the residual land value exceeds the value as improved with the Stadium.

SALES COMPARISON APPROACH

The Sales Comparison Approach to value involves the comparison of the subject property with recent sales of comparable properties and then isolating pertinent units of comparison which can be applied to the subject. The sale price per acre, lot/unit or per square foot are typically the units of comparison utilized.

The subject property has several unique characteristics. It is a large property in which a planned community will be developed, but with the market continuing to move toward multi-family residential development. It also has elements of an “infill” site in a great location for development with medium to high-density residential units and retail, office and hotel uses in a village atmosphere.

Lacking sufficient comparable sales of large, unentitled raw land parcels, the best approach to valuing the subject property is to value each of the likely future uses (residential, retail, office and hotel) and blend those indications into an average value per square foot.

The following is a summary of the component valuations:

Multi-Family Residential

The type of high quality multi-family residential development at a density averaging 75 units per acre envisioned for the subject is more representative of what is being built in greater downtown and other communities adjacent to Downtown or between Downtown and Mission Valley. Downtown has numerous high density multi-family projects. Mission Valley has not yet experienced an influx of high density projects, but the Planning Department was encouraging higher densities in the future and the new community plan will allow for such.

In this section, the primary data used for the valuation was from greater Downtown. Applicable recent and historical sales in Mission Valley are also presented to assist in supporting the conclusions at the lower density range.

The following is a summary of the residential land data. Location maps are included in the Addendum (Exhibit C).

Summary of Comparable Residential Multi-Family Land Data

No.	Buyer/Seller/ Project/Location/APN	Date Closed Doc. No.	Sale Price	Net Acres (Sq. Ft.)	Price PSF	Price Per Unit No. of Units Density	Comments
1	T&C Lot 3, LLC/Hotel Circle Property, LLC 800 Hotel Circle North San Diego (Mission Valley) 437-260-18, 19, 20, 21, 27 (portions)	9/18 4/17 escrow 404361	\$74,850,000	7.694 (335,151)	\$223.33	\$89,107 840 109.2 du/ac	Entitled; 17 month escrow period; Holland Partner Group project; 840 residential units; demo existing structures approximately 200,000 sq. ft.; part of Town & Country Hotel remodeling project
2	Normal Heights CIC, LP/City Heights Hosp., Inc. 3803 El Cajon Boulevard San Diego (Normal Heights) 447-201-15, 16, 17	11/17 551306	\$2,600,000	0.515 (22,433)	\$115.90	\$50,000 52 101.0 du/ac	Unentitled; long escrow period (not disclosed); senior homeless veteran housing project with underground parking
3	Fashion Valley Apts., LLC/Mary Anewalt Perrine 123 Camino De La Reina San Diego (Mission Valley) 437-260-38, 39, 40	10/17 4/16 escrow 484305	\$18,000,000	4.920 (214,315)	\$83.99	\$62,937 286 58.1 du/ac	Unentitled; 18 month escrow period; Alexan Fashion Valley project; 284 residential units; 8,150 sq. ft. office; 3,145 sq. ft. restaurant and six-level parking structure; demo three existing office bldgs. (68,983 sq. ft.)
4	Diversyfund Park Blvd, LLC/T-Huy Investm., LLC 3922-3932 Park Boulevard San Diego (Uptown) 445-642-12	6/17 296607	\$3,650,000	0.353 (15,377)	\$237.37	\$61,864 59 167.1 du/ac	Unentitled; mixed-use plan 58 apartments (5 affordable) and 5,000 sq. ft. of retail (7 units); demolition \$50,000
5	WCOT Broadstone North Park, LLC/CHW Arizona Street Dev., LP 4220 Arizona Street north side of Howard Avenue from Arizona Street to Texas Street San Diego (North Park) 445-412-14	7/15 392569	\$7,113,500	1.210 (52,708)	\$134.96	\$60,284 118 97.5 du/ac	Entitled; incl waiver of afford housing requirement satisfied by adjacent project; (1:600 SF land), but subject to bonuses; 3- and 4-story apartment buildings over 2 levels of parking, some below grade and some on grade; Inclusionary housing fee would have been \$9.85/SF 151 sp x est. 325 SF/sp = 49,075; 49,500 sq. ft. demo
6	The Boulevard/Fenton/Am. Prop Adv. 2030 El Cajon Boulevard (north side between Florida and Alabama Streets San Diego (North Park) 445-323-15, 19, 20, 21 23, 33, 34, 35 (now 33)	9/14 390180	\$7,700,000	1.540 (67,082)	\$114.78	\$46,667 165 107.1 du/ac	Entitled 77 (1 BR) 84 (2 BR) 4 (MU) Podium: 7-story, 5-apts. 2 retail, ST parking 135 units Courtyard: 3-story, at grade parking, 30 units 140,759 sq. ft. bldg.
7	Murfey Apartments/Murphey/Acadia 4021 8th Avenue NEC Washington Street and 8th Avenue San Diego (Hillcrest-Uptown) 444-560-29	8/14 346910	\$2,000,000	0.360 (15,682)	\$127.54	\$55,556 36 100.0 du/ac	Entitled 28 (1BR), 8 (2BR) 4-story apartments over parking at grade 62,200 sq. ft. bldg.
8	Mr. Robinson Apartments/Segal/Le Chau 3752 Park Boulevard NWC Robinson Avenue San Diego (Hillcrest-Uptown) 445-362-10 and 11 (now 34)	6/14 249513	\$1,800,000	0.383 (16,683)	\$107.89	\$58,065 31 80.9 du/ac	Entitled 29 loft units 1,000 - 1,600 sf 2 Retail Commercial 1,200 sf and 2,600 sf 6-story, 46,626 sq. ft. bldg.
9	The Guild on 30th/McNamara/King Family Trust 1021 30th Street NEC Broadway & 30th Street San Diego (Golden Hill) 539-542-25, 26	4/14 138390	\$1,165,000	0.321 (14,000)	\$83.21	\$50,652 23 71.7 du/ac	Entitled; for 16 apartments; 1 unit/600 SF 50' ht limit; could have gotten 23 units, but elected to do 15; 3-story townhouses: 1BR+loft, 2BR+office individual garages, surface 77,431 sq. ft. bldg. above grade

Comparable 1 is a 7.694 acre portion of the Town & Country Hotel project which is undergoing an extensive renovation, including new residential units being built by Holland Partners. The site was purchased entitled.

Comparable 2 is an unentitled .515 acre site located south of the subject in Normal Heights. The transaction had a long escrow and a senior homeless veteran housing project was planned.

Comparable 3 is an unentitled 4.92 acre site located west of the subject in Mission Valley. The transaction had a long escrow and a relatively low density mixed-use project featuring apartments, office and restaurant space. The buyer paid for demolition of the existing improvements.

Comparable 4 is an unentitled .353 acre site located south of the subject in Uptown. It was planned for a higher density mixed-use project featuring apartments and retail space.

Comparable 5 is a 1.21 acre site located on the north side of Howard Avenue between Arizona Street and Texas Street. It closed escrow entitled and included a waiver of an affordable housing requirement that was satisfied by an adjacent project. The design features three and four-story apartment buildings over two levels of parking, some below and some on grade.

Comparable 6 is a 1.54 acre site at an interior location on El Cajon Boulevard in North Park. It closed escrow entitled for 165 units of which 161 are residential and four are mixed-use. A seven-story podium building will contain 135 units and 30 units will be contained in a three-story building.

Comparable 7 is a .360 acre site located at the northeast corner of Washington Street and 8th Avenue and Hillcrest. It closed entitled for 36 residential units and a four-story building to be constructed over parking at grade.

Comparable 8 is a .383 acre site located at the northwest corner of Robinson Avenue and Park Boulevard in Hillcrest. It closed escrow entitled for 29 loft units and two retail-commercial spaces proposed in a six-story building.

Comparable 9 is a .321 acre site located at the northeast corner of Broadway and 30th Street in Golden Hill. At the close of escrow the property was entitled for 16 apartments but the buyer could have gotten and approval for 23 units and elected to build 15 townhomes with lofts and office spaces.

The comparables above are supplemented by the following additional historical comparables from Mission Valley:

NO.	PROPERTY/LOCATION/APN	CLOSING DATE CONTRACT DATE	DOC. NO.	SALE PRICE	NET ACRES (SQ. FT.)	UNITS	SALE PRICE PSF	PER UNIT	UNITS PER ACRE	ENTITLEMENT
1	Quarry Falls (Civita) - Shea Homes Northwest corner of Civita Boulevard and Via Alta San Diego (Mission Valley) 677-220-40	11/10		\$24,000,000 (including credits)	9.500 (413,820)		\$58.00	21.1		Graded super pad with utilities stubbed onto property; buyer to process Substantial Conformance Review within approved Specific Plan
		4/10			200		\$120,000			
			609560							
2	Pacific Ridge-Carmel Partners 5961 Linda Vista Road San Diego (Bay Park-Linda Vista) 436-430-05; 437-430-01	11/10		\$41,000,000	13.920 (606,355)		\$67.62	38.3		"Shovel ready" project with plans, some grading, fees paid, but not building permits
		9/10			533		\$76,923			
	The Irvine Company 436-430-05	2/08	591414	\$50,000,000	13.280 (578,477)		\$86.43	40.1		Closed entitled
		12/07			533		\$93,809			
	The William Lyon Company 436-430-05	4/07		\$65,000,000	13.280 (578,477)		\$112.36	40.1		Closed entitled
		7/04			533		\$121,951			
3	Quarry Falls (Civita) - New Home Co. North side of Franklin Ridge Road at Via Alta San Diego (Mission Valley) 677-440-08, 22	4/16		\$31,000,000	6.330 (275,735)		\$112.43	21.0		Entitled (SCR); gross site area 8.775 acres but 2.445 acres is slope
		NA			133		\$233,083			
			203917							
4	Quarry Falls (Civita) - Shea Homes East of Via Alta north of Civita Blvd. San Diego (Mission Valley) 677-410-53	1/15		\$9,000,000	2.530 (110,207)		\$81.66	26.1		Entitled (SCR); Lucent Condominiums Phase 2; site remapped from 3.15 acres in two parcels
		NA			66		\$136,364			
			21062							

Comparable 1 is the first of two, "historical" sales in Mission Valley and the first guest builder sale in the Civita planned community. It consists of a portion of the Terrace residential component of that project. CoStar Group reported the price as \$23,000,000 but Marco Sessa of Sudberry Properties, the project manager, reported that the price was approximately \$24,000,000 based on reimbursements for fees and credits.

Comparable 2 is the former University of San Diego (USD) High School property which was sold or was under contract several times between 2004 and 2010. The price differentials reflected market conditions and the changing highest and best use. The location is in west Mission Valley overlooking USD and there are also distant ocean views. The completed apartment project sold in April 2017 for \$232 million or \$435,272 per unit.

Comparables 3 and 4 are more recent guest builder sales at Civita. Comparable 3 was acquired by the New Home Company and is proposed for a high quality project as is evident from the sale price per square foot.

Comparable 4 is another acquisition by Shea Homes which will comprise Phase 2 of its Lucent condominium project (see Comparable 1 for Phase 1 sale).

Adjustments

For purposes of estimating the gross sales for this portion of the subject property, the assumed condition is as entitled finished lots. The following is a summary of the adjustments to the land sales:

Property Rights:

The fee simple interest was transferred in all the sales, so no adjustments were required.

Financing:

All sales were cash or cash equivalent; therefore, no adjustments were required.

Property Condition:

If the amount of the demolition cost was not given, an allowance of \$10.00 per square foot was applied to the building square footage of the comparables that were improved. In addition, if other extraordinary costs were disclosed, they were also adjusted.

Expenditures Made Immediately After Purchase:

A knowledgeable buyer considers expenditures that will have to be made upon purchase of a property because these costs affect the price the buyer agrees to pay. Such expenditures may include costs to petition for a zoning change or costs to remediate environmental contamination.

No adjustments were necessary for such costs.

Conditions of Sale:

The Comparables that sold as unentitled properties were adjusted upward 20% as the subject is being appraised assuming it is entitled. Development costs will be considered later in the analysis.

There were no extraneous motivations or other items that would influence the conditions of the sale for the remaining transactions.

Changes In Market Conditions:

Multi-family residential market conditions have been strong (see the Market Conditions section). According to SDCAA, the average apartment rents in San Diego County increased 13.6% between the Fall of 2015 and the Fall of 2016. The 13.6% increase was also projected for 2017. For 2015, the 13.6% annual increase was used, (calculated monthly), and prior to that, an annual 10% increase was used, (calculated monthly).

Fees:

The applicable development fees for each community in the year of sale were compared to those applicable in Mission Valley for fiscal year 2017 and adjusted accordingly.

Size:

Traditionally, smaller commercial sites sell for higher prices per square foot. However, for multi-family residential properties, there are economies of scale that work in reverse, making larger properties more valuable. Adjustments were made based on appraiser's experience and discussions with knowledgeable market participants.

Configuration:

The subject property is assumed to have a rectangular configuration. Adjustments were made based on appraiser's experience and discussions with knowledgeable market participants.

Specific Location:

The subject property base for adjustment purposes was assumed to a full block, which was considered slightly superior (5% adjustment) to corner lots or lots with three-street frontage. Interior lots were adjusted upward 10% based on appraiser's judgement and discussions with knowledgeable market participants. A full block configuration also allows more design/layout flexibility, thus considered superior.

General Location:

The differences in average rents published by SDAA by Postal Zip Code previously shown were used as a guide in the specific location adjustments as follows:

Location Postal Zip Code	BR Count	Spring 2017			Fall 2017			Spring 2018		
Mission Valley 92108	Studio	\$0			\$0			\$0		
	One	\$1,861			\$2,019			\$1,951		
	Two	\$1,981			\$2,390			\$2,482		
	Three +	\$2,388			\$2,949			\$3,237		
			\$1,921			\$2,205			\$2,217	
Normal Heights 92116	Studio	\$813			\$870			\$837		
	One	\$1,119			\$1,197			\$1,136		
	Two	\$1,423			\$1,480			\$1,321		
	Three +	\$0			\$2,665			\$2,388		
			\$1,271	51%		\$1,339	44%		\$1,229	56%
Hillcrest-Uptown 92103	Studio	\$954			\$1,037			\$1,180		
	One	\$1,293			\$1,314			\$1,394		
	Two	\$1,751			\$1,778			\$1,880		
	Three +	\$2,518			\$0			\$2,034		
			\$1,522	26%		\$1,546	24%		\$1,637	17%
North Park 92104	Studio	\$625			\$671			\$1,139		
	One	\$1,136			\$1,186			\$1,318		
	Two	\$1,379			\$1,433			\$1,520		
	Three +	\$1,367			\$1,818			\$1,184		
			\$1,258	53%		\$1,310	47%		\$1,419	35%
Golden Hill 92102	Studio	\$832			\$1,200			\$900		
	One	\$1,125			\$1,453			\$920		
	Two	\$1,168			\$1,612			\$1,297		
	Three +	\$1,309			\$2,000			\$0		
			\$1,147	68%		\$1,533	25%		\$1,109	73%

The above differences in average rents for one- and two-bedroom units were used to guide the adjustments. Since not all locations had owners of studio or three+ bedroom units who responded, only the rents for one and two-bedroom units were used. Notable is that the differences above also include quality and age, so they were used as guidelines only.

Adjustment Grid

The adjustment grid was prepared at the hypothetical overall average of 75 units per acre, in an average block of 317 units on an average of 4.231 acres. The following is a summary of the adjustments to the land sales, (note, the Excel program rounds to the nearest dollar):

Multi-Family Residential	Holland Partner Group 1	The Lofts at Normal Heights 2	Alexan Fashion Valley 3	Diversyfund, Inc. 4	4220 Arizona Street 5
Subject Property					
Sale Price	\$74,850,000	\$2,600,000	\$18,000,000	\$3,650,000	\$7,113,500
No. of Units 317	840	52	286	59	118
Price Per Unit	\$89,107	\$50,000	\$62,937	\$61,864	\$60,284
Property Rights Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0	\$0	\$0	\$0	\$0
Financing Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0	\$0	\$0	\$0	\$0
Property Condition \$0	\$0	\$0	\$0	\$0	\$0
Comparison	\$2,381	\$0	\$2,412	\$847	\$4,195
Adjustment	\$2,381	\$0	\$2,412	\$847	\$4,195
Expen. Immed. After Purch. Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0
Conditions of Sale (Entitlement) Comparison	Equal	Inferior	Inferior	Inferior	Equal
Adjustment	0%	20%	20%	20%	0%
	\$0	\$10,000	\$12,587	\$12,373	\$0
Subtotal PSF Land	\$91,488	\$60,000	\$77,936	\$75,085	\$64,479
Changes In Market Conditions Date of Sale Through 9/17	4/17 escrow	11/17	4/16 escrow	6/17	7/15
No. of Months	6	-	18	4	27
Total Adjustment Amount	\$6,404	\$0	\$17,226	\$3,504	\$20,276
Subtotal	\$97,892	\$60,000	\$95,162	\$78,589	\$84,755
Fees \$12,713	\$12,713	\$12,839	\$12,713	\$11,642	\$6,873
Adjustment Amount	\$0	\$126	\$0	(\$1,071)	(\$5,840)
Size-Units 317	840	52	286	59	118
Comparison	Sl. Inferior	Sl. Superior	Equal	Sl. Superior	Sl. Superior
Adjustment	5.00%	-5.00%	0.00%	-5.00%	-5.00%
Adjustment Amount	\$4,895	(\$3,000)	\$0	(\$3,929)	(\$4,238)
Configuration Rectangular	Irregular	Rectangular	Irregular	Rectangular	Rectangular
Comparison	Sl. Inferior	Equal	Sl. Inferior	Equal	Equal
Adjustment	5.00%	0.00%	5.00%	0.00%	0.00%
Adjustment Amount	\$4,895	\$0	\$4,758	\$0	\$0
Specific Location Full Block	Corner	Corner	Corner	Interior	3 Streets
Comparison	Sl. Inferior	Sl. Inferior	Sl. Inferior	Inferior	Sl. Inferior
Adjustment	5.00%	5.00%	5.00%	10.00%	5.00%
Adjustment Amount	\$4,895	\$3,000	\$4,758	\$7,859	\$4,238
General Location Mission Valley	Mission Valley	Normal Heights	Mission Valley	Hillcrest-Uptown	North Park
Comparison	Equal	Inferior	Equal	Inferior	Inferior
Adjustment	0.00%	50.00%	0.00%	25.00%	50.00%
Adjustment Amount	\$0	\$30,000	\$0	\$19,647	\$42,378
Indicated Value-Per Unit	\$112,576	\$90,126	\$104,679	\$101,094	\$121,293
Density-Units Per Acre 75.0	109.2	101.0	58.1	167.1	97.5
Net Acreage 4.231	7.694	0.515	4.920	0.353	1.210
Size Sq. Ft. 184,292	335,151	22,433	214,315	15,377	52,708
Corresponding Value Per Square Foot	\$282.15	\$208.91	\$139.69	\$387.90	\$271.55

Multi-Family Residential		2030 El Cajon Boulevard 6	4021 8th Avenue 7	3752 Park Boulevard 8	1021 30th Street 9
Subject Property					
Sale Price		\$7,700,000	\$2,000,000	\$1,800,000	\$1,165,000
No. of Units	317	165	36	31	23
Price Per Unit		\$46,667	\$55,556	\$58,065	\$50,652
Property Rights Comparison Adjustment		Equal \$0	Equal \$0	Equal \$0	Equal \$0
Financing Comparison Adjustment		Equal \$0	Equal \$0	Equal \$0	Equal \$0
Property Condition	\$0	\$0	\$0	\$0	\$0
Comparison		\$0	\$1,389	\$1,117	\$0
Adjustment		\$0	\$1,389	\$1,117	\$0
Expen. Immed. After Purch. Comparison Adjustment		Equal \$0	Equal \$0	Equal \$0	Equal \$0
Conditions of Sale (Entitlement) Comparison Adjustment		Equal 0% \$0	Equal 0% \$0	Equal 0% \$0	Equal 0% \$0
Subtotal PSF Land		\$46,667	\$56,944	\$59,182	\$50,652
Changes In Market Conditions					
Date of Sale	Through 9/17	9/14	8/14	6/14	4/14
No. of Months		37	38	40	42
Total Adjustment Amount		\$19,738	\$24,739	\$27,069	\$24,330
Subtotal		\$66,405	\$81,683	\$86,251	\$74,982
Fees	\$12,713	\$4,594	\$11,642	\$8,627	\$9,140
Adjustment Amount		(\$8,119)	(\$1,071)	(\$4,086)	(\$3,573)
Size-Units	317	165	36	31	23
Comparison		Sl. Superior	Sl. Superior	Sl. Superior	Sl. Superior
Adjustment		-5.00%	-5.00%	-5.00%	-5.00%
Adjustment Amount		(\$3,320)	(\$4,084)	(\$4,313)	(\$3,749)
Configuration	Rectangular	Rectangular	Triangular	Rectangular	Rectangular
Comparison		Equal	Inferior	Equal	Equal
Adjustment		0.00%	10.00%	0.00%	0.00%
Adjustment Amount		\$0	\$8,168	\$0	\$0
Specific Location	Full Block	Interior	Corner	Interior	Corner
Comparison		Inferior	Sl. Inferior	Inferior	Sl. Inferior
Adjustment		10.00%	5.00%	10.00%	5.00%
Adjustment Amount		\$6,640	\$4,084	\$8,625	\$3,749
General Location	Mission Valley	North Park	Hillcrest-Uptown	Hillcrest-Uptown	Golden Hill
Comparison		Inferior	Inferior	Inferior	Inferior
Adjustment		50.00%	25.00%	25.00%	70.00%
Adjustment Amount		\$33,202	\$20,421	\$21,563	\$52,488
Indicated Value-Per Unit		\$94,809	\$109,201	\$108,040	\$123,897
Density-Units Per Acre	75.0	107.1	100.0	80.9	71.7
Net Acreage	4.231	1.540	0.360	0.383	0.321
Size Sq. Ft.	184,292	67,082	15,682	16,683	13,983
Corresponding Value Per Square Foot		\$233.20	\$250.69	\$200.75	\$203.80

After all adjustments, the indicated range of value on a per unit and per square foot basis is wide. This is due to the need for one more adjustment, which recognizes the relationship between the price per unit and density. The following is a summary of a distribution of the comparables based upon density and corresponding adjusted price per unit and price per square foot of land area:

**ADJUSTED COMPARABLE LAND DATA
ARRAYED BY DENSITY**

Base Data:

Comp. No.	Units Per Acre	Adjusted Value Per Unit	Adjusted Value PSF Land	Location	Date
SP	75.0			Mission Valley	9/17
1	109.2	\$112,576	\$282.15	Mission Valley	4/17
2	101.0	\$90,126	\$208.91	Normal Heights	11/17
3	58.1	\$104,679	\$139.69	Mission Valley	4/16
4	167.1	\$101,094	\$387.90	Hillcrest-Uptown	6/17
5	97.5	\$121,293	\$271.55	North Park	7/15
6	107.1	\$94,809	\$233.20	North Park	9/14
7	100.0	\$109,201	\$250.69	Hillcrest-Uptown	8/14
8	80.9	\$108,040	\$200.75	Hillcrest-Uptown	6/14
9	71.7	\$123,897	\$203.80	Golden Hill	4/14

Sorted:

Comp. No.	Units Per Acre	Adjusted Value Per Unit	Adjusted Value PSF Land	Location	Date
3	58.1	\$104,679	\$139.69	Mission Valley	4/16
9	71.7	\$123,897	\$203.80	Golden Hill	4/14
SP	75.0			Mission Valley	9/17
8	80.9	\$108,040	\$200.75	Hillcrest-Uptown	6/14
5	97.5	\$121,293	\$271.55	North Park	7/15
7	100.0	\$109,201	\$250.69	Hillcrest-Uptown	8/14
2	101.0	\$90,126	\$208.91	Normal Heights	11/17
6	107.1	\$94,809	\$233.20	North Park	9/14
1	109.2	\$112,576	\$282.15	Mission Valley	4/17
4	167.1	\$101,094	\$387.90	Hillcrest-Uptown	6/17

Units	Units Per Acre	Value Per Unit	Estimated Value	Acreage	PSF Land
317	75.0	\$122,000	\$38,674,000	4.231	\$209.85

The data array indicates a wide spread and there lacks a traditional regression pattern. Comparables 1 and 3 are located in Mission Valley and require deep foundation systems as does the subject. However, the subject is being appraised in this section without consideration of the additional costs

for such foundations. Instead, an adjustment will be made for the additional foundation costs as previously summarized in the Market Conditions section. The average of the adjusted comparables is \$107,302 per unit at an average density of 99.2 units per acre. The average is reduced due to the prices of Comparables 1 and 3 being lower indicators as they have the deep foundation requirements. The best comparables were 1, 3, 5, 8 and 9 which support a conclusion of \$122,000 per unit.

As previously noted, the supplemental sales in Mission Valley were also used to assist in confirming the estimated values at the densities below 75 units per acre. In that regard, Comparable 3 (\$233,083 per unit at a density of 20 units per acre) and Comparable 4 (\$136,364 per unit at a density of 26.1 units per acre), were the most helpful. They are the most recent sales in the Civita project.

Retail

The following is a summary of the retail land data. Location maps are included in the Addendum (Exhibit F).

Summary of Comparable Retail Land Data

No.	Buyer/Seller/Location/Apn.	Date Closed/ Under Contract Doc. No.	Sale Price	Net Acres (Sq. Ft.)	Price Psf	Building Sq. Ft.	Price Psf Building	Floor Area Ratio
1	NA/Silver State Eq Commercial Site 4835 Glasoe Lane San Diego (Mission Valley) 438-060-16	Listing NA	\$2,250,000	0.758 (33,018)	\$68.14	NA	NA	NA
2	Centillon Ventures LLC/Edward & Lamis O'Son Trust Auto Dealership Parking Lot 1430 South Melrose Drive Oceanside 169-011-44	12/15 11/15 627146	\$3,800,000	1.500 (65,340)	\$58.16	NA	NA	NA
3	Del Sur TC LLC (Shea)/Black Mountain Ranch LLC Proposed Community Center South side of Camino Del Sur between Garretson Street and Zaslavsky Place San Diego County (Del Sur) 678-650-04, 05, 06, 07, 10, 11	10/14 2013 465270	\$19,702,000	18.120 (789,307)	\$24.96	203,080	\$97.02	25.7%
4	Confidential/Regency Centers Elder Care Center and Fast Food Restaurant Southeast corner of Rancho Bernardo Road and Dove Canyon Road San Diego County (4S Ranch) 678-650-04	2/15 2013 NA	\$3,200,000 ground lease basis	2.810 (122,404)	\$26.14	NA	NA	NA
5	Larry Bedrosian/Ben F. Smith Jr. Trust Former Ben F. Smith Property 7120 Miramar Road San Diego (Miramar) 343-070-11	2/15 NA 83071	\$3,600,000	1.930 (84,071)	\$42.82	25,221	\$142.74	30.0%
6	7980 Miramar LLC/FP&ME Keenan Trust Former Amazon Stones Property 7980 Miramar Road San Diego (Miramar) 343-082-20	2/15 NA 36133	\$1,990,500	1.030 (44,867)	\$44.36	2,040	\$975.74	4.5%

Comparable 1 is a much smaller site of 1.58 gross acres (net .758 acres) located west of the subject in the Hotel Circle portion of Mission Valley. The zoning allows a variety of uses and the site is partially finished. The owner is a fitness center operator who chose not to build.

Comparable 2 is a smaller site located in Oceanside. This property sold with a construction permit, but work stopped due to revisions being made to the proposed 12,000 square foot retail center.

Comparable 3 is a much larger community shopping center site located in the Del Sur planned community east of Carmel Valley and west of Rancho Bernardo-4S Ranch anchored by a Target store

of 142,987 square feet. The remainder of the project will consist of high-end retail shops (food and soft goods) and two pads to be leased by a fast food restaurant and financial institution. There were no facilities benefits assessment (FBA) fees in lieu of the seller-developer making a large investment in infrastructure.

Comparable 4 is a summary of the imputed land value basis in two ground leases located at the corner just north of an LA Fitness building in the 4S Commons Town Center in 4S Ranch. Based on a 10% return on the annual rent of \$320,000 the value is \$3,200,000 or \$26.14 per square foot. The leases were negotiated with an elder care operator and a fast food restaurant for 55 year terms. The land basis was calculated on the third year rent as, initially, the rents are lower in the first two years during the construction and a period for initial opening for business.

Comparable 5 is an industrial zoned property located on Miramar Road. Although the property is zoned for office and industrial use, it was purchased by a user at a premium for a tile and granite showroom according to the broker. For example, a 1.74 acre site at 7988 Miramar Road was purchased in February 2015 for \$24.80 per square foot for construction of a self-storage facility. The existing improvements include a 4,180 square foot metal industrial building/shed and a 1,500 square foot wood frame and stucco office building. Approximately two-thirds of the site is concrete paved. Even though zoned industrial, properties fronting Miramar Road are able to capture retail sales demand that is allowed under the zoning.

Comparable 6 is also an industrial zoned property located on Miramar Road. This property has 55 feet of frontage on Miramar Road but exposure to most of the site is somewhat obscured due to an intervening improved parcel. Even though zoned industrial, properties fronting Miramar Road are able to capture retail sales demand that is allowed under the zoning. The property was purchased by a user who will use the property "as is" for a tile showroom. This is consistent with the prior use. The contributory value of the 2,040 square foot building was not provided.

All of the comparable properties involved the sale of the fee simple interest, except Comparable 4 was an imputed value, based on capitalization of ground rent. All of the sale transactions were cash to the seller, or, where there was seller carried financing, that was taken into consideration. Other factors considered were: date of sale, property condition, conditions of sale, location, assessment district obligations, size and zoning. The reconciliation considers the subject's placement in the overall comparison to each comparable ranked from high to low. The subject land is bracketed by the data as follows:

Comparable	Adjusted Price PSF	Comparison
1	\$68.14	Superior
2	\$58.16	Superior
Subject	\$45.00	
6	\$44.36	Sl. Inferior
5	\$42.82	Inferior
4	\$26.14	Inferior
3	\$24.96	Inferior

The subject property is considered superior to Comparables 3, 4, 5 and 6 and inferior to Comparables 1 and 2. The subject property is well located in Mission Valley and will likely benefit from reciprocal access and parking with other components of the project. Therefore, a value of \$45.00 per square foot was considered to be a reasonable conclusion ($\$45.00 \text{ psf} \times 2.75 \text{ acres} \times 43,560 \text{ sq. ft.} = \$5,390,550$).

As previously noted, there will be an additional 30,000 square feet of retail space dispersed elsewhere in the project on the ground floors of the residential and office buildings. The above valuation is also applicable to this space, so the total retail space valuation is \$10,781,100.

Hotel

The following is a summary of the hotel land data. Location maps are included in the Addendum (Exhibit G).

Summary of Comparable Hotel Land Data

Buyer/Seller No. Project/Location/Apn.	Date Closed/ Under Contract Doc. No.	Sale Price	Net Acres (Sq. Ft.)	Price PSF	No. of Rooms	Price Per Room	Density FAR
Escondido Hotel LP/San Bernardino Hospitality, LLC							
1 105 Room Marriott Springhill Suites Hotel	3/17	\$3,500,000	1.680	\$47.83	105	\$33,333	62.5
200 La Terraza Boulevard	1/17		(73,181)				
Escondido							87.7%
232-150-59	117158						
Nook East Village LP/Bell Hotel Ltd.							
2 91 Room SRO Hotel	6/16	\$3,500,000	0.405	\$198.35	91	\$38,462	224.6
1492 K Street	12/15		(17,646)				
San Diego (Downtown)							154.7%
535-105-06	522060						
Tech Way Hotel LP/Metropolitan Transit System							
3 105 Room TownPlace Suites by Marriott Hotel	1/16	\$2,100,000	1.570	\$30.71	105	\$20,000	66.9
8650 Tech Way	2012 LOI		(68,389)				
San Diego (Kearny Mesa)							92.1%
369-220-85	35307						
Carmel Valley Centre Drive, LLC/Pardee Homes							
4 135 Room Springhill Suites Hotel	10/14	\$4,000,000	2.100	\$43.73	135	\$29,630	64.3
2401 Camino Del Rio North			(91,476)				
San Diego (Mission Valley)	11/11						90.2%
438-052-18 (portion)	445865						
Palmetto Hospitality of SD, LLC/Little Russell, LLC							
5 112 Room Springhill Suites Hotel and Retail	4/14	\$5,000,000	3.060	\$37.51	112	\$44,643	36.6
3520 Valley Centre Drive			(133,294)				
San Diego (Carmel Valley)	2/14						61.9%
307-240-03, 04	171008						

Comparable 1 is a smaller site located in Escondido. It sold with a franchise fee in place and a transient occupancy tax sharing agreement. Further details were held confidential at the request of the confirming source.

Comparable 2 is a much smaller site located in downtown San Diego. There was a \$150,000 demolition cost to remove a 12,000 square foot building. The property was entitled as a hotel, but some minor changes were made to the entitlement during escrow. The development plan is for a single room occupancy (SRO) hotel.

Comparable 3 is a smaller surplus property sold by the Metropolitan Transit System (MTS) in the San Diego Spectrum project. MTS was given the property during the approval process for the Spectrum project, but it became a surplus property. The transaction price was based on a letter of intent in 2012. There was a sewer line that had to be relocated at a cost of \$200,000 and a 3% brokerage commission

(\$63,000) was paid by the buyer outside the escrow. It was a finished lot with the exception of a dirt pile that had to be moved.

Comparable 4 is a smaller, unentitled site that is part of a 3.29 acre larger parcel located in Mission Valley. It is a freeway visible site located very close to the on and off-ramps. It was a finished lot for which the price was set in 2011 and escrow opened in April 2012 contingent upon city approval of a site development plan and a building permit. The price was net of \$500,000 for extraordinary foundation costs which raises the basis to \$4,500,000 (\$49.19 per square foot). All of the larger parcel was transferred in this transaction, but the price shown above was only for the hotel site portion. The larger parcel will be subdivided into three lots for the hotel, a Starbucks and a site to be ground leased to a specialty tenant that will construct their own improvements. The two retail sites are to be retained by the seller and will be deeded back to the seller after the subdivision map is recorded. The project is under construction.

Comparable 5 is a smaller site located in Carmel Valley. The buyer had this property under contract in 2004 but the transaction did not close. The current transaction was under contract for 60 days with no contingencies due to the buyer's familiarity with the property from the due diligence completed 10 years before. The property is a finished lot and the project will include two levels of subterranean parking. There are two perimeter easements that do not affect the yield.

Adjustments

The following is a summary of the adjustments to the land sales:

Property Rights:

The fee simple interest was transferred in all the sales, so no adjustments were required.

Financing:

All sales are all cash or cash equivalent; therefore, no adjustments were required.

Property Condition:

For the comparables, requiring demolition costs or that needed improvements, the actual costs provided were used.

Expenditures Made Immediately After Purchase:

A knowledgeable buyer considers expenditures that will have to be made upon purchase of a property because these costs affect the price the buyer agrees to pay. Such expenditures may include the costs to demolish and remove any buildings, costs to petition for a zoning change, or costs to remediate environmental contamination.

No adjustments were necessary for such costs.

Conditions of Sale:

Comparables 1 and 3 were sold as entitled properties and no adjustment was made. The other comparables were adjusted upward 10% for being unentitled. Comparable 4 had a brokerage commission of \$63,000 paid outside the escrow, which was adjusted upward. For Comparable 5, there was a deduction for the \$3,600 per month rental for one year of the existing duplex.

Changes In Market Conditions:

Market conditions have been strong as previously discussed in the Market Conditions section. Based on comparing changes in ADRs and RevPARs, the adjustment amounts used were: 4% for 2012, 4% for 2013, 9% for 2014, 8% for 2015, 3% for 2016 and 3% for 2017.

Size:

Traditionally, smaller sites sell for higher prices per room and per square foot. Adjustments were made in 5% increments based on appraiser's experience and discussions with knowledgeable market participants.

Configuration:

The subject property is assumed to have an irregular configuration. Adjustments were made in 5% increments based on appraiser's experience and discussions with knowledgeable market participants.

Specific Location:

The subject property is assumed to be a corner lot. Adjustments were made in 5% increments based on appraiser's experience and discussions with knowledgeable market participants.

General Location:

The comparables are located in Escondido, Downtown, Mission Valley and Carmel Valley. The ADR and RevPar data discussed on pages 39, 40 and 41 were compared to arrive at appropriate adjustments for differences in location. The downward adjustments range from 30% to 40% with the downtown San Diego and Carmel Valley locations representing the high end of the adjustments. Only the Escondido property was shown to be inferior in location.

Adjustment Grid

Following is a summary of the adjustments, (note, the Excel program rounds to the nearest dollar):

Hotel	Marriott Springhill Hotel 1	SRO Hotel 2	Marriott TownPlace Hotel 3	Marriott Springhill Hotel 4	Marriott Springhill Hotel 5
Subject Property					
Sale Price	\$3,500,000	\$3,500,000	\$2,100,000	\$4,000,000	\$5,000,000
No. of Rooms 300	105	91	105	135	112
Price Per Room	\$33,333	\$38,462	\$20,000	\$29,630	\$44,643
Financing					
Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0	\$0	\$0	\$0	\$0
Property Condition \$0.00	\$0	\$0	\$0	\$0	\$0
Comparison	\$0	\$1,648	\$1,905	\$3,704	\$0
Adjustment	\$0	\$1,648	\$1,905	\$3,704	\$0
Expen. Immed. After Purcl					
Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0	\$0	\$0	\$0	\$0
Conditions of Sale Entitled	Equal	Equal	Inferior	Inferior	Inferior
Comparison	0%	0%	10%	10%	10%
Adjustment	\$0	\$0	\$2,000	\$2,963	\$4,464
Other	0%	0%	3%	0%	-1%
Adjustment	\$0	\$0	\$600	\$0	(\$386)
Subtotal PSF Land	\$33,333	\$40,110	\$24,505	\$36,296	\$48,721
Changes In Market Conditions					
Date of Sale (contract) 9/17	1/17	12/15	2012	10/14	4/14
No. of months 2012	0	0	12	2	9
Adjustment	\$0	\$0	\$980	\$0	\$0
No. of months 2013	0	0	12	2	9
Adjustment	\$0	\$0	\$1,019	\$0	\$0
No. of months 2014	0	0	12	2	9
Adjustment	\$0	\$0	\$2,385	\$544	\$3,289
No. of months 2015	0	12	12	12	12
Adjustment	\$0	\$3,209	\$2,311	\$2,947	\$4,161
No. of months 2016	0	12	12	12	12
Adjustment	\$0	\$1,300	\$907	\$1,194	\$1,685
No. of months 2017	9	9	9	9	9
Adjustment	\$750	\$1,004	\$677	\$922	\$1,302
Subtotal	\$34,083	\$45,622	\$32,785	\$41,904	\$59,158
Size-Acres 300	105	91	105	135	112
Comparison	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0	\$0	\$0	\$0	\$0
Configuration Irregular	Triangular	Rectangular	Irregular	Irregular	Irregular
Comparison	Sl. Inferior	Sl. Superior	Equal	Equal	Equal
Adjustment	5.00%	-5.00%	0.00%	0.00%	0.00%
Adjustment Amount	\$1,704	(\$2,281)	\$0	\$0	\$0
Specific Location Corner	Interior	Corner	Inter.- 2 Streets	Interior	Int.- 2 Streets
Comparison	Sl. Inferior	Equal	Equal	Sl. Inferior	Equal
Adjustment	5.00%	0.00%	0.00%	5.00%	0.00%
Adjustment Amount	\$1,704	\$0	\$0	\$2,095	\$0
General Location Mission Valley	Escondido	Downtown	Downtown	Mission Valley	Carmel Valley
Comparison	Inferior	Superior	Superior	Equal	Superior
Adjustment	20%	-40%	-40%	0%	-30%
	\$6,817	(\$18,249)	(\$13,114)	\$0	(\$17,747)
Indicated Value-Per Room	\$44,308	\$25,092	\$19,671	\$43,999	\$41,410
Density-Units Per Acre 42.9	62.5	224.6	66.9	64.3	36.6
Land Acreage 7.00	1.68	0.41	1.57	2.10	3.06
Land Square Feet 304,920	73,181	17,642	68,389	91,476	133,294
Price Per Square Foot	\$63.57	\$129.43	\$30.20	\$64.93	\$34.80

After all adjustments, the indicated range of value on a per room and per square foot basis is wide. This is due to one more adjustment, or recognition of a needed adjustment missing in the analysis.

There is a relationship between the price per room and price per square foot of land area and density. The following is a summary of a distribution of the comparables based upon density and corresponding adjusted price per unit and price per square foot of land area:

Adjusted Comparable Land Data Arrayed By Floor Area Ratio

Base Data:

Comp. No.	Units Per Acre	Adjusted Value Per Room	Adjusted Value PSF Land	Location	Date
SP	42.9			Mission Valley	9/17
1	62.5	\$44,308	\$63.57	Escondido	1/17
2	224.6	\$25,092	\$129.43	Downtown	12/15
3	66.9	\$19,671	\$30.20	Downtown	2012
4	64.3	\$43,999	\$64.93	Mission Valley	10/14
5	36.6	\$41,410	\$34.80	Carmel Valley	4/14

Sorted:

Comp. No.	Units Per Acre	Adjusted Value PSF Room	Adjusted Value PSF Land	Location	Date
5	36.6	\$41,410	\$34.80	Carmel Valley	4/14
SP	42.9			Mission Valley	9/17
1	62.5	\$44,308	\$63.57	Escondido	1/17
4	64.3	\$43,999	\$64.93	Mission Valley	10/14
3	66.9	\$19,671	\$30.20	Downtown	2012
2	224.6	\$25,092	\$129.43	Downtown	12/15

Rooms	Units Per Acre	Per Room	Estimated Value	Net Acreage	PSF Land
300	42.9	\$42,000	\$12,600,000	7.00	\$41.32

Conclusion

The data array by price per unit shows little pattern based on density. The average of the adjusted comparables is \$34,896 per room, which equates to \$64.59 per square foot of land area, with the average density being 90.98 units per acre. The subject is closest in density to Comparables 1, 4 and 5 and is bracketed by Comparables 1 and 5. Based on this data, a value of \$42,000 per unit and \$41.32 per square foot of land area was estimated for the subject property as shown above.

Office

The following is a summary of the office land data. Location maps are included in the Addendum (Exhibit H).

Summary of Comparable Office Land Data

Buyer/Seller No. Project/Location/APN.	Date Closed/ U/C Doc. No.	Sale Price	Net Acres (Sq. Ft.)	Price PSF	Entitled/ Planned Building Sq. Ft.	Price Psf Building	Floor Area Ratio	Zoning
ARE San Diego Region 41 LLC/City of San Diego								
1 Torrey Pines Lot 10B	3/17	\$4,970,100	2.700	\$42.26	41,850	\$118.76	35.6%	IP-1-1
North side of Callan Road west of Torreyana Road	9/16		(117,612)					
San Diego (Torrey Pines)								
340-010-25	134792							
ARE San Diego Region 42 LLC/City of San Diego								
2 Headquarters Point	3/17	\$3,280,000	5.300	\$14.21	123,676	\$26.52	53.6%	IL-2-1
South side of Headquarters Point 400 feet west of	9/16		(230,868)					
Wateridge Circle								
San Diego (Sorrento Mesa)	134792							
340-090-55								
Pacific Highlands Property LLC/Pardee Homes								
3 Aperture Del Mar Office Project	6/15	\$53,000,000	15.720	\$77.40	630,000	\$84.13	92.0%	IP-2-1
Northeast corner SR 56 and Carmel Valley Road	5/15		(684,763)					OC-1-1
San Diego (Pacific Highlands Ranch)								
305-031-40, 41, 47, 48	342675							
6420-6450 Sequence Drive (Cruzan)/Motorola Mobility								
4 Arris Campus Excess Land (Allocation)	3/15	\$7,500,000	5.700	\$30.21	342,043	\$21.93	137.8%	IL-2-1
North side of Sequence Drive west of Genetic Center Drive	2/15		(248,292)					
San Diego (Sorrento Mesa)					135,360	\$55.41	54.5%	
311-521-39 and a portion of 59	143908							
California Highway Patrol/Cook Inlet Region LP								
5 California Highway Patrol Office	2/15	\$10,819,000	5.200	\$47.76	40,000	\$270.48	17.7%	IL-2-1
North side of Kearny Villa Road between Ruffin Road	NA		(226,512)					
and Chesapeake Drive					170,000	\$63.64	75.1%	
San Diego (Kearny Mesa)	44736							
369-082-24								
Towne Centre Drive LLC/LPL Holdings								
6 Former LPL Holdings - Irvine Company-Office Land	9/14	\$6,200,000	4.500	\$31.63	80,000	\$77.50	40.8%	IP-1-1
North side of Towne Centre Drive at Towne Centre Court	7/14		(196,020)					
San Diego (University Towne Centre)								
343-121-40	411185							

Comparables 1 and 2 were sold in the same transaction to the same buyer, entities of Alexandria Real Estate Equities (ARE), which allocated the total price of \$8,250,100. Comparable 1 is a 3.182 gross acre site with flag lot easement access. The City has a record of a designated allowable building size of 41,850 square feet. The net buildable area is raw land and the property needs to be entitled. The costs were estimated to be \$7.52 per square foot. The buyer allocated \$4,970,100 of the purchase price to this property which was way above the appraised value. The motivation was believed to be the ability to transfer the density off this property to an adjacent property also owned by an ARE entity. However, this was not confirmed by the buyer.

Comparable 2 is a 10.31 gross acre raw land parcel for which access needs to be created. The building area shown on the summary was based on an assumption used in an appraisal of that property prior to it being marketed for sale. The estimated entitlement and construction costs were estimated to be

\$12.94 per square foot. The buyer allocated \$3,280,000 of the purchase price to this property which was the appraised value.

Comparable 3 is located at the diamond freeway interchange of SR-56 at Carmel Valley Road. It was purchased for construction of Class A office and/or life science space. This transaction was confirmed on a confidential basis and further details were withheld at the request of the confirmation source.

Comparable 4 is not an outright land sale but an excess land component that sold with a long term lease being negotiated with Arris. The transaction is larger than just the excess land portion which was an allocation made by the buyer and also confirmed with the broker. There is a master entitlement for 342,043 square feet that will require structured parking, but the more likely plan is for a surface parked project (135,360 square feet) according to the buyer and broker.

Comparable 5 is located in the northerly portion of Kearny Mesa. Per the broker, it was originally an 8.00 acre site for which some habitat area was segregated to create a 5.93 gross acre site with 5.20 net acres. The seller had processed an entitlement for 170,000 square feet of office space by transferring the pro-rata building area from the habitat area onto the 5.93 acre portion. Subsequently, the California Highway Patrol sought to purchase the site to construct a 40,000 square foot building, but the seller held firm on the price reflective of the entitlement for the larger building square footage.

Comparable 6, according to the seller and broker, is a site owned by Kilroy Realty which sold this property (which was considered to be an expansion site) and two adjacent buildings to The Irvine Company (in a separate transaction for \$29,500,000) when the original build to suit tenant for the two buildings, LPL Financial, vacated to relocate elsewhere in University Towne Centre.

Adjustments

Due to planned development overlays and other restrictions, the trend has been to analyze both the price per square foot of land area and price per square foot of proposed building area in sale transactions of office properties. This comparison is also helpful to adjust for differing coverage ratios. For adjustment purposes, Comparable 5 was analyzed on the entitled building square footage, not the CHP's planned building area, which is only a 17.7% floor area ratio.

The following is a summary of the adjustments to the land sales:

Financing:

All sales are all cash or cash equivalent; therefore, no adjustments are necessary.

Property Condition:

These adjustments must first be made before others are applied to bring these sites into comparable "finished lot" condition with the other sales.

Comparables 1 and 2 required adjustments for the costs summarized above (raw and undeveloped condition).

Expenditures Made Immediately After Purchase:

A knowledgeable buyer considers expenditures that will have to be made upon purchase of a property because these costs affect the price the buyer agrees to pay. Such expenditures may include the costs to demolish and remove any buildings, costs to petition for a zoning change, or costs to remediate environmental contamination.

No adjustments were necessary for such costs.

Conditions of Sale:

Comparable 1 was adjusted downward based on the over-market allocation made to that portion of the two property transaction (when compared to the appraised value which was used as the basis for that adjustment). Comparable 3 was adjusted upward based on confidential information received during the sale confirmation.

There were no extraneous motivations or other items that would influence the conditions of the sale for the remaining transactions.

Changes In Market Conditions:

Market conditions were strong through the end of 2007 and increasing at 1% per month. However, they declined in 2008 and 2009 by approximately 30%. Market conditions began to improve gradually, but until recently, there was a lack of land sale data to support increases. That data has come in the form of a spike indicated by pairing Comparable 3 with older data.

Only Comparable 6 required an upward adjustment of 25%.

Fees:

Most properties have Development Impact Fees (DIF) or Facilities Benefits Assessment (FBA) charges which are applicable to properties in the city of San Diego. The fees are based upon estimated average daily trips (ADT's) per 1,000 square feet according to City specifications or on a fixed amount per acre. Based upon the fee schedule and the anticipated uses at each property at the time of acquisition, the fees per square foot of land area were calculated.

A new housing impact "linkage" fee, to provide for affordable housing, was adopted by the City Council and became effective on January 1, 2015. The fees are calculated on proposed building area based on the following schedule:

Type of Use	Fee Per Building Square Foot		
	Through 12/31/15	Through 12/31/16	After 1/1/17
Office	\$1.41	\$1.76	\$2.12
Hotel	\$0.85	\$1.06	\$1.28
R&D	\$0.80	\$0.80	\$0.80
Retail	\$0.85	\$1.06	\$1.28

There are no fees for manufacturing and warehouse space. All but Comparable 7 have offsetting amounts for the linkage fee.

Adjustments for differentials in fees were made accordingly.

Often, there are also common area fees associated with park maintenance often attributable to lots in business parks (and costs such as the child care contribution). These costs are fairly uniform and nominal among competitive parks and were not adjusted.

Size:

Traditionally, smaller sites have sold for higher prices per square foot. However, brokers report that supply-demand imbalance is currently playing a bigger role in pricing than size differentials. In fact, large parcels offer the flexibility to construct a mixed-use project or campus-like environment. Therefore, no adjustments were made for size.

Configuration:

The subject property has a similar configuration to the comparables.

Zoning:

The city of San Diego has various zoning designations, some being more restrictive than others. Based on appraiser's judgment and experience with various zoning designations, adjustments were made in minimum 5% increments. The subject property is assumed to be zoned SP (Specific Plan).

APZ-1 Restrictions:

A significant influence on north City properties is the Marine Corps Air Station (MCAS) Miramar which has land use limitations set forth in its Airport Land Use Compatibility Plan (ALUCP). The Plan has various overlays, (noise notifications, etc.), but the most significant are the safety zones. They are:

APZ-1 (Accident Potential Zone 1)

APZ-2 (Accident Potential Zone 2)

TZ (Transitional Zone)

Restrictive Use Easements

APZ-1, APZ-2 and TZ zones are specified on a map in the Plan but the Restrictive Use Easements are administered by MCAS Miramar and limit land use by deed restriction (with restrictions similar to those in APZ-2 and the TZ zones). The subject property is not located in a safety zone but some of the comparable sales (1, 2 and 6) are subject to the zone.

There were some examples of sites selling in APZ-1 as opposed to APZ-2 (when the latter did not have the population restriction) in 1996 and 1997. For those properties, the differential in price was approximately 38% without considering any other adjustment (which would be minimal anyway). Under current market conditions, the adjustment between properties in APZ-1, APZ-2 and TZ is not considered to be that large. The limitations on population and lot coverage are suited to flexible-use and biotechnology wet laboratory properties, but an adjustment is still warranted. The appropriate adjustment was considered to be 10%.

Specific Location:

Pricing in business parks is typically adjusted for location, with a corner location at the main entrance to the park being the most desirable. Visibility along a main street also is considered a superior feature. For comparison purposes, the subject is classified as a corner site with freeway exposure:

<u>Grid Classification</u>	<u>Meaning</u>
Freeway-Main	A freeway exposure site also with the attributes of a main street
Interior-T	Interior lot at a "T" intersection
Int.-Freeway	Interior lot but with freeway exposure
Interior	Interior lot in a subdivision
Cul-de-sac	Lot at the end of a cul-de-sac street
Int. Corner	Corner lot but at an interior intersection in the subdivision
Corner-Freeway	Corner lot with freeway exposure
Corner	Corner lot at a major intersection
Prime Corner	Corner lot in a prime location at a major intersection (intended to be the next level up from a "corner" lot)

General Location:

The comparables are located in various North City business park locations. Upward and/or downward adjustments were made based upon the appraiser's experience having appraised numerous properties in the competitive submarkets and reviewing information from CoStar Group on rents in these locations.

Adjustment Grid

Following is a summary of the adjustments, (note, the Excel program rounds to the nearest dollar):

Office Subject Property	Torrey Pines Lot 10B 1	Headquarters Point 2	Pardee- Lincoln Property Company 3	Arris Campus Excess Land 4	California Highway Patrol 5	LPL- Irvine Company 6
Sale Price	\$4,970,100	\$3,280,000	\$53,000,000	\$7,500,000	\$10,819,000	\$6,200,000
Net Acreage 12.600	2.700	5.300	15.720	5.700	5.200	4.500
Size Sq. Ft. 548,856	117,612	230,868	684,763	248,292	226,512	196,020
Price Per Sq. Ft.	\$42.26	\$14.21	\$77.40	\$30.21	\$47.76	\$31.63
Financing						
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Property Condition	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Comparison	\$7.52	\$12.94	\$0.00	\$0.00	\$0.00	\$0.00
Adjustment	\$7.52	\$12.94	\$0.00	\$0.00	\$0.00	\$0.00
Expen. Immed. After Purch.						
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conditions of Sale	Equal	Equal	Inferior	Equal	Equal	Equal
Comparison	-25%	0%	10%	0%	0%	0%
Adjustment	(\$10.56)	\$0.00	\$7.74	\$0.00	\$0.00	\$0.00
Subtotal PSF Land	\$39.21	\$27.15	\$85.14	\$30.21	\$47.76	\$31.63
Changes In Market Conditions						
Date of Sale (contract) 9/17	9/16	9/16	5/15	2/15	2/15 (closing)	7/14
Adjustment	0.00%	0.00%	0.00%	0.00%	0.00%	25.00%
Adjustment Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7.91
Subtotal	\$39.21	\$27.15	\$85.14	\$30.21	\$47.76	\$39.54
FBA Fees PSF-						
Comparison \$2.04	\$5.21	\$1.88	\$6.25	\$1.88	\$0.88	\$11.49
Adjustment	\$3.17	(\$0.16)	\$4.21	(\$0.16)	(\$1.15)	\$9.46
Linkage Fees PSF-						
Comparison \$1.16	\$0.28	\$0.76	\$1.30	\$0.70	\$1.06	\$0.35
Adjustment	(\$0.87)	(\$0.40)	\$0.14	(\$0.45)	(\$0.10)	(\$0.81)
Size-Acres 12.600	2.700	5.300	15.720	5.700	5.200	4.500
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Configuration						
Comparison Irregular	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Adjustment Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Zoning (assumed) SP	IP-1-1	IL-2-1	IP-2-1	IL-2-1	IL-2-1	IP-1-1
Comparison	Sl. Inferior	Equal	Inferior	Equal	Equal	Sl. Inferior
Adjustment	5.00%	0.00%	10.00%	0.00%	0.00%	5.00%
Adjustment Amount	\$1.96	\$0.00	\$8.51	\$0.00	\$0.00	\$1.98
APZ Restrictions						
Comparison No	APZ-2	APZ-2	No	No	No	TZ
Adjustment	Inferior	Inferior	Equal	Equal	Equal	Inferior
Adjustment Amount	10.00%	10.00%	0.00%	0.00%	0.00%	10.00%
	\$3.92	\$2.71	\$0.00	\$0.00	\$0.00	\$3.95
Specific Location						
Comparison Corner-Freew.	Interior-Flag	Interior	Corner-Freeway	Interior	Corner-Freeway	Interior-T
Adjustment	Inferior	Inferior	Equal	Inferior	Equal	Inferior
Adjustment Amount	10.00%	10.00%	0.00%	10.00%	0.00%	10.00%
	\$3.92	\$2.71	\$0.00	\$3.02	\$0.00	\$3.95
Indicated Value-PSF Land	\$51.32	\$32.02	\$98.01	\$32.61	\$46.51	\$58.07
General Location						
Comparison Mission Valley	Torrey Pines	Sorrento Mesa	Pac Highl. Rch.	Sorrento Mesa	Kearny Mesa	UTC
Adjustment	Superior	Equal	Superior	Equal	Equal	Superior
	-10%	0%	-30%	0%	0%	-15%
	(\$5.13)	\$0.00	(\$29.40)	\$0.00	\$0.00	(\$8.71)
Indicated Value-PSF Land	\$46.19	\$32.02	\$68.60	\$32.61	\$46.51	\$49.36
Building Square Feet 450,000	41,850	123,676	630,000	135,360	170,000	80,000
Floor Area Ratio 81.99%	35.6%	53.6%	92.0%	54.5%	75.1%	40.8%
Price Per Square Foot - Building	\$129.80	\$59.77	\$74.57	\$59.83	\$61.97	\$120.94

After all adjustments, the indicated range of value on a per-square-foot-of-land and building basis is wide. This is due to one more adjustment, or recognition of a needed adjustment missing in the analysis.

There is a relationship between the price per square foot of land area, the floor area ratio and the price per square foot of building area. To demonstrate, the indicated value per square foot of land after all adjustments was used to calculate the value of square foot of building area and the floor area ratios as shown at the bottom of the adjustment grid. The following is a summary of a distribution of the comparables based upon floor area ratio and the corresponding adjusted price per square foot of building area and land area for each building:

Adjusted Comparable Land Data Arrayed By Floor Area Ratio

Base Data:

Comp. No.	Floor Area Ratio	Adjusted Value PSF Bldg.	Adjusted Value PSF Land	Location	Date
SP	82.0%			Mission Valley	9/17
1	35.6%	\$129.80	\$46.19	Torrey Pines	9/16
2	53.6%	\$59.77	\$32.02	Sorrento Mesa	9/16
3	92.0%	\$74.57	\$68.60	Pac Highl. Rch.	5/15
4	54.5%	\$59.83	\$32.61	Sorrento Mesa	2/15
5	75.1%	\$61.97	\$46.51	Kearny Mesa	2/15
6	40.8%	\$120.94	\$49.36	UTC	7/14

Sorted:

Comp. No.	Floor Area Ratio	Adjusted Value PSF Bldg.	Adjusted Value PSF Land	Location	Date
1	35.6%	\$129.80	\$46.19	Torrey Pines	9/16
6	40.8%	\$120.94	\$49.36	UTC	7/14
2	53.6%	\$59.77	\$32.02	Sorrento Mesa	9/16
4	54.5%	\$59.83	\$32.61	Sorrento Mesa	2/15
5	75.1%	\$61.97	\$46.51	Kearny Mesa	2/15
SP	82.0%			Mission Valley	9/17
3	92.0%	\$74.57	\$68.60	Pac Highl. Rch.	5/15

	Bldg. Sq.Ft.	FAR	PSF Bldg.	Estimated Value	Acreage	PSF Land
Total	450,000	82.0%	\$55.00	\$24,750,000	12.600	\$45.09

Conclusion

The data array by price per square foot of building area shows some pattern regarding value per square foot of building area. The average of the adjusted comparables is \$79.33 per square foot of building area (\$49.27 per square foot of land area) with the average floor area ratio being 65.6%.

The subject is closest in floor area ratio to Comparables 3 and 5, with Comparable 3 being somewhat of an outlier. Based on this data, a value of \$55.00 per square foot of building area (\$45.09 per square foot of land area) was estimated for the subject property as shown on the previous page.

Medical Office

The medical office component is projected to be a 50,000 square foot building on a 100,000 square foot lot (50% floor area ratio). The adjustment grid previously shown for the office space was altered as shown on the following page. The main difference is in the different FBA and linkage fees for medical office use, based on the different projected floor area ratio. The following is a summary of the adjustments, (note, the Excel program rounds to the nearest dollar):

Medical Office Subject Property	Torrey Pines Lot 10B 1	Headquarters Point 2	Pardee- Lincoln Property Company 3	Arris Campus Excess Land 4	California Highway Patrol 5	LPL- Irvine Company 6
Sale Price	\$4,970,100	\$3,280,000	\$53,000,000	\$7,500,000	\$10,819,000	\$6,200,000
Net Acreage 2.296	2.700	5.300	15.720	5.700	5.200	4.500
Size Sq. Ft. 100,000	117,612	230,868	684,763	248,292	226,512	196,020
Price Per Sq. Ft.	\$42.26	\$14.21	\$77.40	\$30.21	\$47.76	\$31.63
Financing						
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Property Condition	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Comparison	\$7.52	\$12.94	\$0.00	\$0.00	\$0.00	\$0.00
Adjustment	\$7.52	\$12.94	\$0.00	\$0.00	\$0.00	\$0.00
Expen. Immed. After Purch.						
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Conditions of Sale	Equal	Equal	Inferior	Equal	Equal	Equal
Comparison	-25%	0%	10%	0%	0%	0%
Adjustment	(\$10.56)	\$0.00	\$7.74	\$0.00	\$0.00	\$0.00
Subtotal PSF Land	\$39.21	\$27.15	\$85.14	\$30.21	\$47.76	\$31.63
Changes In Market Conditions						
Date of Sale (contract) 9/17	9/16	9/16	5/15	2/15	2/15 (closing)	7/14
Adjustment	0.00%	0.00%	0.00%	0.00%	0.00%	25.00%
Adjustment Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7.91
Subtotal	\$39.21	\$27.15	\$85.14	\$30.21	\$47.76	\$39.54
FBA Fees PSF-						
Comparison	\$5.21	\$1.88	\$6.25	\$1.88	\$0.88	\$11.49
Adjustment	\$3.97	\$0.64	\$5.01	\$0.64	(\$0.36)	\$10.25
Linkage Fees PSF-						
Comparison	\$0.28	\$0.76	\$1.30	\$0.70	\$1.06	\$0.35
Adjustment	(\$0.42)	\$0.05	\$0.59	(\$0.00)	\$0.35	(\$0.36)
Size-Acres	2.700	5.300	15.720	5.700	5.200	4.500
Comparison	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Configuration						
Comparison Irregular	Equal	Equal	Equal	Equal	Equal	Equal
Adjustment	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Adjustment Amount	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Zoning (assumed)						
Comparison SP	IP-1-1	IL-2-1	IP-2-1	IL-2-1	IL-2-1	IP-1-1
Adjustment	Sl. Inferior	Equal	Inferior	Equal	Equal	Sl. Inferior
Adjustment	5.00%	0.00%	10.00%	0.00%	0.00%	5.00%
Adjustment Amount	\$1.96	\$0.00	\$8.51	\$0.00	\$0.00	\$1.98
APZ Restrictions						
Comparison No	APZ-2	APZ-2	No	No	No	TZ
Adjustment	Inferior	Inferior	Equal	Equal	Equal	Inferior
Adjustment	10.00%	10.00%	0.00%	0.00%	0.00%	10.00%
Adjustment Amount	\$3.92	\$2.71	\$0.00	\$0.00	\$0.00	\$3.95
Specific Location						
Comparison Corner-Freew.	Interior-Flag	Interior	Corner-Freeway	Interior	Corner-Freeway	Interior-T
Adjustment	Inferior	Inferior	Equal	Inferior	Equal	Inferior
Adjustment	10.00%	10.00%	0.00%	10.00%	0.00%	10.00%
Adjustment Amount	\$3.92	\$2.71	\$0.00	\$3.02	\$0.00	\$3.95
Indicated Value-PSF Land	\$52.56	\$33.27	\$99.25	\$33.86	\$47.76	\$59.31
General Location						
Comparison Mission Valley	Torrey Pines	Sorrento Mesa	Pac Highl. Rch.	Sorrento Mesa	Kearny Mesa	UTC
Adjustment	Superior	Equal	Superior	Equal	Equal	Superior
Adjustment	-10%	0%	-30%	0%	0%	-15%
Adjustment Amount	(\$5.26)	\$0.00	(\$29.78)	\$0.00	\$0.00	(\$8.90)
Indicated Value-PSF Land	\$47.31	\$33.27	\$69.48	\$33.86	\$47.76	\$50.42
Building Square Feet	50,000	123,676	630,000	135,360	170,000	80,000
Floor Area Ratio	50.00%	53.6%	92.0%	54.5%	75.1%	40.8%
Price Per Square Foot	\$132.95	\$62.10	\$75.52	\$62.11	\$63.63	\$123.53

Subsequently, the data array was altered as follows:

Base Data:

Comp. No.	Floor Area Ratio	Adjusted Value PSF Bldg.	Adjusted Value PSF Land	Location	Date
SP	50.0%			Mission Valley	9/17
1	35.6%	\$132.95	\$47.31	Torrey Pines	9/16
2	53.6%	\$62.10	\$33.27	Sorrento Mesa	9/16
3	92.0%	\$75.52	\$69.48	Pac Highl. Rch.	5/15
4	54.5%	\$62.11	\$33.86	Sorrento Mesa	2/15
5	75.1%	\$63.63	\$47.76	Kearny Mesa	2/15
6	40.8%	\$123.53	\$50.42	UTC	7/14

Sorted:

Comp. No.	Floor Area Ratio	Adjusted Value PSF Bldg.	Adjusted Value PSF Land	Location	Date
1	35.6%	\$132.95	\$47.31	Torrey Pines	9/16
6	40.8%	\$123.53	\$50.42	UTC	7/14
SP	50.0%			Mission Valley	9/17
2	53.6%	\$62.10	\$33.27	Sorrento Mesa	9/16
4	54.5%	\$62.11	\$33.86	Sorrento Mesa	2/15
5	75.1%	\$63.63	\$47.76	Kearny Mesa	2/15
3	92.0%	\$75.52	\$69.48	Pac Highl. Rch.	5/15
	Bldg. Sq.Ft.	FAR	PSF Bldg.	Estimated Value	PSF Land
Total	50,000	50.0%	\$70.00	\$3,500,000	2.296

The data array by price per square foot of building area shows some pattern regarding value per square foot of building area. The average of the adjusted comparables is \$80.20 per square foot of building area (\$50.38 per square foot of land area) with the average floor area ratio being 65.6%.

The subject is closest in floor area ratio to Comparables 2, 4 and 6. Based on this data, a value of \$70.00 per square foot of building area (\$35.00 per square foot of land area) was estimated for the subject property as shown on the previous page. The difference between the conclusions for the office and medical office space is due to the floor area ratios for which the medical office space would not need as much structured parking, even though medical office has higher parking requirements.

RECAPITULATION

The following is a recapitulation of the revenues by use:

Use	Units	Acres	Estimated Building Square Feet	Land Square Feet	Floor Area Ratio	Estimated Land Value PSF	Estimated Value
Multi-Family Residential and Ground Floor Retail	4,125	55.00	3,712,500	2,395,800	155%	\$210.06	\$503,250,000
Retail (not included ground floors of other buildings)		2.75	30,000	119,790	25%	\$45.00	\$5,390,550
Retail (included ground floors of other buildings)	included		30,000	included			\$5,390,550
Hotel - 300 Rooms		7.00	216,493	304,920	71%	\$41.32	\$12,600,000
Class A Office		12.60	450,000	548,856	82%	\$45.09	\$24,750,000
Class A Medical Office PPO/HMO		2.30	50,000	100,188	50%	\$35.00	\$3,500,000
Total Net Developable		79.65	4,488,993	3,469,554	129%	\$159.93	\$554,881,100
Parks Required for Multi-Family Residential		21.37					
Circulation, Plaza, Common Area, Open Space,							
Trolley Station, Parking (for River Park and Trolley)		31.07					
Assessor's Parcel 433-250-14 (Murphy Canyon Creek)		2.49					
City Pure Water Program Wells/Facilities/Structures		0.54					
Total Developable		135.12					
River Park		34.60					
Total Gross		169.72					

INCOME APPROACH – DISCOUNTED CASH FLOW ANALYSIS

The analysis begins with a projection of revenue using the property values developed in the previous sections of this report, which were valued on a finished entitled basis. An estimate of when a specific portion or use type will sell was not made as the sales absorption program does not begin for five-years (which makes it difficult to project the market demand at that time). Expense items must then be deducted from the projected sale proceeds, (typically in an even manner similar to the revenue,) to arrive at the net cash flows which are discounted for entrepreneurial incentive to arrive at a present value indication which is the market value estimate.

Numerous market participants were interviewed during preparation of this appraisal. The comments will be summarized to protect confidentiality and will not be attributed to a specific source unless published or a matter of record or by permission. Some of those interviewed provided information from actual projects and some provided “program” numbers and ranges. The information will be summarized by general category or major assumption.

Project Duration

Market participants interviewed agreed that a 14-year total project term was considered adequate to entitle and then complete demolition, “horizontal” development and land sales absorption with the challenge being where in the business cycle entitlements are achieved. “Vertical” development would be left to the subsequent buyers. The entitlement period is five years and the sales absorption period is nine years thereafter.

Inflation-Revenue and Expenses

Some of the information used in the analysis of inflation was gleaned from a study prepared for another assignment completed in April 2018. The following is a summary of market participant interviews on this subject:

Market participants unanimously agree that trending a current value into the future is a challenge made more difficult, and in some ways easier, with the length of the term. There is a benefit to having the actual data revealed over the passage of time when working on a retrospective valuation. The longer the term of the prediction, it is more likely that the answer is simple and drawn from the historical long-term average which takes into consideration the ups and downs of business cycles. The risk is in pressure when attempting to predict the timing of business cycles.

Regarding commercial real estate, the vast majority of market participants most easily related to and referenced an annual increase of 3% being the norm for relatively short term leases on a contractual basis. Beyond a 10 year lease, it is difficult to forecast and the amount of a contractual increase would be highly influenced by market conditions at the time the lease was negotiated. Conversely, in a 42-year career, the appraiser has read a few ground leases that have annual fixed and compounded 3% increases or more. However, those leases were negotiated at a time when market conditions reflected relatively high underlying inflation. Such is not the case at this time and as of the effective date of valuation.

It became obvious that for many market participants, their opinion to apply an annual increase of 3% was the default position and that conclusion does not necessarily relate directly to every property. Like with all properties, location, size and highest and best use must be considered. Unlike a newly constructed building, even if it represents the highest and best use, the land is the hard asset component and the improvements are the depreciating component. In this case, the location is good, but size is of paramount importance. The subject highest and best use being for a large mixed-use project results in many assumptions being made and the inflation rate(s) are an important part of the conclusion of the discount rate used to value the property.

Relatively speaking, inflation has been low for a long time. The U.S. Bureau of Labor Statistics website has an inflation calculator feature that indicates the following:

Beginning Date	Ending Date	No. of Years	Beginning Amount	Ending Amount	Annual Compound Inflation
9/1917	9/2017	100	1.00	18.56	2.96%
9/1967	9/2017	50	1.00	7.35	4.07%
9/1977	9/2017	40	1.00	4.02	3.54%
9/1987	9/2017	30	1.00	2.15	2.58%
9/1997	9/2017	20	1.00	1.53	2.15%
9/2007	9/2017	10	1.00	1.18	1.67%

Out of almost meaningless curiosity, the average of the six indicators is 2.83%. Inflation has been down recently and on a downward trend since 1967 but the government has not been consistent with items included in the basis of the calculation (the Consumer Price Index for All Urban Consumers). Periodically, items have been removed. Hence, the majority of real estate leases have fixed increases or inflation clauses with minimums and maximums. Market participants acknowledged the cyclical nature of the market but did not suggest or endorse a methodology where an escalation factor would attempt to model the ups and downs of a real estate cycle. In fact, no two cycles are exactly the same.

As to the ranges of opinions provided, the low was 2% per year and the high was 6% per year. All agreed that this is a non-scientific endeavor. Given the location and size, the subject property is nearly irreplaceable. The lifeblood of the real estate market is the cycle. Regardless of methodology, the subject property is in a good location and such assets have the potential to outperform long-term increases in inflation and ups and downs in the cycle.

Typically, the long term inflation in land values would be informative. However, there is a lack of historical data on the sales of large parcels of over 100 acres in San Diego County to study. There was an analysis of the applicable adjustment for changes in market conditions for each individual land valuation previously presented. Those adjustments were made mindful of estimating the “finished

lot” value for the sale of each component to third party developers. The conclusions are not applicable to the subject property in its unentitled “as is” condition.

Engineering News Record (ENR)

Inflation in land value is also sensitive to changes in construction costs.

Engineering News-Record is an American weekly magazine that provides news, analysis, data and opinion for the construction industry worldwide. It is widely regarded as one of the construction industry's most authoritative publications.

ENR's Building Cost Indexes are published monthly. Data on the cost of key components and labor in 20 major cities is surveyed and has been surveyed for many years. The following is a brief description of the categories:

The Construction Cost Index is comprised of 200 hours of common labor at the 20-city average of common labor rates, plus 25 cwt of standard structural steel shapes at the mill price prior to 1996 and the fabricated 20-city price from 1996, plus 1.128 tons of Portland cement at the 20-city price, plus 1,088 board ft. of 2 x 4 lumber at the 20-city price.

The Building Cost Index is comprised of 68.38 hours of skilled labor at the 20-city average of bricklayers, carpenters and structural ironworkers rates, plus 25 cwt of standard structural steel shapes at the mill price prior to 1996 and the fabricated 20-city price from 1996, plus 1.128 tons of Portland cement at the 20-city price, plus 1,088 board ft. of 2 x 4 lumber at the 20-city price.

The Materials Cost Index is the materials component of ENR's building and construction cost indexes. It tracks the weighted price movement of structural steel, Portland cement and 2 X 4 lumber.

The Skilled Labor Index is the labor component of ENR's Building Cost Index and tracks union wages, plus fringe benefits, for carpenters, bricklayers and iron workers.

The Common Labor Index is the labor component of ENR's Construction Cost Index and tracks the union wage, plus fringe benefits, for laborers.

The following is a summary of the ENR cost index data to and from various dates:

ENR Cost Index Summary

Date	Constr. Cost Index	Change	Building Cost Index	Change	Materials Cost Index	Change	Skilled Labor Index	Change	Common Labor Index	Change	Overall Average
9/9/19	11311		6147		3469		10527		23822		
9/30/17	10823	4.5%	5873	4.7%	3220	7.7%	10158	3.6%	22950	3.8%	
Years		1.92		1.92		1.92		1.92		1.92	
Average Per Year		2.4%		2.4%		4.0%		1.9%		2.0%	2.5%
9/30/17	10823		5873		3220		10158		22950		
9/30/12	9341	15.9%	5195	13.1%	2890	11.4%	8966	13.3%	19866	15.5%	
Years		5		5		5		5		5	
Average Per Year		3.2%		2.6%		2.3%		2.7%		3.1%	2.8%
9/30/17	10823		5873		3220		10158		22950		
9/30/07	8050	34.4%	4533	29.6%	2238	43.9%	7701	31.9%	16946	35.4%	
Years		10		10		10		10		10	
Average Per Year		3.4%		3.0%		4.4%		3.2%		3.5%	3.5%
9/30/17	10823		5873		3220		10158		22950		
9/30/97	5851	85.0%	3378	73.9%	2238	43.9%	5267	92.9%	11766	95.1%	
Years		20		20		20		20		20	
Average Per Year		4.2%		3.7%		2.2%		4.6%		4.8%	3.9%

The ENR figures are in direct conflict with the results of interviews with market participants who say that costs have increased at a greater rate recently. Strong market conditions have placed upward pressure on the demand for labor and volume has increased the price of materials. The consensus of construction executives and developers interviewed was that a 4% increase in costs was appropriate and this is the index included in the Clark Construction proposal for the SDSU West project to adjust to the anticipated construction date of June 2020.

Conclusion

After considering the comparable data, a split conclusion was made for inflation. For revenues, annual compounded inflation of 3% was considered appropriate and for costs, annual compounded inflation of 4% was considered appropriate.

Rather than trying to predict spikes and dips in prices, all market participants interviewed agreed that a modest inflation rate of 2.5% to 3.0% in revenues is appropriate. A 3.0% projection was the consensus of opinion. This allowance was also considered adequate to cover projected increases in development fees. The fiscal year fees for the Mission Valley community increased only 1.5% in 2017 from 2016 but increased at a higher rate in the past two fiscal years as follows:

Fiscal Year	Residential Fee	Change
2016	\$12,098	
2017	\$12,276	1.5%
2018	\$12,713	3.6%
2019	\$13,134	3.3%

Entitlement Period and Expenses

Entitling such a large project is a challenge. Knowledgeable market participants report that a minimum of five years will likely be required after an application is “deemed complete” by the City and a developer could spend up to one year just preparing such an application. This was confirmed by city of San Diego employees in the Planning Department and Development Services Department. As a check, the following is a summary of the entitlement time frames on several significant projects in San Diego:

Project	Year Submitted	Year Approved (Projected)	Years	Comments
Riverwalk	2018	2020	3	A re-entitlement and revision from the Levi-Cushman Specific Plan; application deemed complete 2/28/18
Town & Country	2015	2018	3	Extensive hotel renovation and new residential construction; application deemed complete 9/28/15 approved 3/20/18
One Paseo	2008	2015	7	Very controversial and downsized after facing significant opposition and lawsuit
Civita	2005	2008	4	Discussions with the City's Traffic Planning Department began in 2002 (6 years total)
Liberty Station	1993	2001	8	Navy announced base closure; committee formed in 1994; draft plan submitted 1996; EIR certified 1998; developer's submittal to City late 1999
New Century Center-San Diego Spectrum	1997	2000	3	A re-entitlement and revision from the Century Park Plan

Riverwalk was in the planning stages and being discussed with City officials in 2017. The official submission occurred in 2018. The Town & Country project is an extensive renovation of an existing hotel and convention center with construction of new residential units. One Paseo in Carmel Valley was downsized to avoid protracted delays due to a lawsuit over its density and traffic impact. Another lawsuit filed after the approval in 2015 resulted in further downsizing of the project. Civita is located in Mission Valley, less than one mile west of the Stadium. Notable is that, as of the effective date of valuation, the Civita project in Mission Valley was in its ninth year of development after a three-year entitlement period subsequent to their application being deemed “complete” by the City. Liberty Station in Point Loma took longer than expected because the project kicked off as part of the Federal Base Realignment and Closure Act, requiring extra time. San Diego Spectrum in Kearny Mesa had a

relatively short entitlement period as the original General Dynamics – New Century Center plan was approved and then revised to be the San Diego Spectrum project.

This information is supportive of a five-year entitlement period which was confirmed by knowledgeable market participants. Strong consideration was also given to the community plan update that was in process as of the effective date of valuation. Entitlement costs were estimated to be \$8,000,000 which was considered a reasonable projection for a high profile project at the subject property.

Market participants mostly agreed with splitting the 14-year project duration between an entitlement period of five years and a sales absorption period of 10-years or splitting it into five years and nine years, respectively. The latter was considered more reasonable given the support for the five-year entitlement period. The key indicator supporting the absorption period is that land for construction of 4,125 multi-family residential units would have to be sold out in nine years which equates to an average of 458 units per year. With pre-sales and pre-leasing efforts during construction and proper product stratification, “vertical” developers should be able to achieve a sufficient absorption rate to support that sales absorption rate. Notable is that there continues to be a shortage of residential units constructed annually in San Diego County.

Demolition Cost

The estimate for demolition costs of the stadium and site improvements was made after evaluating several sources. The figure used in a 2011 appraisal of the subject property by Bell, Anderson & Sanders, LLC (date of valuation August 14, 2004) was \$9,800,000 as provided by a local contractor Erreca’s, Inc.

Notable is that demolition costs are often used as a loss leader, especially for stadium projects as there is national television exposure of the initial implosion (blasting). Therefore, those costs tend not to increase significantly over time. Also, demolition activities take two forms, conventional (dismantling with equipment) and implosion (blasting). With an active San Diego Trolley station at the southerly portion in reasonably close proximity to the San Diego River and residences overlooking the subject property from the valley ruins, it is highly unlikely that implosion and the commensurate dust and pollution, would be allowed. Both methods are typically comparable in cost but the conventional method takes more time.

At the Hunter’s Point-former Candlestick Park project in San Francisco, the 2015 demolition and site clearing cost was reported as \$10,000,000.

In the fall of 2015, a demolition and site clearing estimate for the subject property prepared by Turner Construction, was provided to the City of San Diego. It totaled \$11,425,000 as of an anticipated construction start date of June 2017.

A May 2019 estimate for demolition prepared by Clark Construction on behalf of the SDSU Team for its project is as follows:

	<u>Component</u>	<u>Amount</u>
	Asbestos Abatement	\$1,000,000
	Demolition	\$10,000,000
(1)	Selective Demolition (1)	<u>\$202,424</u>
	Total	\$11,202,424
(2)	Indexing to September 30, 2017 (20 months)	<u>0.935611</u>
	Revised Total	\$10,481,111
	(1) Removal of curbs, gutters, sidewalks, water, sewer and and storm drain lines/structures	
	(2) 4% per year compounded and calculated monthly	

After considering the comparable data and information gleaned from knowledgeable market participants, the indexed Clark Construction figure of \$10,481,111 was considered reasonable for use in this appraisal.

Remediate Flood Zone – Floodway Elevation

Based on information submitted for review for a previous appraisal, an approximately 66.5 acre portion of the property will require import of soil and placement to raise the elevation two feet. This equates to 214,573 cubic yards of material which, at the City's 2017 bonding estimate of \$21.30 per cubic yard, equals \$4,570,405, $((66.5 \text{ acres} \times 43,560 \text{ sq. ft. per acre} \times 2 \text{ feet}) / 27 = 214,573 \text{ cubic yards} \times \$21.30)$.

The May 2019 Clark Construction figures received from the SDSU Team indicate a quantity of 300,000 cubic yards which would increase the cost to \$6,390,000. When indexed back to September 2017, the amount is \$6,018,479 which was considered reasonable.

This cost is very sensitive to availability of clean fill dirt as of the construction date. Reportedly, Clark Construction has assured the SDSU Team that they have the dirt available at no cost or a significantly reduced cost. However, that is as of May 2019, not September 2017.

Murphy Canyon Creek

Regarding Murphy Canyon Creek, the deferred maintenance costs and future estimated maintenance is being quantified by the City of San Diego. Past capital expenditures are unknown. Historic annual maintenance costs include the City performing sediment and debris removal in the channel in 2015, for an estimated cost of \$1,000,000. In the channel's current configuration, this maintenance may need to be performed approximately every 10 or more years. However, it should be noted that in the future when the channel is in a restored, sediment-neutral condition, sediment maintenance costs would be significantly reduced, if not eliminated. There are no known deferred maintenance items. The City does not have a detailed scope of work for any developer who purchases the stadium site and Murphy Canyon Creek for what is required for storm water mitigation on Murphy Canyon Creek.

However, the design objectives are generally outlined in the City's comments on Murphy Canyon Creek Channel (see Murphy Canyon Creek Channel comments 1.a through 1.d in the "SDSU Stadium Initiative Purchase Agreement – Storm Drain System Recommendations"). The City does not have a cost estimate for the restoration of Murphy Canyon Creek Channel. However, using a general unit cost approach for estimating this type of restoration work (\$2,000 to \$2,500 per linear foot), the improvements are estimated to cost between \$3,000,000 and \$4,000,000.

As previously noted, these costs are being reviewed and quantified and were not considered in the appraisal.

Other On-Site Construction Costs

Information provided for a 2011 appraisal of the Civita planned community in Mission Valley indicated that the on and off-site construction costs to create the sites for the various uses was estimated at \$90,000,000. This equates to \$8.96 per square foot on the gross (230.5 acres) and \$13.76 per square foot on the net (150.2 acres).

The Civita Specific Plan was approved in 2008 and the estimate was provided in 2011. As of 2017, it has increased to \$110,000,000 or \$10.96 per square foot gross and \$16.81 per square foot net. The Civita site is terraced into a hillside and the Stadium site is relatively flat making Civita more expensive to develop. As of June 2019, it is \$175,000,000 or \$17.43 per square foot gross and \$26.75 per square foot net.

A 206.0-acre gross and 157.5-net acre project in Chula Vista had a 2017 estimate for on and offsite costs of \$12.20 per square foot gross or \$15.96 per net square foot. The mix is approximately 65% multi-family residential and 35% commercial mixed-use, office, retail and hospitality. A second source for an on and off-site cost estimate for this project reported that it was only \$11.48 per net square foot.

A large project in North San Diego of 383.8 acres gross and 314.0 acres net had a 2017 estimate for on and offsite cost of \$19.32 per square foot gross and \$23.63 per square foot net. The mix is 3,050 residential units with an average lot size of 4,000 square feet, 500,000 square feet of office space and a 225,000 square foot community retail center.

A project that is re-entitling in Mission Valley has a rough 2017 estimate for on and offsite cost estimate of \$1,000,000 per net acre or \$22.96 per square foot. As of June 2019, the estimate is \$26.40 per square foot.

The following is a summary of the indications:

EXISTING STADIUM SITE

Project/Location	Gross Acres	Net Acres	Net to Gross Ratio	PSF Gross	PSF Net
Civita/San Diego (Mission Valley)	230.5	150.2	65.2%	\$10.96	\$16.81
Confidential/Chula Vista	260.0	157.5	60.6%	\$12.20	\$15.96
Confidential/North San Diego	383.8	314.0	81.8%	\$19.32	\$23.63
Confidential/San Diego (Mission Valley)	200.0	120.0	60.0%	\$38.26	\$22.96
The above estimate as of 2019	200.0	120.0	60.0%	\$44.00	\$26.40

The comparables form an extremely wide range and, at first glance, the best comparable would be Civita, a former rock/gravel extraction property. The developer of that project reports that the mining operations, reclamation and grading were completed mindful of the proposed contours for the subsequent mixed-use development, but it cost the land owner \$25,000,000 (\$3.82 per net square foot).

The Clark Construction estimate for the SDSU Mission Valley project totals \$127,721,621 as follows:

Category	Amount
Hazardous Materials Abatement	\$1,000,000
Demolition	\$11,202,424
Site Preparation	\$12,628,261
Site Improvements	\$68,508,269
Liquid and Gas Site Utilities	\$22,821,645
Electrical Site Improvements	\$7,674,094
General Requirements	\$3,887,069
Total	\$127,721,762

This does not include pre-construction services, contractor's profit and overhead and SDSU soft costs. The following is a summary of the costs provided by the SDSU Team with deductions for the other items separately estimated in this appraisal:

Item #		Clark
1	Direct Construction Cost Budget. (Includes Self Perform Costs and Escalation)	See Below
	<i>Bid Form Items:</i>	
2	Preconstruction & Design Costs:	
2.1	Design Fees	\$ 6,610,017
2.2	Preconstruction Fees	\$ 1,008,965
3	Construction Phase Fees & GC's:	
3.1	Site Management Fee for Construction of the Project	\$ 7,440,473
3.2	Design-Builder Performance & Payment Bond	\$ 1,228,868
3.3	Subcontractor Performance & Payment Bond	\$ 1,099,514
3.4	Construction Phase Overhead & Profit	\$ 5,044,827
4	Self Perform Scope of Work (included in item #1 above)	Included
	Contractor Contingency, (5% of direct construction cost of \$127,721,761)	\$ 6,386,088
	GMP Agreement (items 1 + 2 + 3 + Contractor Contingency)	\$ 28,818,753
	SDSU Soft Costs (includes, CEQA costs, permits, & fees, but not off-sites)	\$ 54,292,833
	Total Project Cost (GMP + SDSU Soft Costs)*	\$ 83,111,587
	<i>*Ground Improvement, Deep Foundation Costs Excluded. Still under evaluation.</i>	
	Direct Construction	\$ 127,721,761
	Total Project Cost	\$ 83,111,587
	Demolition	\$ (10,481,111)
	Floodway Elevation	\$ (6,018,479)
	River Park	\$ (25,947,330)
	Sub-Total	\$ 168,386,428
	Indexing to 9/30/17 (20 months)	0.935611
	Revised Total	\$ 157,544,194

Reportedly, the Clark figures are 30% firm with the remainder being estimates largely on a design-build basis with the project still being designed. Since the SDSU Mission Valley project is specific to the University, significantly more dense and includes site accommodations for a future football stadium, the costs are considered to be high, especially when SDSU's use of prevailing wage labor is considered. Knowledgeable market participants report that the impact of using prevailing wage labor is not as significant for horizontal construction as there is more equipment involved and the labor is more skilled and paid accordingly. The labor cost differences are more significant in vertical construction where there are more less-skilled laborers at lower pay scales. A 15% reduction was considered appropriate ($\$157,544,194 \times .85 = \$133,912,565$). This equates to \$17.87 per square foot gross (172.00 acres), \$38.60 per square net (79.65 acres).

Off-Site Costs

The most current information on the off-site requirements was derived from a draft summary prepared by Fehr & Peers and OCMI dated March 19, 2019 sourced primarily from a 2015 Environmental Impact Report prepared for a potential new NFL caliber stadium for the then San Diego Chargers and subject to completion of a traffic study pursuant to the SDSU Mission Valley plan. The summary includes future projects throughout Mission Valley and 'fair share' estimate for the subject property for some of those projects. The following is a summary of these figures:

Transportation Improvement Implementation Plan
March 19, 2019 Draft

Item	Total Cost Estimate	Fair Share %	Subject Property Amount
Stadium Transportation and Parking Management Plan	\$50,000	100.0%	\$50,000
Intersection 11	\$3,402,587	100.0%	\$3,402,587
Intersection 15	\$50,000	48.2%	\$24,100
Intersection 35	\$21,079,597	56.4%	\$11,888,893
Intersection 18	\$75,000	100.0%	\$75,000
Roadway Segment 21	\$25,000	100.0%	\$25,000
Roadway Segment 22	\$18,000	7.9%	\$1,422
Intersection 31	\$15,000	100.0%	\$15,000
Intersection 26	\$4,042,181	100.0%	\$4,042,181
Intersection 17	\$15,000	45.3%	\$6,795
Intersection 9	\$400,000	100.0%	\$400,000
Intersection 32	\$15,000	100.0%	\$15,000
Intersection 21	\$6,722,051	100.0%	\$6,722,051
Intersection 13	\$15,000	51.7%	\$7,755
Intersection 8	\$7,305,276	100.0%	\$7,305,276
Intersection 12	\$375,895	48.0%	\$180,430
Intersection 10	\$15,000	14.6%	\$2,190
Intersection 1	\$15,000	42.4%	\$6,360
Intersection 19	\$75,000	100.0%	\$75,000
Intersection 20	\$3,304,118	100.0%	\$3,304,118
Intersection 17	\$15,000	100.0%	\$15,000
Intersection 41	\$15,000	100.0%	\$15,000
Intersection 34	\$496,063	100.0%	\$496,063
Intersection 27	\$15,000	100.0%	\$15,000
Intersection 22	\$250,000	100.0%	\$250,000
Total	\$47,805,768	80.2%	\$38,340,220
Indexing to September 30, 2017 (18 months)			0.941859
Revised Total			\$36,111,082

The above information is the best available at this time and was utilized in this appraisal. These figures are assumed to be correct but are an estimate and could change with additional information.

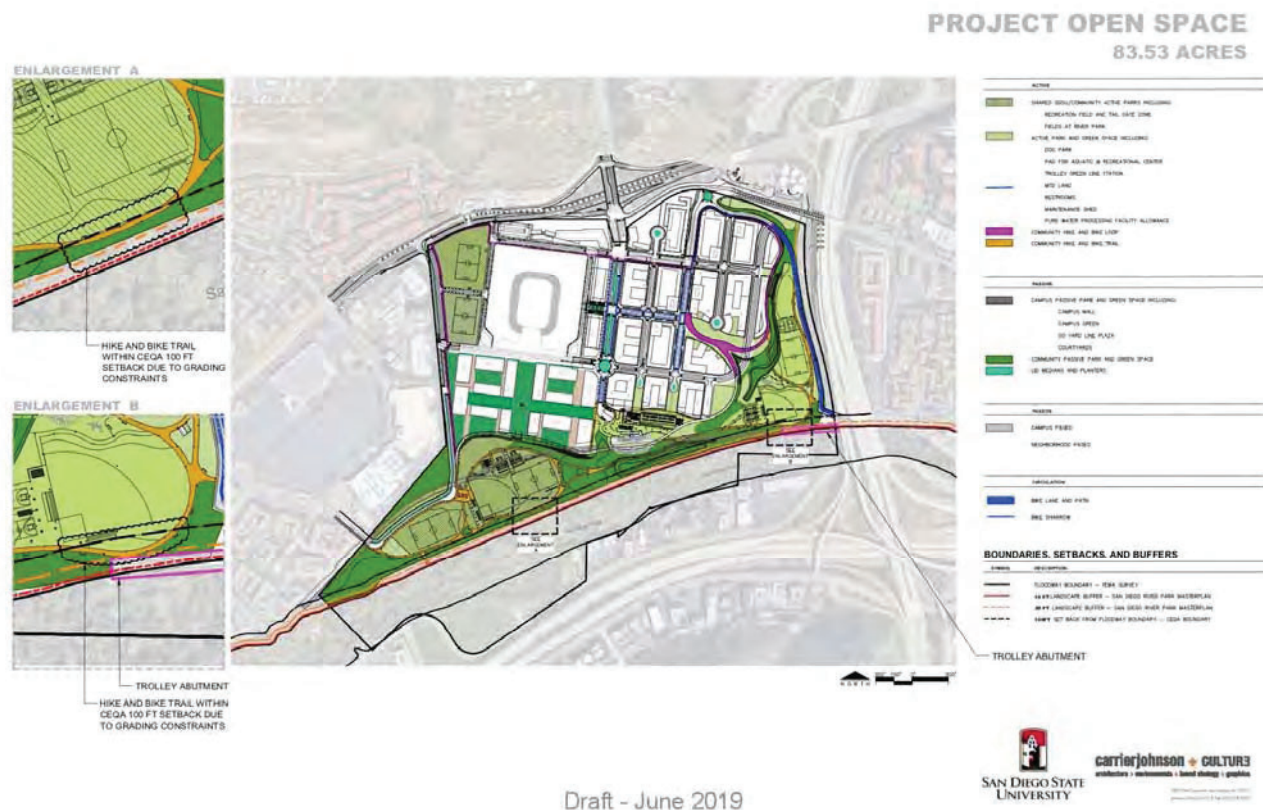
River Park

The 34.6 acres south of the Trolley tracks is earmarked for a regional park. An assumption of this appraisal is that the developer of the project on the 135.12 acres north of the Trolley tracks will construct the park improvements. Knowledgeable market participants were surveyed regarding park

costs. Some provided budget numbers such as \$1,500,000 per acre (\$34.44 per square foot) to \$1,700,000 per acre (\$39.03 per square foot) with use of 'prevailing wage' labor. Even though the River Park is assumed to be built by a private sector developer it would be a City-approved project and highly likely subject to the requirements to use prevailing wage labor in a market-rate highest and best use appraisal.

The Clark Construction estimate for the SDSU Mission Valley project is not organized in a manner that makes it easy to extract the River Park costs. An estimate from Cummins Construction dated July 25, 2018 was submitted for review covering 62.5 acres of park area. The total is \$38,971,000 or \$14.31 per square foot. The estimate was made in two components, residential (49.69 acres) and River Park (12.81 acres), at costs ranging from \$14.14 to \$15.01 per square foot, respectively. This estimate is considered to be outdated.

The following is rendering of the SDSU River Park plan:



City staff provided actual costs and the most recent estimates for several City park projects as follows:

Date	Park	Total Cost	Acres	Per Square Foot	Comments
2/19	Stadium Regional (River) (subject property)	\$27,457,549	34.00	\$18.54	does not include rec. center and aquatic complex of \$30,210,784 (a \$20.40 psf add)
1/17	Pacific Highlands Ranch Community Park	\$17,575,306	13.00	\$31.04	does not include recreation center complex of \$7,640,942 (\$13.49 psf add)
1/19	Denberry Ranch Otay Mesa	\$10,282,000	9.00	\$26.23	3.65 acres of turf, 1.58 acres of planting, basketball courts, skate park
11/16	Cesar Solis Comm. Park Otay Mesa	\$19,833,095	15.43	\$29.51	soccer field, restroom building, baseball fields
2017	Civita Central Park	\$25,344,018	14.30	\$40.69	very expensive active amenities
2018	Mission Valley				
2016	Mira Mesa Community Park Expansion Phase 1	\$16,838,874	11.00	\$35.14	ball fields, community center
2019 estimate	Fairbrook Neighborhood Park-Scripps Ranch	\$4,992,699	3.00	\$38.21	multi-purpose sport court, faux bridge, restroom and storage building
2019 estimate	Carmel Valley Neighborhood Park #8	\$6,630,525	4.00	\$38.05	incomplete information
2019 estimate	Hidden Trails Neighborhood Park	\$5,850,000	4.00	\$33.57	information not submitted
2019 estimate	Riviera Del Sol Neighborhood Park	\$7,140,963	4.90	\$33.46	ball fields, multi-purpose court, children's play areas, restrooms
2019 estimate	Wangenheim Joint Use Mira Mesa	\$5,643,211	4.00	\$32.39	multi-purpose athletic field, basketball half-court, restrooms
2018 estimate	Torrey Meadows NP Torrey Highlands	\$6,041,455	5.00	\$27.74	multi-purpose athletic field, basketball half-court, restrooms
2019 estimate	Salk NP & Joint Use Mira Mesa	\$5,936,686	6.10	\$22.34	multi-purpose athletic field, amphitheater, restrooms, parking lot

The costs, which were provided by City staff, are in a wide range with the largest comparable being less than one-half the acreage of the subject river park. Therefore, the City's estimate of \$27,457,549 was used, but indexed 17 months back to the effective date of valuation ($0.944998 \times \$27,457,549 = \$25,947,330$). Notable is that City has yet to approve and accept a design for the River Park). There will also be a community recreation center of 20,000 square feet and a swimming pool situated on the River Park land. City staff report that construction of those improvements would not be the responsibility of the developer of the subject property but the necessary land would be reserved.

Allowance for Increased "Deep" Foundation Costs

Group Delta Consultants prepared a memorandum dated May 6, 2019 which was submitted for review. The following is a summary of their conclusions:

The design and construction to develop the site will need to manage the substantial variability observed in the subsurface materials. The liquefaction hazard will require mitigation that typically consists of ground improvement or deep foundations. However, the use of ground improvement is complicated by the variability of the soil physical characteristics, the pervasive gravel, and the observation of the mineral mica and its corresponding structure in the soil. Low displacement methods, such as steel-H piles, or replacement methods, such as Cast-In-Drilled-Hole (CIDH) piles, are possible deep foundation options considering the subsurface materials. However, the

displacement pile cross section needs to be slender enough to drive through the gravel with the least resistance and be robust enough to sustain high driving stresses. The diameter and type of drilling tool for replacement piles needs to be able to remove gravel, cobbles and boulders. Groundwater will influence the method of pile installation; however, it should not adversely impact most other construction activities since it was measured at about 15 feet below the deepest cut. Piles will need to be designed for additional loads that develop from liquefaction-induced settlement, referred to as downdrag loads. These loads can be as high as the service loads.

The foundation systems for the SDSU Mission Valley project are still being designed and alternatives include stone columns, deep piles and soil mixing. The soils issues affect sites near the river and several developers and contractors were interviewed regarding the potential costs. The following is a summary of the estimated costs provided on a confidential basis and the high and low-end estimates for the SDSU Mission Valley project:

		Land	Building	Total	No. Units
	Estimated	Area	Footprint	Building	Per
Comp.	Cost	Acres	Sq. Ft.	Sq. Ft.	Unit
SDSU	\$42,027,648	42.80	933,948	6,515,405	4,600
Low		\$22.54	\$45.00	\$6.45	\$9,136
SDSU	\$75,204,681	42.80	933,948	6,515,405	4,600
High		\$40.34	\$80.52	\$11.54	\$16,349
1	\$7,594,514	7.69	276,164	672,000	840
		\$22.66	\$27.50	\$11.30	\$9,041
2	\$21,408,400	70.00	949,185	4,745,925	4,300
		\$7.02	\$22.55	\$4.51	\$4,979
3	\$3,200,000	5.38		672,000	277
		\$13.65		\$4.76	\$11,552
Average		\$21.24	\$43.89	\$7.71	\$10,211
Conclusion	\$35,000,000	79.65		4,458,993	4,125
		\$10.09		\$7.85	\$8,485

This maze of numbers needs to first be understood relative to land area. The SDSU Mission Valley project is very dense and the 42.8 acres excludes the planned new Stadium footprint of 15.6 acres. The range is wide when analyzed on total land area being developed. Knowledgeable market participants report that building footprint area is a good indicator as the foundation costs are directly related to the footprint area. However, cost per total building area is an indicator of how density affects the total. Price per unit is a very good indicator if the majority of the project is residential units. The

tightest range was for price per square foot of building area which was given the most emphasis resulting in an estimate of \$35,000,000 under a highest and best use plan. When indexed to the effective date of valuation ($\$35,000,000 \times .935611 = \$32,746,385$).

Indexing for Inflation – Costs

Data previously shown supports indexing recent construction estimates back to September 30, 2017. The conclusions were that indexing construction costs forward and back to September 30, 2017 should be at an annual rate of 4% compounded monthly. Inflation in revenues was projected at an annual 3%. Please refer to the previous Inflation-Revenue and Expenses section on page 92.

Discount Rate (IRR)

There are three components to estimating the appropriate discount rate (all cash “unlevered” internal rate of return): risk associated with entitlement, construction risk and economic risk. All three elements are present relative to the subject property.

Market participants all agree that a project duration commensurate with creating a planned community of this scope would require a higher return than the typical unlevered (unleveraged) 15% derived by blending 50% equity at 25% and 50% debt at 5% used on “vertical” development projects. The vast majority of the opinions as to discount rate were in a range of between 15% and 20%. This is due to the risk and expense of obtaining entitlements, high construction costs and the lengthy sales absorption period in a future climate of unknown economic conditions, interest rates and local politics.

One market participant weighted the rate between the entitlement period and the construction and sell-out period. The site is relatively level and presents virtually no construction risk. Therefore, all the risk is in the entitlement and sell-out and weathering the storm of one or two market downturns. In blending between entitlement and sell-out risk, using 25% for a 50% weighting on entitlement risk and 15% weighting on economic risk equals 20%.

Notable is that most market participants interviewed report that they would use a discounted cash flow analysis projected annually over the 15-year project period. The dynamics of having significant entitlement, demolition and site preparation costs before land sales begin lends itself more to a methodology for discounting annual net cash flows. Internal rates of return have been sensitive to a blended capital stack (different risk rates for different tranches of funds) and the competitiveness from low interest rates which are not expected to stay so low in the future. Also taken into consideration is the prestige of working on such a high profile project.

Research indicates that traditional lenders are not likely to make an acquisition and development loan on the subject property but prefer to participate after the entitlements are obtained. Thus, an equity partner would be required. However, with the assumption of no interim operational losses, (the stadium operates at a multi-million dollar annual loss), the rate can be reduced. Given the preponderance of opinions in a range between 15% and 20%, the mid-point was chosen for a discount rate of 17.5%.

Finally, the average discount rates summarized in the National Development Land Market section of the PwC Real Estate Investors Survey are included in the Addendum, Exhibit A and are summarized as follows:

PwC Indicators

Discount Rates - National Development Land Market

Fourth Quarter 2017				Average	Second Quarter 2017				Average
10.00%	-	20.00%	15.40%		10.00%	-	20.00%	16.00%	

The averages are also supportive of the 17.5% conclusion. PwC only publishes this portion of their survey in the second and fourth quarters.

Market data for this analysis was derived through numerous conversations with knowledgeable market participants. Much of the information provided was considered confidential and was summarized in terms of a consensus of opinion rather than naming names and attributing specifically comments accordingly. The development costs are discussed earlier in this report. As previously noted, the valuation is divided into the entitlement term of six years and the sales absorption period of nine years.

Land Sales:	The total component valuations of \$554,881,100, previously summarized, are averaged over the absorption period.
DIF Reimbursements:	Development Impact Fee reimbursements were projected beginning in Year 8.
Inflation-Revenue:	Inflation of 3% annually was projected for revenues.
Entitlement Expenses:	The \$8,000,000 cost for plans, reports, studies and approvals is deducted evenly over the entitlement term.
Demolition Cost:	The estimated demolition cost of \$10,481,111 is deducted in Year 6.
Remediate Floodway:	The \$6,018,479 estimated cost for raising the applicable portions of the property above the flood plain is deducted in Year 6.
Other Onsite Costs:	The other on-site costs of \$133,912,565 not separately accounted for are deducted evenly over the first seven years of the period beginning in Year 7.
Offsite Costs:	The on and offsite costs of \$36,111,082 are deducted evenly over the first seven years of the absorption period beginning in Year 6.
River Park:	Per the appraisal instructions, the river park is to be completed within seven years of the contract date which is the effective date of valuation of September 30, 2017. But, the \$25,947,330 cost was projected in Year 6 as

the intent would be to construct these improvements in the first year of construction.

River Park Maintenance: The \$578,000 annual cost was projected beginning in Year 6 with the cost declining annually as property is sold and that obligation is taken over by an owner's association or maintenance district.

Allowance For Foundation Costs: The \$32,746,385 impact for additional foundation costs is deducted beginning in Year 6 and spread evenly over the absorption period.

Inflation-Costs: Inflation of 4% annually was projected for construction costs.

Property Taxes: Initial taxes are calculated on the final estimate of value multiplied by the tax rate plus estimated special assessments. After increasing the statutory maximum of 2% annually, taxes are then reduced in proportion to the property sold beginning in Year 7.

Overhead and Administration: An allowance of 3% of the demolition and construction costs was considered a reasonable allowance divided evenly over the 15-year project duration. As it is an overhead and administration allowance, expressed as a percentage, it was not inflated.

Marketing, Sales and Closing Costs: An allowance of 1% of the inflated revenues was considered a reasonable allowance.

Contingency: A nominal forecast of 1% of the above indirect costs was utilized as a nominal contingency factor.

Discount Rate: As previously noted, the discounted cash flow analysis is presented with a no line-item profit valuation scenario utilizing a discount rate of 17.5%.

The following is the valuation:

EXISTING STADIUM SITE

Existing Stadium Site Discounted Cash Flow Analysis

Fiscal Year	Sep 17 Beginning Value/Cost	Ending Sep-18 1	Sep-19 2	Sep-20 3	Sep-21 4	Sep-22 5	Sep-23 6	Sep-24 7	Sep-25 8
Revenue									
Land Sales	\$554,881,100	\$0	\$0	\$0	\$0	\$0	\$61,653,456	\$61,653,456	\$61,653,456
DIF Reimbursements	\$52,441,125	\$0	\$0	\$0	\$0	\$0	\$0	\$6,555,141	\$6,555,141
Inflation Rate		3%	3%	3%	3%	3%	3%	3%	3%
Inflation Factor		1.000	1.030	1.061	1.093	1.126	1.159	1.194	1.230
Inflated Revenue	\$607,322,225	\$0	\$0	\$0	\$0	\$0	\$71,473,253	\$81,444,631	\$83,887,970
Business Operations									
Entitlement Expenses	-\$8,000,000	-\$1,600,000	-\$1,600,000	-\$1,600,000	-\$1,600,000	-\$1,600,000	\$0	\$0	\$0
Construction Costs									
Demolition Cost	-\$10,481,111	\$0	\$0	\$0	\$0	\$0	-\$10,481,111	\$0	\$0
Remediate Floodway Elevation	-\$6,018,479	\$0	\$0	\$0	\$0	\$0	-\$6,018,479	\$0	\$0
Other On-Site Costs	-\$133,912,565	\$0	\$0	\$0	\$0	\$0	-\$19,130,366	-\$19,130,366	-\$19,130,366
Off-Site Costs	-\$36,111,082	\$0	\$0	\$0	\$0	\$0	\$0	-\$5,158,726	-\$5,158,726
River Park	-\$25,947,330	\$0	\$0	\$0	\$0	\$0	-\$25,947,330	\$0	\$0
River Park Maintenance	-\$578,000	\$0	\$0	\$0	\$0	\$0	-\$578,000	-\$526,082	-\$466,921
Allowance For Foundation Costs	-\$32,746,385	\$0	\$0	\$0	\$0	\$0	-\$3,638,487	-\$3,638,487	-\$3,638,487
Inflation Rate		4%	4%	4%	4%	4%	4%	4%	4%
Inflation Factor		1.000	1.040	1.082	1.125	1.170	1.217	1.265	1.316
Inflated Construction Costs	-\$245,794,952	\$0	\$0	\$0	\$0	\$0	-\$80,048,186	-\$36,002,959	-\$37,365,225
Indirect Costs									
Property Taxes	-\$8,068,809	-\$793,215	-\$809,169	-\$825,443	-\$842,041	-\$858,972	-\$797,130	-\$721,211	-\$639,122
Overhead and Administration	3.0% -\$6,391,457	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533
Marketing, Sales and Closing	1.0% -\$7,957,063	\$0	\$0	\$0	\$0	\$0	-\$714,733	-\$814,446	-\$838,880
Contingency on Indirect Costs	1.0% -\$224,173	-\$12,497	-\$12,657	-\$12,820	-\$12,986	-\$13,155	-\$19,684	-\$19,922	-\$19,345
Total Costs/Expenses:	-\$276,436,454	-\$2,862,245	-\$2,878,359	-\$2,894,795	-\$2,911,560	-\$2,928,660	-\$82,036,265	-\$38,015,071	-\$39,319,105
Net Cash Flow									
	\$330,885,771	-\$2,862,245	-\$2,878,359	-\$2,894,795	-\$2,911,560	-\$2,928,660	-\$10,563,012	\$43,429,559	\$44,568,865
Discount Rate	17.5%	0.8510638	0.7243096	0.6164337	0.5246245	0.4464889	0.3799906	0.3233962	0.2752308
Present Value		-\$2,435,953	-\$2,084,823	-\$1,784,449	-\$1,527,476	-\$1,307,614	-\$4,013,845	\$14,044,955	\$12,266,725
Cumulative Present Value		-\$2,435,953	-\$4,520,776	-\$6,305,226	-\$7,832,701	-\$9,140,315	-\$13,154,160	\$890,795	\$13,157,520
Indicated Value-Rounded To									

EXISTING STADIUM SITE

Existing Stadium Site Discounted Cash Flow Analysis

Fiscal Year		Sep 17 Beginning Value/Cost	Sep-26 9	Sep-27 10	Sep-28 11	Sep-29 12	Sep-30 13	Sep-31 14	Totals
Revenue									
Land Sales		\$554,881,100	\$61,653,456	\$61,653,456	\$61,653,456	\$61,653,456	\$61,653,456	\$61,653,456	\$554,881,100
DIF Reimbursements		\$52,441,125	\$6,555,141	\$6,555,141	\$6,555,141	\$6,555,141	\$6,555,141	\$6,555,141	\$52,441,125
Inflation Rate			3%	3%	3%	3%	3%	3%	
Inflation Factor			1.267	1.305	1.344	1.384	1.426	1.469	
Inflated Revenue		\$607,322,225	\$86,404,609	\$88,996,747	\$91,666,650	\$94,416,649	\$97,249,149	\$100,166,623	\$795,706,280
Business Operations									
Entitlement Expenses		-\$8,000,000	\$0	\$0	\$0	\$0	\$0	\$0	-\$8,000,000
Construction Costs									
Demolition Cost		-\$10,481,111	\$0	\$0	\$0	\$0	\$0	\$0	-\$10,481,111
Remediate Floodway Elevation		-\$6,018,479	\$0	\$0	\$0	\$0	\$0	\$0	-\$6,018,479
Other On-Site Costs		-\$133,912,565	-\$19,130,366	-\$19,130,366	-\$19,130,366	-\$19,130,366	\$0	\$0	-\$133,912,565
Off-Site Costs		-\$36,111,082	-\$5,158,726	-\$5,158,726	-\$5,158,726	-\$5,158,726	-\$5,158,726	\$0	-\$36,111,082
River Park		-\$25,947,330	\$0	\$0	\$0	\$0	\$0	\$0	-\$25,947,330
River Park Maintenance		-\$578,000	-\$405,985	-\$343,220	-\$278,573	-\$211,987	-\$143,403	-\$72,761	-\$3,026,931
Allowance For Foundation Costs		-\$32,746,385	-\$3,638,487	-\$3,638,487	-\$3,638,487	-\$3,638,487	-\$3,638,487	-\$3,638,487	-\$32,746,385
Inflation Rate			4%	4%	4%	4%	4%	4%	
Inflation Factor			1.369	1.423	1.480	1.539	1.601	1.665	
Inflated Construction Costs		-\$245,794,952	-\$38,776,439	-\$40,238,164	-\$41,751,997	-\$43,319,570	-\$14,314,214	-\$6,179,501	-\$337,996,254
Indirect Costs									
Property Taxes		-\$8,068,809	-\$550,502	-\$454,974	-\$352,140	-\$241,581	-\$122,856	-\$60,452	-\$8,068,809
Overhead and Administration	3.0%	-\$6,391,457	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$456,533	-\$6,391,457
Marketing, Sales and Closing	1.0%	-\$7,957,063	-\$864,046	-\$889,967	-\$916,666	-\$944,166	-\$972,491	-\$1,001,666	-\$7,957,063
Contingency on Indirect Costs	1.0%	-\$224,173	-\$18,711	-\$18,015	-\$17,253	-\$16,423	-\$15,519	-\$15,187	-\$224,173
Total Costs/Expenses:		-\$276,436,454	-\$40,666,230	-\$42,057,652	-\$43,494,589	-\$44,978,273	-\$15,881,613	-\$7,713,338	-\$368,637,756
Net Cash Flow									
		\$330,885,771	\$45,738,379	\$46,939,095	\$48,172,060	\$49,438,376	\$81,367,536	\$92,453,285	\$427,068,524
Discount Rate	17.5%		0.2342390	0.1993523	0.1696616	0.1443928	0.1228875	0.1045851	
Present Value			\$10,713,712	\$9,357,418	\$8,172,947	\$7,138,547	\$9,999,054	\$9,669,237	\$68,208,435
Cumulative Present Value			\$23,871,232	\$33,228,651	\$41,401,598	\$48,540,144	\$58,539,198	\$68,208,435	
Indicated Value-Rounded To							\$68,200,000		\$68,200,000

FINAL ESTIMATE OF VALUE

Based upon investigation and analysis, the prospective market value of the fee simple interest of the subject property, as of September 30, 2017, subject to the attached assumptions and limiting conditions, is:

SIXTY EIGHT MILLION TWO HUNDRED THOUSAND DOLLARS

\$68,200,000

APPRAISAL REPORT

ADDENDUM

EXHIBIT A

PwC Real Estate Investor Survey

National Highlights

LOOKING BEYOND TRADITIONAL CRE INVESTMENTS

Diversity. Uncertainty. Yield. These are three reasons investors cite for looking at noncore, less-traditional commercial real estate (CRE) for opportunities. Diversity – to better safeguard returns and balance portfolios, many investors are more open to diversity in terms of both property type and geography than they have been. Uncertainty – at this point in the cycle, many investors remain cautious about buying core assets due to the uncertainty of continued growth and the likelihood of a downward pricing shift. Their anxieties seem fewer for the near-term performance of niche sectors, like self storage, medical office buildings, and student housing, which are need-driven by growing key demographics. Yield – achieving yield through growing revenue and mitigating risk is a priority for investors and while no real estate sector is “recession proof,” a few investors feel that certain niche sectors come very close. “During hard economic times, yields do not fluctuate in student housing and self storage like they can in core asset categories, and we like that,” shares an investor.

The allure of investing in niche property types is evident when looking at the initial yields in our Survey this quarter. For our newly included national self-storage market, for example, the average overall cap rate is 5.78%. Only 33 basis points separates this average from the aggregate average overall cap rate for the eight core national markets in the Survey. When you consider the limited recurring capital costs and low re-leasing expenses of self storage compared to office, apartment, and warehouse assets, as well as the existing CRE environment and late-cycle uncertainties, the growing appeal of self storage ownership becomes clearer.

Even though capital expenditures and re-leasing costs are higher for owners of medical office buildings (MOBs) compared to those that own self storage, its much higher initial return (averaging 6.71% this quarter) continues to draw investors to a segment supported by health care, one of the fastest growing employment sectors in the country, as well as by the aging baby-boomer generation. “The MOB market remains strong,” affirms a participant. According to Real Capital Analytics, MOB sales grew 36.6% year over year in the second quarter of 2017. In addition, the average sale price for MOB assets rose 11.5% on a quarterly basis.

The student-housing sector continues to benefit from incessant growth in college enrollments, particularly among Millennials, as well as the need to replace aging blocks of college dormitories. This sector’s occupancy rate was 95.0% in 2016 and it posted an average annual rent growth of 2.3%, according to Axiometrics. “We like the growth prospects and steady income stream potential of student housing,” notes a participant. Even though numerous student-housing properties are under construction, demand is expected to remain ahead of supply in the near term. The National Center for Education Statistics reports that enrollment in post-secondary institutions increased 20.0% from 2003 to 2013, and it is projected to increase an average of 1.4% every year through 2023.

The rising popularity of investing in niche property sectors reflects a broadening of the commercial real estate industry and its participants, which appear more in tune with the ever-changing economics and demographics of today’s world. While only a few institutional investors once considered ownership of niche, noncore assets as viable investment options, their growing capital investments thus far suggest that some of these niche sectors may one day be considered mainstream. ♦

Overall Cap Rate Analysis

In the third quarter of 2017, the average overall capitalization (cap) rate decreases in 18 Survey markets, increases in nine, and holds steady in eight compared to the second quarter of 2017. This is the highest number of markets posting quarterly declines since the third quarter of

2016 when the total was 19 markets.

Most of the cap rate decreases are in city-specific office markets. As shown in Exhibit 1, ten city office markets post declines in their average cap rates this quarter – this total was eight last quarter and six in the first quarter of 2017.

LOOKING FORWARD

Over the next six months, most surveyed investors foresee overall cap rates holding steady in 32 of the 35 markets analyzed (see Exhibit 2). In the national net lease and the Houston office markets, most of them forecast rates to increase.

Exhibit 1

OVERALL CAPITALIZATION RATES

Third Quarter 2017

National Markets	Average	Quarterly Change*
Warehouse	5.22%	- 5
Apartment	5.35%	- 5
CBD Office	5.66%	- 2
Strip Shopping Center	6.19%	- 7
Regional Mall	6.23%	3
Power Center	6.40%	5
Suburban Office	6.69%	5
Net Lease	6.71%	- 17
MOB**	6.71%	- 5
Flex/R&D	7.10%	0
Secondary Office	7.46%	6
Regional Warehouse		
Pacific Region	4.83%	- 15
ENC*** Region	5.35%	- 8
Apartment Markets		
Pacific Region	4.49%	0
Mid-Atlantic Region	5.04%	3
Southeast Region	5.13%	3
Office Markets		
Manhattan	4.94%	- 4
Washington, DC	5.27%	- 2
San Francisco	5.45%	0
Los Angeles	5.74%	- 10
Seattle	5.79%	- 3
Pacific Northwest	5.99%	- 2
Boston	6.27%	0
Dallas	6.48%	- 2
San Diego	6.51%	0
Phoenix	6.53%	- 9
Denver	6.56%	0
Northern Virginia	6.77%	14
Charlotte	6.93%	3
Atlanta	7.19%	- 2
Southeast Florida	7.26%	0
Chicago	7.28%	4
Philadelphia	7.29%	- 14
Houston	7.31%	0
Suburban Maryland	7.35%	- 13

* Basis points; ** Medical office buildings;

*** East North Central

Source: PwC Real Estate Investor Survey

Exhibit 2

OVERALL CAPITALIZATION RATE FORECASTS

Third Quarter 2017

OVERALL CAP RATE		SIX-MONTH EXPECTATIONS		
MARKET	3Q 2017	INCREASE	DECREASE	HOLD STEADY
National				
Regional Mall	6.23%	50%	0%	50%
Power Center	6.40%	29%	14%	57%
Strip Shopping Center	6.19%	33%	0%	67%
CBD Office	5.66%	29%	14%	57%
Suburban Office	6.69%	13%	0%	88%
Net Lease	6.71%	80%	0%	20%
Medical Office Buildings	6.71%	20%	0%	80%
Secondary Office	7.46%	27%	0%	73%
Industrial				
National Flex/R&D	7.10%	0%	20%	80%
National Warehouse	5.22%	0%	10%	90%
ENC Region Warehouse	5.35%	0%	0%	100%
Pacific Region Warehouse	4.83%	0%	0%	100%
Apartment				
National	5.35%	44%	0%	56%
Mid-Atlantic Region	5.04%	20%	0%	80%
Pacific Region	4.49%	20%	0%	80%
Southeast Region	5.13%	20%	0%	80%
Office				
Atlanta	7.19%	20%	0%	80%
Boston	6.27%	17%	17%	67%
Charlotte	6.93%	0%	0%	100%
Chicago	7.28%	43%	0%	57%
Dallas	6.48%	17%	0%	83%
Denver	6.56%	40%	0%	60%
Houston	7.31%	50%	25%	25%
Los Angeles	5.74%	14%	0%	86%
Manhattan	4.94%	0%	0%	100%
Northern Virginia	6.77%	0%	17%	83%
Pacific Northwest	5.99%	0%	0%	100%
Philadelphia	7.29%	40%	0%	60%
Phoenix	6.53%	17%	17%	67%
San Diego	6.51%	40%	0%	60%
San Francisco	5.45%	20%	0%	80%
Seattle	5.79%	0%	0%	100%
Southeast Florida	7.26%	20%	0%	80%
Suburban Maryland	7.35%	0%	0%	100%
Washington, DC	5.27%	0%	0%	100%

Source: PwC Real Estate Investor Survey

BREAKOUT OF KEY INDICATORS

Overall cap rates, discount rates, and residual cap rates for the CBD and suburban submarkets of each individual office market are presented in Exhibit 3.

As shown, average overall cap rates remain lower for all CBD submarkets than for their suburban counterparts since higher barriers to entry and a lack of land for new development tend to keep supply and demand a bit more balanced in a market's CBD. As a result, CBD

assets typically maintain higher rental rates and occupancy levels.

In addition, downtown cores tend to provide better forms of mass transportation and embody 18- or 24-hour, live-work lifestyles that appeal to many individuals and firms. As a result, CBD assets are generally perceived as providing less investment risk to the owner – less risk, lower overall cap rate.

This quarter, a 108-basis-point spread exists between the composite average for the overall cap rates of the

CBDs included in our table and the composite average for the suburbs.

For the Survey's individual office markets that have both a CBD and suburban component, the Chicago office market reports the largest gap between its CBD and suburban average overall cap rates this quarter – a difference of 266 basis points. The next highest is Boston with a gap of 172 basis points followed closely by Denver and Southeast Florida with spreads of 138 and 128 basis points, respectively. ♦

Exhibit 3

BREAKOUT OF KEY INDICATORS

Third Quarter 2017

CBD OF:	DISCOUNT RATE RANGE	AVERAGE	OVERALL CAPITALIZATION RATE RANGE	AVERAGE	RESIDUAL CAPITALIZATION RATE RANGE	AVERAGE
Atlanta	6.00% – 9.25%	8.03%	5.25% – 8.50%	6.73%	6.00% – 8.50%	7.03%
Boston	5.75% – 8.00%	6.77%	4.00% – 8.50%	5.41%	5.00% – 8.50%	6.15%
Charlotte	6.50% – 9.00%	8.00%	5.00% – 7.50%	6.55%	5.50% – 7.75%	6.63%
Chicago	5.50% – 10.00%	7.45%	4.50% – 8.00%	5.95%	5.50% – 9.00%	6.54%
Dallas	6.00% – 11.00%	7.60%	5.00% – 8.50%	6.21%	6.00% – 8.00%	6.90%
Denver	6.50% – 10.00%	7.66%	5.00% – 7.00%	5.88%	5.75% – 8.50%	6.84%
Houston	6.50% – 12.00%	8.51%	5.00% – 8.00%	6.77%	5.75% – 9.50%	7.12%
Los Angeles	5.50% – 9.50%	7.25%	4.00% – 7.00%	5.46%	5.00% – 8.00%	6.29%
Manhattan	5.50% – 9.00%	6.81%	3.00% – 8.50%	4.94%	3.00% – 8.50%	5.63%
Pacific Northwest	5.25% – 9.00%	7.00%	4.25% – 8.00%	5.55%	5.00% – 9.00%	6.17%
Philadelphia	7.00% – 10.00%	8.08%	5.00% – 8.00%	6.83%	6.00% – 9.00%	7.29%
Phoenix	7.00% – 11.00%	8.93%	5.00% – 8.00%	6.40%	5.50% – 8.00%	6.68%
San Diego	6.50% – 10.50%	8.25%	5.50% – 8.50%	6.50%	5.75% – 8.75%	6.91%
San Francisco	5.00% – 8.00%	6.40%	3.50% – 7.00%	5.00%	5.00% – 8.00%	5.70%
Seattle	5.25% – 9.00%	6.90%	4.25% – 8.00%	5.40%	5.00% – 9.00%	6.13%
Southeast Florida	6.00% – 10.00%	7.88%	5.00% – 9.50%	6.63%	5.00% – 10.50%	6.88%
Washington, DC	5.00% – 8.00%	6.48%	4.25% – 6.50%	5.27%	5.00% – 6.50%	5.65%
Secondary Office	6.50% – 11.00%	8.56%	4.50% – 9.50%	7.06%	6.00% – 9.00%	7.40%
SUBURBS OF:	DISCOUNT RATE RANGE	AVERAGE	OVERALL CAPITALIZATION RATE RANGE	AVERAGE	RESIDUAL CAPITALIZATION RATE RANGE	AVERAGE
Atlanta	7.00% – 10.50%	8.55%	6.00% – 9.00%	7.65%	6.50% – 9.00%	7.73%
Boston	6.75% – 10.00%	8.08%	5.25% – 10.00%	7.13%	6.50% – 10.50%	7.50%
Charlotte	7.00% – 10.00%	8.73%	6.00% – 8.75%	7.30%	6.50% – 8.50%	7.50%
Chicago	8.00% – 12.00%	9.77%	7.00% – 10.00%	8.61%	7.50% – 10.50%	8.96%
Dallas	6.75% – 9.00%	8.13%	5.50% – 8.50%	6.75%	5.50% – 9.00%	7.35%
Denver	7.00% – 11.00%	8.25%	6.00% – 9.00%	7.25%	6.50% – 9.50%	7.75%
Houston	7.50% – 13.50%	9.53%	6.50% – 10.00%	7.85%	6.50% – 10.00%	7.81%
Los Angeles	5.00% – 11.00%	7.57%	4.25% – 8.00%	6.02%	5.00% – 8.00%	6.64%
Northern Virginia	6.00% – 9.50%	7.71%	5.00% – 8.50%	6.77%	5.50% – 8.50%	6.85%
Pacific Northwest	5.50% – 10.00%	7.88%	5.00% – 7.75%	6.44%	5.00% – 8.00%	6.67%
Philadelphia	8.00% – 11.00%	9.17%	5.50% – 9.50%	7.75%	6.50% – 10.00%	8.29%
Phoenix	7.00% – 11.00%	8.63%	5.50% – 8.00%	6.67%	5.50% – 8.00%	6.92%
San Diego	6.50% – 11.00%	8.18%	5.25% – 8.50%	6.53%	5.75% – 8.75%	6.95%
San Francisco	6.00% – 9.50%	7.33%	5.00% – 8.00%	5.91%	5.00% – 9.00%	6.73%
Seattle	5.50% – 10.00%	7.58%	5.00% – 7.00%	6.19%	5.00% – 7.50%	6.41%
Southeast Florida	7.00% – 10.50%	8.75%	6.50% – 10.00%	7.90%	6.50% – 10.50%	8.10%
Suburban Maryland	7.00% – 10.00%	8.65%	5.50% – 9.00%	7.35%	6.00% – 9.50%	7.73%
Secondary Office	6.50% – 13.00%	9.42%	5.50% – 10.00%	7.86%	6.50% – 11.00%	8.17%

Source: PwC Real Estate Investor Survey

Valuation Issues

RENT SPIKES

A rent spike is an increase in market rent that is markedly higher than the general inflation rate. For example, if inflation is 3.0%, one might expect a spike to be at least 50.0% to 100.0% higher, or say 4.5% to 6.0%. According to participants, rent spikes typically occur during the first five years of a ten-year forecast. Although they are most often applied in a series of years,

an unusually high spike may be applied for a single year only.

Participants who apply rent spikes maintain that they are both extremely property specific and heavily dependent on submarket conditions. Specifically, they are used “where and when appropriate” in markets where hard evidence exists that rents will increase substantially in the future. Such evidence includes a diversified economic base, strong job growth, and an above-average rate of absorption. Furthermore, since many participants time the use of rent spikes according to anticipated supply-demand conditions, they most commonly apply them during the latter part of an expansion.

Rent spikes are also used, but to a lesser extent, at the beginning of the recovery phase of the market cycle. The expectation is that rents will initially rise slowly until space demand gets ahead of acceptable supply. At that point, there is often a rent spike of relatively short duration until construction picks up the slack on the supply side.

Of the 31 Survey markets included in Exhibit 4, the use of rent spikes decreases in 16 of them, increases in two, and remains unchanged in 13 of them since the third quarter of 2016. Declines in usage since last year have occurred in the office markets of Atlanta, Charlotte, and Southeast Florida. The only two office markets that have experienced an increase use of rent spikes over the past year are Los Angeles and San Diego.

In fact, the Los Angeles office market has the greatest percentage of investors using rent spikes (63.0%). The next highest usage is in both the Phoenix office market and the San

Diego office market – both at 50.0%.

In the Survey’s national warehouse and flex/R&D markets, the use of rent spikes has declined over the past year, but it has remained steady in the East North Central and Pacific warehouse regions. In the Survey’s three retail markets, rent spikes are no longer used by investors in both the national regional mall and national strip shopping center markets. However, 29.0% of investor participants are using rent spikes in the national power center market.

With fewer surveyed investors now using rent spikes, reporting specific amounts of spikes for all markets remains difficult. In the Los Angeles office market, most investors who use rent spikes use two of them. The first occurs between year one and five and ranges from 5.0% and 10.0%. The second occurs between year two and four and ranges from 5.0% to 9.0%.

DEBT SERVICE

Survey participants indicate that debt remains readily available, but requires due diligence and “smart underwriting” on the part of borrowers. Overall, loan-to-value percentages (LTV ratios) for the Survey’s 39 markets indicate a range from 30.0% to 90.0% and an average of 61.0% (see Exhibit 5).

Surveyed investors report that they have had little difficulty obtaining debt for deals, both for existing assets and new development projects. However, debt for new construction may soon become more difficult as interest rates rise. “Debt for new construction will become more difficult to get, which is a win for the industry’s fundamentals,” says an investor.

Current interest rate levels for each

Exhibit 4		
RENT SPIKES		
Third Quarter 2017		
	% OF PARTICIPANTS USING RENT SPIKES	
	CURRENT QUARTER	YEAR AGO
National Markets		
Regional Mall	0.0%	0.0%
Power Center	29.0%	33.0%
Strip Shopping Center	0.0%	11.0%
CBD Office	29.0%	57.0%
Suburban Office	38.0%	38.0%
Flex/R&D	50.0%	60.0%
Warehouse	20.0%	40.0%
Net Lease	17.0%	20.0%
MOB*	0.0%	0.0%
Secondary Office	36.0%	50.0%
Regional Markets		
ENC** Warehouse	40.0%	40.0%
Pacific Warehouse	20.0%	20.0%
Office Markets		
Atlanta	0.0%	40.0%
Boston	17.0%	17.0%
Charlotte	20.0%	40.0%
Chicago	0.0%	0.0%
Dallas	17.0%	25.0%
Denver	0.0%	17.0%
Houston	13.0%	13.0%
Los Angeles	63.0%	60.0%
Manhattan	17.0%	17.0%
Northern Virginia	0.0%	0.0%
Pacific Northwest	18.0%	27.0%
Philadelphia	0.0%	0.0%
Phoenix	50.0%	60.0%
San Diego	50.0%	33.0%
San Francisco	0.0%	0.0%
Seattle	17.0%	33.0%
Southeast Florida	0.0%	33.0%
Suburban Maryland	0.0%	3.0%
Washington, DC	17.0%	17.0%
* Medical office buildings		
** East north central		
Source: PwC Real Estate Investor Survey		

market are also shown in Exhibit 5. Overall, our surveyed investors indicate that interest rates range from 1.75% to 8.00% and average 4.51% – seven basis points higher than the Survey average a year ago.

When the cost of debt capital is

below the rate of return (IRR) on equity and the financed portion of a sale is in the 50.0%-to-60.0% range, some buyers can use positive leverage to bid up prices by a small margin above the all-cash price. Buyers who can access economical debt capital to

finance a portion of the sale price can anticipate a better yield than the indicated property yield, offer slightly more for a property than an all-cash buyer, and thus win the bid.

By doing so, they can increase their equity IRR above the property

IRR and thus fare better than they would have in an all-cash deal. Furthermore, they perceive only minimal additional risk as long as the financed portion is small enough to offset the possibility that the leverage might become negative. Current leverage premiums are included in Exhibit 5.

LODGING NOI TIMING

Our lodging participants indicate that they use one of the following three NOI timing scenarios in direct capitalization: prior 12 months; forecast (next) 12 months; or both (see Income Capitalized in Direct Capitalization on page 106).

The NOI used in direct capitalization varies among each hotel segment. While most full-service, limited-service mid-scale & economy,

Exhibit 5 DEBT SERVICE Third Quarter 2017									
	INTEREST RATES (%)			LTV DEBT RATIO (%)			PREMIUM ADDED (1)		
	LOW	HIGH	AVERAGE	LOW	HIGH	AVERAGE	LOW	HIGH	AVERAGE
National & Regional Markets									
Regional Mall	3.25	8.00	4.79	40	75	60			
Power Center	3.00	6.00	4.78	30	75	59	0	300	94
Strip Shopping Center	3.65	7.50	4.93	45	75	61	0	300	75
CBD Office	3.75	6.00	4.63	40	75	58	0	400	141
Suburban Office	4.00	5.50	4.71	40	75	60			
Flex/R&D									
Warehouse									
National									
ENC Region									
Pacific Region									
Apartment									
National	3.00	7.00	4.53	50	80	69	25	300	141
Mid-Atlantic Region	2.50	6.00	3.94	30	80	61	25	300	172
Pacific Region	3.00	4.50	3.79	30	85	59	50	500	231
Southeast Region	3.00	5.00	3.94	50	80	70			
Net Lease	3.50	6.00	4.73	50	75	61	0	150	60
Medical Office Buildings	3.25	7.00	4.75	40	90	64	0	1,000	231
Secondary Office	3.75	7.00	4.86	50	75	65	150	900	310
Office Markets									
Atlanta	3.00	5.50	4.25	50	75	62	0	300	77
Boston	3.00	6.00	4.53	50	70	58	0	500	206
Charlotte	3.50	5.50	4.33	50	75	65	0	600	250
Chicago	2.75	6.50	4.36	40	90	63	0	600	250
Dallas	2.50	5.50	4.34	40	75	58	0	300	158
Denver	3.80	6.50	4.64	50	80	63	0	400	188
Houston	3.25	8.00	5.10	35	75	54	0	750	258
Los Angeles	1.75	7.00	4.20	40	75	60	6	800	157
Manhattan	3.00	7.00	4.28	50	75	60	50	250	115
Northern Virginia	3.50	6.00	4.41	50	72	58			
Pacific Northwest	3.50	5.50	4.51	40	75	61	50	300	163
Philadelphia	3.00	7.00	4.51	50	75	61	7	1,100	163
Phoenix	3.00	6.50	4.53	50	75	64			
San Diego	3.00	5.00	4.25	50	75	60			
San Francisco	3.00	5.50	3.99	40	65	54	50	300	188
Seattle	3.50	5.25	4.44	40	75	61	50	300	154
Southeast Florida	3.00	7.00	4.83	50	75	62	0	600	233
Suburban Maryland	3.50	5.50	4.42	50	75	63			
Washington, DC	3.25	5.00	3.96	35	65	56			
Lodging Markets									
Full Service	3.00	8.00	5.17	40	70	57	0	500	155
Limited-Service Midscale & Economy	3.50	6.50	5.06	50	80	63	0	700	313
Luxury/Upper Upscale	3.50	6.00	4.72	40	70	57	0	1,200	400
Select Service									
(1) Basis points added to "all cash" IRR (discount rate); empty spaces mean an insufficient number of responses; LTV = loan to value Source: PwC Real Estate Investor Survey									

Exhibit 6**LODGING RESERVES AND MANAGEMENT FEES**

Third Quarter 2017

SEGMENT	REPLACEMENT RESERVES (1) (% OF TOTAL REVENUE)			MANAGEMENT FEE (% OF TOTAL REVENUE)		
	LOW	HIGH	AVERAGE	LOW	HIGH	AVERAGE
Full Service	2.50%	6.00%	4.25%	1.00%	4.00%	2.58%
Limited-Service Midscale & Economy	2.00%	5.00%	4.10%	2.00%	5.00%	3.60%
Luxury/Upper Upscale	4.00%	6.00%	4.40%	2.50%	5.00%	3.50%
Select Service	2.00%	5.00%	3.60%	2.50%	4.00%	3.20%

Source: PwC Real Estate Investor Survey; (1) for FF&E and structural repairs

and luxury/upper-upscale investors analyze forecasted incomes, select-service investors are more inclined to evaluate prior 12 months income.

LODGING REPLACEMENT RESERVES

As a percentage of total revenue, average replacement reserves for the lodging industry range from 3.60% to 4.40% (see Exhibit 6). This reserve is for both FF&E and structural repairs. All hotel participants indicate that they deduct this replacement reserve from NOI before capping.

Some surveyed investors use the above percentage for structural reserves and add a separate FF&E reserve based on a per-room rate. In the instances where two separate reserves are used, all participants deduct the FF&E reserve prior to capitalization, but only 75.0% subtract the structural component before capping.

LODGING MANAGEMENT FEES

As a percentage of total revenue, average base management fees for the lodging industry range from 2.58% to 3.60% (see Exhibit 6). These rates are

relatively unchanged from a year ago.

Incentive management fees are extremely diverse across each hotel category and very few of our surveyed investors report them.

BUYERS vs. SELLERS

While sellers continue to dictate investment pricing in many markets, it appears that the industry is at an inflection point. When analyzing the Survey's 35 markets, 38.0% of investor participants believe market conditions favor sellers – down from 53.0% last year and 58.0% in 2015.

Even though only 15.0% of our participants feel that market conditions favor buyers, this percentage is up from 10.0% last year and 5.0% in 2015. However, the greatest evidence of a turning point is that the largest portion of investors (47.0%) now feel that markets are neutral – equally favoring buyers and sellers. This percentage is up from 37.0% a year ago and 27.0% in 2015. ♦

Exhibit 7**BUYERS vs. SELLERS**

Third Quarter 2017

	BUYERS' MARKET	SELLERS' MARKET	NEUTRAL MARKET*		BUYERS' MARKET	SELLERS' MARKET	NEUTRAL MARKET*
National Markets				Office Markets			
Regional Mall	40%	40%	20%	Atlanta	20%	20%	60%
Power Center	17%	33%	50%	Boston	0%	67%	33%
Strip Shopping Center	11%	44%	44%	Charlotte	0%	50%	50%
CBD Office	0%	43%	57%	Chicago	43%	43%	14%
Suburban Office	38%	13%	50%	Dallas	17%	67%	17%
Flex/R&D	0%	0%	100%	Denver	0%	20%	80%
Net Lease	0%	40%	60%	Houston	80%	0%	20%
Medical Office Buildings	0%	100%	0%	Los Angeles	0%	43%	57%
Secondary Office	36%	27%	36%	Manhattan	0%	50%	50%
Warehouse Markets				Northern Virginia	33%	17%	50%
National	0%	60%	40%	Pacific Northwest	0%	18%	82%
Pacific Region	0%	80%	20%	Philadelphia	33%	0%	67%
East North Central Region	0%	100%	0%	Phoenix	50%	17%	33%
Apartment Markets				San Diego	20%	20%	60%
National	0%	44%	56%	San Francisco	0%	40%	60%
Mid-Atlantic Region	20%	0%	80%	Seattle	0%	33%	67%
Pacific Region	0%	20%	80%	Southeast Florida	25%	25%	50%
Southeast Region	0%	100%	0%	Suburban Maryland	20%	20%	60%
				Washington, DC	17%	33%	50%

Note: Figures may not total 100% due to rounding; figures represent participants' opinions relating to market favorability.

*A neutral market equally favors buyers and sellers.

Source: PwC Real Estate Investor Survey

Survey Trends: *Retail Sector*

The retail sector continues to be challenged by the growing popularity of e-commerce, which is negatively impacting each retail segment to some degree.

- In the each of the Survey's retail markets – regional mall, power center, and strip shopping center, cash flow assumptions stayed relatively steady this quarter, suggesting that most investors are taking a more cautious attitude toward acquisitions.
- Interestingly, the average overall cap rate remains quite low for each retail market compared to averages from the past 11 years (see Chart ST-1).
- Currently, the average overall cap rate in each retail market remains below the respective average from the last market peak (midyear 2007).
- The national regional mall market has posted the lowest average in each year analyzed – coming very close to the power center's average in 2014.

Various average overall cap rates are shown for each retail Survey market in the Trends Tracker on this page. Since debuting in the Survey, the national strip shopping center has posted the greatest decline in its average overall cap rate, dropping 328 basis points since the fourth quarter of 1991. The national power center market is next with a decline of 315 basis points over the past 21 years followed by the national regional mall market, where the average has decreased only 50 basis points since debuting in 1990. ♦

TRENDS TRACKER

Average Overall Cap Rates

	<u>Mall</u>	<u>Power</u>	<u>Strip</u>
3Q 2007	7.00%	7.00%	7.20%
3Q 2009	7.98%	8.63%	8.41%
3Q 2011	7.50%	7.50%	7.20%
3Q 2013	6.52%	6.67%	6.95%
3Q 2015	6.13%	6.54%	6.91%
3Q 2017	6.20%	6.35%	6.26%

Regional Mall⁽¹⁾:

Lowest OAR: 6.00% in 1Q & 2Q 2016

Power Center⁽²⁾:

Lowest OAR: 6.31% in 3Q/4Q 15; 3Q 16

Strip Shopping Center⁽³⁾:

Lowest OAR: 6.18% in 4Q 2016

OAR = overall cap rate

(1) over 28-year history; (2) over 22-year history;

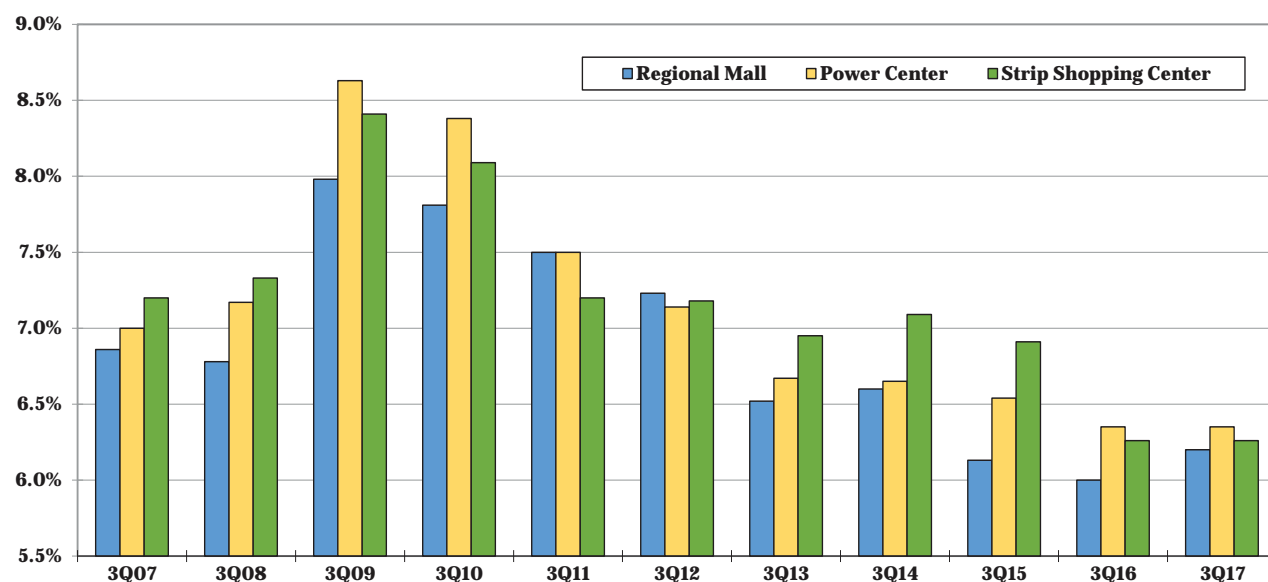
(3) over 27-year history

Source: PwC Real Estate Investor Survey

Chart ST-1

AVERAGE OVERALL CAP RATE TRENDS

3Q 2007 to 3Q 2017



Source: PwC Real Estate Investor Survey; national retail markets

Survey Trends: *Retail Sector*

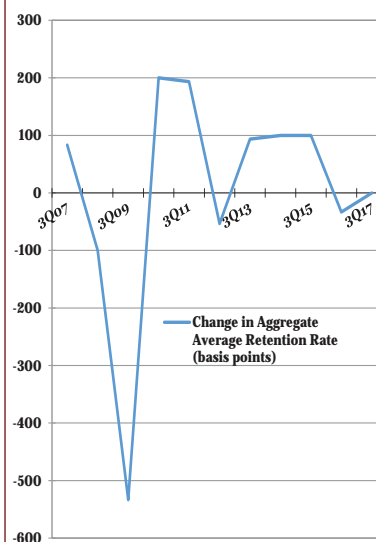
As the retail sector's performance has fluctuated due to the recession and the growth of e-commerce, the average tenant retention rate used by investors has also varied.

- Prior to the impact of the U.S. economic recession, the average tenant retention rates in the Survey's retail markets were quite high, ranging from 70.0% to 73.0% (see Chart ST-2).
- Following the end of "the great recession," investors' expectations of tenant retention dropped dramatically in the national power center market, declining to 61.0% in the third quarter of 2009.
- Although the average tenant retention rate for the national power center market recovered during the next two years, it has been erratic recently due to the burgeoning growth of e-commerce.

The combined annual changes for the average retention rates of the Survey's three national retail markets are shown in Chart ST-3. This chart shows the depth to which the composite average declined following the 18-month recession from December 2007 to June 2009. During this time period, there were numerous store closings and consolidations.

While the average retention rates have rebounded in each segment, the retail sector's ongoing transformation is making it difficult for this key market indicator to establish a consistent trend. ♦

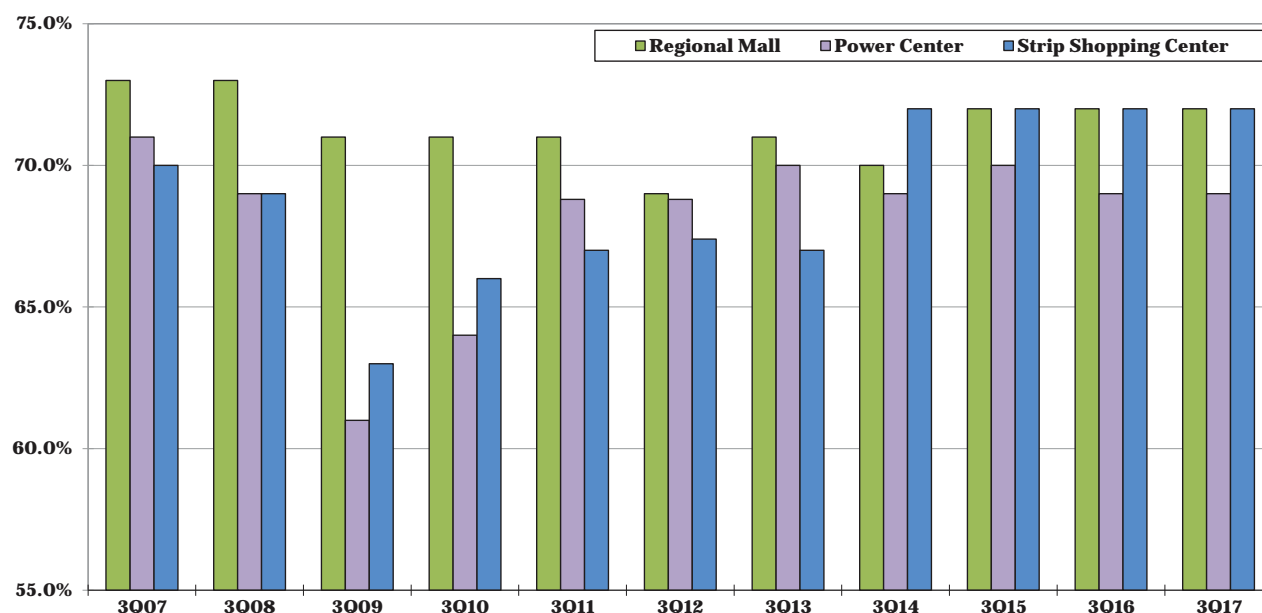
Chart ST-3
AVERAGE RETENTION RATE
CHANGE*
3Q 2007 to 3Q 2017



*for national regional mall, power center, & strip shopping center markets

Source: PwC Real Estate Investor Survey

Chart ST-2
AVERAGE TENANT RETENTION RATES
3Q 2007 to 3Q 2017



Source: PwC Real Estate Investor Survey; national retail markets

National Secondary Office Market

Changes in two key cash flow assumptions this quarter suggest an increasingly cautious outlook for the national secondary office market. First, the average overall cap rate inches up for the second consecutive quarter to 7.46%. As shown in the Key 3Q17 Survey Stats, the average CBD cap rate holds steady at 7.06% while the suburban average increases 12 basis points. “The CBD is attractive, but the suburbs should be approached carefully on a case-by-case basis,” warns an investor active in Sacramento.

Secondly, this market’s average initial-year market rent change rate falls for the fourth consecutive quarter to land at 2.84% (see Table SEC-1).

While the outlook for future rent growth has tempered over the past several quarters, it remains above both the Survey’s national CBD and national suburban office markets, at 2.54% and 2.00%, respectively.

As investors exercise greater scrutiny of potential acquisitions in this market, they highlight strong parking ratios and diversified tenant rent rolls as crucial property characteristics. “Location and creative space typically get a premium,” states a participant. Another cites job and population growth, limited speculative development, a strong residential market, and corporate expansions as necessary market traits. ♦

KEY 3Q17 SURVEY STATS*

Tenant Retention Rate:

Average	72.0% ▼
Range	60.0% to 80.0%

Months of Free Rent⁽¹⁾:

Average	6 ▲
Range	1 to 11
% of participants using	100.0% =

Average Overall Cap Rates:

Market (as a whole)	7.46% ▲
CBD	7.06% =
Suburbs	7.86% ▲

* ▼, ▲, = change from prior quarter
(1) on a ten-year lease

Table SEC-1
NATIONAL SECONDARY OFFICE MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	6.50% – 13.00%	6.50% – 13.00%	5.75% – 13.00%	6.50% – 14.00%	6.75% – 14.00%
Average	8.99%	8.95%	8.80%	9.19%	9.53%
Change (Basis Points)		+ 4	+ 19	– 20	– 54
OVERALL CAP RATE (OAR)^a					
Range	4.50% – 10.00%	4.50% – 9.50%	4.50% – 10.00%	4.50% – 10.00%	4.00% – 11.00%
Average	7.46%	7.40%	7.37%	7.81%	8.11%
Change (Basis Points)		+ 6	+ 9	– 35	– 65
RESIDUAL CAP RATE					
Range	6.00% – 11.00%	6.00% – 10.00%	6.00% – 10.00%	4.50% – 10.00%	6.00% – 10.50%
Average	7.79%	7.72%	7.69%	7.95%	8.30%
Change (Basis Points)		+ 7	+ 10	– 18	– 51
MARKET RENT CHANGE^b					
Range	0.00% – 5.00%	0.00% – 5.00%	0.00% – 10.00%	0.00% – 10.00%	0.00% – 12.00%
Average	2.84%	2.88%	3.65%	3.52%	2.88%
Change (Basis Points)		– 4	– 81	– 56	– 4
EXPENSE CHANGE^b					
Range	1.50% – 3.50%	1.50% – 3.00%	1.50% – 3.00%	2.00% – 3.00%	2.00% – 3.00%
Average	2.52%	2.48%	2.48%	2.58%	2.54%
Change (Basis Points)		+ 4	+ 4	0	– 2
MARKETING TIME^c					
Range	3 – 9	3 – 9	2 – 9	2 – 9	2 – 12
Average	5.8	5.7	5.8	5.8	6.3
Change (▼, ▲, =)		▲	=	=	▼

a. Rate on unleveraged, all-cash transactions

b. Initial rate of change

c. In months

Table SOM-1

NATIONAL SECONDARY OFFICE MARKET—SELECT SURVEY RESPONSES

Third Quarter 2017

	GEOGRAPHY	INITIAL-YEAR CHANGE RATES			RESIDUAL		DISCOUNT RATE (IRR)	OVERALL CAP RATE (OAR)	VACANCY ASSUMPTIONS		REPLACEMENT RESERVE		MARKETING TIME
	REGION/ CITY	MARKET RENT	EXPENSES	CAP RATE	SELLING EXPENSE	FREE & CLEAR	FREE & CLEAR	FREE & CLEAR	MONTHS VACANT	TENANT RETENTION	UNDERLYING VACANCY & CREDIT LOSS	PER SQUARE FOOT	MONTHS
FULL-SERVICE ADVISORY FIRM ♦ Forecast Period: 10 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI after capital replacement reserve but before TIs and leasing commissions; expects overall cap rates to hold steady over the next six months; does not use rent spikes.	West/ Sacramento	0.0%	2.5%	6.75% to 7.00% (CBD); 7.75% to 8.25% (suburbs)	2.5% to 5.0%	9.00% to 11.00% (CBD); 11.00% to 13.00% (suburbs)	6.00% to 7.00% (CBD); 7.75% to 8.25% (suburbs)	6	75.0%	5.0%	\$0.15 to \$0.20	6 to 9	
REAL ESTATE FIRM ♦ Forecast Period: 1 to 3 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; expects overall cap rates to increase 25 to 50 basis points over the next six months; may use a rent spike.	Mountain/ Las Vegas	4.0% to 5.0%	2.0% to 2.5%	7.50% to 8.25% in both CBD & suburbs	2.0% to 3.0%	8.00% to 9.00% in both CBD & suburbs	7.00% to 7.75% in both CBD & suburbs	6 to 9	75.0%	10.0%	\$0.10 to \$0.15	3 to 5	
REAL ESTATE ADVISOR ♦ Forecast Period: 3 to 10 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; expects overall cap rates to increase over the next six months; does not use rent spikes.	Southeast/ Tampa	3.0% to 5.0%	3.0%	7.25% to 8.00% (CBD); 8.00% to 9.00% (suburbs)	1.0% to 3.0%	7.75% to 8.50% (CBD); 8.50% to 9.75% (suburbs)	6.25% to 7.25% (CBD); 7.50% to 9.00% (suburbs)	6 to 10	70.0% to 75.0%	5.0% to 7.5%	\$0.15 to \$0.25	4 to 6	
REAL ESTATE ADVISOR ♦ Forecast Period: 3 to 7 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; believes market conditions currently favor buyers; expects cap rates to hold steady over the next six months.	South/ Orlando	1.0% to 3.0%	2.0% to 3.0%	6.75% to 7.25% (CBD); 7.75% to 8.50% (suburbs)	2.0% to 3.0%	8.00% to 9.25% (CBD); 9.00% to 11.00% (suburbs)	6.00% to 7.25% (CBD); 7.25% to 8.75% (suburbs)	3 to 9	70.0% to 75.0%	2.0% to 8.0%	\$0.10 to \$0.25	6 to 9	
REAL ESTATE FIRM ♦ Forecast Period: 5 to 10 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; believes market conditions equally favor buyers and sellers; uses face rents and reflects concessions when they are scheduled to occur.	Southwest/ San Antonio	3.0% to 5.0%	2.0% to 3.0%	6.50% to 8.50% (CBD); 7.00% to 9.00% (suburbs)	1.0% to 5.0%	7.25% to 9.25% (CBD); 9.00% to 11.00% (suburbs)	6.00% to 8.00% (CBD); 7.00% to 9.50% (suburbs)	5 to 9	70.0% to 75.0%	5.0% to 7.0%	\$0.10 to \$0.20	5 to 8	

Source: Personal survey conducted by PwC during July 2017.

Table SOM-2

NATIONAL SECONDARY OFFICE MARKET—SELECT SURVEY RESPONSES

Third Quarter 2017

	GEOGRAPHY	INITIAL-YEAR CHANGE RATES			RESIDUAL		DISCOUNT RATE (IRR)	OVERALL CAP RATE (OAR)	VACANCY ASSUMPTIONS	REPLACEMENT RESERVE		MARKETING TIME	
	REGION/ CITY	MARKET RENT	EXPENSES	CAP RATE	SELLING EXPENSE	FREE & CLEAR	FREE & CLEAR	FREE & CLEAR	MONTHS VACANT	TENANT RETENTION	UNDERLYING VACANCY & CREDIT LOSS	PER SQUARE FOOT	MONTHS
REAL ESTATE COMPANY ♦ Forecast Period: 5 to 10 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; believes market conditions currently favor sellers; no longer uses rent spikes.	West/ San Jose	2.0%	2.0% to 3.0%	6.50% to 7.50% in both CBD & suburbs	1.0% to 1.5%	6.50% to 7.50% in both CBD & suburbs	5.00% to 7.00% (CBD); 5.50% to 7.50% (suburbs)	60.0% to 70.0%	6 to 9	3.0% to 7.0%	Does not use	3 to 6	
	East North Central/ Indianapolis	2.5% to 4.0%	2.0% to 3.0%	8.00% to 9.00% (CBD); 8.50% to 10.00% (suburbs)	1.5% to 3.0%	8.00% to 10.00% (CBD); 8.00% to 12.00% (suburbs)	8.00% to 9.50% (CBD); 8.25% to 9.50% (suburbs)	70.0% to 75.0%	8 to 10	8.0% to 10.0%	Does not use	3 to 5	
REAL ESTATE SERVICE FIRM ♦ Forecast Period: 5 to 10 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; believes market conditions currently favor sellers; expects overall cap rates to hold steady over the next six months; may use rent spikes.	Northeast/ Pittsburgh	2.0%	1.5% to 2.0%	6.50% to 7.25% (CBD); 7.25% to 7.75% (suburbs)	2.0% to 3.0%	8.25% to 8.50% (CBD); 8.75% to 9.00% (suburbs)	6.50% to 7.50% (CBD); 7.25% to 8.25% (suburbs)	70.0% to 80.0%	6 to 12	5.0% to 8.0%	\$0.15 to \$0.25	6 to 9	
	Southwest/ Austin	3.0% to 5.0%	2.0% to 3.0%	6.00% to 7.00% (CBD); 7.25% to 8.50% (suburbs)	0.5% to 6.0%	6.50% to 9.00% (CBD); 7.00% to 10.00% (suburbs)	4.50% to 7.75% (CBD); 5.50% to 8.50% (suburbs)	70.0% to 75.0%	5 to 9	5.0% to 7.0%	\$0.10 to \$0.20	5 to 8	
INVESTMENT FIRM ♦ Forecast Period: 5 to 7 years Uses both DCF and direct capitalization; in direct cap, capitalizes NOI before TIs, leasing commissions, and replacement reserve; believes market conditions equally favor buyers and sellers; expects overall cap rates to hold steady over the next six months.	Southeast/ Jacksonville	3.0%	2.5% to 3.0%	8.00% to 8.50% in both CBD & suburbs	2.0% to 3.0%	9.00% to 11.00% (CBD); 9.00% to 10.50% (suburbs)	8.00% to 9.00% (CBD); 7.50% to 8.50% (suburbs)	70.0% to 75.0%	6 to 10	5.0% to 10.0%	\$0.20 to \$0.30	4	

Source: Personal survey conducted by PwC during July 2017.

National Strip Shopping Center Market

Even though additions to supply, store closures, and growing e-commerce sales have combined to push up the vacancy rate for the U.S. neighborhood and community shopping center sector at mid-year 2017, the increase is alarming few prospective buyers for now. “Our goal is unchanged – focus on tenant credit, trade area stats, and maintaining a competitive edge,” shares an investor. Data from Reis puts the vacancy rate for this sector at 10.0% for the second quarter of 2017, up from 9.9% in the prior quarter.

While it’s still a prominent opinion among investors that grocery-anchored centers are “isolated” from

downturns and the impact of growth in e-commerce, that thought may soon change. Based on a report by CoStar Group, commercial retail space allocated to grocery sales set a record in 2016 at 4.15 square feet per person – nearly 30 times the amount of space allocated to groceries at major chains in 1950.

Part of this expansion has come from grocers, but it has also come from club chains, dollar stores, big-box merchants, and online sites that have increased food offerings to drive traffic and boost profits. When combined with the fact that Americans are eating out more than they are dining home, these trends bare watching. ♦

KEY 3Q17 SURVEY STATS*

Tenant Retention Rate:

Average	72.0%	=
Range	50.0% to 100.0%	

Months of Free Rent⁽¹⁾:

Average	2	=
Range	0 to 6	
% of participants using	44.0%	=

Market Conditions Favor:

Buyers	11.0%	=
Sellers	44.0%	=
Neither	45.0%	=

* ▼, ▲, = change from prior quarter
(1) on a ten-year lease

Table 3
NATIONAL STRIP SHOPPING CENTER MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	5.50% – 10.50%	5.50% – 10.50%	5.50% – 10.75%	6.25% – 11.00%	6.50% – 12.50%
Average	7.25%	7.32%	7.46%	8.23%	8.43%
Change (Basis Points)		– 7	– 21	– 98	– 118
OVERALL CAP RATE (OAR)^a					
Range	4.00% – 9.50%	4.00% – 9.50%	4.50% – 9.50%	5.00% – 10.00%	5.25% – 9.50%
Average	6.19%	6.26%	6.24%	7.05%	7.06%
Change (Basis Points)		– 7	– 5	– 86	– 87
RESIDUAL CAP RATE					
Range	4.75% – 9.75%	4.75% – 9.75%	4.75% – 9.75%	5.00% – 10.00%	6.00% – 12.00%
Average	6.57%	6.50%	6.44%	7.34%	7.69%
Change (Basis Points)		+ 7	+ 13	– 77	– 112
MARKET RENT CHANGE^b					
Range	0.00% – 3.00%	0.00% – 3.00%	0.00% – 3.00%	0.00% – 5.00%	0.00% – 4.00%
Average	1.69%	1.72%	1.89%	1.78%	1.73%
Change (Basis Points)		– 3	– 20	– 9	– 4
EXPENSE CHANGE^b					
Range	0.00% – 3.00%	0.00% – 3.00%	0.00% – 3.00%	2.50% – 3.00%	2.50% – 4.00%
Average	2.67%	2.69%	2.69%	2.97%	3.03%
Change (Basis Points)		– 2	– 2	– 30	– 36
MARKETING TIME^c					
Range	2 – 18	2 – 18	2 – 12	2 – 12	2 – 18
Average	6.1	6.2	5.9	6.1	7.0
Change (▼, ▲, =)		▼	▲	=	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Suburban Office Market

The desire to acquire suburban office assets has been a low priority for many investors for a variety of reasons. This quarter, a growing number of surveyed investors make positive comments when asked about investment opportunities in the national suburban office market. “We like suburban office because a maturing millennial workforce is now moving to the suburbs to raise their families,” remarks an investor. “Certain suburbs are providing better yields with minimal additional risk compared to CBD assets, which are still aggressively priced,” says another.

While sales activity involving CBD office properties lost steam in the

second quarter of 2017 compared to the prior year, volume for suburban office building sales climbed 22.0% year over year in the second half of 2017, as per Real Capital Analytics, who reports that sales activity over the last two quarters is only \$2.7 billion off the pace set in the first half of 2015 and on pace to exceed this sector’s 2015 peak.

Despite this positive sales activity, our investors note that investing in this market remains challenging due to the threat of new supply, a slowdown in tenant demand and rent growth, and the unknown effect of upcoming government policies set by the new administration. ♦

KEY 3Q17 SURVEY STATS*

Tenant Retention Rate:

Average 63.0% =

Range 40.0% to 75.0%

Months of Free Rent⁽¹⁾:

Average 8 ▲

Range 0 to 18

% of participants using 88.0% =

Market Conditions Favor:

Buyers 38.0% ▲

Sellers 12.0% ▼

Neither 50.0% ▼

* ▼, ▲, = change from prior quarter
(1) on a ten-year lease

Table 5
NATIONAL SUBURBAN OFFICE MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	6.00% – 11.50%	6.00% – 11.50%	5.75% – 10.00%	6.25% – 11.00%	6.00% – 12.50%
Average	8.03%	7.97%	7.59%	7.97%	8.60%
Change (Basis Points)		+ 6	+ 44	+ 6	– 57
OVERALL CAP RATE (OAR)^a					
Range	5.00% – 10.00%	5.00% – 10.00%	4.50% – 9.00%	5.00% – 9.00%	5.00% – 10.50%
Average	6.69%	6.64%	6.43%	6.72%	7.53%
Change (Basis Points)		+ 5	+ 26	– 3	– 84
RESIDUAL CAP RATE					
Range	5.75% – 11.50%	6.00% – 11.50%	5.50% – 10.00%	6.00% – 10.00%	6.00% – 11.00%
Average	7.42%	7.45%	7.28%	7.34%	7.98%
Change (Basis Points)		– 3	+ 14	+ 8	– 56
MARKET RENT CHANGE^b					
Range	0.00% – 5.00%	0.00% – 5.00%	0.00% – 5.00%	0.00% – 5.00%	(3.00%) – 4.00%
Average	2.00%	2.03%	2.25%	2.50%	1.42%
Change (Basis Points)		– 3	– 25	– 50	+ 58
EXPENSE CHANGE^b					
Range	0.00% – 4.00%	0.00% – 4.00%	2.00% – 4.00%	1.00% – 3.50%	2.00% – 4.00%
Average	2.72%	2.75%	2.91%	2.69%	2.75%
Change (Basis Points)		– 3	– 19	+ 3	– 3
MARKETING TIME^c					
Range	1 – 12	1 – 12	3 – 12	3 – 12	2 – 18
Average	6.0	6.0	6.1	7.6	8.5
Change (▼, ▲, =)		=	▼	▼	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

San Diego Office Market

Along with a slowdown in transaction activity in the San Diego office market over the past 12 months, the composition of buyers has also shifted. In 2013, private capital investors were the dominant buyers in this market, but decreased in activity from 2014 through 2016 when institutional buyers became more active, as per Real Capital Analytics. As of midyear 2017, these positions have flipped as institutions represent just 14.0% of the capital invested here and private capital accounts for 65.0%. “Some may feel that San Diego is not an institutional market, but we are watching institutional capital creep back into this market,” observes a participant.

As the investment environment has quieted, the average overall cap rate holds steady this quarter – a trend that investors foresee continuing in the next six months. Also, this market’s average initial-year market rent change rate falls for the second consecutive quarter, dipping to 3.50% (see Table 19). However, this figure remains well above the aggregate average of 2.46% for the Survey’s 19 city-specific office markets.

Overall, investors’ outlook for property value appreciation remains upbeat here. Our Survey participants expect property value changes to range from -5.0% to +10.0%, with an average of +2.3% over the next 12 months. ♦

KEY 3Q17 SURVEY STATS*

Tenant Retention Rate:

Average	67.0%	=
Range	60.0% to 75.0%	

Months of Free Rent⁽¹⁾:

Average	4	=
Range	1 to 10	
% of participants using	100.0%	=

Average Overall Cap Rates:

Market (as a whole)	6.51%	=
CBD	6.50%	=
Suburbs	6.53%	=

* ▼, ▲, = change from prior quarter
(1) on a ten-year lease

Table 19
SAN DIEGO OFFICE MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	6.50% – 11.00%	6.50% – 10.50%	6.25% – 10.50%	6.50% – 11.50%	7.00% – 12.50%
Average	8.21%	7.83%	7.83%	8.13%	9.28%
Change (Basis Points)		+ 38	+ 38	+ 8	– 107
OVERALL CAP RATE (OAR)^a					
Range	5.25% – 8.50%	5.25% – 8.50%	5.00% – 8.50%	5.50% – 8.50%	6.00% – 10.00%
Average	6.51%	6.51%	6.78%	6.97%	7.88%
Change (Basis Points)		0	– 27	– 46	– 137
RESIDUAL CAP RATE					
Range	5.75% – 8.75%	5.50% – 8.75%	5.75% – 8.75%	6.00% – 8.00%	6.75% – 9.00%
Average	6.93%	6.82%	7.11%	7.06%	7.86%
Change (Basis Points)		+ 11	– 18	– 13	– 93
MARKET RENT CHANGE^b					
Range	2.00% – 5.00%	2.00% – 5.00%	2.00% – 6.00%	0.00% – 6.00%	(10.00%) – 5.00%
Average	3.50%	3.70%	3.80%	3.40%	0.30%
Change (Basis Points)		– 20	– 30	+ 10	+ 320
EXPENSE CHANGE^b					
Range	2.00% – 3.00%	2.00% – 3.00%	2.00% – 3.00%	2.00% – 3.00%	2.00% – 3.00%
Average	2.80%	2.80%	2.80%	2.90%	2.90%
Change (Basis Points)		0	0	– 10	– 10
MARKETING TIME^c					
Range	3 – 12	3 – 12	1 – 6	1 – 6	1 – 9
Average	5.1	5.1	4.3	4.3	4.8
Change (▼, ▲, =)		=	▲	▲	▲
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Apartment Market

Some investors sense a chink in the armor of the national apartment market as new supply continues to deliver at a steady pace. “How can you not be concerned? Developers are gluttons!” exclaims an investor. “We are absolutely concerned because this new supply will put downward pressure on rents going forward,” warns another.

During the first six months of this year, roughly 87,700 new apartment units were added in this market; however, by year’s end this figure is forecast to rise to 288,981 units, according to Reis. In the face of mounting new supply, overall vacancy is projected to move from 4.4% at midyear

2017 to 4.8% at year-end 2017. In addition, the average growth for effective rent is forecast to slip to 3.2%, down from 3.8% in 2016.

Despite these trends, many investors see the impact of new supply as submarket-specific and not detrimental in the long term. “There is enough demand to handle the new supply,” confirms an investor. Evidence of this viewpoint is visible in the outlook for value appreciation in this market. Overall, investors foresee property value changes ranging from -5.0% to +10.0% and averaging +2.6% in the coming year – above the aggregate average expected value change of +1.5% for all the national Survey markets. ♦

KEY 3Q17 SURVEY STATS*

Total Vacancy Assumption:

Average	6.0%	=
Range	2.0% to 10.0%	

Months of Free Rent⁽¹⁾:

Average	1	=
Range	0 to 2	
% of participants using	78.0%	=

Market Conditions Favor:

Buyers	0.0%	=
Sellers	44.0%	▲
Neither	56.0%	▼

* ▼, ▲, = change from prior quarter
(1) on a one-year lease

Table 29
NATIONAL APARTMENT MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	5.00% – 10.00%	5.50% – 10.00%	5.50% – 10.00%	6.00% – 12.00%	5.25% – 14.00%
Average	7.28%	7.28%	7.25%	7.92%	8.28%
Change (Basis Points)		0	+ 3	- 64	- 100
OVERALL CAP RATE (OAR)^a					
Range	3.50% – 7.50%	3.50% – 8.00%	3.50% – 7.50%	3.50% – 9.00%	3.75% – 10.00%
Average	5.35%	5.40%	5.25%	5.51%	5.74%
Change (Basis Points)		- 5	+ 10	- 16	- 39
RESIDUAL CAP RATE					
Range	4.25% – 7.75%	4.50% – 8.00%	4.25% – 7.50%	4.25% – 9.00%	4.50% – 9.75%
Average	5.79%	5.82%	5.74%	5.97%	6.20%
Change (Basis Points)		- 3	+ 5	- 18	- 41
MARKET RENT CHANGE^b					
Range	(1.00%) – 5.00%	(1.00%) – 5.00%	0.00% – 5.00%	0.00% – 8.00%	(2.00%) – 10.00%
Average	2.69%	2.64%	2.88%	2.75%	2.73%
Change (Basis Points)		+ 5	- 19	- 6	- 4
EXPENSE CHANGE^b					
Range	2.00% – 3.00%	2.00% – 3.00%	2.00% – 4.00%	1.00% – 4.00%	1.00% – 3.50%
Average	2.72%	2.69%	2.81%	2.76%	2.69%
Change (Basis Points)		+ 3	- 9	- 4	+ 3
MARKETING TIME^c					
Range	1 – 9	1 – 9	1 – 9	0 – 9	0 – 18
Average	3.8	3.8	3.6	3.8	5.3
Change (▼, ▲, =)		=	▲	=	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

Regional Apartment Markets

Investor sentiment regarding the impact of new supply in the Mid-Atlantic, Pacific, and Southeast regional apartment markets ranges from optimistic to cautious, but similar to sentiment in the national apartment market, most do not view the situation as threatening for the long-term health of this sector. “The supply pipeline may present short-term challenges for existing properties but not over the long term,” summarizes an investor active in the Southeast region.

While a Pacific region participant states, “We are currently contemplating the use of lower rent growth and concessions in our underwriting due to the impact of new supply;” a Mid-

Atlantic region investor counters, “A supply issue is definitely on our radar, and we consider it a buying opportunity.” For those looking to purchase apartment assets in these three regions, prices range from a low of 70.0% of replacement cost in the Mid-Atlantic region to a high of 150.0% of replacement cost in the Pacific region. The Pacific region also reveals the highest average price of 107.3% of replacement cost, followed by the Mid-Atlantic region at 99.0%, and the Southeast region at 98.8%.

Even with supply-side concerns, key cash flow assumptions do not reveal any dramatic shifts this quarter. Even though the average overall cap

rate ticks up in both the Mid-Atlantic and Southeast regions, it holds steady in the Pacific region and maintains the lowest average of the three areas. Over the next six months, most investors foresee cap rates holding steady in each region while some anticipate increases of up to 25 basis points in the Pacific and Southeast regions and as much as 75 basis points in the Mid-Atlantic region.

At the same time, Survey participants’ outlook for future rent growth holds steady in the Southeast and Pacific regions at 3.05% and 2.85%, respectively. However, this key indicator dips ten basis points to 1.75% in the Mid-Atlantic region this quarter. ♦

Table 30
SOUTHEAST REGION APARTMENT MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	5.75% – 10.00%	5.75% – 10.00%	5.75% – 10.00%	6.00% – 10.00%	6.50% – 11.00%
Average	7.50%	7.50%	7.53%	7.70%	8.20%
Change (Basis Points)		0	– 3	– 20	– 70
OVERALL CAP RATE (OAR)^a					
Range	3.50% – 6.50%	3.50% – 6.50%	3.50% – 6.50%	4.00% – 7.25%	4.75% – 7.00%
Average	5.13%	5.10%	5.10%	5.55%	5.96%
Change (Basis Points)		+ 3	+ 3	– 42	– 83
RESIDUAL CAP RATE					
Range	4.50% – 7.00%	4.50% – 7.00%	4.50% – 7.00%	5.00% – 7.00%	5.50% – 9.75%
Average	5.75%	5.75%	5.75%	6.13%	6.71%
Change (Basis Points)		0	0	– 38	– 96
MARKET RENT CHANGE^b					
Range	1.00% – 4.00%	1.00% – 4.00%	1.00% – 4.00%	2.00% – 4.00%	(10.00%) – 4.00%
Average	3.05%	3.05%	3.05%	3.15%	1.21%
Change (Basis Points)		0	0	– 10	+ 184
EXPENSE CHANGE^b					
Range	2.00% – 3.00%	2.00% – 3.00%	2.00% – 3.00%	2.00% – 4.00%	1.00% – 3.00%
Average	2.80%	2.80%	2.80%	3.00%	2.50%
Change (Basis Points)		0	0	– 20	+ 30
MARKETING TIME^c					
Range	1 – 6	1 – 6	1 – 6	1 – 6	1 – 18
Average	3.3	3.3	3.1	3.0	6.5
Change (▼, ▲, =)		=	▲	▲	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

Table 31

REGIONAL APARTMENT MARKETS

Third Quarter 2017

	MID-ATLANTIC REGION					PACIFIC REGION				
	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a										
Range	5.25% – 10.00%	5.25% – 10.00%	5.50% – 10.00%	6.00% – 11.00%	5.50% – 14.00%	5.25% – 10.00%	5.25% – 10.00%	5.50% – 9.00%	5.00% – 12.00%	5.25% – 12.50%
Average	7.33%	7.35%	7.50%	8.08%	9.25%	6.73%	6.75%	6.80%	7.40%	8.60%
Change (Basis Points)	- 2	- 17	- 75	- 75	- 192	- 2	- 2	- 7	- 67	- 187
OVERALL CAP RATE (OAR)^a										
Range	3.00% – 6.75%	3.00% – 6.75%	3.00% – 7.50%	4.00% – 7.50%	4.00% – 7.50%	3.50% – 6.00%	3.50% – 6.00%	3.50% – 6.00%	3.50% – 6.25%	4.00% – 7.00%
Average	5.04%	5.01%	5.20%	5.50%	5.67%	4.49%	4.49%	4.52%	4.81%	5.19%
Change (Basis Points)	+ 3	- 16	- 46	- 46	- 63	0	0	- 3	- 32	- 70
RESIDUAL CAP RATE										
Range	4.00% – 6.75%	4.00% – 6.75%	4.25% – 7.00%	4.50% – 9.00%	4.50% – 9.75%	4.25% – 6.00%	4.25% – 6.00%	4.00% – 6.00%	4.00% – 7.00%	4.00% – 7.50%
Average	5.53%	5.53%	5.53%	6.04%	6.27%	5.00%	5.00%	5.05%	5.54%	5.58%
Change (Basis Points)	0	0	- 51	- 51	- 74	0	0	- 5	- 54	- 58
MARKET RENT CHANGE^b										
Range	0.00% – 4.00%	0.00% – 4.00%	0.00% – 4.00%	0.00% – 5.00%	(5.00%) – 6.00%	0.00% – 5.00%	0.00% – 5.00%	0.00% – 5.00%	2.00% – 7.00%	0.00% – 10.00%
Average	1.75%	1.85%	2.10%	2.50%	2.58%	2.85%	2.85%	3.15%	4.13%	3.96%
Change (Basis Points)	- 10	- 35	- 75	- 75	- 83	0	0	- 30	- 128	- 111
EXPENSE CHANGE^b										
Range	0.00% – 4.00%	0.00% – 4.00%	1.00% – 3.00%	1.00% – 3.00%	1.00% – 3.00%	0.00% – 3.00%	0.00% – 3.00%	2.00% – 3.00%	2.00% – 4.00%	2.00% – 3.00%
Average	2.50%	2.50%	2.70%	2.75%	2.58%	2.23%	2.23%	2.83%	2.96%	2.79%
Change (Basis Points)	0	- 20	- 25	- 25	- 8	0	0	- 60	- 73	- 56
MARKETING TIME^c										
Range	1 – 9	1 – 9	2 – 9	2 – 8	1 – 18	1 – 9	1 – 9	1 – 9	1 – 9	1 – 12
Average	3.9	3.9	4.2	4.4	5.4	4.1	4.1	4.5	4.0	5.4
Change (▼, ▲, =)	=	▼	▼	▼	▼	=	=	▼	▲	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months										

National Medical Office Buildings Market

While a scarcity of institutional quality offerings in the national medical office buildings (MOBs) market continues to challenge willing buyers, total sales volume ticked up in the first half of 2017. In the 12 months leading up to midyear 2017, total sales reached \$14.7 billion, compared to \$10.3 billion at midyear 2016, as per Real Capital Analytics. Moreover, the average sale price per square foot increased 9.8% during that time.

For buyers seeking to purchase MOB assets, prices can reach as much as 150.0% of replacement cost with an average price of 116.3% of replacement cost. “Construction costs are increasing primarily due to labor

shortages, which means pro-forma rental rates will be increasing and may lead to bumps in pricing for existing product in the coming quarters,” remarks an investor.

The expectation of higher rental rates is not yet reflected in this market’s quarterly average initial-year market rent change rate, which holds steady at 2.20% this quarter (see Table 33). At the same time, however, its average overall cap rate slips five basis points to 6.71% – the lowest level since this market debuted in 2008. Over the next six months, the majority of Survey participants foresee cap rates holding steady in this market. ♦

KEY 3Q17 SURVEY STATS*

Tenant Retention Rate:

Average 81.0% =

Range 70.0% to 90.0%

Months of Free Rent⁽¹⁾:

Average 2 =

Range 1 to 6

% of participants using 80.0% =

Average Overall Cap Rates:

Market (as a whole) 6.71% ▼

On campus 6.40% ▼

Off campus 7.03% ▼

* ▼, ▲, = change from prior quarter
(1) on a ten-year lease

Table 33
NATIONAL MEDICAL OFFICE BUILDINGS MARKET
Third Quarter 2017

	CURRENT	LAST QUARTER	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	5.75% – 11.00%	5.75% – 11.00%	5.50% – 11.00%	6.00% – 11.00%	6.50% – 13.00%
Average	7.80%	7.85%	8.04%	8.42%	8.97%
Change (Basis Points)		– 5	– 24	– 62	– 117
OVERALL CAP RATE (OAR)^a					
Range	4.75% – 10.00%	4.75% – 10.00%	4.50% – 10.00%	5.00% – 11.00%	5.75% – 11.00%
Average	6.71%	6.76%	6.78%	7.60%	7.94%
Change (Basis Points)		– 5	– 7	– 89	– 123
RESIDUAL CAP RATE					
Range	5.25% – 10.25%	5.50% – 10.25%	5.25% – 10.25%	5.50% – 10.50%	6.00% – 12.00%
Average	6.98%	7.00%	7.12%	7.71%	8.17%
Change (Basis Points)		– 2	– 14	– 73	– 119
MARKET RENT CHANGE^b					
Range	0.00% – 3.00%	0.00% – 3.00%	0.00% – 4.00%	(5.00%) – 3.00%	(5.00%) – 3.00%
Average	2.20%	2.20%	2.46%	1.65%	0.97%
Change (Basis Points)		0	– 26	+ 55	+ 123
EXPENSE CHANGE^b					
Range	1.00% – 4.00%	1.00% – 4.00%	1.00% – 4.00%	0.00% – 4.00%	0.00% – 4.00%
Average	2.50%	2.50%	2.43%	2.45%	2.22%
Change (Basis Points)		0	+ 7	+ 5	+ 28
MARKETING TIME^c					
Range	1 – 12	1 – 12	1 – 12	1 – 12	1 – 12
Average	4.8	4.8	4.5	5.2	5.4
Change (▼, ▲, =)		=	▲	▼	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Lodging Highlights

The following data and narrative is extracted from "Hospitality Directions US" updated August 2017, published by PwC Hospitality & Leisure.

As uncertainty weighs on the economy, softening lodging industry growth expected to continue. Following a weak first quarter, the U.S. economy strengthened in the second quarter. An initial second-quarter GDP estimate of 2.7% and further solid contributions from consumer spending suggest that the U.S. economy will remain on solid footing for the balance of 2017. Overall, moderate demand growth in the second quarter supported increases in both occupancy and ADR, resulting in a RevPAR increase of 2.7%.

Despite ongoing political uncertainty, consumer and business spending are expected to continue to support economic growth in the second half of 2017. Benefiting from rising employment, real disposable income, and household wealth, consumers have been a driving force of economic

growth this cycle. Business fixed investment is also expected to contribute meaningfully to economic growth, according to IHS-Markit. For the U.S. lodging industry, this increase in domestic spending is expected to support growth in demand and ADR, though supply growth continues to be a meaningful downside risk. ADR growth of 2.1% is expected to continue to outpace inflation, resulting in a 2.3% increase in RevPAR in 2017.

Looking ahead to 2018, policy uncertainty and Congressional gridlock, combined with the accelerating timeline to midterm elections, pose as significant overhangs to business and consumer confidence. The U.S. dollar is anticipated to continue to weaken in 2018, which could help support inbound international travel. However, it may also weigh negatively on domestic consumer spending, as prices on imported goods increase and consumers reallocate discretionary spending.

Though inflation is forecast to re-

main well below the 2.0% targeted by the Federal Reserve, ADR is expected to continue to grow, albeit at a slower pace. Overall, we continue to anticipate RevPAR growth of 2.0%, the lowest increase since the beginning of the economic recovery.

SUPPLY

Supply growth for the U.S. lodging industry is expected to accelerate to 1.9% in 2017 (up from 1.5% in 2016). PwC's updated lodging outlook for 2018 anticipates supply growth peaking in the first quarter and tapering throughout the balance of the year.

For 2018, the upper midscale chain-scale segment is forecast to see the greatest increase in supply, growing at 4.0% (up from its expected growth of 3.2% in 2017). In contrast, the economy chain-scale segment is expected to realize a 0.5% increase in supply in 2018.

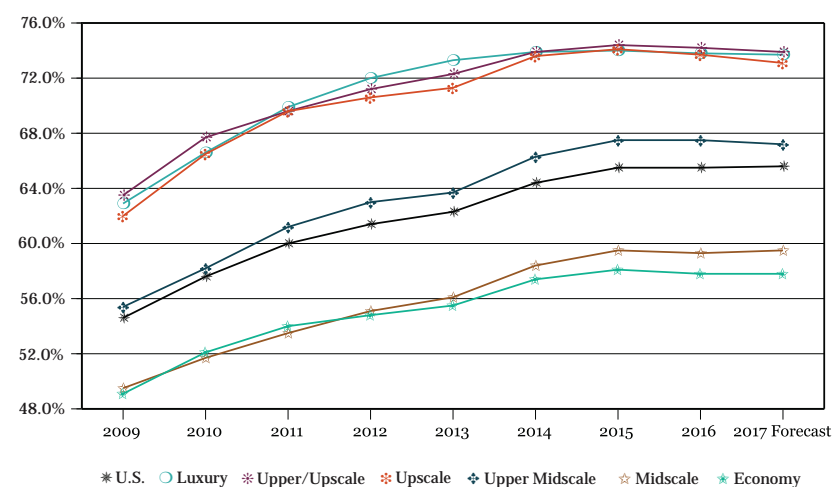
DEMAND

For 2017, PwC's lodging outlook anticipates demand growing 2.1% for the industry and also increasing in each chain-scale segment (between 0.3% in the economy chain-scale segment to 5.1% in the upscale chain-scale segment).

Demand is expected to largely follow the same trends as supply in 2018. As a result, the supply-demand balance is expected to shift in 2018 for the first time this cycle, resulting in a minor decline in occupancy for the U.S. lodging industry.

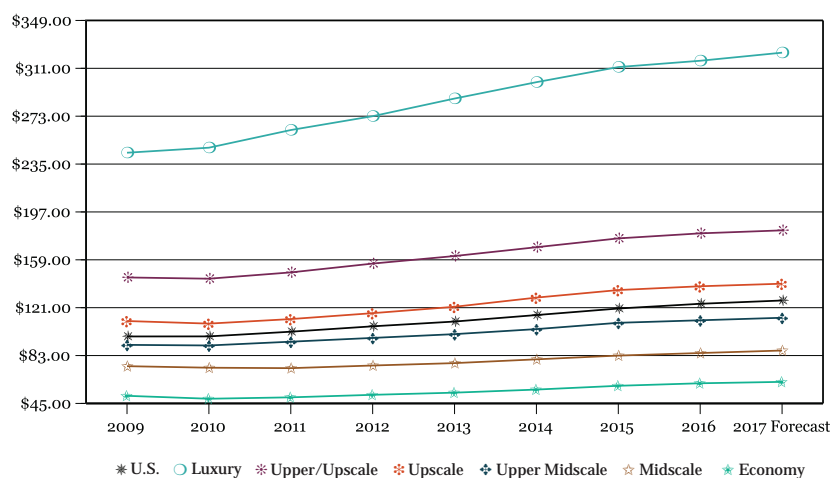
In 2018, PwC forecasts demand growth to decelerate for the industry as a whole, as well as in the upscale and midscale chain-scale segments.

Exhibit L-1
OCCUPANCY



Source: STR (2009 thru 2016); PwC (2017 Forecast)

Exhibit L-2
AVERAGE DAILY RATE (ADR)



Source: STR (2009 thru 2016); PwC (2017 Forecast)

OCCUPANCY

As shown in Exhibit L-1, only two of the six chain-scale segments included in our lodging analysis are forecast to see increases in annual occupancy in 2017, led by the midscale segment.

For 2018, acceleration of supply growth paired with a continued deceleration in the rate of demand growth is expected to result in a decline in the industry's occupancy for the first time this cycle. Specifically, PwC forecasts the industry's occupancy level to decrease to 65.5% in 2018.

AVERAGE DAILY RATE (ADR)

As shown in Exhibit L-2, ADR growth is forecast for each chain-scale segment in 2017. However, the overall rate of growth is 100 basis points below the average in 2016.

For 2018, PwC forecasts ADR for the U.S. lodging industry to grow 2.1% – equal to the rate projected for full-year 2017.

MANHATTAN

Despite a strong April for both occupancy and ADR, which increased 2.4% and 3.0%, respectively, the months of

May and June failed to maintain this strength. Several national headwinds, including political uncertainty and the potential for reduced inbound international travel, still remain a concern for the Manhattan lodging market. However, as supply growth continues to moderate, it could prove to be an eventual tailwind for pricing power.

Hotel performance was mixed in Manhattan's five neighborhoods. While hotels in Midtown South were the only ones to increase ADR, they reported the largest decrease in occupancy and RevPAR in the second quarter. Hotels in Upper Manhattan performed best, increasing RevPAR 1.2%, as a 4.3% increase in occupancy more than offset a 2.9% decline in ADR. Hotels in Midtown East experienced the largest increase in occupancy, at 5.4%, but also the most dramatic decline in ADR, at 4.9%. On a year-to-date basis, Upper Manhattan was the only one to experience an increase in RevPAR, albeit minimal, of 0.4%.

INVESTMENT ACTIVITY

U.S. hotel sales totaled \$13.5 billion for the first half of 2017 – comparable

to the same period in 2016, as per Real Capital Analytics. While portfolio and entity-level activity boosted hotel sales in the second quarter of 2017, these “megadeals” were concentrated in non-major markets.

On a year-over-year basis, hotel sales volume in major markets was down 29.0% in the first half of 2017. By comparison, it was up 58.0% in tertiary markets.

When looking at specific metros, volume was up in 19 of the top-25 markets year over year in 2017. The top-five metros in terms of sales volume for the first half of 2017 are in Table NLH-1. Only one had the distinction of being in the top five for 2016 while four are new to the list. ♦

Table NLH-1
HOTEL SALES VOLUME
FIRST-HALF 2017

Top U.S. Metros

Metro	Total Volume (\$M)	Rank 2016
1. Los Angeles	\$1,054	5
2. Honolulu	\$527	7
3. Atlanta	\$516	12
4. Charlotte	\$489	54
5. Dallas	\$436	15

Source: Real Capital Analytics, Inc.

Trends and forecasts have been extracted from *Hospitality Directions US*, published by PwC Hospitality & Leisure. Released August 2017, this report provides historical data and forecasts for the U.S. lodging industry and seven chain-scale segments with respect to ADR, supply, demand, occupancy, RevPAR, and revenue. For more information, email contact.hospitality@pwc.com.

National Full-Service Lodging Segment

For the second half of 2017, most surveyed investors expect a steady performance for the national full-service lodging sector, albeit with slower growth, especially in locations with additions to supply. “This sector’s performance should be stable with only some negative impact in cities with substantial supply growth,” remarks a participant. “We foresee a relatively flat outlook for 2017,” says another.

In the upscale chain-scale segment, PwC forecasts supply to grow 6.0% in 2017 – well above the U.S. lodging

industry’s forecast average of 1.9%.

For 2018, the rate of supply growth in the upscale segment is expected to decrease to 3.1%, but will remain well above the industry’s average forecast of 1.9%. In the upper-midscale segment, supply growth is forecast to increase 3.2% in 2017 and 4.0% in 2018.

Both chain-scale segments are forecast to post higher demand growth in 2017 compared to 2016. However, demand growth is expected to lag the growth of supply, causing occupancy to fall slightly in each segment in 2017 (see Table FSM-1). ♦

**Table FSM-1
LODGING FORECASTS**

Segment	2017	Annual Change
Upscale		
Occupancy	73.1%	– 0.9%
ADR	\$140.04	+ 1.3%
RevPAR	\$102.35	+ 0.4%
Upper Midscale		
Occupancy	67.2%	– 0.4%
ADR	\$113.00	+ 1.4%
RevPAR	\$75.93	+ 1.0%

Source: *Hospitality Directions US*, August 2017; published by PwC

**Table 34
NATIONAL FULL-SERVICE LODGING SEGMENT**
Third Quarter 2017

	CURRENT	FIRST QUARTER 2017	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	8.00% – 13.00%	8.00% – 13.00%	8.00% – 12.75%	9.00% – 13.00%	8.50% – 13.00%
Average	10.19%	10.19%	10.40%	10.71%	11.00%
Change (Basis Points)		0	– 21	– 52	– 81
OVERALL CAP RATE (OAR)^a					
Range	6.00% – 10.00%	6.00% – 10.00%	6.25% – 10.00%	6.00% – 11.00%	6.00% – 10.00%
Average	7.85%	7.90%	7.78%	7.81%	8.05%
Change (Basis Points)		– 5	+ 7	+ 4	– 20
RESIDUAL CAP RATE					
Range	7.00% – 10.00%	7.00% – 10.00%	7.00% – 10.00%	6.50% – 11.00%	6.00% – 12.00%
Average	8.44%	8.40%	8.38%	8.29%	8.64%
Change (Basis Points)		+ 4	+ 6	+ 15	– 20
AVERAGE DAILY RATE^b					
Range	(2.00%) – 7.00%	(2.00%) – 7.00%	0.00% – 5.00%	0.00% – 7.00%	0.00% – 10.00%
Average	2.75%	2.83%	3.10%	3.83%	4.50%
Change (Basis Points)		– 8	– 35	– 108	– 175
OPERATING EXPENSE^b					
Range	1.00% – 4.00%	1.00% – 4.00%	1.00% – 4.00%	1.00% – 4.00%	1.00% – 5.00%
Average	2.92%	2.92%	2.80%	2.83%	3.04%
Change (Basis Points)		0	+ 12	+ 9	– 12
MARKETING TIME^c					
Range	3 – 9	3 – 9	3 – 9	3 – 9	3 – 24
Average	6.3	6.3	7.0	6.7	9.9
Change (▼, ▲, =)		=	▼	▼	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Limited-Service Midscale & Economy Lodging Segment

While some surveyed investors see a flat near-term performance for the national limited-service midscale & economy lodging segment, others expect slight gains in ADR, occupancy, and RevPAR, but at considerably lower levels. “Aging product and new supply threats will keep this segment’s performance neutral,” notes a participant. “Fundamentals will moderate,” projects another.

For the midscale segment, PwC forecasts a 0.3% increase in occupancy in 2017 as supply growth stays below demand. In 2018, however, supply is

forecast to move ahead of demand in this segment, resulting in a 0.5% decline in occupancy. In the economy segment, demand is forecast to trend faintly ahead of supply in 2017, allowing for only a 0.1% increase in occupancy (see Table ELM-1).

The anticipation of muted occupancy gains is revealed in this market’s key indicators. First, the low end of the overall cap rate range rises to 7.75%. And second, the high end of the range for its ADR growth rate assumption falls to 4.00% – moving its average down 65 basis points to 2.30%. ♦

**Table ELM-1
LODGING FORECASTS**

Segment	2017	Annual Change
Midscale		
Occupancy	59.5%	+ 0.3%
ADR	\$86.64	+ 1.7%
RevPAR	\$51.56	+ 2.0%
Economy		
Occupancy	57.8%	+ 0.1%
ADR	\$62.11	+ 2.1%
RevPAR	\$35.93	+ 2.2%

Source: *Hospitality Directions US, August 2017*; published by PwC

**Table 35
NATIONAL LIMITED-SERVICE MIDSCALE & ECONOMY LODGING SEGMENT**
Third Quarter 2017

	CURRENT	FIRST QUARTER 2017	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	8.50% – 13.00%	8.50% – 13.00%	8.50% – 12.00%	9.00% – 12.00%	9.00% – 13.00%
Average	11.00%	11.00%	10.55%	10.70%	10.94%
Change (Basis Points)		0	+ 45	+ 30	+ 6
OVERALL CAP RATE (OAR)^a					
Range	7.75% – 11.00%	7.50% – 11.00%	7.50% – 10.00%	8.00% – 10.00%	8.00% – 12.00%
Average	9.08%	9.06%	8.70%	9.00%	9.70%
Change (Basis Points)		+ 2	+ 38	+ 8	– 62
RESIDUAL CAP RATE					
Range	7.75% – 11.00%	7.75% – 11.00%	7.75% – 10.00%	8.00% – 11.00%	8.00% – 12.00%
Average	9.83%	9.66%	9.43%	9.55%	9.85%
Change (Basis Points)		+ 17	+ 40	+ 28	– 2
AVERAGE DAILY RATE^b					
Range	(2.50%) – 4.00%	(2.50%) – 8.00%	0.00% – 4.00%	2.00% – 5.00%	0.00% – 7.00%
Average	2.30%	2.95%	2.65%	3.30%	3.60%
Change (Basis Points)		– 65	– 35	– 100	– 130
OPERATING EXPENSE^b					
Range	2.50% – 3.00%	2.50% – 3.00%	2.50% – 3.00%	1.00% – 3.00%	1.00% – 3.00%
Average	2.95%	2.95%	2.95%	2.75%	2.75%
Change (Basis Points)		0	0	+ 20	+ 20
MARKETING TIME^c					
Range	2 – 12	2 – 12	2 – 12	2 – 12	2 – 12
Average	6.9	6.5	6.8	7.0	7.6
Change (▼, ▲, =)		▲	▲	▼	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Luxury/Upper-Upscale Lodging Segment

As supply growth stays ahead of demand, many surveyed investors expect “fundamentals to moderate” in the national luxury/upper-upscale lodging segment as it moves into the second half of 2017. “This hotel sector will continue to show growth, but at a slower pace compared to prior years,” comments an investor. Others, however, see fundamentals holding steady. A shown in Table LUM-1, occupancy for the luxury segment is forecast to remain at 73.7% for 2017 compared to 2016, but it is forecast to decline 0.4% in the upper-upscale segment.

When analyzing investments in this lodging market, our investors’ assumptions for ADR growth have moderated. As shown in Table 36, the high end of the range for this cash flow assumption declines 100 basis points to 5.00% this quarter. In addition, its average slips ten basis points to 3.00%. Even though this average is well below the assumption from a year ago, it is the highest average of the Survey’s four national lodging markets. Select-service lodging posts the second-highest quarterly average at 2.80%. ♦

**Table LUM-1
LODGING FORECASTS**

Segment	2017	Annual Change
Luxury		
Occupancy	73.7%	0.0%
ADR	\$323.42	+ 2.0%
RevPAR	\$238.49	+ 1.9%
Upper Upscale		
Occupancy	73.9%	– 0.4%
ADR	\$182.38	+ 1.6%
RevPAR	\$134.78	+ 1.1%

Source: *Hospitality Directions US*, August 2017; published by PwC

**Table 36
NATIONAL LUXURY/UPPER-UPSCALE LODGING SEGMENT
Third Quarter 2017**

	CURRENT	FIRST QUARTER 2017	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	6.50% – 12.00%	6.50% – 12.00%	6.50% – 12.00%	8.00% – 12.00%	8.50% – 13.00%
Average	9.53%	9.53%	9.60%	9.82%	10.54%
Change (Basis Points)		0	– 7	– 29	– 101
OVERALL CAP RATE (OAR)^a					
Range	4.00% – 9.00%	4.00% – 9.00%	4.00% – 9.00%	4.00% – 9.00%	6.00% – 10.00%
Average	7.03%	7.00%	6.92%	7.04%	8.18%
Change (Basis Points)		+ 3	+ 11	– 1	– 115
RESIDUAL CAP RATE					
Range	5.50% – 9.50%	5.50% – 9.50%	5.50% – 9.50%	5.75% – 10.00%	6.00% – 12.00%
Average	7.18%	7.18%	7.23%	7.43%	8.73%
Change (Basis Points)		0	– 5	– 25	– 155
AVERAGE DAILY RATE^b					
Range	0.00% – 5.00%	0.00% – 6.00%	0.00% – 9.00%	0.00% – 9.00%	(2.00%) – 15.00%
Average	3.00%	3.10%	4.00%	4.14%	4.33%
Change (Basis Points)		– 10	– 100	– 114	– 133
OPERATING EXPENSE^b					
Range	0.00% – 4.00%	0.00% – 4.00%	0.00% – 5.00%	0.00% – 5.00%	0.00% – 6.00%
Average	2.60%	2.60%	2.75%	2.86%	2.98%
Change (Basis Points)		0	– 15	– 26	– 38
MARKETING TIME^c					
Range	3 – 12	3 – 12	3 – 12	3 – 12	2 – 20
Average	6.8	6.8	6.3	6.0	7.8
Change (▼, ▲, =)		=	▲	▲	▼

a. Rate on unleveraged, all-cash transactions

b. Initial rate of change

c. In months

National Select-Service Lodging Segment

Changes in this quarter's cash flow assumptions suggest that surveyed investors have become more conservative and cautious about the near-term performance of the national select-service lodging segment. First, this sector's average overall capitalization rate moves up ten basis points to 8.70% – the highest average reported for this segment since its Survey debut in 2011. Second, its average ADR change rate slips 20 basis points to 2.80% – the sixth consecutive semi-annual decline for this assumption and its lowest average since its debut.

Five years ago, investors' expectations for this market were more positive than they are now. In 2012, the average ADR growth rate assumption was 4.80% – the highest average of the four Survey lodging markets. In addition, the average expected change in property values was 5.2%. This quarter, that average expectation is a decline of 1.5% (see Table SSL-1).

A main reason for investors' less favorable outlook for this sector today is the "continued pressure that new supply is placing on property performance." ♦

Table SSL-1
EXPECTED VALUE CHANGE*

Survey Lodging Markets

Segment	Range	Average
Full Service	(5.0%) to 6.0%	0.5%
Limited-Service Midscale & Economy	(5.0%) to 5.0%	– 0.3%
Luxury/Upper Upscale	(3.0%) to 10.0%	+ 2.9%
Select Service	(10.0%) to 3.0%	– 1.5%

* Over the next 12 months

Source: PwC Real Estate Investor Survey; 3Q2017

Table 37
NATIONAL SELECT-SERVICE LODGING SEGMENT
Third Quarter 2017

	CURRENT	FIRST QUARTER 2017	1 YEAR AGO	3 YEARS AGO	5 YEARS AGO
DISCOUNT RATE (IRR)^a					
Range	8.00% – 12.00%	8.00% – 11.00%	8.00% – 11.00%	9.00% – 13.00%	9.00% – 15.00%
Average	10.20%	9.90%	9.80%	10.95%	11.30%
Change (Basis Points)		+ 30	+ 40	– 75	– 110
OVERALL CAP RATE (OAR)^a					
Range	6.50% – 10.00%	6.50% – 10.00%	6.50% – 10.00%	5.00% – 11.00%	5.00% – 12.00%
Average	8.70%	8.60%	8.55%	8.25%	8.40%
Change (Basis Points)		+ 10	+ 15	+ 45	+ 30
RESIDUAL CAP RATE					
Range	7.00% – 10.75%	7.00% – 10.75%	7.00% – 10.75%	5.00% – 11.00%	5.00% – 12.00%
Average	9.08%	9.03%	9.03%	8.45%	8.50%
Change (Basis Points)		+ 5	+ 5	+ 63	+ 58
AVERAGE DAILY RATE^b					
Range	(2.00%) – 5.00%	0.00% – 5.00%	0.00% – 6.00%	2.00% – 8.00%	1.00% – 8.00%
Average	2.80%	3.00%	3.20%	5.20%	4.80%
Change (Basis Points)		– 20	– 40	– 240	– 200
OPERATING EXPENSE^b					
Range	2.00% – 4.00%	2.00% – 4.00%	2.00% – 4.00%	2.00% – 4.00%	2.00% – 4.00%
Average	2.70%	2.70%	2.70%	2.95%	2.95%
Change (Basis Points)		0	0	– 25	– 25
MARKETING TIME^c					
Range	2 – 12	2 – 12	2 – 12	2 – 12	2 – 12
Average	6.0	6.0	5.9	6.8	6.8
Change (▼, ▲, =)		=	▲	▼	▼
a. Rate on unleveraged, all-cash transactions b. Initial rate of change c. In months					

National Development Land Market

This quarter, most surveyed investors note that the industrial sector presents the best opportunities for development land investing in the near term. Other top choices include restaurant and high-end luxury residential.

These three property classes are each doing well from a fundamental standpoint. Industrial space demand remains strong due to growing Internet sales and the need for warehousing goods and rapidly delivering them to customers. High-end luxury housing is also doing well, despite additions to supply, mainly due to demand from retirees and young workers. In the restaurant sector, revenue continues to rise as more people are eating out than dining at home.

With most of the industrial sector poised to enter the contraction phase of the real estate cycle starting in 2018 and the apartment sector projected to be in the same cycle position by the end of this year, the “window of opportunity may be closing in this sector.” As one investor comments, “Scary times are around the corner; while things look good right now, it seems that there’s a lot of lipstick on the pig.”

Total spending on U.S. private construction was up 7.0% on a year-over-year basis in March 2017, according to the U.S. Census Bureau (see Table DVL-1). When looking more closely, private residential spending

was up 7.5% while private nonresidential spending was up 6.4% – still positive, but below its year-over-year growth for March 2016 (9.3%). In the nonresidential sector, communication, office, and education reported the highest year-over-year gains in spending as of March 2017. In contrast, spending for health care, religious, and transportation construction declined year over year in March 2017.

DISCOUNT RATES

Free-and-clear discount rates including developer's profit range from 10.0% to 20.0% and average 16.00% this quarter (see Exhibit DL-1). This average is up 50 basis points from the fourth quarter of 2016 and assumes that entitlements are in place. Without entitlements in place, certain investors increase the discount rate between 100 and 800 basis points (an average increase of 394 basis points).

GROWTH RATE ASSUMPTIONS

Growth rates for development expenses, such as amenities, real estate taxes, advertising, and administration, typically range from 1.0% to 7.5% and average 4.1%. For lot pricing, investors indicate a range up to 8.0%; the average growth rate for lot pricing is 4.2%.

ABSORPTION PERIOD

The absorption period required to sell an entire project varies significantly

depending on such factors as location, size, and property type. This quarter, preferred absorption periods for participants range from one to 20 years. The mean absorption period is 9.5 years, more than a year above the average six months ago (8.4 years).

FORECAST VALUE CHANGE

Over the next 12 months, all investor participants expect development land values to increase. Appreciation ranges from 2.0% to 10.0% and averages 5.3% – similar to the average six months ago (5.9%) and well above the average a year ago (3.6%). None of our surveyed investors expect property value declines in the national development land market over the next 12 months.

MARKETING PERIOD

The typical time that a property is on the market prior to selling ranges from three to 36 months and averages 15 months. ♦

Exhibit DL-1 DISCOUNT RATES (IRRS) ^a Second Quarter 2017		
	CURRENT QUARTER	FOURTH QUARTER 2016
FREE & CLEAR		
Range	10.00% – 20.00%	10.00% – 20.00%
Average	16.00%	15.50%
Change		+ 50
a. Rate on unleveraged, all-cash transactions; including developer's profit		

Table DVL-1
U.S. CONSTRUCTION SPENDING*
March 2016 to March 2017

Nonresidential	Year-Over-Year Change
Communication	+ 19.1%
Office	+ 17.7%
Educational	+ 15.3%
Commercial	+ 12.7%
Amusement & Recreation	+ 11.8%
Lodging	+ 8.6%
Power	+ 8.2%
Health Care	– 1.0%
Religious	– 7.3%
Transportation	– 8.7%
Manufacturing	– 9.8%
Total	+ 6.4%
Residential	+ 7.5%
Total Private	+ 7.0%

* Private construction
Source: U.S. Census Bureau; seasonally adjusted

National Development Land Market

In *Emerging Trends in Real Estate*® 2018, development ranks as the third preferred investment category/strategy among *Emerging Trends* respondents for 2018 – behind opportunistic and value-add investments but ahead of core investments. Despite its third-place finish, this year's rating of 3.66 is 0.13 above last year's rating. When considering development opportunities, *Emerging Trend* respondents rank land and construction costs as their top issue followed by infrastructure/transportation, housing costs and availability, and capital availability.

When looking at development prospects for each of the five major commercial real estate (CRE) sectors included in *Emerging Trends*, most rating changes are subtle (see Chart NDL-1). The largest increase over the past year occurs for the retail sector, where the rating rises from 2.42 to 2.55. The retail sector's development rating took a big hit between 2016 and 2017 and it appears that developers are now becoming more comfort-

able with this sector's evolution. Ironically, the only two sectors to see their development ratings decline this year, albeit slightly, are apartments and industrial, where concerns of over-supply issues have been expressed.

Outside of traditional CRE property sectors, *Emerging Trends* respondents feel development prospects in 2018 are also strong for urban mixed-use properties, data centers, infrastructure, self-storage, and suburban mixed-use town centers. Single-family development also gets a nod, as well as senior housing, where favorable demographics, compelling returns, greater liquidity, rising transparency, and mounting understanding of the benefits for residents appeal to investors.

PREFERRED METROS

Of the 78 U.S. metros included in *Emerging Trends*, the top five individual markets with regard to development prospects in the year ahead are (in order) Seattle, Austin, Fort Lauderdale, Raleigh/Durham, Dallas/-

Fort Worth, Miami, Tampa/St. Petersburg, Los Angeles, San Jose, and Salt Lake City. Five of these cities were new to the top-ten for 2018 and include Fort Lauderdale, Miami, Tampa/St. Petersburg, San Jose, and Salt Lake City. Cities that slipped out of the top-ten from last year to this year include Nashville, Charlotte, Portland, Orange County, and Denver. However, these 5 cities still remain in the top 25.

DISCOUNT RATES

On an unleveraged basis, discount rates (including developers' profit) for the national development land market range from 10.00% to 20.00% and average 15.40% this quarter – 60 basis points below the average six months ago.

MARKETING PERIOD

The typical time that a property is on the market prior to selling ranges from 6 to 36 months and averages 16 months.

VALUE

EXPECTATIONS

Looking ahead over the next 12 months, surveyed investors forecast property values in the national development land market to increase as much as 10.0% or decrease as much as 5.0%. Their average expected appreciation rate is 3.5% – well below the rate of 5.6% six months ago. ♦

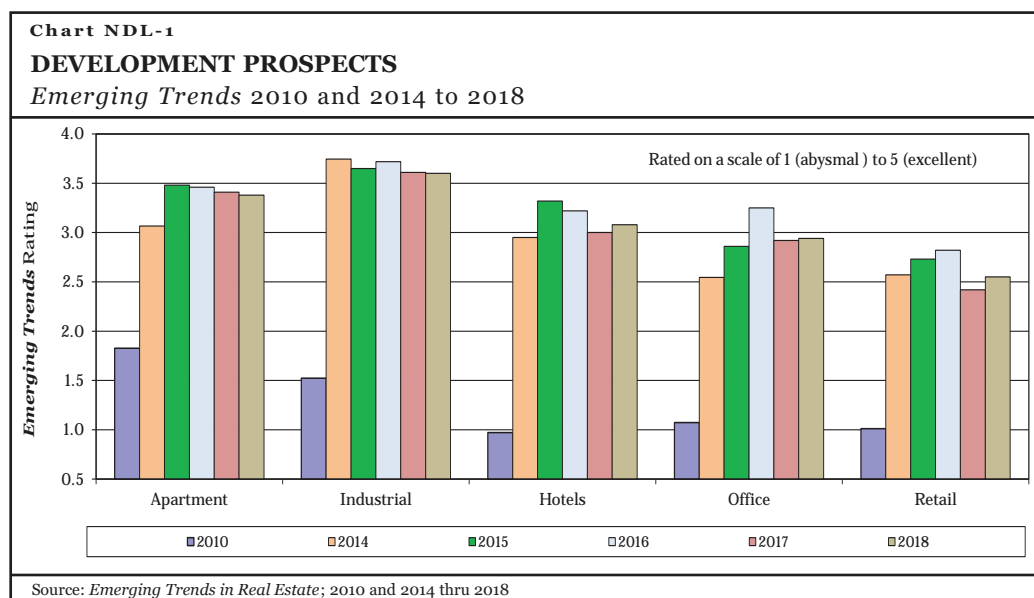


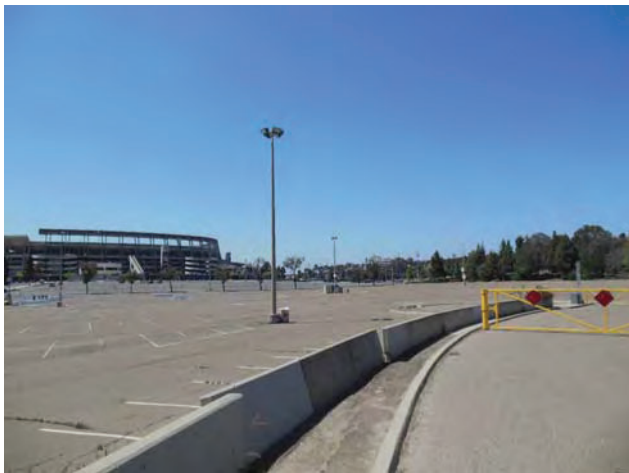
EXHIBIT B



San Diego Mission Road entrance/exit



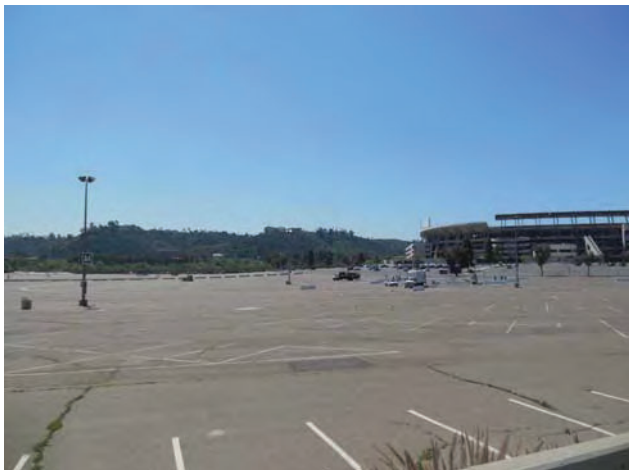
Easterly from San Diego Mission Road entrance/exit



Southwesterly from San Diego Mission Road entrance/exit



Northerly from main entrance



Southerly from San Diego Mission Road entrance/exit



Northwesterly from main entrance



Westerly from main entrance



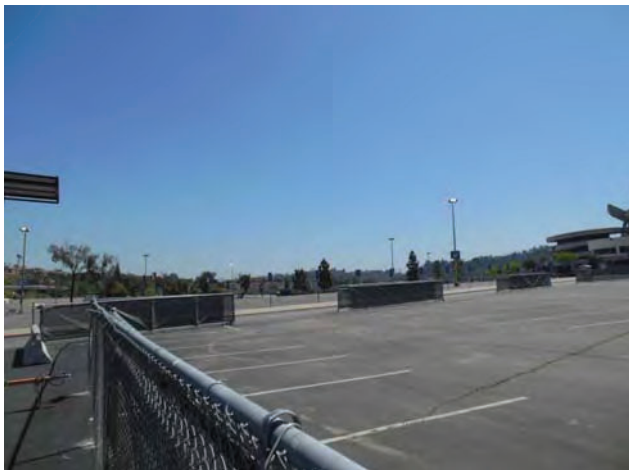
Northeasterly from main entrance



Southerly from main entrance



Westerly from north-central portion



Southeasterly from main entrance



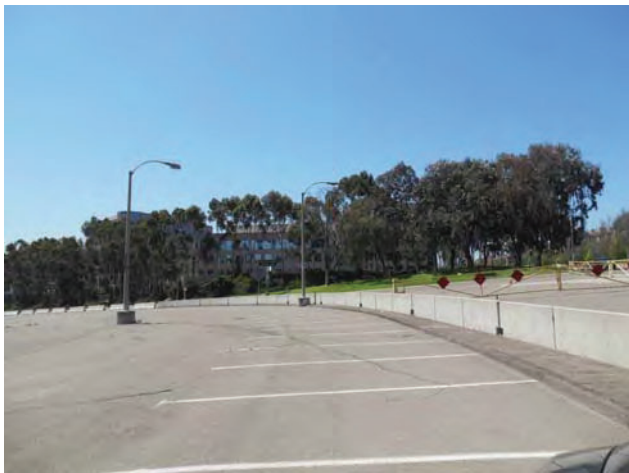
Southwesterly from north-central portion



Southerly from north-central portion



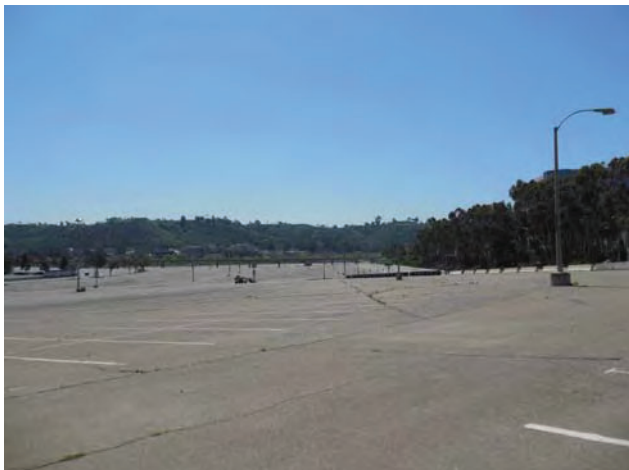
Southeasterly from northwesterly portion



Westerly from northwesterly portion



Westerly from northwesterly portion



Southerly from northwesterly portion



Southerly from westerly portion



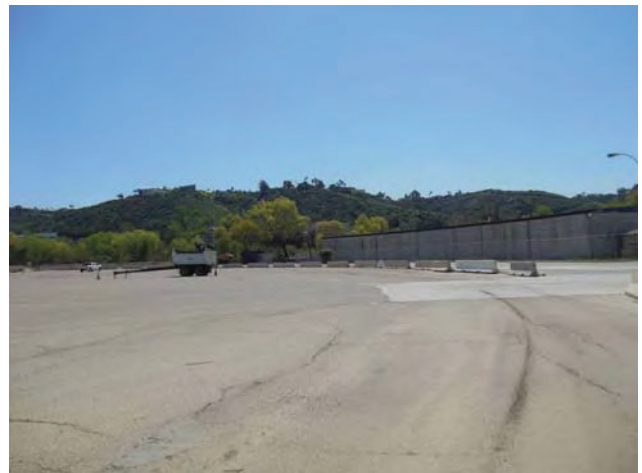
Southeasterly from westerly portion



Northerly from westerly portion



Easterly from westerly portion



Southeasterly from southwesterly portion



Northeasterly from westerly portion



Easterly from southwesterly portion



Northeasterly from southwesterly portion



Northerly from south side of trolley tracks



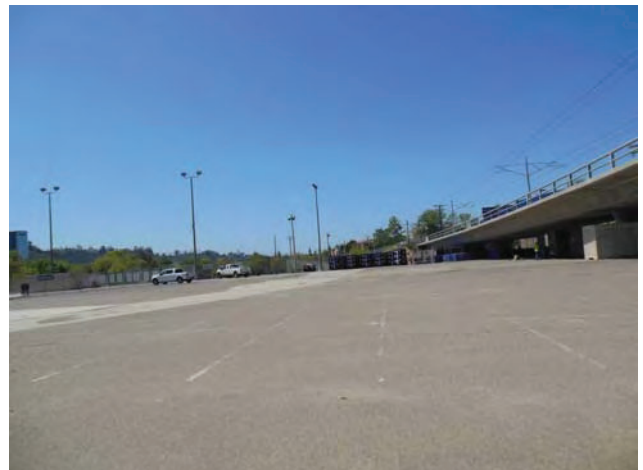
Northerly from southwesterly portion



Northwesterly from south side of trolley tracks



Northwesterly from southwesterly portion



Westerly from south side of trolley tracks



Southwesterly from south side of trolley tracks



Southwesterly of practice and storage area



Southerly from south side of trolley tracks



Southerly of practice and storage area



Southeasterly from south side of trolley tracks



Easterly from practice and storage area



Northerly practice and storage area



Westerly from south of trolley tracks



Northerly from south of trolley tracks



Easterly from south of trolley tracks



Northwesterly from south of trolley tracks



Northerly from south of trolley tracks

SUBJECT PROPERTY PHOTOGRAPHS – APRIL 3, 2017



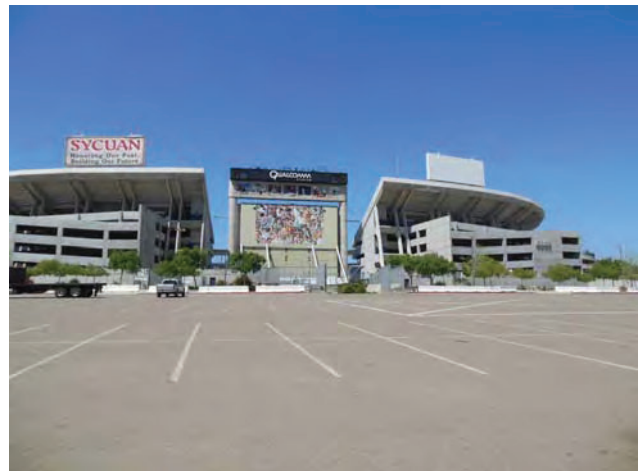
Northerly from south of trolley tracks



Easterly from the south-central portion



Northwesterly from south of trolley tracks



Northerly from the south-central portion



Westerly from south of trolley tracks



Northwesterly from the south-central portion



Southwesterly from the south-central portion



Northerly from the easterly portion



Southerly from the south-central portion



Westerly from the easterly portion



Southeasterly from the south-central portion



Southerly from the easterly portion



Westerly from Mission Village Drive



Southwesterly from the northwest corner of Friars Road and Mission Village Drive



Northwesterly from Mission Village Drive



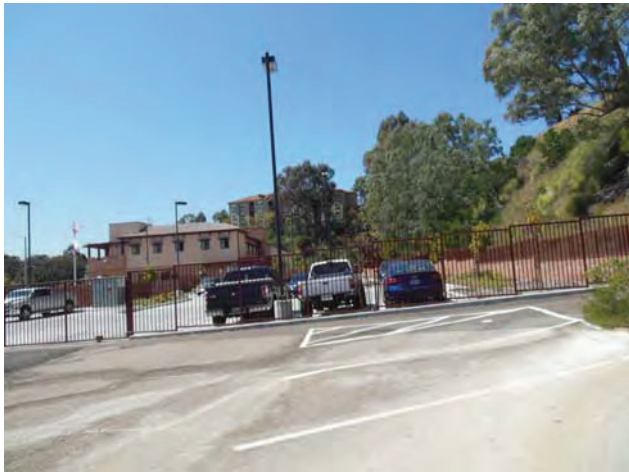
Westerly from the northwest corner of Friars Road and Mission Village Drive



Northerly from Mission Village Drive



Northwesterly from the northwest corner of Friars Road and Mission Village Drive



Westerly from just east of the Fire Station on the north side of Friars Road



Southeasterly from just east of the Fire Station on the north side of Friars Road



Southwesterly from just east of the Fire Station on the north side of Friars Road



Easterly from just east of the Fire Station on the north side of Friars Road



Southerly from just east of the Fire Station on the north side of Friars Road



Northerly of the portion near the San Diego River from the north side of Camino del Rio North



Northeasterly of the portion near the San Diego River
from the north side of Camino del Rio North



Easterly of the portion near the San Diego River
from the north side of Camino del Rio North



Northwesterly of the portion near the San Diego River
from the north side of Camino del Rio North



Northerly of the portion near the San Diego River
from the north side of Camino del Rio North



Westerly of the portion near the San Diego River
from the north side of Camino del Rio North



Northwesterly of the portion near the San Diego River
from the north side of Camino del Rio North



Westerly of the portion near the San Diego River
from the north side of Camino del Rio North



Northerly of the portion near the San Diego River
from the north side of Camino del Rio North

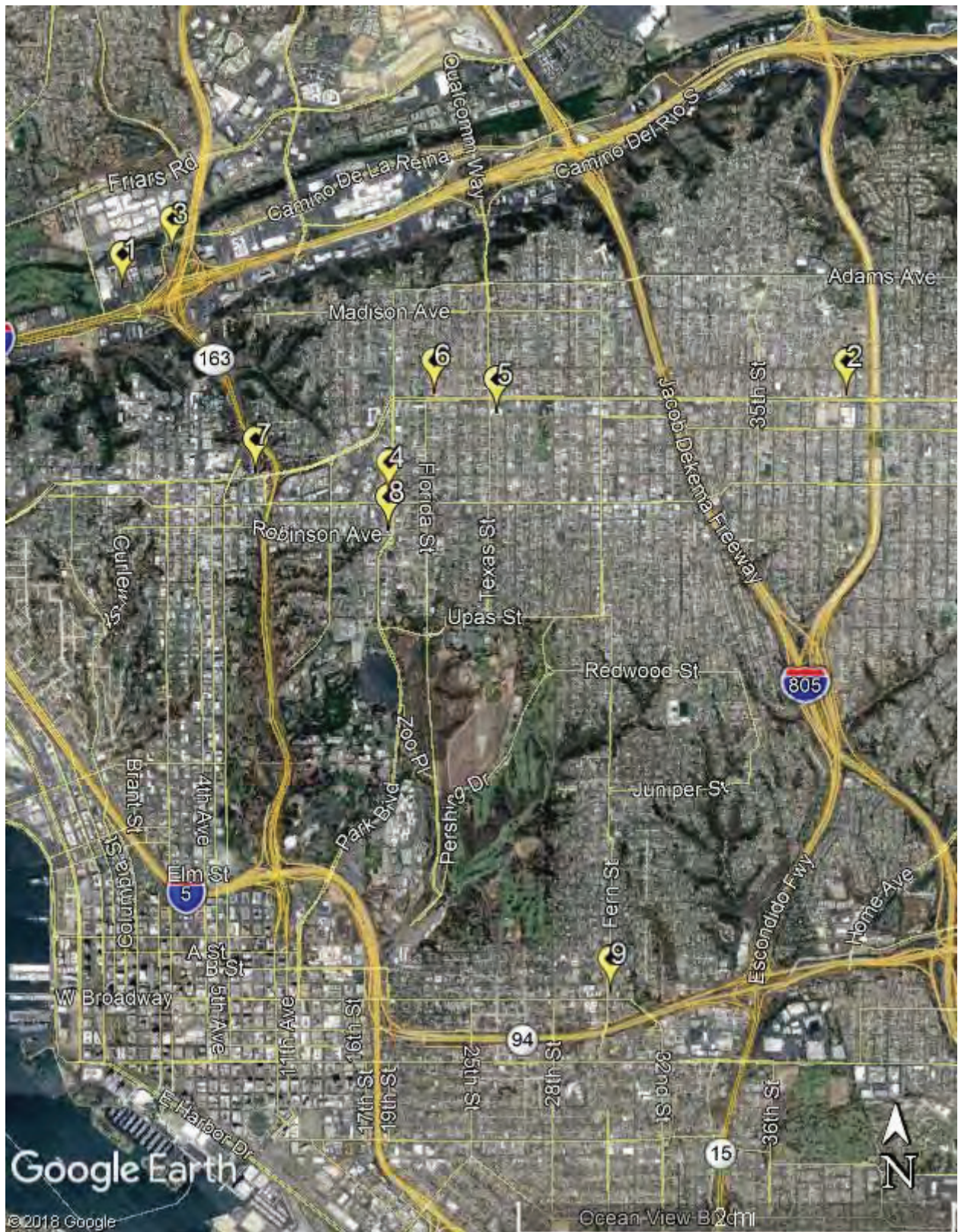


Easterly of the portion near the San Diego River
from the north side of Camino del Rio North

EXHIBIT C

COMPARABLE LAND-MULTI-FAMILY RESIDENTIAL MAPS

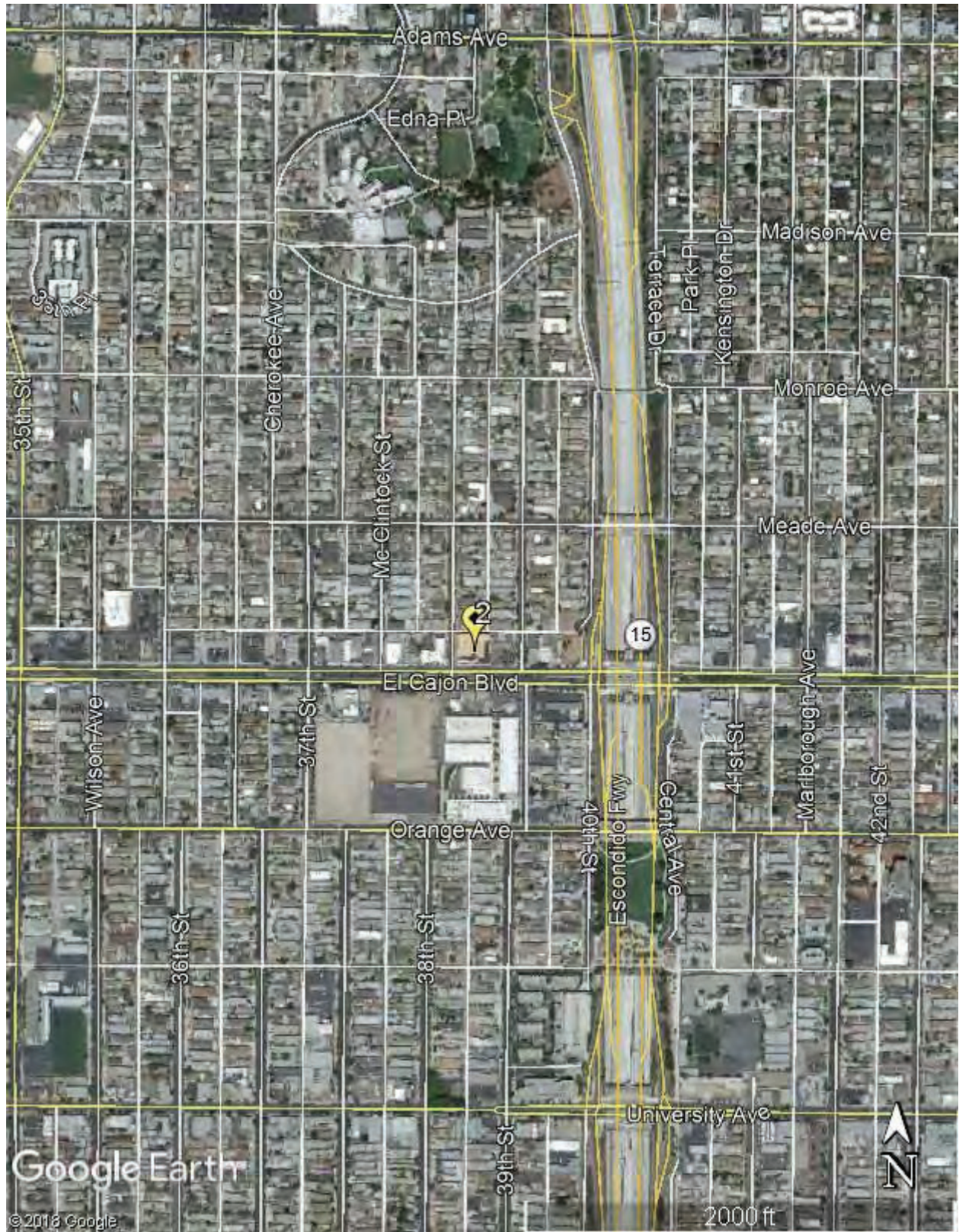
Overview



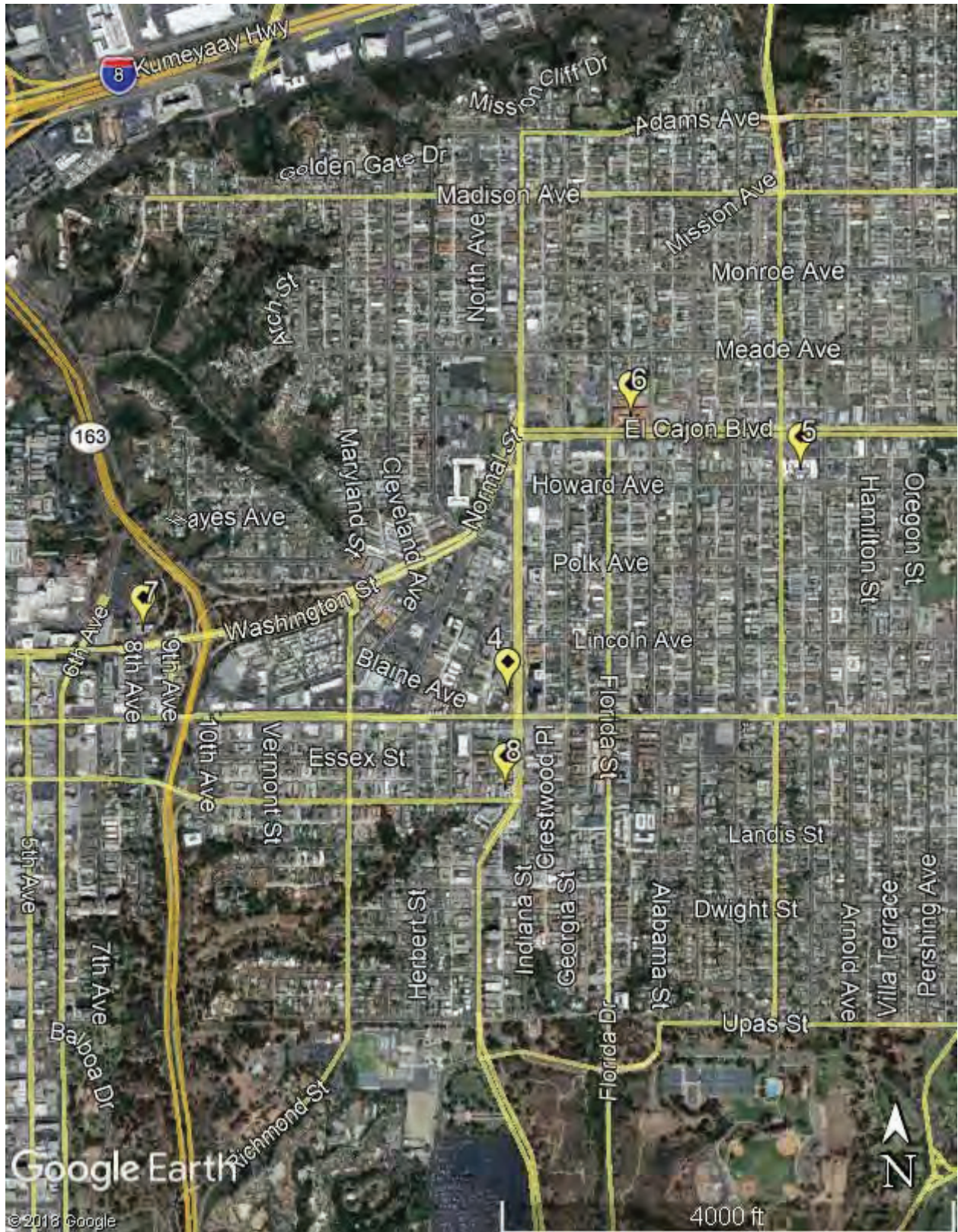
COMPARABLE LAND-MULTI-FAMILY RESIDENTIAL MAPS



COMPARABLE LAND-MULTI-FAMILY RESIDENTIAL MAPS



COMPARABLE LAND-MULTI-FAMILY RESIDENTIAL MAPS



COMPARABLE LAND-MULTI-FAMILY RESIDENTIAL MAPS

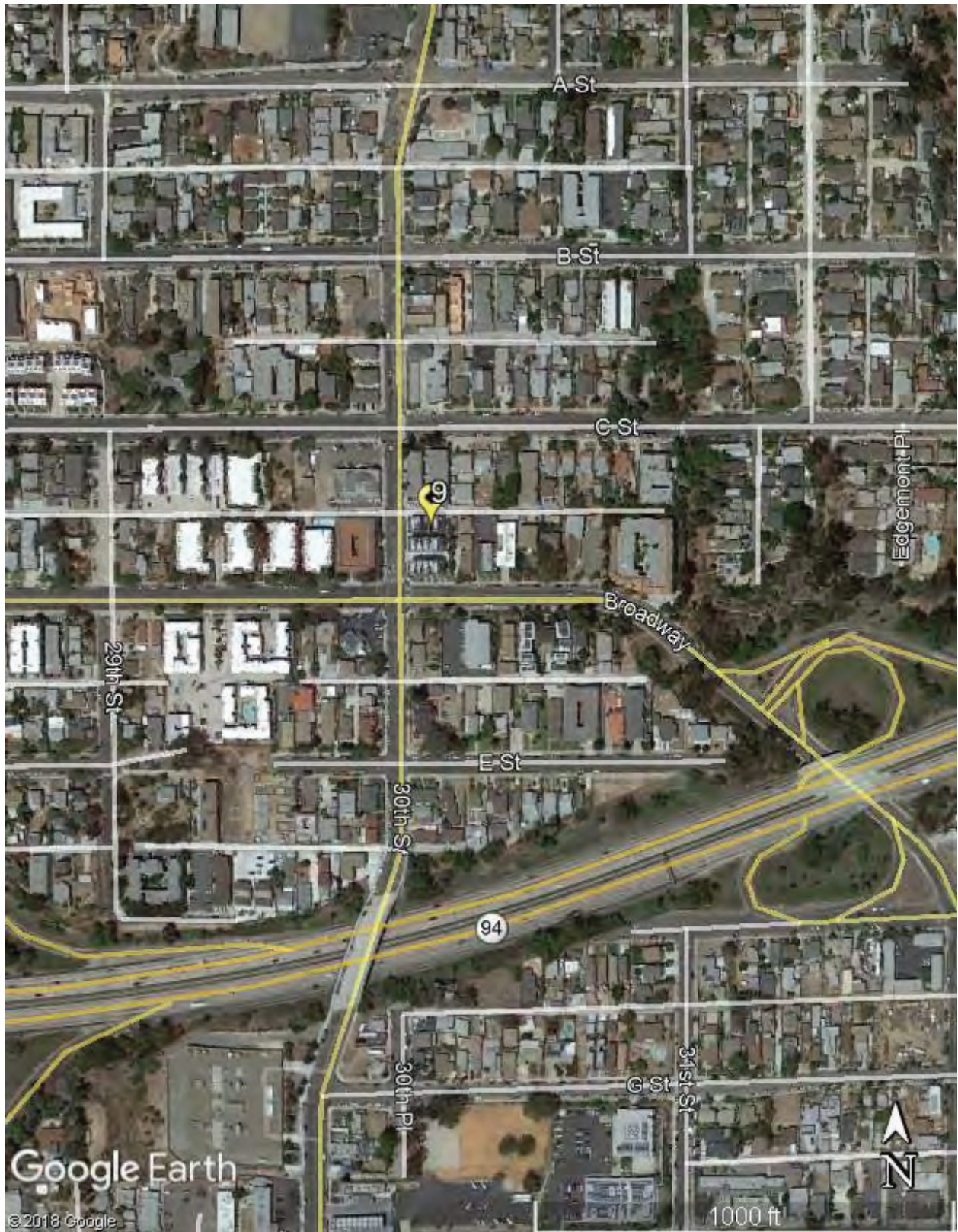


EXHIBIT D

Overview

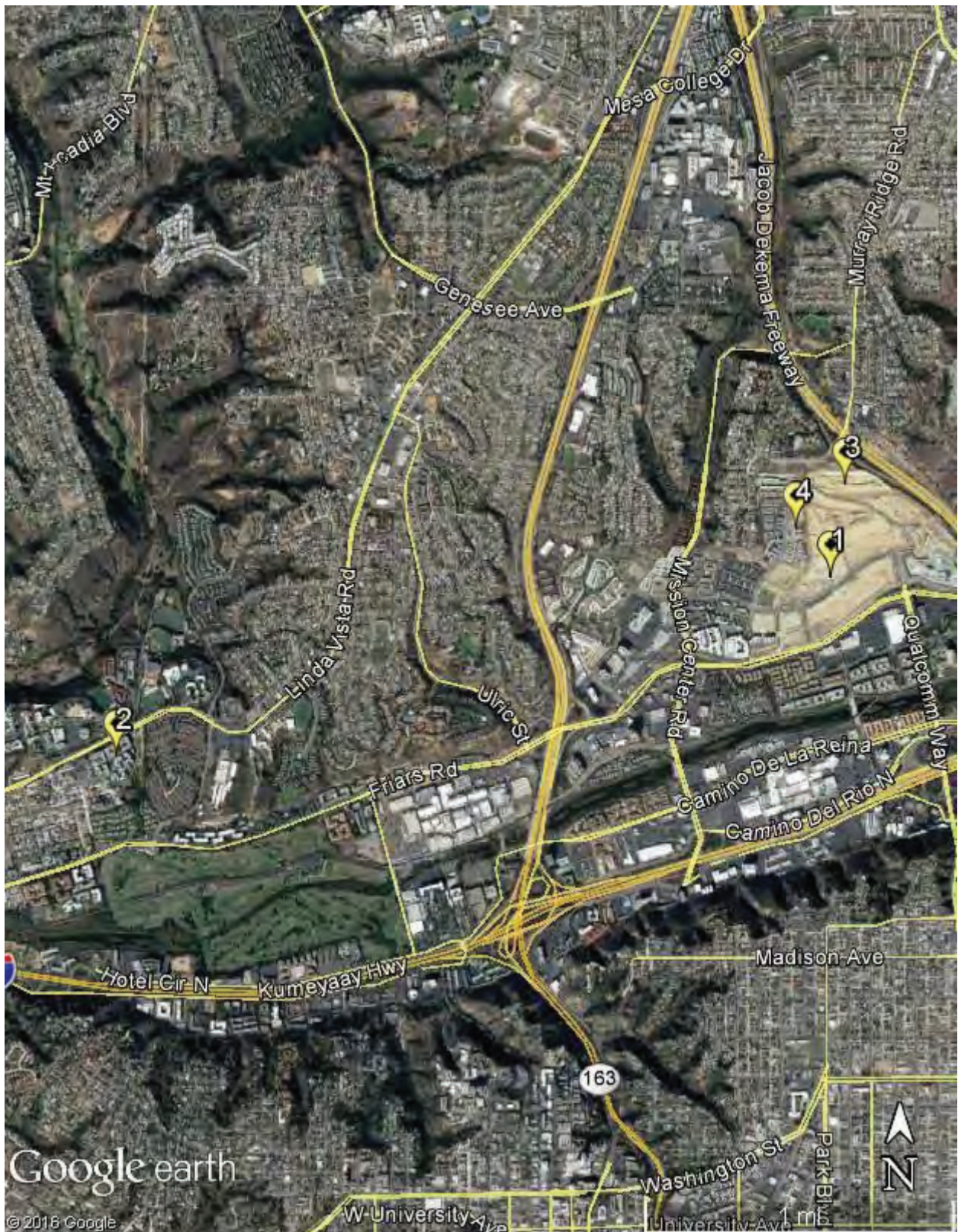
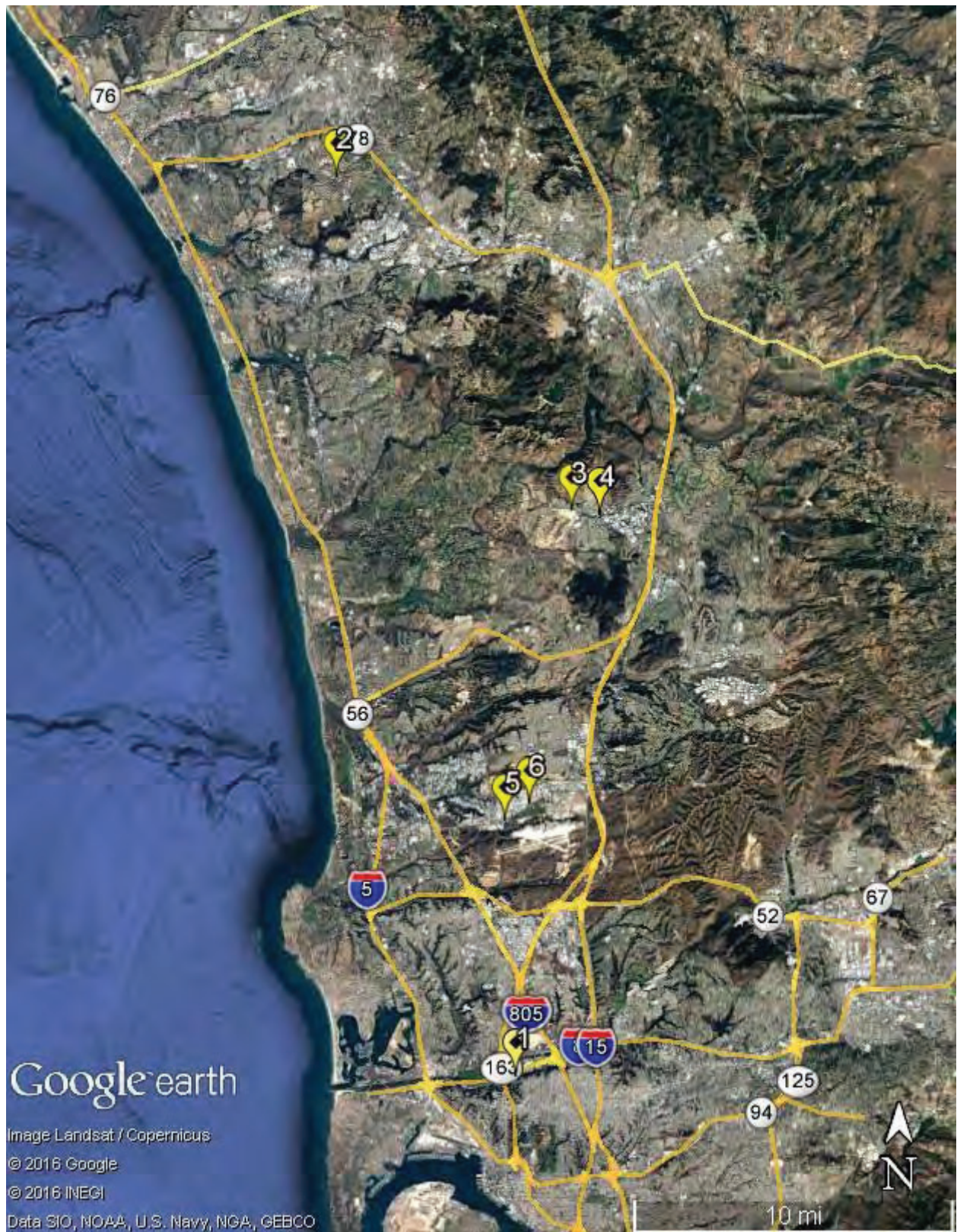


EXHIBIT E

Overview



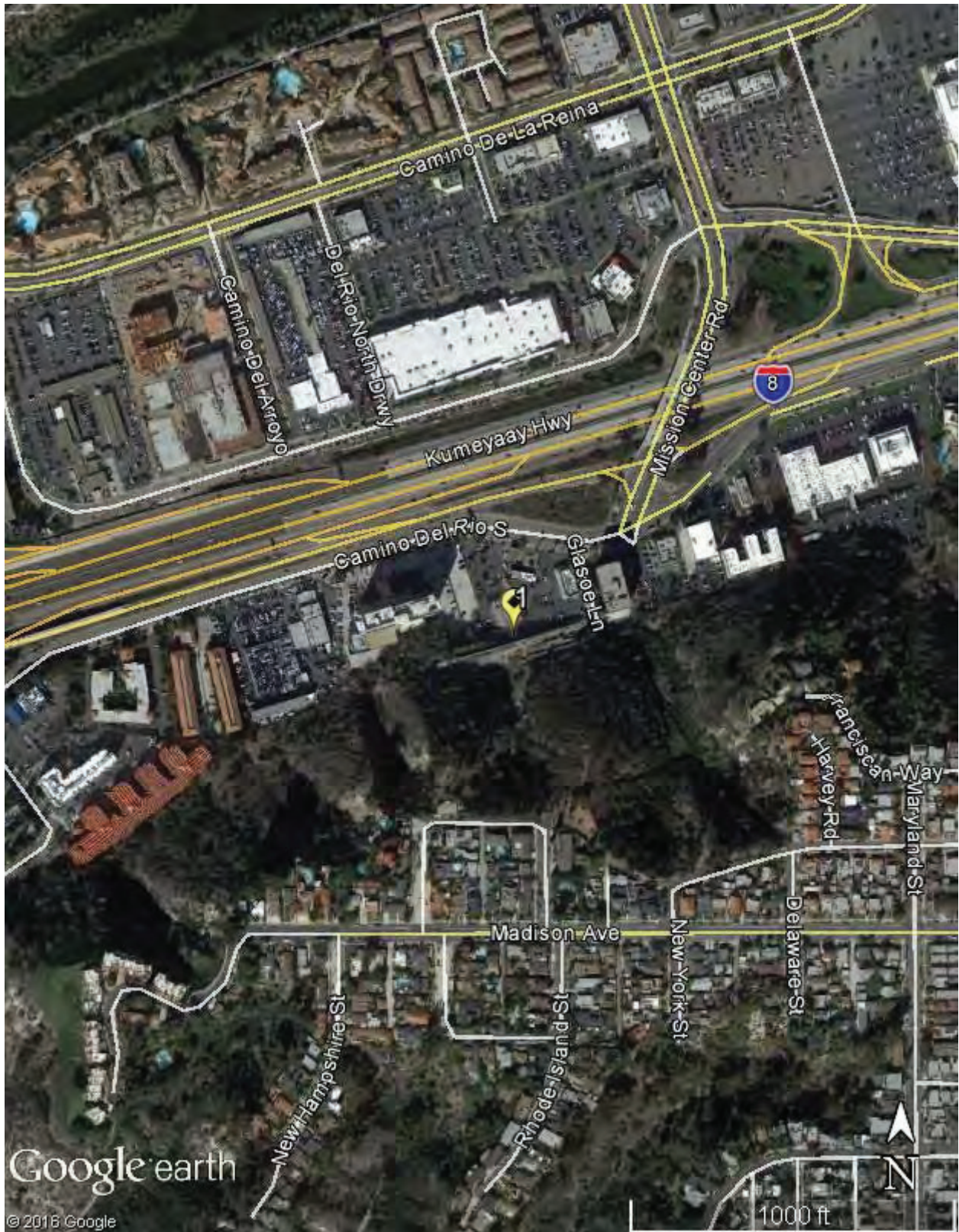


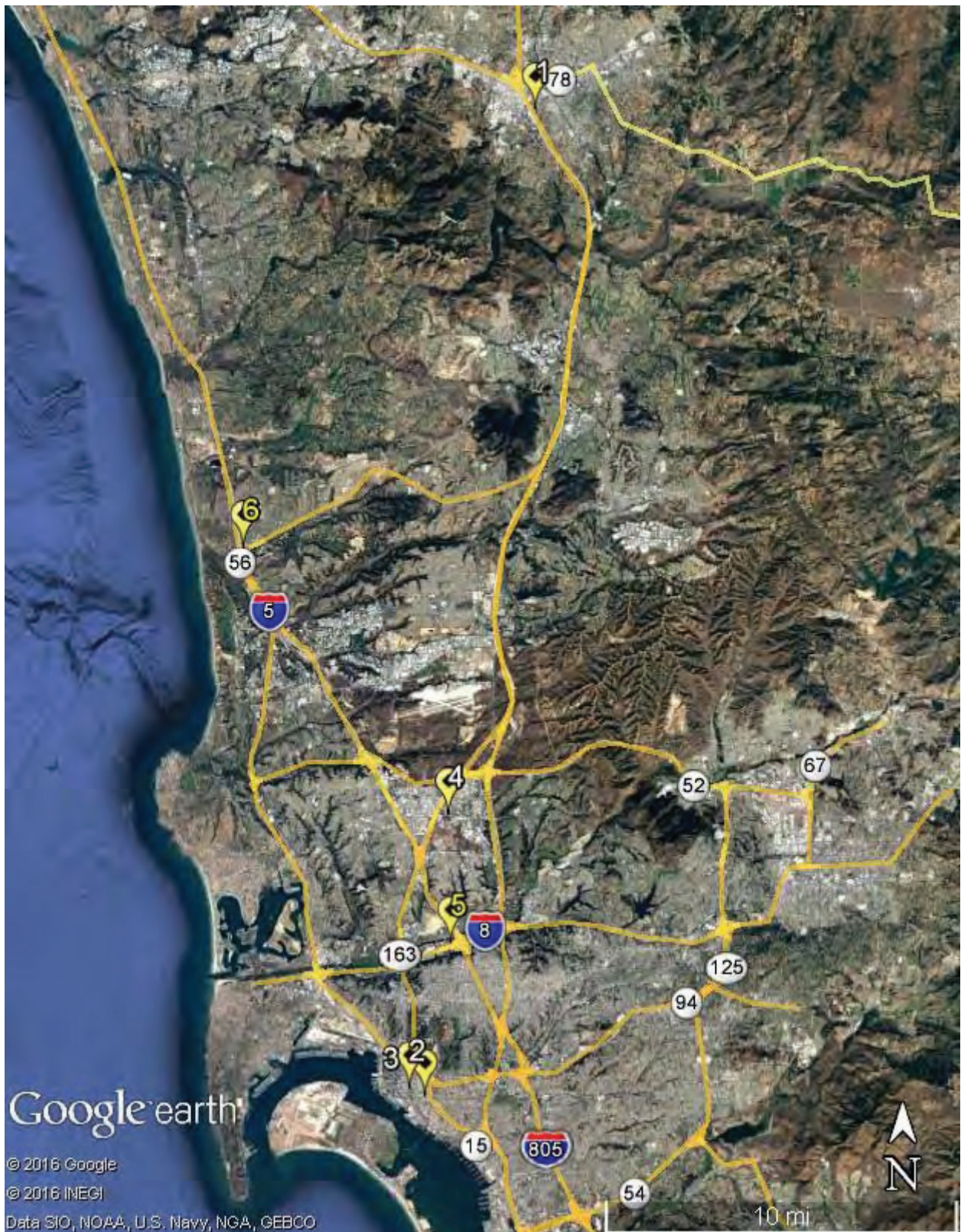


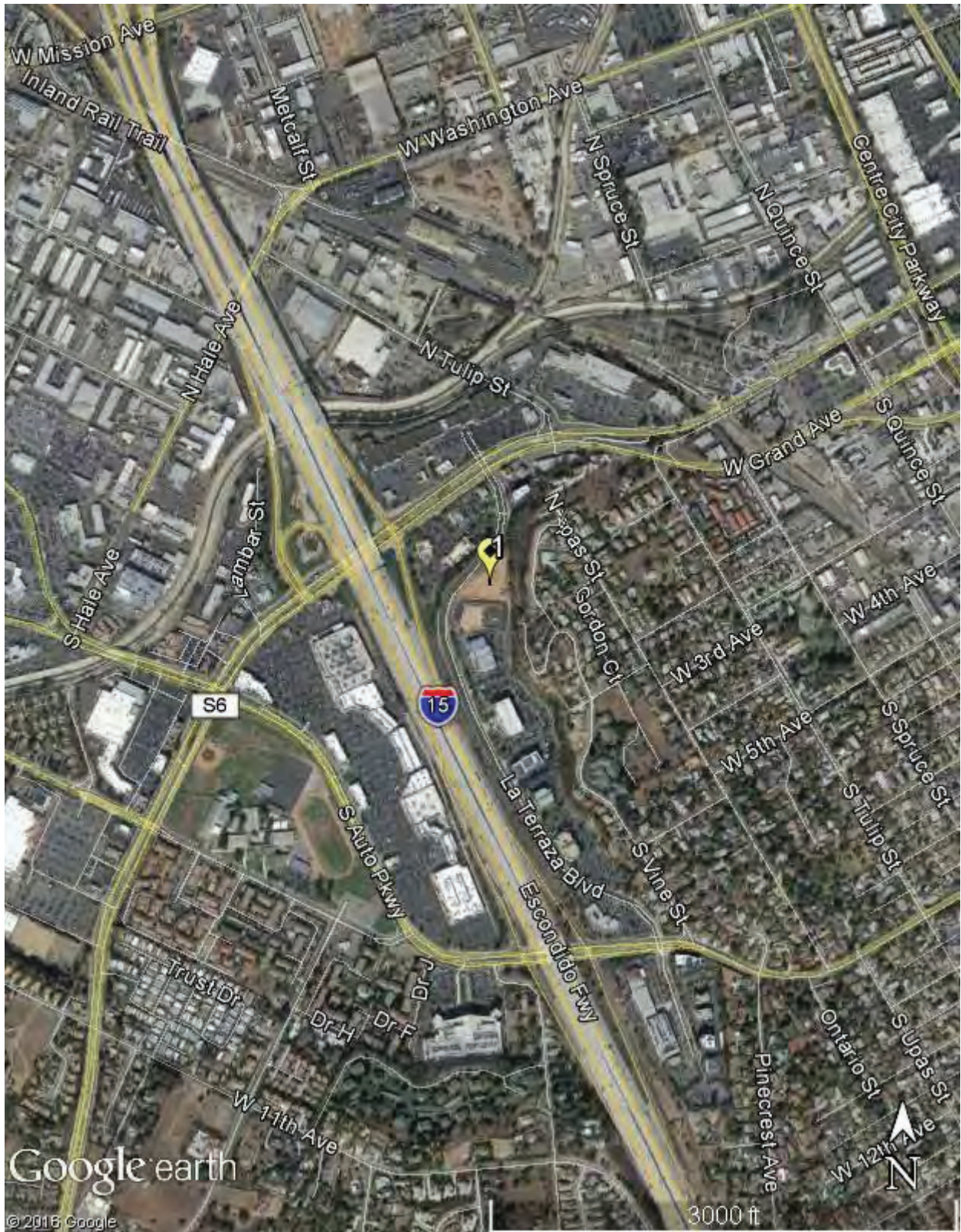


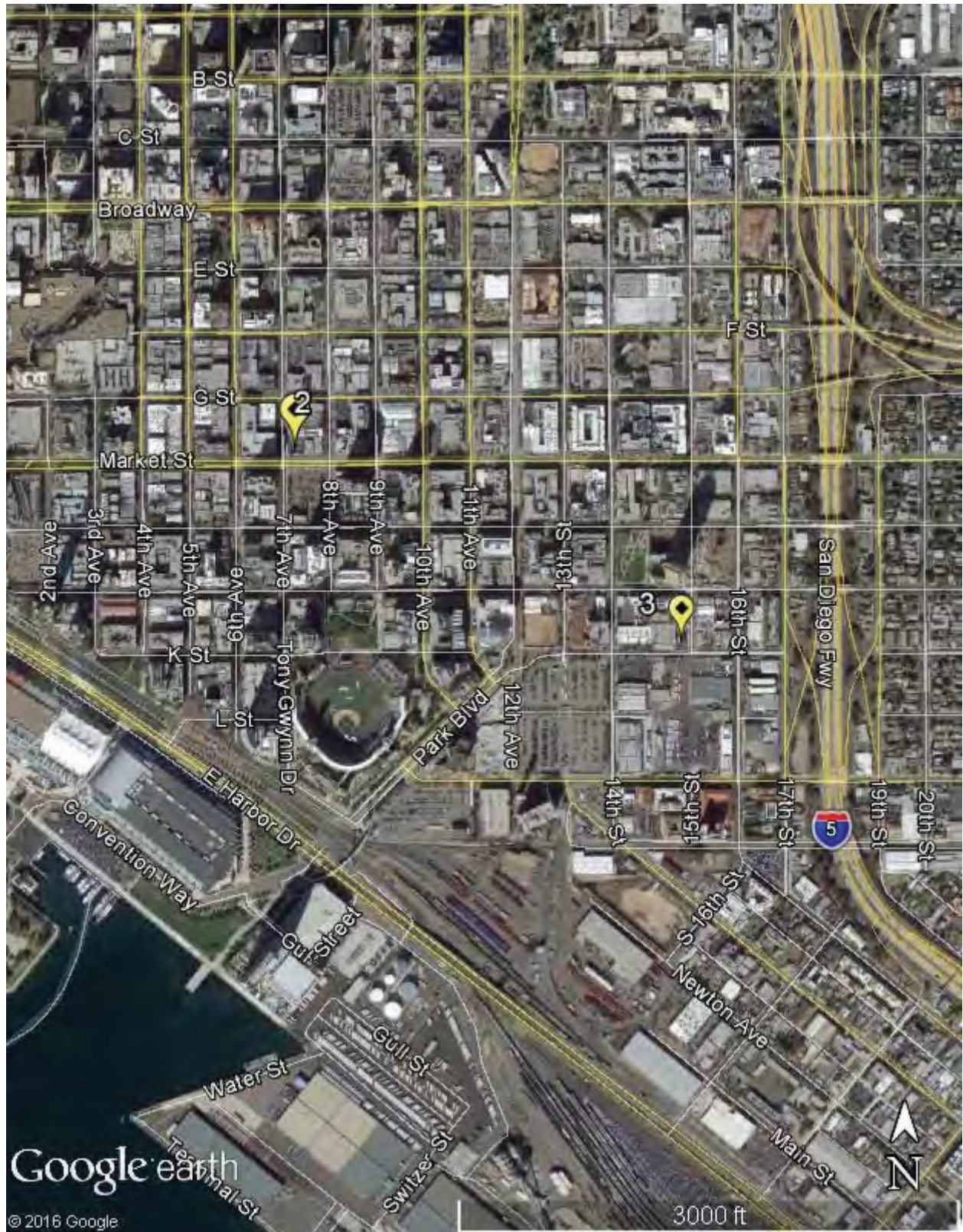


EXHIBIT F

Overview











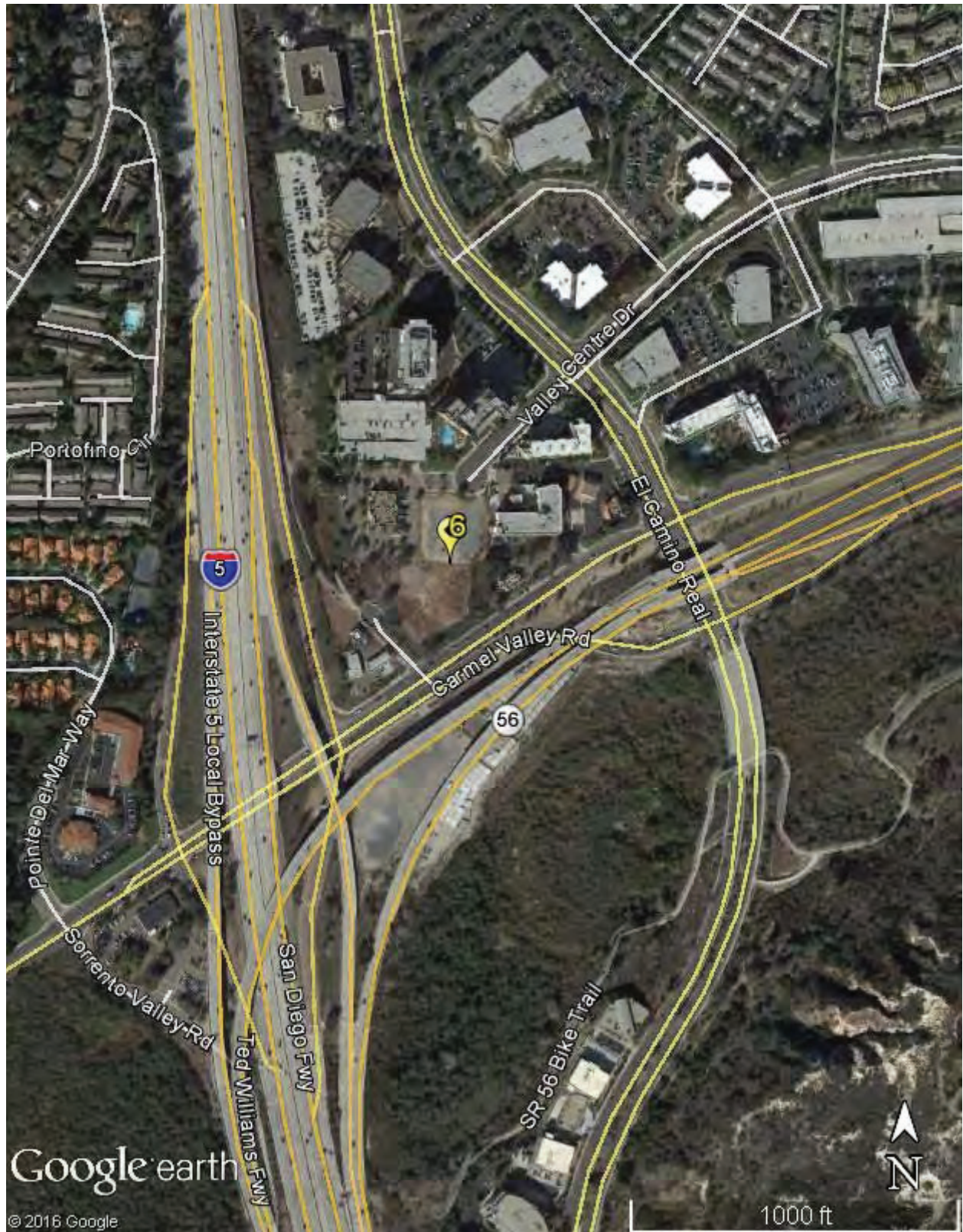
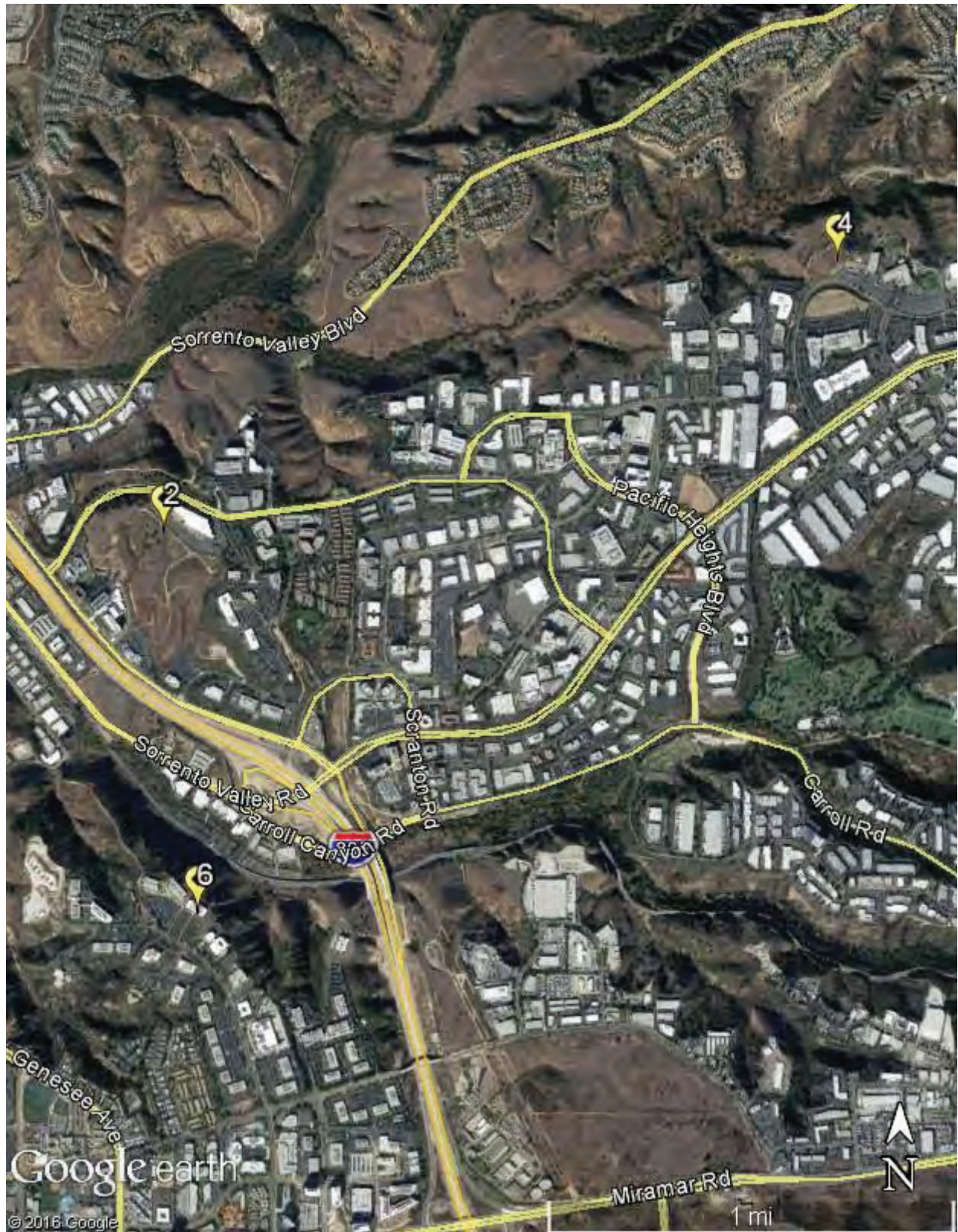


EXHIBIT G

Overview









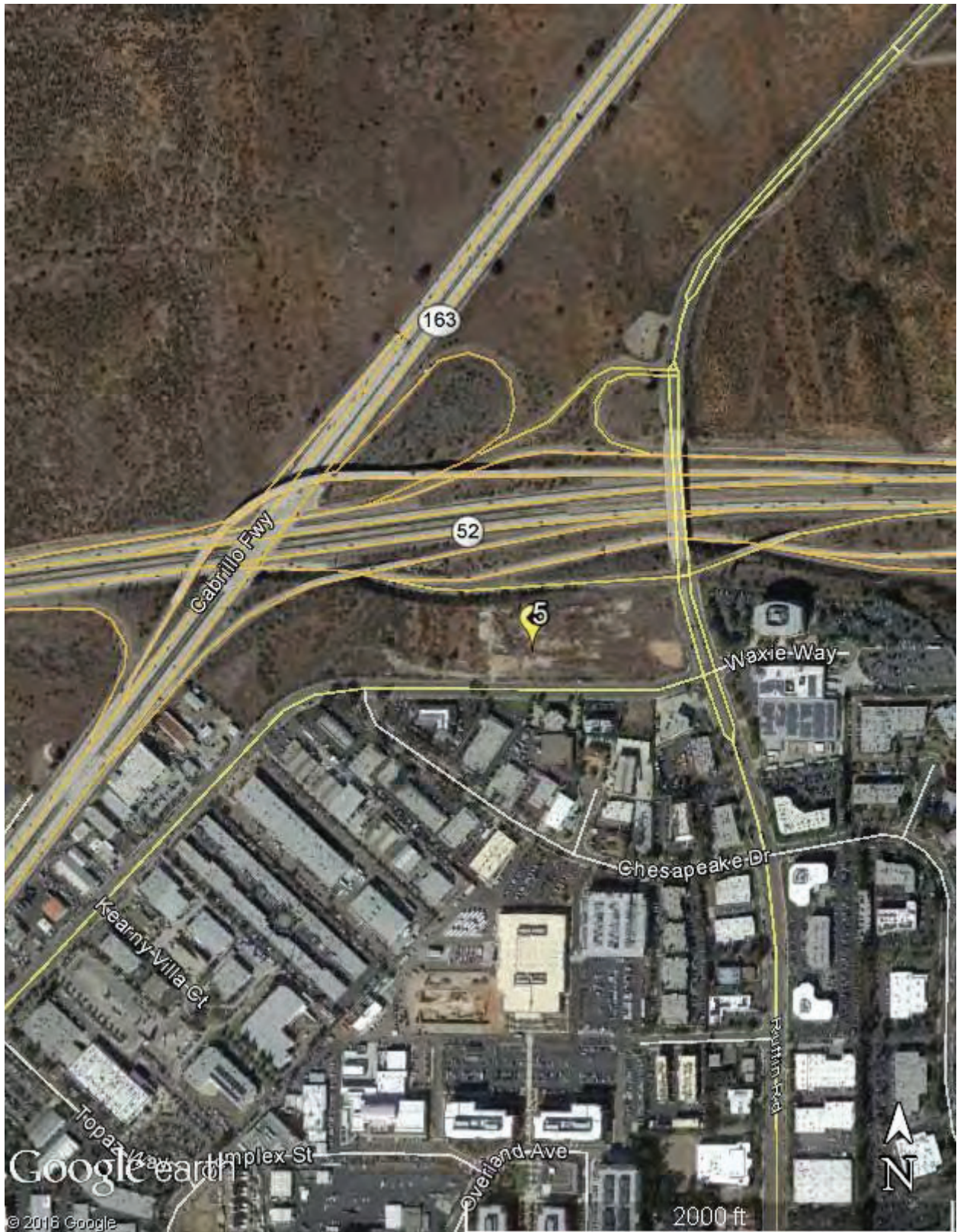
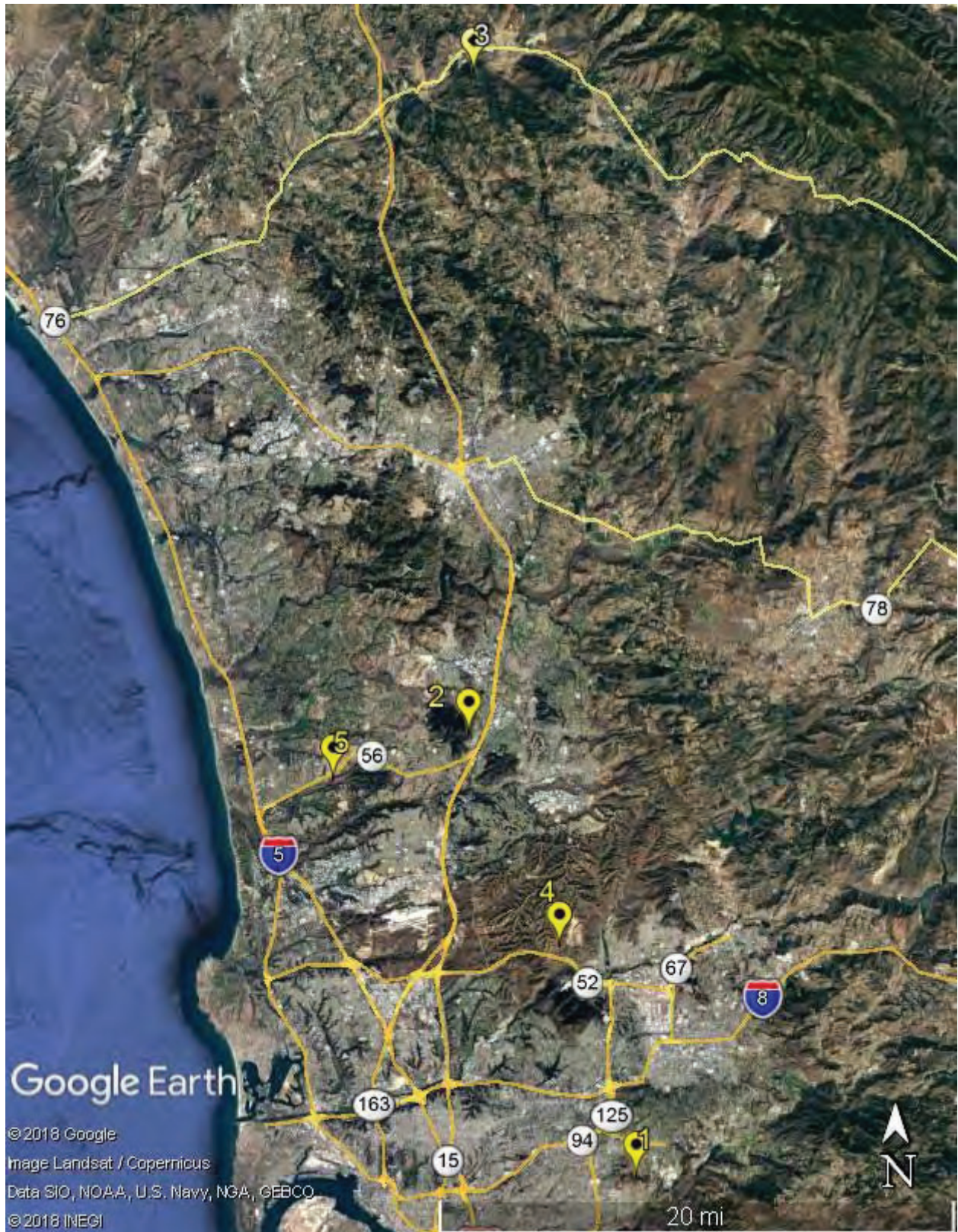
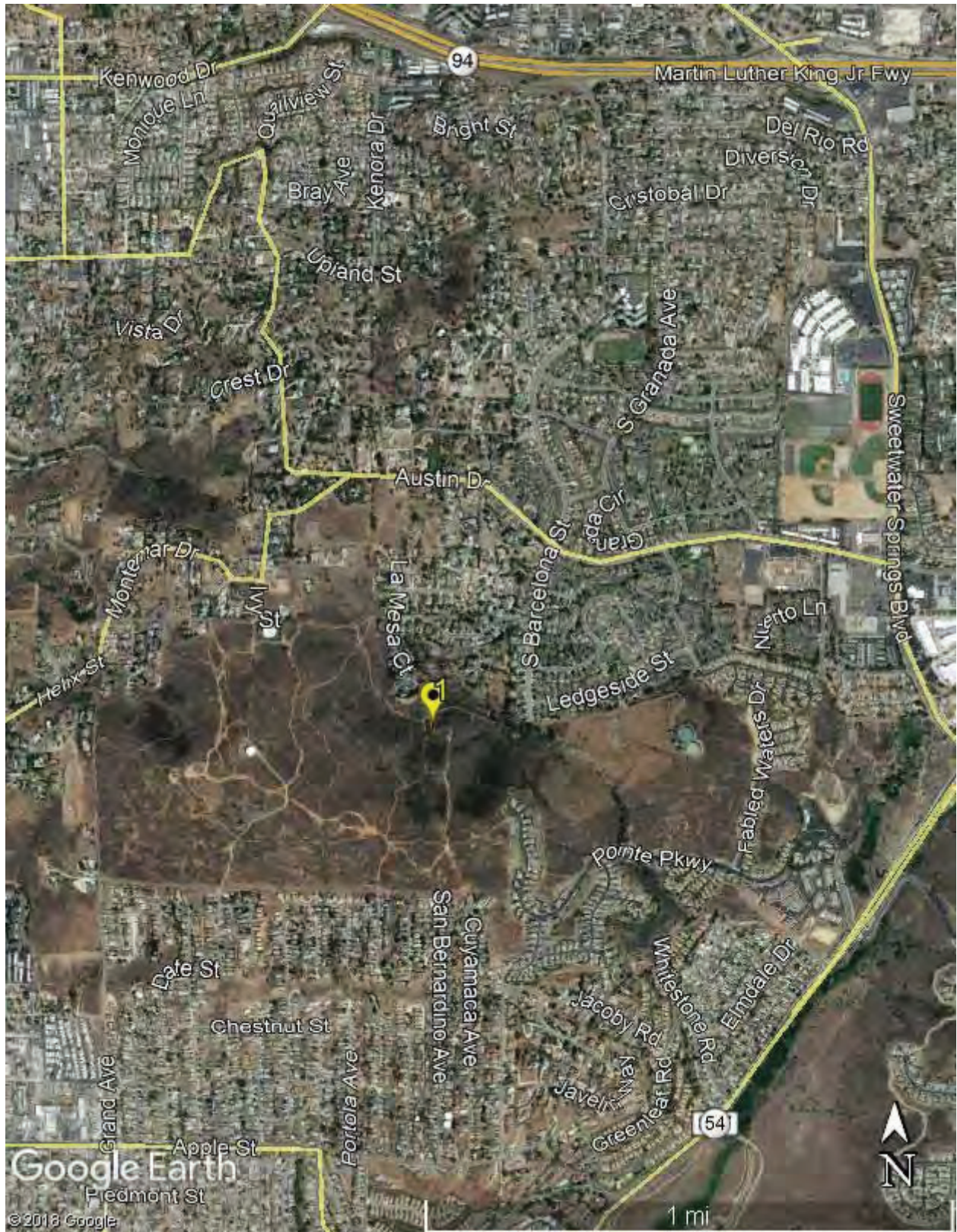
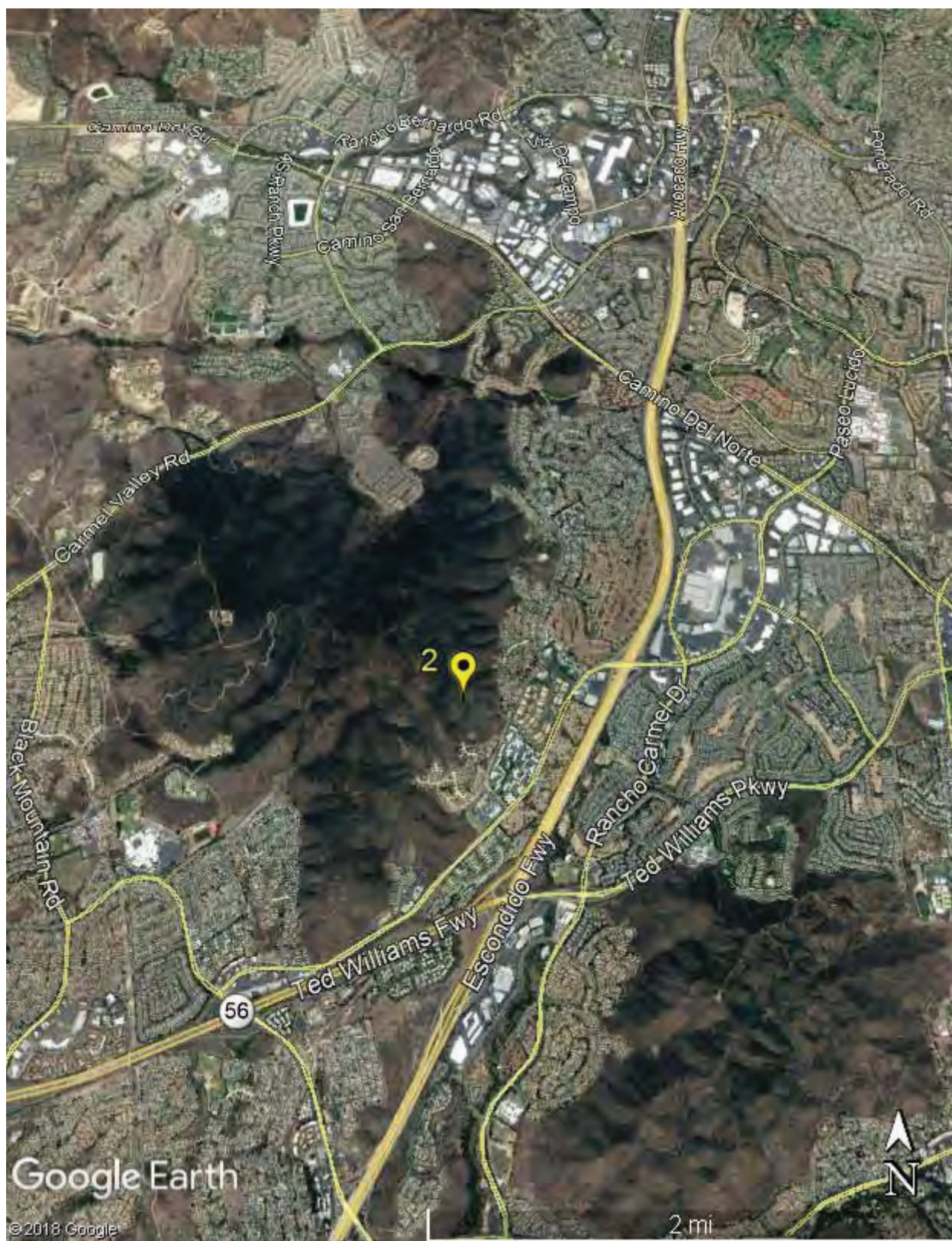


EXHIBIT H

Overview









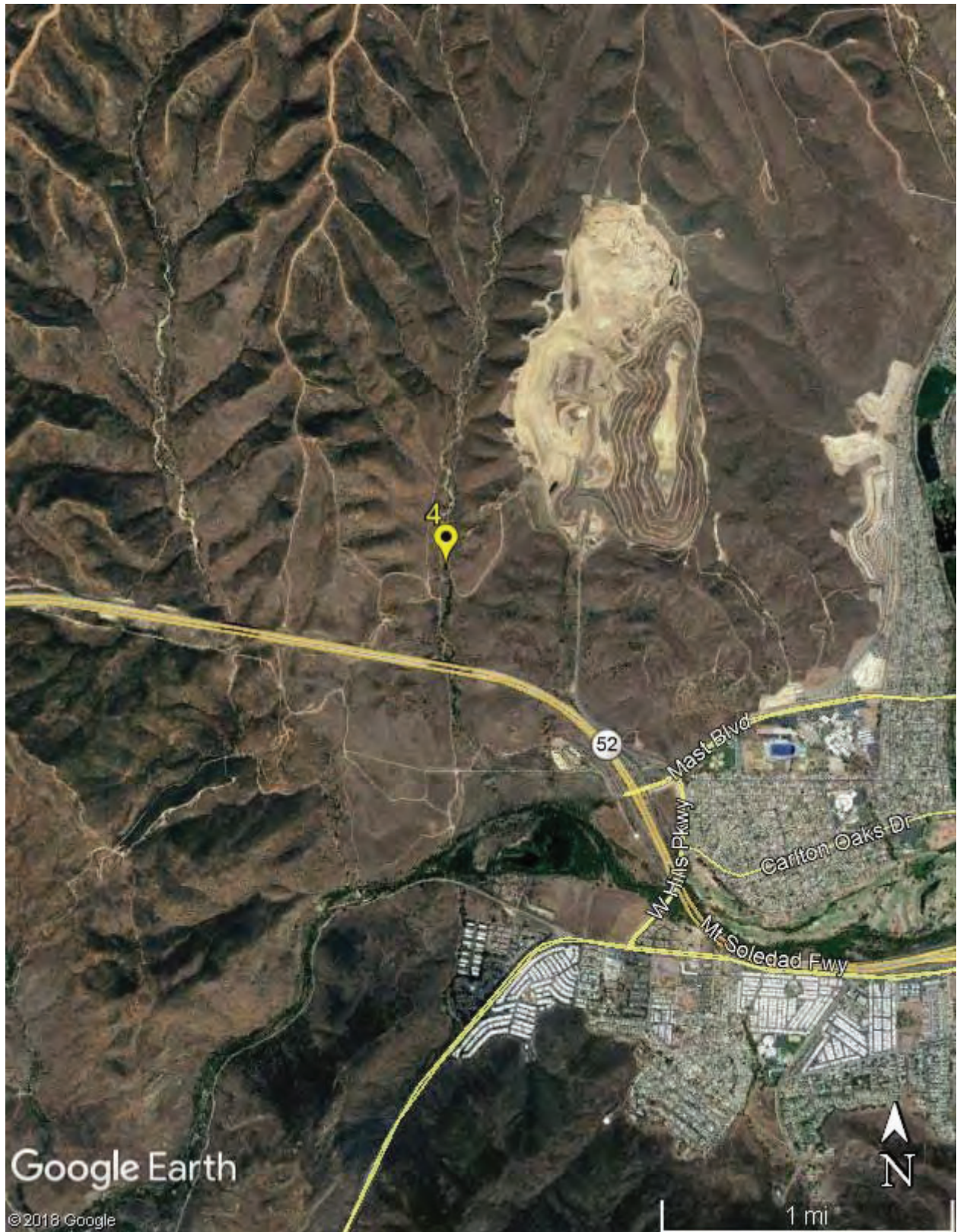




EXHIBIT I

CERTIFICATION

I certify that, to the best of my knowledge and belief...

- 1) The statements of fact contained in this report are true and correct.
- 2) The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions, and are my personal, impartial, unbiased professional analyses, opinions, and conclusions.
- 3) I have no present or prospective interest in the property that is the subject of this report, and no personal interest with respect to the parties involved.
- 4) I have performed services, as an appraiser, regarding the property that is the subject of this report within the three-year period immediately preceding acceptance of this assignment.
- 5) I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment.
- 6) My engagement in this assignment was not contingent upon developing or reporting predetermined results.
- 7) My compensation for completing this assignment is not contingent upon the development or reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.
- 8) My analyses, opinions and conclusions were developed, and this report has been prepared, in conformity with the requirements of the Code of Professions Ethics and the Uniform Standards of Professional Appraisal Practice.
- 9) I have made a personal inspection of the property (interior and exterior) that is the subject of this report.
- 10) No one provided significant real property appraisal assistance to the person signing this certification.
- 11) The reported analyses, opinions, and conclusions were developed, and this report has been prepared in conformity with the Code of Professional Ethics and Standards of Professional Appraisal Practice of the Appraisal Institute.
- 12) The use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives.
- 13) As of the date of this report, I have completed the requirements of the continuing education program for Designated Members of the Appraisal Institute.
- 14) I do not authorize any out-of-context quotations or partial reprintings, or the resale of this report to third parties. Neither all nor any part of this appraisal report shall be disseminated to the general public by the use of media or public communication without the prior written consent of the appraiser.
- 15) The appraisal assignment was not based on a requested minimum valuation, a specific valuation, or the approval of a loan.
- 16) The report was prepared in conformance with the requirements of Title XI of FIRREA and the State of California.

October 11, 2019



David F. Davis, MAI
State Certificate #AG002752

EXHIBIT J

QUALIFICATIONS

DAVID F. DAVIS, MAI

APPRAISAL EXPERIENCE

02/86 - Present	Independent Real Estate Appraiser and Consultant. President, D.F. Davis Real Estate, Inc., specializing in appraisals of proposed construction and development projects, office, R&D, industrial, retail, life science and biotechnology properties, single and multi-family residential and land.
06/84 - 01/86	Vice President, Diversified Equity Investments, Inc., a real estate development firm. Directed acquisitions, construction, leasing and property management.
06/83 - 05/84	Appraisal Officer, Wells Fargo Real Estate Industries Group. Specialized in major proposed commercial and residential projects.
10/77 - 05/83	Union Bank - Appraisal Officer. Similar experience to Wells Fargo.
05/76 - 10/77	F.M. Tarbell Company, residential real estate sales.

EDUCATION

San Diego State University, B.S. Degree in Business Administration with an emphasis in Real Estate, 1977.

Appraisal Institute (and Others)- Courses and Seminars:

<u>Year</u>	<u>Course Titles</u>
2019	2019 San Diego Market Symposium: What's New In Your Neighborhood?
2018	San Diego Development, Disasters & Demographics, How Are They Impacting Real Estate Value?; Business Practices and Ethics
2017	7 Hour USPAP Update Course;
2016	Four Hour Federal and California Statutory and Regulatory Laws; San Diego Real Estate Market Symposium; 7 Hour USPAP Update Course; General Appraiser Report Writing and Case Studies
2014	Condemnation Appraising: Principles and Applications; San Diego Mid-Year Market Symposium (co-organizer and moderator); 7-Hour USPAP Update Course
2013	San Diego Economic Forecast (organizer and moderator); Business Practices and Ethics
2012	San Diego Economic Forecast (organizer and moderator); Timely Appraisal Topics – Niche Areas of Practice; 7 Hour National USPAP Update Course
2011	San Diego Economic Forecast (organizer and moderator); Loss Prevention Seminar For Real Estate Appraisers; Appraising for the IRS, What You Need to Know; San Diego Housing Seminar; Appraisal Curriculum Overview-General
2010	San Diego Economic Forecast (organizer and moderator); San Diego Apartment & Housing Seminar; Unique Assignments in Real Estate Appraisal (presenter); IRS Valuation Summit
2009	San Diego Economic Forecast (organizer and moderator); San Diego Apartment & Housing Seminar

- 2008 San Diego Economic Forecast (organizer and moderator); 7-Hour National USPAP Course; Business Practices and Ethics
- 2007 San Diego Economic Forecast (organizer and moderator)
- 2006 San Diego Economic Forecast (organizer and moderator); 7-Hour National USPAP Update Course; Operating Expense Seminar
- 2005 San Diego Economic Forecast (organizer and moderator); San Diego Apartment and Housing Seminar; Luxury Home Trends in San Diego; Reappraising, Readdressing, Reassigning
- 2004 Applying Economic Forecasts Update; Valuation of Unique Properties Seminar; Unleash the MLS; Business Practices and Ethics; Operating Expense Seminar; Advanced Appraisal Refresher; 7-Hour National USPAP Update Course; San Diego Apartment & Housing Seminar
- 2003 Evaluating Commercial Construction
- 2002 Emerging Demands on R&D and Office; The Environmental Scan; Applying Economic Forecasts Update
- 2001 Applying Economic Forecasts Update; Gramm-Leach-Bliley Act; Mid-Year San Diego Economic Forecast
- 2000 Applying Economic Forecasts Update
- 1999 Operating Expense Seminar - What Does It Cost To Operate That Building?
- 1998 Standards of Professional Practice, Part C; Valuation of Detrimental Conditions in Real Estate
- 1997 Apartment Seminar Update; An Overview of the FHA HUD 203(k) Program; Property Profile of Operating Expense
- 1996 Market Analysis from the Buyer's Viewpoint; Attorneys, Appraisers and Real Estate; Changing Markets and New Research Methods; Property Profile of Operating Expense; The Appraiser Wears the Contractor Hat; Blueprint Reading; Affordable Housing Rules, Regulations; Environmental Issues Past, Present and Future; Applying Economic Forecasts
- 1995 Marketing Your Appraisal Services Effectively; Federal and State Laws and Regulations Workshop
- 1994 Understanding Limited Appraisals and Appraisal Reporting Options - General; Fair Lending and the Appraiser; How to Verify Market Data
- 1993 Basic Income Capitalization; Standards of Professional Practice Parts A and B; Impact of Hazardous Substances on Real Estate; Residential Subdivision Seminar

American Institute of Real Estate Appraisers - Courses and Seminars:

<u>Year</u>	<u>Course Titles</u>
1990	Residential Valuation; Standards of Professional Practice
1988	Standards of Professional Practice Update; Discounted Cash Flow Analysis
1987	Litigation Valuation; Industrial Valuation
1986	FHLBB R41b Requirements
1985	Subdivision Analysis

- 1983 Financial Calculator HP 38E/12C; Cash Flow Analysis
- 1982 Standards of Professional Practice; Litigation Valuation
- 1981 Case Studies in Real Estate Valuation; Real Estate Analysis and Report Writing

Society of Real Estate Appraisers and Appraisal Institute - Courses and Seminars:

Year Course Titles

- 1982 Applied Income Property Valuation
- 1981 Cash Equivalency Analysis
- 1978 Principles of Residential Appraisal; Principles of Income Property Appraisal

PROFESSIONAL

MAI Designation: Appraisal Institute, formerly the American Institute of Real Estate Appraisers, Certificate No. 6892 (since 1984)

State Certification: California Certified General Real Estate Appraiser - State of California - Certificate No. AG002752, expires August 14, 2018

Admissions Committee: American Institute of Real Estate Appraisers 1985-87; Vice Chairman, 1988; Chairman, 1989 and 1990; Appraisal Institute 1991-96, Admissions Coordinator, General Appraisal category, 1991

Appraisal Institute
San Diego Chapter:

- 1991 Member, Board of Directors
- 1992 Treasurer and Member, Board of Directors
- 1993 Secretary and Member, Board of Directors
- 1994 Second Vice President and Member, Board of Directors
- 1995 First Vice President and Member, Board of Directors
- 1996 President and Member, Board of Directors
- 1997 Past President and Member, Board of Directors
- 1997-2013
Golf Tournament Organizer (the tournament funds a college scholarship program)
- 2001-2008
Member, Board of Directors
- 2004-Present
College Scholarship Program Chairman
- 2005 Honored for outstanding service
- 2010 President, Volunteer of Distinction (May) and Member, Board of Directors
- 2011 Immediate Past President and Member, Board of Directors
- 2014-2016
Member, Board of Directors
- 2017 Alternate Regional Representative
- 2018 Alternate Regional Representative

San Diego Board
of Realtors:

Affiliate Member 1984-1989, Realtor Member since 1989

Real Estate Broker:	Licensed in the State of California since 1978 (held salesman license 1976-1977)
Expert Witness:	Qualified in San Diego Superior and Municipal Courts and U.S. Bankruptcy Court (San Diego and Orange Counties)
Advisory Committee:	Member, University of San Diego Real Estate Institute Commercial Real Estate, now Burnham-Moores Center for Real Estate, Advisory - Committee since 2001
College Professor:	Adjunct professor, University of San Diego (Business 328 Commercial Real Estate Valuation) January 2006 through May 2011; Masters of Science in Real Estate (MSRE 508 Commercial Real Estate Valuation) January 2007 through May 2011 Guest lecturer, San Diego State University (Business Finance 435 Class) September 2011 Guest lecturer, San Diego State University (Finance 437 Real Estate Development Class) September 2012, October 2013, February 2015 Guest lecturer, San Diego State University (Finance 331 Real Estate Principles Class) February 2017
Industry Resource:	NAIOP University Challenge Case Study Competition – Industry Resource Appraisal Consultant 2011 to present
Biotechnology Specialty:	Over the past 30 years, David F. Davis has completed 310 appraisals or consulting assignments (as of November 2018) on scientific research facilities including biotechnology wet laboratory or related properties (with manufacturing) and land in San Diego, Carlsbad, Emeryville, Orange County and the San Francisco Bay Area of California and Seattle, Washington. Other consultation assignments have been completed for properties located in Minnesota, Ohio, Texas, North Carolina and Alabama.
Service Organizations:	Member, La Jolla Golden Triangle Rotary Club since October 2008
International Right of Way Association:	Member of Chapter 11 since August 10, 2015

Date: January 10, 2020
To: Gina Jacobs, San Diego State University
From: Sohrab Rashid and Cecily Taylor
Subject: San Diego State University (SDSU) Mission Valley Campus - Fenton Parkway Bridge Traffic Share Calculation

SD18-0276

To supplement the primary traffic impact analysis presented in the SDSU Mission Valley Campus Draft Environmental Impact Report (DEIR), the DEIR included analyses, presented for information purposes only, to determine the level of roadway operations assuming a Fenton Parkway bridge connection at project buildout. This memorandum presents the process by which the share of the Mission Valley project traffic on the Fenton Parkway Bridge was calculated. While SDSU is proposing to provide the necessary funding and construct the bridge no later than construction of 65 percent of the project's equivalent dwelling units¹, the share calculations presented here, consistent with the framework presented in the DEIR, are based on forecast traffic levels in Year 2037, the anticipated buildout year of the SDSU Mission Valley Campus.

Traffic Share Calculation Methodology

The primary traffic analysis presented in the DEIR is based on outputs from a full run of the 2035 SANDAG travel demand model scenario with the SDSU Mission Valley project in place. To account for growth to Year 2037, existing traffic volumes at all of the study area locations were increased accordingly, and mitigation was identified where feasible that would reduce the project's impacts to a less-than-significant (LTS) level.

Supplemental analyses that included a 2-lane and 4-lane Fenton Parkway bridge in place by project buildout were presented in the DEIR for information purposes; the bridge would provide a connection between the southern terminus of Fenton Parkway at the Green Line trolley tracks and the Camino del Rio North/Mission City Parkway intersection. The bridge is proposed in the Mission Valley Community Plan (MVCP) update (see MVCPU pages 59, 64), which projects a 2050 volume of less than 14,000 vehicles per day (vpd) (see the MVCPU Final EIR Appendix D: TIA, Figure 5-2 and Table 5.2). This volume indicates the need for a two-lane bridge with a center two-way left-turn lane that could be managed in cases of emergency/evacuation situations and major SDSU Mission Valley stadium events.

The following is a summary of the methodology used to conduct the supplemental 2-lane bridge analysis presented in the DEIR. To understand how traffic patterns would change with a bridge in

¹ Subject to future CEQA compliance and the satisfaction of other conditions.



place, Fehr & Peers performed an additional model run that included a two-lane bridge connecting Fenton Parkway to Camino del Rio N over the San Diego River. The results from this second run, in combination with the prior run that did not include the bridge in place, were used as a guide to then perform a manual reassignment of both background and project vehicle trips. The reassignment of trips was performed based on a select link analysis from the 2035 model run with the bridge in place to identify the origin and destination of all vehicle trips assigned to the bridge. The output from the select link analysis provides an overall distribution of trips that helped guide the process of reassigning vehicle trips under the “with bridge” scenario.

Figure 1 presents the unadjusted Year 2035 select link assignment from the model and illustrates the source of all traffic expected to use the bridge. As can be seen on the figure, besides the project traffic analysis zone (TAZ) depicted by the link with 4,871.02 daily trips, additional sources of bridge traffic include development on Friars Road to the east and west, Fenton Marketplace, Mission Village Drive, Rio San Diego Drive, Camino del Rio North and South, as well as areas served by Texas Street, I-15, and Fairmount Avenue/Montezuma Road.

However, based on our standard traffic engineering practice, it is not advisable to use “raw” model volumes directly from the model because the raw volumes need to be adjusted to account for how closely existing traffic volumes in the field correlate to base year model volumes, upon which the future year forecasts are based. In addition, the model aggregates land uses into TAZs, which are relatively large in area and, as such, the model cannot reasonably forecast smaller changes in local circulation (i.e., volumes at all parcel driveways on affected streets) that would occur with the new bridge connection.

Accordingly, to properly account for these anomalies, we performed a manual reassignment of Year 2037 volumes to more reasonably estimate local travel paths and the resulting volumes (including those from the project site) that would use the bridge. As shown on Figure 2, 3,461 project trips are forecast to use the new 2-lane bridge on a daily basis out of a total of 14,194 total daily trips based on this reassignment. Using these numbers, the project’s share of total daily traffic at project buildout on the new 2-lane bridge would be 24.4% ($3,461/14,194 = 24.4\%$).

Thematic Response PD-3 – Mitigation Negotiations

Prior to and following release of the Draft EIR, SDSU representatives met separately with representatives of the City of San Diego and Caltrans to discuss the EIR transportation analysis, including proposed mitigation measures. The meetings provided a forum to discuss the EIR's proposed mitigation improvements, including CSU/SDSU's role in implementing the mitigation (i.e., pay full-share or fair-share of improvement costs, or directly construct the improvements).

The following is a summary description of the relevant meetings that took place with each agency, including meeting participants and a brief description of the topics discussed.

City of San Diego Meetings

May 30, 2019 (Prior to Draft EIR Release)

- Participants: SDSU Negotiation Team, City Negotiation Team, Fehr & Peers (SDSU's transportation engineers (F&P)), City traffic engineers, and City Planning Department personnel
- Brief Description: F&P presented the proposed SDSU Mission Valley project circulation plan and the project design features relative to transportation, and also described preliminarily the project's potentially significant impacts to the circulation system. Based on the meeting and at the City's request, SDSU agreed to prepare for information purposes an analysis of the project's impacts relative to vehicle miles traveled (VMT) based on the City guidelines (F&P had already prepared a VMT analysis based on CSU guidelines), and also at the City's request, SDSU agreed to prepare an analysis for information purposes that included the Fenton Parkway Bridge at project buildout as part of the underlying infrastructure (the analysis prepared to date did not include the Fenton Parkway Bridge as part of the underlying infrastructure due to funding uncertainties associated with its future construction).

August 8, 2019 (Post-Draft EIR Release)

- Participants: Sheppard Mullin, Gatzke Dillon and Ballance (GDB), Dudek, SDSU, Deputy City Attorney, City Planning Department personnel
- Brief Description: SDSU presented an overview of the project transportation design features and proposed mitigation measures as presented in the Draft EIR circulated August 5. The parties discussed scheduling follow-up meetings to review the specific traffic mitigation measures and address the feasibility/infeasibility of the measures; the Draft EIR determined that the City mitigation measures were infeasible primarily due to CSU's lack of jurisdiction over the subject improvements and the corresponding need for City approval/authorization.

September 27, 2019

- Participants: Sheppard Mullin, Dudek, F&P, GDB, SDSU, Deputy City Attorney, City Development Services Department personnel, City Planning Department personnel
- Brief Description: City presented comments on the Draft EIR Transportation section, including questioning the Draft EIR mitigation measure approach regarding the feasibility/infeasibility of the recommended improvements due to jurisdictional issues. SDSU explained that if the City stated its approval of the recommended mitigation program and further granted CSU/SDSU the necessary authorization, the EIR mitigation measures would be revised accordingly and would identify the measures as feasible.

October 2, 2019

- Participants: GDB, SDSU, Dudek, Sheppard Mullin, City Planning Department personnel
- Brief Description: Review draft City comments on Draft EIR prior to submission of the comment letter. Specific to traffic mitigation, the City voiced the same concerns as expressed during the September 27 meeting regarding the feasibility/infeasibility of the proposed mitigation measures.

November 12, 2019

- Participants: SDSU, F&P, Dudek, City Planning Department personnel
- Brief Description: Discussion regarding the transportation improvement projects to be included in the \$5 million “community benefit” traffic improvements that are part of SDSU’s purchase offer to the City and that would be funded and implemented by SDSU over and above its CEQA required mitigation obligations.

November 22, 2019

- Participants: SDSU, Development Services Department personnel
- Brief Description: SDSU project team presented the project site plan to Development Services Department personnel and discussed the transportation improvements that would need City coordination and permitting.

December 11, 2019

- Participants: SDSU, F&P, City Planning Department personnel
- Brief Description: Review proposed revisions to Draft EIR City facility traffic mitigation measures made in response to City request. As revised, the SDSU MV project traffic mitigation measures provide that CSU/SDSU will either: (1) pay the City the full cost of the recommended mitigation improvement; or (2) construct/install the necessary improvements to the reasonable satisfaction of the City Engineer. See Final EIR Mitigation Measures MM-TRA-2, MM-TRA-3, MM-TRA-4, MM-TRA-8, MM-TRA-9, MM-TRA-10, MM-TRA-11, and MM-TRA-13. Based on the negotiations, SDSU agreed that for those mitigation improvements for which CSU/SDSU’s fair-share percentage at the subject location is less than 100%, SDSU nevertheless will fully fund the improvements, for the limited purpose of this project only, in light of the substantial benefits that would accrue to the community.

At the meeting, the City noted preliminary approval of the revised mitigation measures and represented they would communicate any suggested revisions to SDSU following further review; as of this writing, the City has not provided any requested revisions. A table prepared by F&P that includes a description of each mitigation improvement and the additional community benefit improvements, and CSU/SDSU’s corresponding fair-share percentage where applicable is attached as Attachment PD-3A.

Caltrans Meetings

SDSU representatives, including transportation engineers Fehr & Peers, met with Caltrans on June 25, 2019, prior to release of the Draft EIR, to provide Caltrans with an overview of the project and related transportation issues. The following items were discussed at the meeting:

- *Bicycle and Pedestrian Circulation.* Caltrans asked about off-site active transportation facilities. SDSU explained that the project would connect the project’s bike and ped paths to all existing facilities intersecting with the site, and that campus development would not preclude other planned projects, such as the

bike/pedestrian bridge over I-8 to the southeast corner of the site. Since the meeting took place, SDSU has agreed to fund portions of a campus-to-campus bicycle connection as part of the \$5M community benefit transportation package referenced above that is over and above the project's mitigation requirements.

- *Potential Improvements at the Fairmount/I-8 Interchange.* SDSU and Caltrans discussed a range of potential improvements at the interchange, from full reconstruction (approximately \$150 million cost) to a reduced scope interchange improvement (approximate cost \$16 million), to realignment of Alvarado Street (approximate cost \$20 million). SDSU explained that while the Draft EIR would not propose any of these improvements as the project would not result in significant impacts at the interchange, SDSU would support efforts to obtain the necessary funding.
- *Fenton Parkway Bridge.* The parties discussed the Bridge in general and as it relates to the River Park Road/Street I connection.
- *Parking.* The parties discussed the specific number of on-site spaces that would be provided by the project and that the College Area campus would be used to provide additional supply to support sold out Mission Valley stadium events. Patrons would use the trolley to travel between campuses (reducing demand on Caltrans facilities) and the overall parking demand would be lower given that the new stadium would be roughly half the size of the existing SDCCU Stadium.
- *Connectivity.* SDSU explained that the new site would have improved distribution and access to the adjacent street system resulting in: 1) reduced use of the Caltrans Friars Road interchange for "local" trips, and 2) better traffic flows for stadium events.
- *Transportation Network Companies.* SDSU described the proposed location to accommodate TNCs and the parties discussed "first in first out" operations as the desired format.

Following release of the Draft EIR, Caltrans submitted comments on the Draft EIR, including comments relating to the mitigation measures proposed in the Draft EIR relative to Caltrans facilities. In response, on January 15, 2020, CSU/SDSU representatives met with Caltrans to further discuss the project, including negotiations regarding CSU's fair-share mitigation obligations relative to the proposed project's identified significant impacts to Caltrans facilities. SDSU representatives attending the meeting included Gina Jacobs, Laura Shinn, Maddy Kilkenny, and Sohrab Rashid and Cecily Taylor of F&P.

At the meeting, CSU/SDSU acknowledged its fair-share responsibility relative to mitigation and also provided an overview of the project's transportation commitments. These on-site and off-site improvements include on-site road improvements that also would improve off-site traffic flow; off-site mitigation of City of San Diego facilities; community benefit improvements, including improved multi-modal bicycle/pedestrian facilities, "smart" improvements" (e.g., adaptive signal controls along Friars Road), and additional road improvements; and construction of additional community benefit improvements such as the Fenton Parkway Bridge, which would improve overall traffic flow in the immediate area.

SDSU also provided Caltrans with graphics depicting the EIR study area, the multi-modal improvements to be implemented by the project, and a table that included a description of the proposed Caltrans facility mitigation improvements, and the project's percentage fair-share at each significantly impacted Caltrans facility. Copies of the materials distributed at the meeting are attached as Attachment PD-3B.

Following the meeting, SDSU coordinated with Caltrans representatives to schedule a review of SDSU's written responses to the comments submitted by Caltrans on the Draft EIR. Subsequent follow-up meetings will be scheduled and, as such, the negotiations process is ongoing. SDSU expects the negotiations to be completed in the near-term.

Other Negotiations

In addition to meeting with the City, and Caltrans, regarding traffic mitigation, CSU/SDSU has met with the City to discuss a variety of environmental issues raised through the City's comment letter on the Draft EIR (Comment Letter A4). Meetings have specifically address the City's comments related to the proposed project's consistency with the City of San Diego's Climate Action Plan (CAP), the location of City-defined "Usable" park acreage and maintenance of the River Park, and topics related to hydrology and water quality, including the 100-year floodplain elevation, BMPs and basins located within the 34-acre River Park, and Low Impact Development.

These meetings constitute compliance with the requirements of SDMC Section 22.0908 (h) to "(i) take steps to reach agreements with the City of San Diego and other public agencies regarding the payment of fair-share mitigation costs for any identified off-site significant impacts related to campus growth and development associated with the Existing Stadium Site;" and Section 22.0908(s) to "negotiate fair-share contributions for feasible mitigation and applicable taxes for development within the Existing Stadium Site."

SDSU Mission Valley Campus Master Plan
Proposed City of San Diego Transportation Improvements Cost Table

January 16, 2020

Proposed Transportation Improvements		Project Percentage Fair Share ¹	CSU/SDSU Negotiated Percentage Share of Improvement Cost Estimate
EIR MITIGATION			
MM-TRA-2	Intersection 8. River Run Drive & Friars Road – Optimize traffic signals within Friars Road corridor from River Run Drive to Stadium Way.	47.8%	100%
MM-TRA-3	Intersection 9. Fenton Parkway & Friars Road – Optimize traffic signals within Friars Road corridor from River Run Drive to Stadium Way.	100%	100%
MM-TRA-4	Intersection 10. Northside Drive & Friars Road – Optimize traffic signals within Friars Road corridor from River Run Drive to Stadium Way. Note that the City prefers that widening Northside Drive to add a second northbound right-turn lane, which would be required to fully mitigate the project's significant impact at this location, not be implemented as it is inconsistent with the City's future circulation plans due, in part, to the future construction of the Fenton Parkway bridge.	100%	100%
MM-TRA-8	Intersection 27. Fairmount Ave & San Diego Mission Rd/Twain Ave – Widen the eastbound approach and restripe the westbound approach to provide each with a dedicated left-turn lane. Modify the traffic signal (including new heads) to provide protected left turn phases on these approaches.	100%	100%
MM-TRA-9	Intersection 31. Texas Street & Camino del Rio S – Restripe to convert the westbound through lane to a shared westbound through/left-turn lane and the eastbound through to a shared eastbound through/left-turn lane; re-optimize traffic signal timing splits.	100%	100%
MM-TRA-10	Intersection 32. Ward Road & Rancho Mission Road – Install a traffic signal.	69.1%	100%
MM-TRA-11	Intersection 34. Fairmount Ave & Mission Gorge Rd – Optimize traffic signal timing splits.	100%	100%
MM-TRA-13	Intersection 41. Ruffin Road & Aero Drive – Optimize traffic signal timing splits.	100%	100%
ADDITIONAL COMMUNITY BENEFIT IMPROVEMENTS			
	Complete the bicycle connection between MV and existing campuses by installing buffered bike lanes on Rancho Mission Road west of Ward Road to site entrance	N/A	100%
	Implement adaptive signal equipment, new detection cameras, and supporting communications technology along Friars Road (6 locations - intersections #8-10, #20-22)	N/A	100%
	Intersection 41. Ruffin Road/Aero Drive - Upgrade communications and camera systems	N/A	100%
	Restripe Rio San Diego Drive (Qualcomm Wy to Fenton Pkwy) to remove two vehicle lanes and provide buffered bike lanes	N/A	100%
	Modify Rancho Mission Road/Ward Road from Camino del Rio N to Friars Road to provide a 2-Lane Collector plus a Two-Way Left-Turn Lane (TWLTL) plus one-way cycle tracks	N/A	100%
	Additional transportation projects in the Mission Valley, Serra Mesa or Navajo Community Plan Areas that provide benefits to those communities and to the SDSU MV campus site	N/A	100%

Notes:

1 - While the project percentage share of future growth generally is equivalent to the project's "fair share" in the context of mitigation payments, in those instances in which mitigation is available that would return operations to pre-project conditions consistent with CEQA's mitigation requirements (i.e., would mitigate the project increment) but would not improve operations to better-than pre-project conditions, the project "fair share" in such cases is the full cost of the recommended improvement, or 100%, rather than the percentage project share of future growth.

Project Share of Future Growth = (Project Traffic) / (Horizon Year Plus Project Traffic - Existing Traffic).

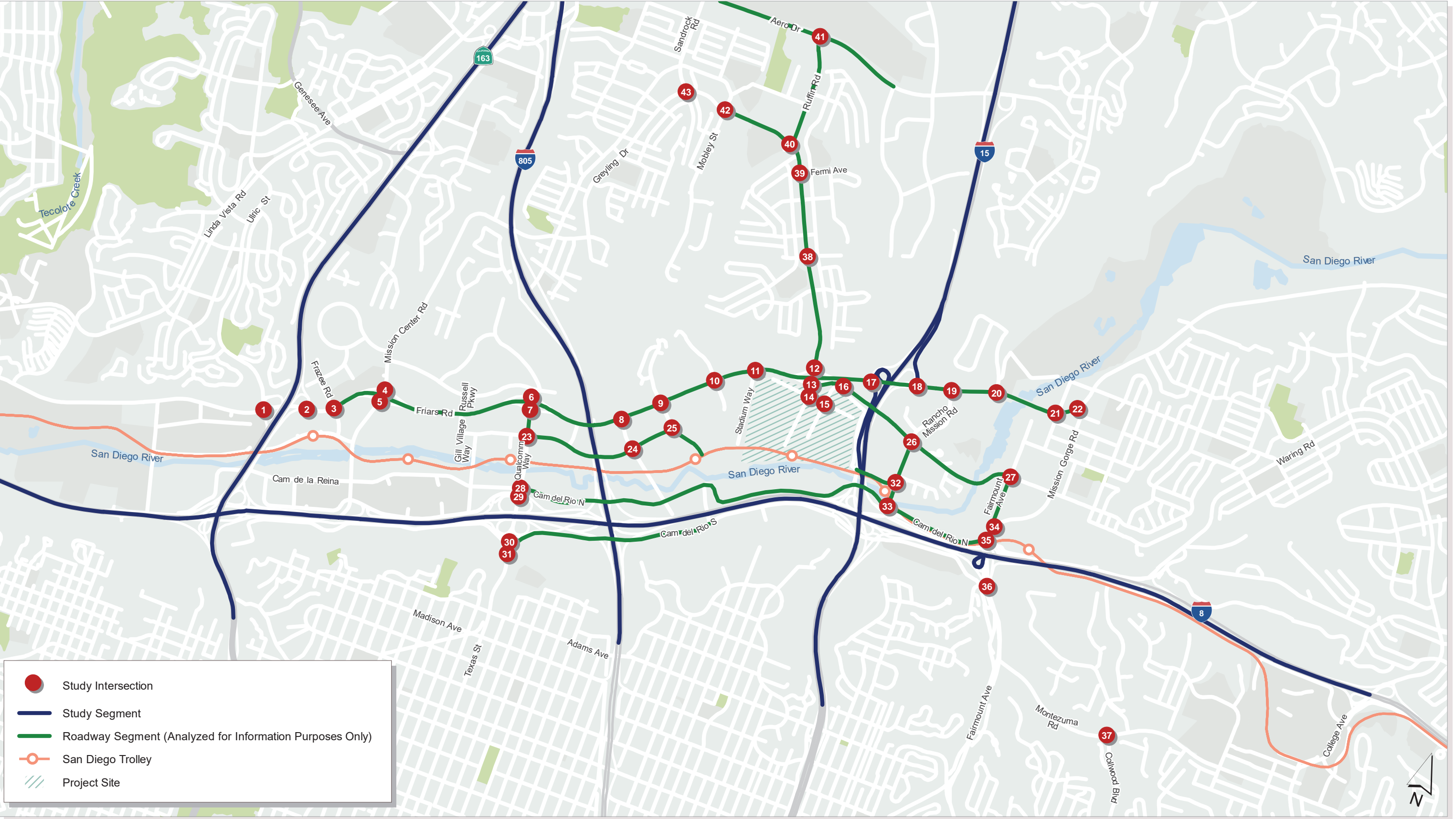
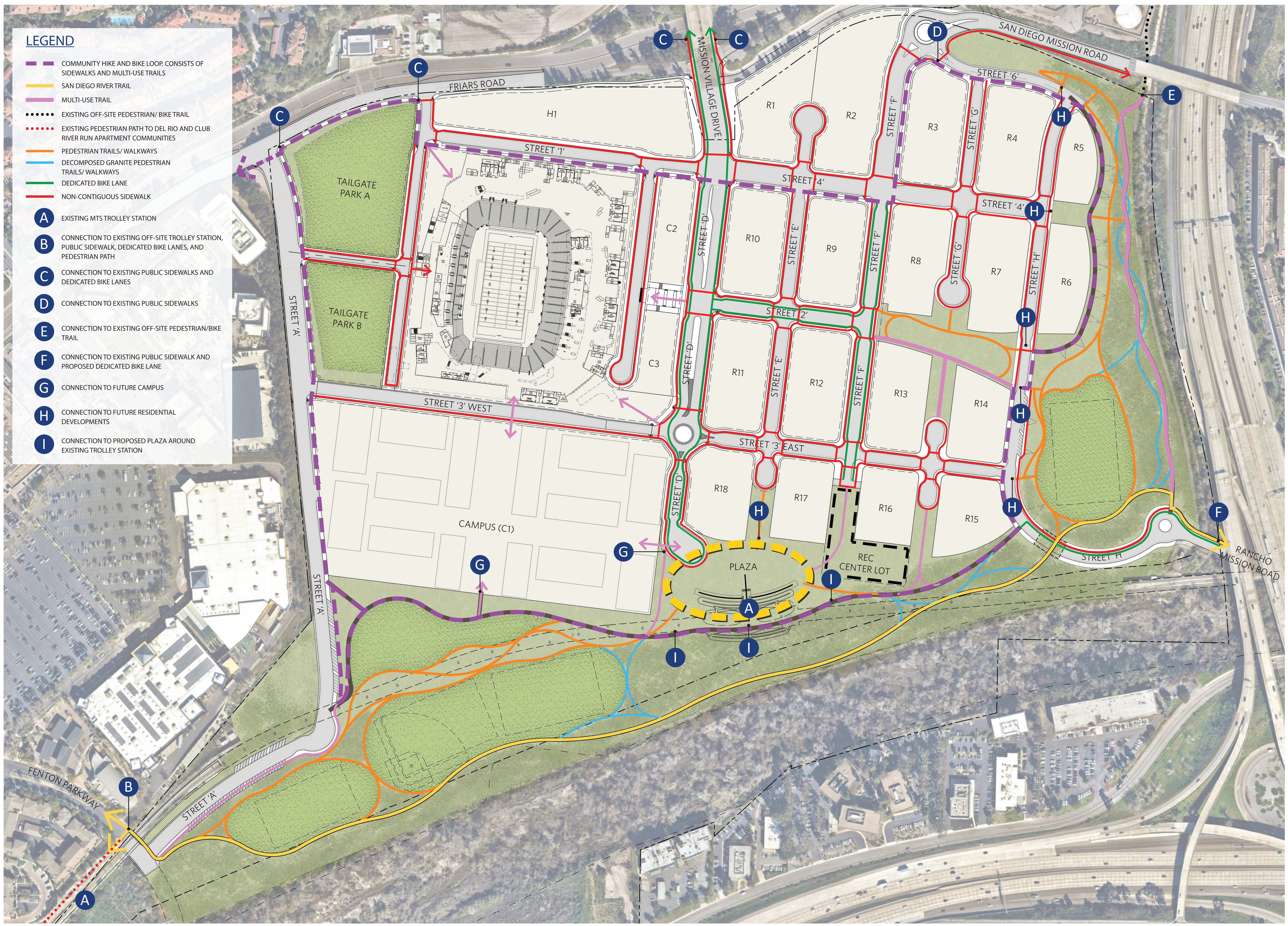


Figure 1

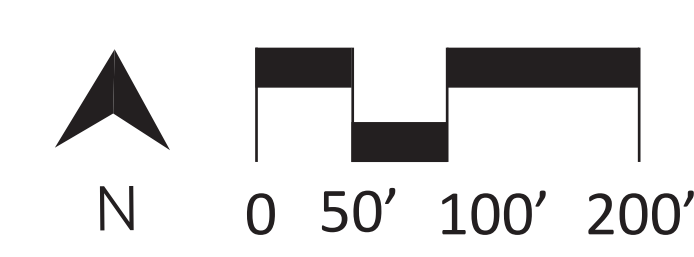
Study Intersections and Segments



- LEGEND**
- COMMUNITY HIKE AND BIKE LOOP. CONSISTS OF SIDEWALKS AND MULTI-USE TRAILS
 - SAN DIEGO RIVER TRAIL
 - MULTI-USE TRAIL
 - EXISTING OFF-SITE PEDESTRIAN/BIKE TRAIL
 - EXISTING PEDESTRIAN PATH TO DEL RIO AND CLUB RIVER RUN APARTMENT COMMUNITIES
 - PEDESTRIAN TRAILS/WALKWAYS
 - DECOMPOSED GRANITE PEDESTRIAN TRAILS/WALKWAYS
 - DEDICATED BIKE LANE
 - NON-CONTIGUOUS SIDEWALK
- A** EXISTING MTS TROLLEY STATION
- B** CONNECTION TO EXISTING OFF-SITE TROLLEY STATION, PUBLIC SIDEWALK, DEDICATED BIKE LANES, AND PEDESTRIAN PATH
- C** CONNECTION TO EXISTING PUBLIC SIDEWALKS AND DEDICATED BIKE LANES
- D** CONNECTION TO EXISTING PUBLIC SIDEWALKS
- E** CONNECTION TO EXISTING OFF-SITE PEDESTRIAN/BIKE TRAIL
- F** CONNECTION TO EXISTING PUBLIC SIDEWALK AND PROPOSED DEDICATED BIKE LANE
- G** CONNECTION TO FUTURE CAMPUS
- H** CONNECTION TO FUTURE RESIDENTIAL DEVELOPMENTS
- I** CONNECTION TO PROPOSED PLAZA AROUND EXISTING TROLLEY STATION

SDSU MISSION VALLEY SITE - PRELIMINARY PEDESTRIAN & BIKE CIRCULATION EXHIBIT

DATE: 27 SEPTEMBER 2019



SDSU Mission Valley Campus Master Plan
Proposed Caltrans Transportation Improvements

January 15, 2020

Proposed Transportation Improvements		Project Percentage Fair Share ¹
MM-TRA-1	<i>Intersection 1. SR-163 SB Ramps/Ulric St & Friars Rd</i> - Optimize the signal offset.	100%
MM-TRA-5 and MM-TRA-14	<i>Intersection 17. I-15 S Ramps & Friars Road</i> – Reconstruct intersection to add a second eastbound left-turn lane and a second westbound right-turn lane. This also requires squaring up the right-turn lanes to improve pedestrian and bicycle safety. Widen the loop ramp (to I-8) and bridge over Murphy Canyon multi-use trail and drainage channel to allow for two lanes on the ramp up to the ramp meter location and provide for a merge after the ramp meter. Implement an overlap signal phase for the westbound right-turn movement at the intersection.	65.1%
MM-TRA-15	<i>Intersection 17. I-15 S Ramps & Friars Rd</i> – Add a second eastbound right-turn lane and widen direct ramp (to I-15 S only) over Murphy Canyon multi-use trail and drainage channel to allow for two general use lanes up to and through ramp meter location.	67.2%
MM-TRA-6 and MM-TRA-7	<i>Intersection 18. I-15 N Ramps & Friars Rd</i> – Reconstruct intersection to add: 1) a second eastbound left-turn lane with approximately 500 ft of storage plus transition, 2) a second southbound right turn-lane and square up the off-ramp, and 3) a second westbound right-turn lane. Also, coordinate this signal with the Rancho Mission Road/Friars Road intersection in the PM peak hour. These improvements, coupled with the need to add sidewalks and buffers to the bike lanes on both sides of the bridge, will require widening of the bridge structure by approximately 27 feet (11 foot travel lane, two 5-foot sidewalks, and 6 feet of buffers total for bike lanes).	52.5%
MM-TRA-12	<i>Intersection 35. Fairmount Ave & Camino del Rio N</i> – Restripe eastbound approach to provide an additional eastbound right-turn lane and optimize cycle length. Note that Fairmount Ave & Mission Gorge Rd (Intersection #34) is coordinated with this signal and will also need to be optimized, which will supersede the mitigation currently identified.	100%

Source: Fehr & Peers, January 2020.

Notes:

1 - While the project's "fair share" generally is equivalent to the project percentage share of future growth in the context of mitigation payments, in those instances in which mitigation is available that would return operations to pre-project conditions consistent with CEQA's mitigation requirements (i.e., would mitigate the project increment) but would not improve operations to better-than pre-project conditions, the project "fair share" in such cases is the full cost of the recommended improvement, or 100%, rather than the percentage project share of future growth.

Project Share of Future Growth = (Project Traffic) / (Horizon Year Plus Project Traffic - Existing Traffic).

Excepting MM-TRA-1 and MM-TRA-12, any CSU/SDSU fair-share mitigation payment to Caltrans would be subject to Caltrans providing satisfactory evidence of a reasonable plan of actual mitigation, including identification of the source of the necessary remainder funding, and Caltrans' commitment to implementing the improvement.

Thematic Response BIO-1 – Murphy Canyon Creek

Comments have been raised generally related to Murphy Canyon Creek, including concerns about the pre-existing flooding conditions on the project site, requests to improve/expand Murphy Canyon Creek to bring the creek to a condition that will adequately convey the appropriate flow, and concerns about the proposed stormwater bioretention facilities.

This response provides an overview of Murphy Canyon Creek and its relation to the project site, the pre-existing flooding conditions of Murphy Canyon Creek on the project site, the proposed project's design and beneficial impacts in relation to hydrology and water quality, and the proposed project's acquisition and maintenance of the creek channel.

This response summarizes information found in multiple Draft EIR sections and technical appendices, including:

- Chapter 1, Introduction and Existing Environmental Setting
- Chapter 2, Project Description
- Section 4.9, Hydrology and Water Quality
 - Appendix 4.9-1, Water Quality technical Report
 - Appendix 4.9-2, Hydrology Report
 - Appendix 4.9-3, Drainage Study
 - Appendix 4.9-4, Water Quality Report for SDSU Mission Valley Campus
 - Appendix 4.9-5, Hydraulic Analyses for the SDSU Mission Valley Campus
- Section 4.17, Utilities and Service Systems
- Chapter 6, Alternatives

Please refer to the above-referenced portions of the Draft EIR for the detailed discussion and analysis of the topics summarized in this response.

As explained in more detail below, Murphy Canyon Creek originates north of the project site and is located within the eastern project boundary.

Murphy Canyon Creek is a partially earthen and partially concrete-lined channel that conveys flow into the San Diego River (Draft EIR Chapter 1, Introduction and Existing Environmental Setting, p. 1-4). Per the boundary shown in the Draft EIR's Project Description chapter, the creek is included along the eastern project boundary (Draft EIR Chapter 2, Project Description; Figure 2-4). The creek currently flows in a southerly direction along the eastern project boundary and west of Interstate (I-) 15. The creek originates north of the project site and discharges to the San Diego River near the southeast corner of the project site. (See Draft EIR Chapter 1, Introduction and Environmental Setting, p. 1-8; and Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-3.)

Murphy Canyon Creek has been channelized as it approaches and then flows along the eastern edge of the project site. From the north, the approaching segment of the creek is a concrete-lined trapezoidal channel, while the segment along the project site is also trapezoidal, but with lining varying between riprap, earth, and vegetation (Draft EIR Chapter 1, Introduction and Environmental Setting, p. 1-8). The creek has intermittent segments above and below ground. The creek is a narrow channel west of I-15 and becomes a covered, lined channel for approximately 0.5 miles as it approaches the Kinder Morgan Energy Partners (KMEP) Mission Valley Terminal (MVT), a fuel storage facility located just north of the project site (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-2). There is a 1,880-foot-long reinforced concrete box culvert within Murphy Canyon Creek, located north of Friars Road and adjacent to the KMEP MVT facility (Draft EIR Appendix 4.9-5, Hydraulic Analyses for SDSU Mission Valley Campus).

As explained below, in its existing condition, Murphy Canyon Creek does not have sufficient, existing capacity to accommodate the 100-year flood flow; as a result, the creek spills from the channel and sheet flows across the KMEP MTV facility (north of the project site) and into the existing stadium site during heavy winter storms. See Figure BIO-1-1, below (red arrows generally depict the flow from the creek in its existing condition). In addition, the reasons for the creek channel's lack of capacity are explained below.

The Federal Emergency Management Agency (FEMA) has delineated a 100-year floodplain along Murphy Canyon Creek. Areas within the 100-year floodplain have a 1% chance of flooding each year. The FEMA mapping shows that the 100-year flow spills out of Murphy Canyon Creek approximately 0.5 miles north of Friars Road, and spills onto the KMEP MVT facility north of the project site. (See Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-30; Draft EIR Figure 1-4; and Figure BIO-1-1, below.) The spillover flow continues south and enters the existing Stadium site near the KMEP access road. This sheet flow continues south along the existing stadium parking lot to the San Diego River. Please refer to Figure BIO-1-1, below, which illustrates Murphy Canyon Creek's existing flooding condition.

Figure BIO-1-1. Murphy Canyon Creek — Existing Condition



Sources: Draft EIR Chapter 6, Alternatives, Figure 6-1B; Draft EIR Appendix 4.9-5, Hydraulic Analyses for SDSU Mission Valley Campus.

Detailed analyses confirm that Murphy Canyon Creek, in its existing condition, does not have capacity to accommodate the 100-year flow rate of 3,500 cubic feet per second (Draft EIR, Chapter 1, Introduction and Existing Environmental Setting, p. 1-8). Murphy Canyon Creek has capacity for approximately 75% of the 100-year flow rate, leaving 25% spillover flow. The 100-year flow will spill out of the existing creek channel onto the KMEP MVT facility and along the existing stadium parking lot (Draft EIR Chapter 1, Introduction and Existing Environmental Setting, p. 1-9).

As stated in the Draft EIR Introduction and Existing Environmental Setting chapter, the creek channel's lack of capacity is associated with the fact that the Murphy Canyon Creek was constructed several decades ago, possibly circa the stadium construction in 1967. During this era, the City of San Diego's 1971 design standards were not based on the FEMA 100-year flow rate. The 100-year methodology was not widely used until sometime between 1971 and 1984. Further, the watershed has developed over time, and ongoing development increased the creek flow rates as impervious surfaces were added and natural infiltration decreased (Draft EIR Chapter 1, Introduction and Existing Environmental Setting, p. 1-9). In addition, the Draft EIR hydraulic analyses show that the box culvert located to the north does not have capacity for the 100-year flow; consequently, at the upstream end of the box culvert, flow spills out of the approaching open channel (Draft EIR Appendix 4.9-5, Hydraulic Analyses for SDSU Mission Valley Campus).

As explained below, the existing project site (San Diego County Credit Union [SDCCU] Stadium site) is currently subject to flood hazards—with or without the proposed project.

The project site currently consists of a large multi-purpose stadium (SDCCU Stadium) and associated parking lot. The existing asphalt parking lot covers most of the project site. The existing site is approximately 90% impervious. SDCCU Stadium was constructed on fill above the 100-year floodplain on a raised earthen mound, while the parking lot was constructed within the 100-year floodplain. During periods of sustained, heavy rains, the existing stadium and parking lot are subject to flooding (Draft EIR Chapter 1, Introduction and Existing Environmental Setting, p. 1-7). Flooding of the existing site has been observed during winter events and occasionally in the summer during monsoonal moisture from equatorial tropical storms. Currently, Murphy Canyon Creek within the project area is contained in a flood control channel, and a berm exists between the channel and the parking lot. However, during storm events, water overtops the berm and floods the existing parking lot (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-4).

As discussed below, the proposed project would address Murphy Canyon Creek and existing flooding through a variety of state-of-the-art environmental considerations.

To address pre-existing flood flow conditions, the project's design focuses on:

- *Setting back* project development areas from Murphy Canyon Creek and the San Diego River, while integrating finger parks, open space, and recreational features.
- *Elevating* development areas above the 100-year floodplain elevation to protect people and property.
- *Replacing* the existing stadium asphalt parking lot adjacent to the creek with a broad, landscaped, sloped park and open space area with trails, fields, native-plant retention basins, swales, and habitat areas.
- *Designing* park and open space areas to accommodate pre-existing creek spillover flows from infrequent winter storms and to allow such flows to infiltrate and be naturally treated before discharging to the San Diego River
- *Designing* retention basins and swales to capture, infiltrate, and treat water from both the project development and creek spillover flows

As explained below, the proposed project does not alter Murphy Canyon Creek.

The proposed project does not include any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek; and therefore, while the existing creek is within the project boundary, no project element, component, improvement, or feature is contemplated within the creek (Draft EIR Chapter 1, Introduction and Existing Environmental Setting, p. 1-8). Construction would also not necessitate or result in any alteration to Murphy Canyon Creek or the San Diego River (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-28). No structures would be built within the Murphy Canyon Creek floodway or within any other portion of the 100-year flood zone (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-30).

As discussed below, the proposed project addresses the pre-existing flood flow conditions with parks, open space, retention basins, and swales.

The proposed project would have a beneficial impact on flooding issues when compared to existing conditions. The project development areas would be setback from Murphy Canyon Creek and San Diego River, allowing for over 80-acres of active and passive park areas to be incorporated along the easterly and southerly edge of the project site (Draft EIR Appendix 4.9-2, Hydrology Technical Report, p. 12). In addition, the proposed project would employ grading techniques, using mostly crushed concrete recycled from the old stadium and parking lot, and imported fill, to elevate the project site outside the floodplain and thereby protect people and property from flood conditions. Areas in the floodplain would be exclusively active and passive park areas and open space, designed for occasional flooding and stormwater infiltration to the San Diego River (Draft EIR Chapter 2, Project Description, p. 2-5).

Specifically, the proposed project would provide over 80-acres of parks, recreation facilities, and open space along the San Diego River and Murphy Canyon Creek. The “River Park” would be approximately 60 acres along the south, southeast, and eastern edges of the project site. The River Park would serve a dual purpose: (i) a community destination with active and passive uses as envisioned by past planning efforts; and (ii) a floodplain buffer between the San Diego River and Murphy Canyon Creek, and the rest of the developed portions of the project area (Draft EIR Appendix 4.9-3, Drainage Study, p. 1). The River Park will sit at a lower elevation compared to the developed portions of the project site, providing recreational space throughout most of the year and an undeveloped buffer for when the rare storm causes flooding. (See https://newscenter.sdsu.edu/sdsu_newscenter/news_story.aspx?sid=77328.)

The project park areas would provide a more natural, pervious floodplain during larger storm events and reduce the commingling of floodwaters with developed areas and associated pollutants (Draft EIR Appendix 4.9-2, Hydrology Technical Report, p. 12). As shown in Draft EIR Figure 4.9-8, Post Development Flood Zones, the proposed project’s open space and River Park areas would convey the Murphy Canyon Creek spillover flow. The intent is to more closely mimic the conditions that existed at the project site prior to development of the existing stadium and parking lot (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-32). The existing project site currently consists almost entirely of paved, impervious surfaces, which prevent infiltration of stormwater runoff into on-site soils and increase runoff volumes and discharge rates (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-29). The proposed project would address this situation and result in a significant decrease in the impervious surfaces, from approximately 90% to 57% of the project site (Draft EIR, Section 4.9, p. 4.9-29). Pervious surfaces allow infiltration of stormwater runoff into on-site soils, thus reducing runoff volumes and discharge rates. Removal of the paved surfaces and increase in vegetation also encourages natural, on-site percolation and increased filtration of incidental contaminants that accumulate on impervious surfaces (Draft EIR Section 4.9, pp. 4.9-21 and 4.9-28). The project would thus result in beneficial impacts with respect to stormwater runoff, infiltration, and natural treatment.

Figure BIO-1-2. Proposed Project Hydrology Concept



Sources: Carrier Johnson + Culture; Draft EIR Chapter 2, Project Description, Figure 2-9C.

As explained below, the proposed project's stormwater treatment devices and bioretention facilities would avoid substantial polluted runoff from the project site.

The proposed project would implement Low Impact Development (LID) Best Management Practices (BMPs) designed to reduce runoff, treat stormwater, treat dry weather runoff, and manage hydromodification (Draft EIR Section 4.9, p. 4.9-22). The proposed project would implement the LID BMPs in compliance with the stormwater management requirements of the Small (Phase II) Municipal Separate Storm Sewer System (MS4) Permit. BMPs incorporated into the proposed project include LID site design, source control, and stormwater treatment/baseline hydromodification measures that reduce the discharge of pollutants in stormwater to the maximum extent practicable. Please refer to Draft EIR Section 4.9, Hydrology and Water Quality, pp. 4.9-12 through 4.9-13 and p. 4.9-22, for examples of such LID BMPs.

Stormwater treatment/baseline hydromodification control BMPs are features such as bioswales, infiltration basins, or bioretention basins, which are designed to infiltrate, filter, and/or treat runoff from the proposed project footprint (Draft EIR Section 4.9, p. 4.9-22; Appendices 4.9-1 and 4.9-4).

The proposed storm drain system would collect and retain runoff and direct drainage to bioretention basins, in compliance with the MS4 Permit requirements (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-22). As indicated on Figure 2-10E, Stormwater Quality Treatment Plan (reproduced below), from Draft EIR Chapter 2, the project site has been divided into nine Drainage Management Areas, all of which contain impervious surfaces. The proposed bioretention basins would capture runoff from these areas. All impervious surfaces within the proposed project will drain to vegetated BMPs prior to discharge (Draft EIR Appendix 4.9-1, Water Quality Technical Report, Table 5-3, Small MS4 Permit and Corresponding Site Design Measures).

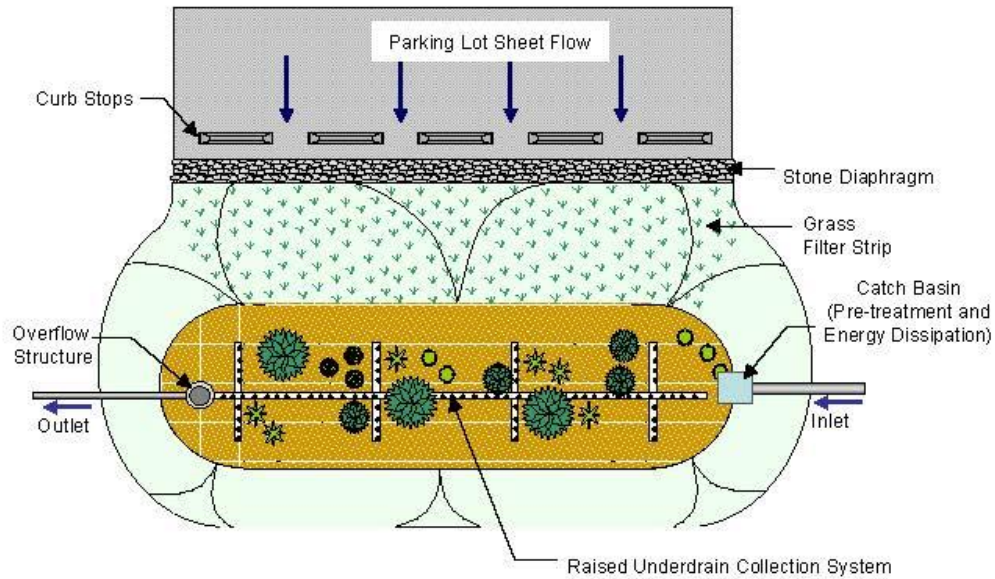
Draft EIR Figure 4.9-5, reproduced below, provides a conceptual illustration of a bioretention basin. In addition to the bioretention basins, lined biofiltration planter boxes would be used throughout the campus (see Draft EIR Figure 4.9-6, Conceptual Biofiltration Planter Box). These biofiltration BMPs achieve water quality treatment by filtering captured stormwater through vegetation and layers of treatment media and drainage rock prior to controlled releases through an underdrain and surface outlet structure (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-22). These biofiltration BMPs also reduce flows to natural channels through infiltration (where feasible) and evapotranspiration (which is the process by which water is transferred from the land to the atmosphere by evaporation from the soil and other surfaces and by transpiration from plants) (Draft EIR Appendix 4.9-1, Water Quality Technical Report, Table 5-3, Small MS4 Permit and Corresponding Project Site Design Measures).

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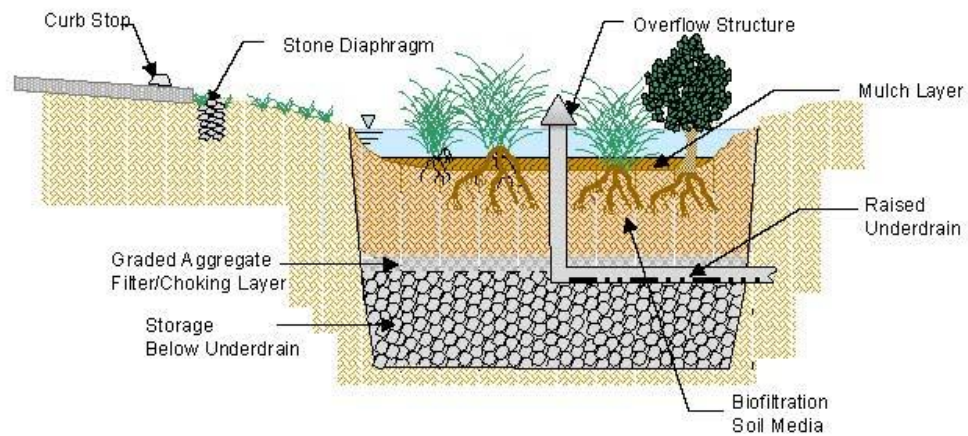


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Plan View



Profile



SOURCE: GEOSYNTEC CONSULTANTS 5/21/2019

SDSU Mission Valley Campus Master Plan EIR



Figure 4.9-5
Conceptual Bio Retention Basin

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Any potential overflow of the proposed bioretention basins and biofiltration planters, such as that generated during larger storms, would be directed to catchment basins near the southern edge of the project site, which would flow into the existing storm drain outlets located at the southern project boundary (Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-22; see Draft EIR Figure 4.9-7, Proposed Drainage.). The catchment basins are shown in Figure 2-10E, above, as the green LID BMP Footprints.

The bioretention facilities in the proposed River Park would be designed for increased habitat to the extent feasible while treating project stormwater runoff. Consultation would occur with the San Diego Management and Monitoring Program staff or the U.S. Geological Survey staff regarding selection of vegetation materials for the bioretention facilities to maximize habitat and biofiltration (Draft EIR Section 4.9, p. 4.9-23). The bioretention basins would also provide passive recreation space that would cohesively integrate with the surrounding parks, recreation facilities, and open space areas. Figure BIO-1-3 provides examples of functioning bioretention Basins. Design principles that would inform the bioretention basins include:

- A sustainable space, natural and native
- Accessible to all
- Flexible, allowing multi-use
- Creating a connection to the San Diego River
- Balancing active and passive recreation
- Providing a living and learning laboratory

Figure BIO-1-3. Examples of Functioning Bioretention Basins



Source: Schmidt Design Group/JMI Realty

As required by the Small MS4 Permit, SDSU would implement and maintain these permanent BMPs in accordance with the stormwater quality control plan. (See Draft EIR Section 4.9, Hydrology and Water Quality, pp. 4.9-13, 4.9-23.)

As explained below, a “Single Channel” Murphy Canyon Creek Alternative is infeasible.

The Draft EIR alternatives analysis considered but rejected a “Single Channel” Murphy Canyon Creek Alternative. (See Draft EIR, Chapter 6 Alternatives, Section 6.3.2.5.) This alternative involved an alternative project design that would widen Murphy Canyon Creek and consolidate drainage in a “single channel.” The intent of this alternative was to widen and improve Murphy Canyon Creek to address the 100-year storm event and avoid potential flooding of the project site (i.e., design Murphy Canyon Creek to convey all flows to the San Diego River). Under this alternative, the River Park area would be substantially reduced to accommodate a widened Murphy Canyon Creek, and the access road west of Murphy Canyon Creek (i.e., the extension of Rancho Mission Road) would be realigned away from the Murphy Canyon Creek corridor.

The alternative is considered infeasible because flooding of a portion of the project site is largely the result of floodwaters that occur north of the project site due to an undersized culvert (see Draft EIR Figure 6-1B and Figure BIO-1-1, above), as well as the confluence of Murphy Canyon Creek and the San Diego River. As discussed above, the existing undersized culverts result in floodwaters “jumping” Murphy Canyon Creek approximately 3,000 feet north of the project site, at the northern edge of the KMEP MVT facility. At this point, floodwaters surface drain through the KMEP MVT site, across San Diego Mission Road, and continue to surface flow onto a portion of the project site as shown in Draft EIR Figure 6-1B. In addition, the presence of an existing multi-product fuel pipeline, an existing 48-inch sewer line, and MTS facilities located at the southern end of the channel, would restrict the ability to implement this alternative because the alternative would cause the need to relocate the existing fuel pipeline and MTS trolley infrastructure, and to reinforce existing trolley abutments to withstand floodwaters (Draft EIR Figure 6-1A). Further, the proposed project does not “cause” the occasional flooding from Murphy Canyon Creek; instead, as discussed above, the flooding is caused by a combination of factors dating back to the 1960s. The proposed project also does not affect or exacerbate existing conditions. Rather, as explained above, the project’s proposed design would accommodate the infrequent flooding through beneficial on-site park, recreation, and open space design features.

Moreover, the proposed project would accommodate the infrequent flooding through the provision of open space, which allows for the flooding to infiltrate and drain into the San Diego River. The proposed project would thus convey any overflow in a more natural flow pattern, allowing for the flood waters to permeate into the open area and deliver cleaner water to the San Diego River (Draft EIR Chapter 6, Alternatives, p. 6-12).

As explained below, the proposed project would acquire and maintain Murphy Canyon Creek.

As part of the purchase and sale of the project site, SDSU would purchase from the City the Murphy Canyon Creek parcel (approximately 2.6 acres) in its “as is” condition. SDSU would continue to maintain the channel after the closing date on a go-forward basis. As noted above, the proposed project does not include any improvements to Murphy Canyon Creek.

Summary

The proposed project does not alter or impact Murphy Canyon Creek. The proposed project will include BMPs, including LID site design, source control, and bioretention basins (LID structural BMPs), in compliance with the Small MS4 Permit, which would reduce flows and the discharge of pollutants in stormwater to the maximum extent practicable. The proposed project would result in a substantial increase in park and open space areas, with a decrease in the impervious surfaces from approximately 90% to 57% of the project site. As part of the approximately 83 acres of parks, recreational facilities, and open space, the proposed project would provide a floodplain buffer between Murphy Canyon Creek and the rest of the developed portions of the project area. As such, this Final EIR finds that the proposed project would have a beneficial effect on infrequent, pre-existing flooding. In addition, the proposed project’s impacts to hydrology and water quality would be less than significant. Further, SDSU would continue to maintain the Murphy Canyon Creek channel, and the proposed bioretention BMPs, on a go-forward basis.

Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments

Comments on the Draft EIR recommended that the SDSU Mission Valley Campus Master Plan project (the proposed project) incorporate additional sustainability measures to further reduce: (1) emissions of greenhouse gases (GHGs) and criteria air pollutants, (2) vehicle miles traveled (VMT) and traffic, (3) water consumption, and (4) solid waste generation. Specific sustainability recommendations made by commenters included, but were not limited to,² commitments to achieve Leadership in Energy and Environmental Design (LEED) Gold certification, building electrification/elimination of natural gas, water recapture and/or re-use, and enhanced recycling.

This thematic response begins by providing an overview of the proposed project’s sustainability commitments that were presented in the Draft EIR (see, e.g., Section 4.4, Energy, and Section 4.7, Greenhouse Gas Emissions) circulated for public review and comment, as well as refinements to those commitments based on input received in comments on the Draft EIR. This response then evaluates the feasibility of the sustainability recommendations identified in the paragraph above.

Project Design Features Presented in the Draft EIR

As presented in the Draft EIR (see, e.g., Section 4.7.4), the proposed project would include numerous project design features (PDFs) with sustainability co-benefits in the form of GHG and criteria air pollutant emissions, VMT/traffic, water consumption, and solid waste generation reduction. Some PDFs were quantitatively accounted for in the EIR’s analyses, whereas other PDFs were subject to a more qualitative discussion due to the complexities associated with quantifying their effects. The pertinent PDFs are set forth below for ease of reference and with refinements and additions made in response to comments, where applicable.

Solar Photovoltaic Panels

As presented in the Draft EIR, the proposed project would incorporate solar photovoltaic (PV) panels on available roof space that is expected to result in a total generation capacity equivalent to approximately 10,820,000 kilowatt hours (kWh) of electricity, or 14.9% of the proposed project’s total electricity demand. This total was based on building typology (residential, campus, hotel, and stadium) and potential roof area available for solar panels. Because of the vertical nature of the proposed project (which is designed to maximize high-density development opportunities within an infill site), mechanical heating, ventilation, and air conditioning (HVAC) equipment would be located on rooftops of residential, hotel, and campus/office buildings. These types of equipment have access and setback requirements that preclude the entire roof areas from being covered in solar panels; accordingly, a reasonable percentage of available rooftop area was determined by the project architects, accounting for HVAC and other uses. These percentages were as follows:

- Campus/Office – 50% of roof area, or approximately 198,658 square feet (3,039 kilovolt ampere [kVA])
- Hotel – 50% of roof area, or approximately 51,000 square feet (780 kVA)
- Residential – 30% of roof area, or approximately 175,800 square feet (2,688 kVA)

At the time the Draft EIR was prepared, no solar was assumed on the stadium land use. However, based on review of the stadium design plans, up to 50,000 square feet of roof space would be available for solar PV panels. The refined PDF is set forth below, with changes shown in underline and ~~strikeout~~:

² Sustainability recommendations made with less frequency are discussed and evaluated in the individual responses to comments contained in this Final EIR.

PDF Solar Photovoltaic Panels The proposed project is incorporating solar PV panels on a total of approximately 428,458 square feet of available roof space; that is located throughout the project's campus/office, hotel, stadium and residential development areas, these panels are estimated to have a total generation capacity equivalent to 10,895,660 10,819,478 kilowatt-hours of electricity, or 15.0%14.9% of the proposed project's total project electricity demand. In the event that the final stadium design does not accommodate the approximately 3,000 square feet of solar PV panel coverage called for in this PDF, the PV panels shall be installed in other on-site development areas.

When incorporated into the Draft EIR, this additional solar generation capacity would reduce emissions by 13 MT CO₂e/yr. The Final EIR is revised to reflect these refinements to the solar PV panel PDF.

Indirect GHG Emissions from Electricity Use

On September 17, 2019, the San Diego City Council approved the establishment of a community choice aggregation (CCA) program and creation of an implementation-oriented joint-powers entity with cities across the region. By the end of 2019, a comprehensive plan to form a Joint-Powers Authority (JPA) and CCA program will be presented to the Mayor and City Council for decision. The program is scheduled to begin service to customers in 2021, with a target of providing 100% renewable electricity to City residents and businesses by 2035.³

Because the JPA needed to implement the CCA program is not yet established, SDG&E is assumed to be the utility provider to the project site as it is the current utility provider to the project site. This is a conservative approach because the project's emissions and energy modeling does not assume a 100% renewable electricity mix by 2035, which is the target established for the City's CCA program; instead, the modeling is informed by the state's current Renewables Portfolio Standard parameters. In the event that the CCA program commences service, the proposed project's land uses would procure electricity from the program and emissions would be further reduced from those disclosed in the Draft EIR.

Residential Hearths

As presented in the Draft EIR, 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.

In response to comments received on the Draft EIR, the project design has been refined to prohibit the inclusion of natural gas fireplaces in residential units. The refined PDF is set forth below, with changes shown in underline and ~~strikeout~~:

PDF Residential Hearths ~~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.~~ Residential units in the proposed project shall not have natural gas fireplaces or wood-burning fireplaces.

This project design refinement would have the effect of reducing 182 metric tons carbon dioxide equivalent (MT CO₂e), 0.42 pounds per day (lb/day) of volatile organic compound emissions, 3.57 lb/day of nitrogen oxide emissions, 1.52 lb/day of carbon monoxide emissions, 0.29 lb/day of coarse particulate matter emissions, and 0.29 lb/day fine particulate matter emissions. The Final EIR is revised to reflect this project design refinement.

³ City of San Diego. 2019. Community Choice Aggregation Overview Presentation. https://www.sandiego.gov/sites/default/files/cosd_cca_ppt.pdf.

Electric Vehicle-Ready Infrastructure and Electric Vehicle Chargers

As presented in the Draft EIR, the proposed project is equipping 3% of total residential parking spaces and 6% of total nonresidential parking spaces with appropriate electric supply equipment to allow for the future installation of electric vehicle (EV) chargers (i.e., “EV ready”). Of these EV-ready spaces, 50% will be equipped with EV charging stations. In total, approximately 500 spaces will be designated as “EV ready,” and 252 of the “EV ready” spaces will be equipped with operable EV charging stations.

In response to comments received on the Draft EIR, and because the California Green Building Standards (CalGreen) Code update is going into effect on January 1, 2020, the PDF has been refined as set forth below, with changes shown in underline and ~~strikeout~~:

PDF Electric Vehicle-Ready Parking and Electric Vehicle Chargers The proposed project is equipping 10% ~~3%~~ of total residential parking spaces and 6% of total nonresidential parking spaces with appropriate electric supply equipment to allow for the future installation of EV chargers (i.e., “EV ready”). Of these EV-ready spaces, 50% will be equipped with EV charging stations. Based on these parameters, in total, approximately 901 ~~500~~ parking spaces on the project site will be designated as “EV ready,” and 451 ~~252~~ of the “EV ready” spaces will be equipped with operable EV charging stations.

This increase in the number of EV charging stations would have the effect of reducing 1,604 MT CO₂e, as well as gasoline consumption by 271,953 gallons/year. The Final EIR is revised to reflect this project design refinement.

Transit Oriented Development

The proposed project is located within a Transit Priority Area (TPA), as it is served by the Metropolitan Transit System (MTS) Stadium Trolley Station on the MTS Trolley Green Line; see Attachment GHG-1A. The proposed project incorporates the MTS Trolley Green Line and existing Stadium Trolley Station, and reserves adequate right-of-way for the planned future MTS Trolley Purple Line. The Stadium Trolley Station is within 0.5 miles of all future residents and jobs within the project site.

Consistent with the San Diego Association of Governments’ (SANDAG’s) San Diego Forward plan, the project co-locates housing and employment on an infill site in an urbanized area served by transit. The project also would provide further enhancements to the existing transportation options located on the project site through the multi-faceted TDM Program. Thus, the project would ensure the success of smart growth land use policies, which would assist the state in achieving the Senate Bill 375 GHG emission reduction targets by reducing VMT from light-duty vehicles through the development of more compact, complete, and efficient communities. Furthermore, the project is consistent with the goals of Senate Bill 743 to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.

The proposed project would accommodate an SDSU Mission Valley campus, including academic and administrative buildings and classrooms; technology, research and development, and office space; complementary retail space to serve neighborhood residents, businesses, Stadium games, and events; hotels; faculty and staff housing; undergraduate and graduate student housing; apartment units available for the public; and other workforce and affordable housing. Specifically, the proposed project would provide a variety of land uses, including 4,600 residential units; 95,000 square feet of neighborhood-serving commercial/retail; 1.565 million square feet of office, research and development, and innovation space; and 84.5 acres of parks, recreation, and open space, within a TPA served by the MTS Trolley Green Line and Stadium Trolley Station. The proposed project would include transit, bicycle, and pedestrian improvements to encourage alternative modes

of transportation. As a result, the estimated proposed project employment growth would be 5,866 estimated annual jobs and a maximum of 8,282 total estimated jobs (including part-time stadium employment and future faculty and staff jobs as explained in Section 4.13, Population and Housing), and a population of 8,510 within 0.5 miles of a transit stop. This would increase the capacity for transit-supportive residential and employment intensities within the TPA, and, as explained under Thematic Response TR-1 – General Increase in Traffic, supports reductions in overall VMT by co-locating land uses within close proximity.

Transportation Demand Management Program

The proposed project includes a Transportation Demand Management (TDM) Program that incentivizes alternative transportation besides single commuter trips. The TDM Program is comprised of two components – the first targets the proposed project’s campus office, residential and retail uses, and the second targets the proposed project’s stadium.

The TDM Program consists of the following strategies that apply to the proposed project’s campus office, residential, and retail uses:

- **Land Use Diversity**
- **Neighborhood Site Enhancement**
 - New Bicycle Facilities
 - Dedicated Land for Bicycle/Multi-Use Trails
 - Bicycle Parking
 - Showers and Lockers in Employment Areas
 - Increased Intersection Density
 - Traffic Calming
 - Car Share Service Accommodations
 - Enhanced Pedestrian Network
- **Parking Policy and Pricing**
 - Unbundled Residential Parking
 - Parking Cash-Out Program for Office Use
 - Metered On-Street Parking
 - Reduced Parking Supply
- **Commute Trip Reduction Services**
 - TDM Program Coordinator and Marketing
 - Electric Bike-Share Accommodations
 - Ridesharing Support
 - School Pool
 - Hotel Shuttle Service
 - Transit Pass Programs

The TDM strategies identified above were evaluated via reference to California Air Pollution Control Officers Association (CAPCOA) standards to determine the effectiveness of the TDM and the amount of VMT and trip reduction that would be attributable to the SDSU Mission Valley Campus TDM Program. The CAPCOA report titled, “Quantifying Greenhouse Gas Mitigation Measures” (August 2010) contains guidelines for quantifying the environmental benefits of the TDM strategies and includes the most comprehensive and up-to-date set of calculations for calculating TDM effectiveness. For TDM strategies not addressed by the CAPCOA standards, case studies were utilized to estimate vehicle trip and VMT reduction. The effectiveness of these TDM strategies is summarized in Table GHG-1-1 below (excerpted from Appendix 4.15-1, Transportation Impact Analysis); as shown, the TDM strategies, as they pertain to non-stadium land uses, are expected to reduce VMT and the corresponding consumption of gasoline by 14.41%.

Table GHG-1-1. Proposed Non-Stadium TDM Trip Reductions

CAPCOA Category	TDM Measure	Initial Reduction	Final Reduction ¹
Land Use Diversity ²	Mix of land uses, including residential, commercial, education, and parks/recreation	-- 2	-- 2
Neighborhood Site Enhancements	Improve Site Design including: <ul style="list-style-type: none"> • New Bicycle Facilities • Dedicated Land for Bicycle/Multi-Use Trails • Bicycle Parking • Increased Intersection Density 	11.08%	5.00%
	Traffic Calming	0.25%	
	Car Share	0.37%	
	Pedestrian Network	2.00%	
Parking Policy/ Pricing	Unbundle Parking	0.95%	4.07%
	Metered On-Street Parking	3.15%	
Commute Trip Reduction	TDM Marketing with Transportation Coordinator including:		6.09%
	Shower and Locker Facilities	2.21%	
	Carpool Matching/Guaranteed Ride Home	2.80%	
	Bicycle Share	0.50%	
	School Pool	0.70%	
	Hotel Shuttle Service	0.04%	
Combined Total Reduction			14.41%

Note:

¹ Combinations of strategies in the major categories are multiplicative in that there is a dampening effect based on a variety of studies.

² The TDM Program's land use diversity benefits are incorporated into the trip generation rates developed for the proposed project; in order to ensure that their benefits are not double-counted, land use diversity is not considered here.

Sources: Quantifying Greenhouse Gas Emissions (CAPCOA 2010) and Fehr & Peers 2019.

The TDM Program also consists of the following strategies that have been developed exclusively for the proposed project's stadium land use. The benefits of these strategies conservatively have not been quantitatively accounted for in the analysis, but will further reduce GHG emissions and criteria pollutants:

- **Encourage Alternative Modes of Transportation**
 - Discounted or free use of MTS
 - Prizes for transit users
 - Reward opportunities based on transportation choices
 - Vanpool subsidy & administration
 - Marketing & outreach campaign
- **Encourage Carpools and Zero-Emission Vehicles [ZEVs]**
 - Preferential parking
 - Variable parking price
 - Vehicle charging spaces
 - Reduced parking rates for ZEVs

- **Encourage Active Transportation**
 - Secure bicycle parking spaces
 - Bike valet
 - Showers & lockers for employees
 - Bicycle fix-it station
 - Bicycle & walk pools for employees
 - Wayfinding to the trails and connections proposed on the site
- **Encourage Off-Site Parking at Main Campus**
- **Provide Mobility and Parking Information Services**
 - Wayfinding to the Trolley station, bicycle parking, and passenger drop-off & pick up areas
 - Real-time travel/parking availability information
 - Welcome packets & ongoing marketing for new employees
 - External marketing campaign
- **Online Parking Reservation System**

Unquantified PDFs with Demonstrated Environmental Benefits

The proposed project includes additional PDFs that have been considered qualitatively in the EIR, but for which quantitative reductions have not been calculated. Those PDFs include the following:

- 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.
- The campus locates buildings in close proximity to one another, which would facilitate the use of common heating/cooling sources, where feasible, as project-level development proceeds. (The use of common heating/cooling sources will be evaluated as the building plans for individual development parcels are developed; relevant factors that will influence the use of such sources include the temporal proximity of development, type of use, and market forces.)
- Project development areas would maximize natural ventilation.
- The proposed project integrates extensive parks and landscaping, including the planting of new, on-site trees to minimize heat gain.
- The proposed project would include adaptive lighting controls, where appropriate and feasible, in order to maximize energy efficiency and minimize light pollution.

It also is noted that, to the extent applicable, project-related development will comply with the principles and goals set forth in the California State University Sustainability Policy adopted by the California State University Board of Trustees in 2014, and would be required to comply with any and all applicable State regulations including triennial building code updates.

Sustainability Recommendations Made in Comments on the Draft EIR

As to the specific requests received during the public review and comment period on the Draft EIR, CSU/SDSU offers the following in light of the above commitments.

LEED Gold

With respect to the request that the proposed project commit to achieve LEED Gold certification, rather than LEED Silver or equivalent (as provided in the Draft EIR), CSU/SDSU have added the following PDF specific to the proposed Stadium:

PDF-Stadium LEED Gold Certification The proposed project will pursue and achieve LEED Version 4 Gold certification through the U.S. Green Building Council for the Stadium.

CSU/SDSU have incorporated the additional Stadium-specific LEED commitment into the Final EIR because the design-level planning for the Stadium is sufficiently far along to enable a meaningful LEED Gold feasibility assessment and determination for that particular land use. The current availability of the requisite planning information for the Stadium is consistent with the proposed project's anticipated build-out timeline, which would result in construction of the Stadium by the end of 2022.

However, such information is not available for other vertical components at this time. Therefore, regarding the remainder of the project site, CSU/SDSU notes the following: First, the approach set forth in the Draft EIR is consistent with CSU's 2014 Sustainability Policy, which provides that CSU "shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED 'Silver.'" The existing PDF, therefore, acts as a floor (not a ceiling) to the LEED-based sustainability characterization of the project. Second, a commitment to LEED Gold is not guaranteed to provide any additional emissions reduction benefits because not all LEED credits are specific to energy efficiency or other GHG- or criteria air pollutant-reducing strategies. As for those credits that are specific to energy, GHG, or criteria air pollutants, not all such LEED credits are quantifiable through the California Emissions Estimator Model (CalEEMod). This is why no quantitative credit was taken for the project's commitment to LEED Silver in the Draft EIR. Third, as part of the request for proposals (RFP) process that SDSU shall follow for each of the vertical development components of the proposed project (i.e., construction of the buildings), a scorecard will be used to judge proposals. As part of each scorecard, additional credit/points will be allocated for sustainability features. Because there is no restriction limiting vertical development to LEED Silver, this commitment acts as a minimum from which vertical developers may exceed to secure additional points through the RFP process. This has proven to be a successful model as recent SDSU construction projects on the existing SDSU campus have achieved LEED Platinum certification, including the Conrad Prebys Aztecs Student Union. To ensure implementation of this commitment, a new PDF has been included in the Final EIR as follows, with additions shown in underline:

PDF Selection of Developer/Builders As part of the scoring system for evaluating responses to Requests for Proposals and through the builder/developer review and selection process for each future building site within the Mission Valley Campus Master Plan Area, CSU/SDSU shall include "Sustainability" as a component of the scoring criteria and weigh each builder/developer's commitment to implementing strategies above and beyond CBC Title 24, CalGreen and LEED Silver (Version 4.0) as at least 10% of the overall scoring.

Building Electrification/Elimination of Natural Gas in Building Design

With respect to the request that the proposed project eliminate the use of natural gas, as noted above, in response to comments received on the Draft EIR, the PDF limiting residential hearths to 5% of residential units has been refined to eliminate residential hearths entirely. In addition, CSU/SDSU has committed to all electric heating and cooling for all non-Stadium land uses within the proposed project. CSU/SDSU has also committed to sizing all electrical utilities and conduit to enable the electrification of all uses in the future. To ensure implementation of these commitments, two new PDFs have been included in the Final EIR as follows, with additions shown in underline:

PDF Building Heating and Cooling As part of the Mechanical, Electrical and Plumbing Plans (MEPs) for all non-stadium buildings, CSU/SDSU shall require all heating, ventilation and cooling systems (HVAC) and water heating systems to be electric.

PDF Electric Conduit Sizing CSU/SDSU shall require that all electrical conduit for the project site be designed, sized and installed to enable the future electrification of the entire project.

These design refinements (i.e., elimination of natural gas fireplaces, electric space and water heating and cooling, and electrical infrastructure sizing) are reflected in the Final EIR. CSU/SDSU also notes that the project design limits opportunities for natural gas primarily to residential, stadium- and restaurant-related cooktops, and campus laboratory facilities.

Additionally, based on the project's latest design planning, the structured parking on the project site will no longer require mechanical ventilation, but instead has been redesigned to permit natural ventilation. This new PDF, as shown with additions in underline below, has been incorporated into the Final EIR and serves to reduce the project's energy consumption and emissions profile.

PDF Naturally Ventilated Parking All structured parking on the project site shall be naturally ventilated.

When incorporated into the Draft EIR, this design refinement would reduce GHG emissions by 1,904 MT CO₂e/yr and energy consumption by 11,489,244 kWh/yr.

Lastly, the proposed project would be built out over an approximately 15-year schedule (see Draft EIR Chapter 2, Project Description) and, as noted above, subject to any and all updates to the state building code, which may include additional restrictions on natural gas usage or otherwise provide for the electrification of buildings.

Water Re-Use Opportunities

Regarding the request for the proposed project to re-use water on site, the Draft EIR determined that the proposed project would have a less than significant impact to water supply. Specifically, Appendix 4.17-5, Water Use Estimation Memo, and page 4.17-19 of the Draft EIR compared the estimated water usage of the proposed project to other factors. As described therein, the proposed project would use approximately 693,343 gallons per day (gpd), which is a reduction of approximately 901,847 gpd compared to the City of San Diego Water Departments Facility Design Guidelines, or approximately 56.5% less. This reduction would be achieved through a combination of indoor and outdoor conservation measures, best available technologies, and compliance with recently adopted water conservation laws and regulations. Therefore, any additional requirement to reduce or otherwise conserve water is not mitigation for CEQA impacts and would be a PDF.

CSU/SDSU notes that reclaimed water may be available and that, in order to facilitate future connections, CSU/SDSU would install "purple pipes" during construction, which could connect to the City's future recycled water system for landscape irrigation. This would reduce the amount of potable water used by the proposed project, which conservatively was not considered in the analysis contained in the Draft EIR and, therefore, may also reduce energy usage associated with water. To ensure implementation of this commitment, a new PDF has been included in the Final EIR as follows, with additions shown in underline:

PDF Connection to Future Reclaimed Water System CSU/SDSU either (1) shall require that purple pipe be installed in all streets with landscaping and stubbed to all parks, recreation, and open space areas to provide reclaimed water for irrigation purposes or (2) shall otherwise provide for future connections to the City of San Diego's Pure Water Phase 2 program to reduce potable water usage.

CSU/SDSU notes that the use of greywater and/or the use of rain barrels for harvesting/capture for irrigation of parks and green spaces also was evaluated. Concerns were raised by the public during plenary sessions of the River Park Advisory Group because BMPs do not address residual chemicals in greywater from indoor appliances. As a result, utilization of greywater within the project site, which is designed to outlet into the San Diego River, was

not pursued as a design feature because of potential downstream impacts to habitat. In addition, re-use of treated water from the project's bioretention basins was considered but not pursued because there was no effective storage area, and water must be drained within 72 hours to avoid creating breeding grounds for vector.

Additional Solid Waste Management Strategies

Lastly, regarding recycling, CSU/SDSU would provide recycling bins for eligible types of trash (e.g., glass bottles, paper, cans,) throughout the campus and residential areas to encourage recycling opportunities and would work with the local trash provider to improve recycling practices on the Mission Valley Campus. In addition, the Mission Valley Campus would be required to comply with all regulatory requirements adopted by the state. To ensure implementation of CSU/SDSU's commitment to composting, a new PDF has been included in the Final EIR as follows, with additions shown in underline:

PDF Composting CSU/SDSU shall utilize pre-consumer organic food composting for the proposed Stadium and University-constructed buildings, and shall encourage the incorporation of composting facilities in the residential units developed through the public-private partnerships (the P3 process.) CSU/SDSU also shall utilize post-consumer organic food composting for the proposed Stadium and University-constructed buildings when feasible (e.g., when the University's solid waste provider operates a facility that is permitted to accept post-consumer compost).

Summary

Based on these additional commitments, Ramboll prepared the San Diego State University Mission Valley Campus Master Plan Project Additional Technical Memo (December 2019) to calculate the estimated reductions from the above PDFs. As analyzed therein, GHG emissions from operation of the proposed project would be reduced by an additional 5,113 MT/CO₂e/year as shown in Table GHG-1-2, and reflected in the Final EIR:

Table GHG-1-2. Summary of GHG Emissions Inventory (With Project Design Features)

Emissions Category	Project GHG Emissions
	MT CO ₂ e/yr
Draft EIR Area Sources	240
<i>Final EIR Updates to Residential Hearth PDF</i>	-182
Draft EIR Energy Usage	15,735
<i>Final EIR Updates to Solar PV Panels PDF</i>	-13
<i>Final EIR Updates to Building Heating and Cooling PDF</i>	-1,410
<i>Final EIR Updates to Naturally Ventilated Parking Structures PDF</i>	-1,904
Draft EIR Water	2,772
Draft EIR Waste Disposed	2,253
Draft EIR Traffic	46,653
<i>Final EIR Updates to EV Ready Infrastructure and EV Chargers PDF</i>	-1,604
Draft EIR Stationary	40
Draft EIR Operational Subtotal	67,693
<i>Updates to Final EIR PDFs</i>	-5,113
Updates to Final EIR Operational Subtotal	62,580

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Thematic Response TR-1 – General Increase in Traffic

Concerns have been raised generally related to the proposed project's contribution to traffic in the project vicinity. This topical response addresses those comments by presenting an overview of the transportation analysis presented in the Draft EIR, including the Transportation Demand Management (TDM) Program to be implemented as part of the project and a summary of the vehicle miles traveled (VMT) analysis, as well as a summary of the related subjects of project consistency with various area land use plans, and the project's role in meeting the region's housing requirements, which will assist in lowering both the project and region's VMT.

Draft EIR Section 4.15, Transportation, addressed the proposed project's impacts on the area's transportation facilities and determined the project would result in significant impacts that, at least preliminarily, were identified as unavoidable largely because CSU/SDSU does not have jurisdiction to implement the recommended mitigation improvements. Specifically, the Draft EIR identifies 14 mitigation measures to reduce the proposed project's impacts to traffic; however, because implementation of these measures is not within the control of CSU/SDSU, implementation of these measures cannot be reasonably assured without agreement and coordination with those agencies with jurisdiction; therefore, the Draft EIR determined the impacts are significant and unavoidable.

However, following release of the Draft EIR, CSU/SDSU coordinated with the City of San Diego; the City, in response, has granted its approval for CSU/SDSU to implement a nearly all of the subject mitigation measures within its jurisdiction. (See Responses to Comment Letter A4.) Moreover, as described below, given the project features designed to reduce vehicular trips, the project site's unique location within a Transit Priority Area (TPA), and the project's proposed mix of land uses, including 4,600 residential units, campus/office uses, and retail uses, the vehicle trips to be generated by the proposed project and the related impacts on the area roadways have been reduced to the extent feasible, while, at the same time, the project will accommodate an important share of the required housing stock in San Diego.

Transportation Demand Management

The proposed project includes a TDM Program. The TDM Program facilitates alternative transportation modes over single-occupant vehicle travel. The TDM Program, which applies to the proposed project's campus/office, residential, and retail uses, consists of the following strategies:

- **Land Use Diversity**
- **Neighborhood Site Enhancement**
 - New Bicycle Facilities—A network of bicycle lanes on key north–south streets and connections to existing off-site facilities (e.g., Murphy Canyon Trail) is part of the proposed campus site plan. A total of nearly 1 lane-mile of on-street bike lanes within the site is proposed. Additionally, bike facilities that are part of any off-site traffic improvements will be maintained or enhanced.
 - Dedicated Land for Bicycle/Multi-Use Trails—The site plan also includes a network of multi-use trails through the River Park, dedicated lanes in the office plaza area, plus a campus loop multi-use path that encircles the site. Multi-use trails and paths comprise a total of nearly four miles within the site.
 - Bicycle Parking—Residential units will include secure bicycle parking per City of San Diego standards (up to 0.6 spaces per dwelling unit anticipated based on units containing up to three bedrooms); similarly, short-term (racks) and long-term spaces (rooms, enclosures, or lockers) will also be provided for nonresidential uses per City of San Diego standards (0.1 short-term spaces per 1,000 square feet and 5% of nonresidential automobile parking provided in long-term spaces).

- Showers and Lockers—Changing facilities will be provided in at least one of the following locations to support bicycling and walking as commute modes for employees: the campus office, research and innovation, or retail building areas.
- Increased Intersection Density—On-site roadway network includes a relatively high intersection density of more than 69 spaces per square mile, which results in short block lengths and travel distances between complementary land uses. This intersection density strongly encourages walking, bicycling, or other micromobility modes to travel within the site and to adjacent neighborhoods.
- Traffic Calming—Nearly all on-site intersections will include curb extensions and bulbouts; several on-site roadways will include raised crosswalks; and two roundabouts will help to manage travel speeds and enhance pedestrian safety.
- Car Share Service Accommodations—Dedicated parking spaces for car sharing companies will be established in on-street spaces and/or within the campus and/or office parking structures.
- Enhanced Pedestrian Network—All streets within the project site will include sidewalks on both sides of the street, or a multi-use path on one side of the street with enhanced pedestrian crossings. Separate pedestrian phases at signalized intersections to enhance safety and raise driver awareness will also be included. As noted above, the campus loop and other paths will provide in excess of 2 miles of pedestrian paths in addition to sidewalks.
- **Parking Policy and Pricing**
 - Unbundled Parking—Parking in all residential buildings will be “unbundled” from units such that residents will have to request a parking space separate from their apartment/condominium unit and pay for that parking space separately. This approach is consistent with the recently adopted City of San Diego ordinance that requires all multi-family residential parking in TPAs to be unbundled from units.
 - Parking Cash-Out Program for Office Use—The proposed project’s office use employers will provide employees with monetary incentives for not driving to work.
 - Metered On-Street Parking—All on-street spaces within the campus core will be metered and require payment of an hourly charge during typical daytime hours (e.g., between 8:00 a.m. and 6:00 p.m.). The parking spaces on the southwest and southeast edges of the site nearest the park/recreation facilities may also be metered, but at a minimum will include time limits to ensure parking turnover and prevent extended storage of resident vehicles.
 - Limit Parking Supply—The proposed project will provide a limited parking supply of a maximum of 1.23 spaces per dwelling unit. The parking rate is limited in comparison to the parking provided at similar developments in the Mission Valley region. The recently adopted City of San Diego ordinance referencing unbundled parking above also allows for no parking to be provided for multi-family residential units in TPAs. Should residential buildings be built with lower parking ratios that reduce the overall parking supply, additional trip reductions and TDM benefits are expected.
- **Commute Trip Reduction Services**
 - TDM Program Coordinator and Marketing—To ensure the TDM Program strategies are implemented and effective, a Campus Transportation Coordinator will be identified to monitor the TDM Program. As part of overall campus management, a staff member or outside consultant will be designated to serve as the on-site Campus Transportation Coordinator for employees and residents. Coordinators are responsible for developing, marketing, implementing, and evaluating TDM Programs, where dedicated personnel in this role make TDM Programs more robust, consistent, and effective. Additionally, residents and employees would have a designated point of contact for questions about the various TDM strategies, which would allow them to easily stay informed of various TDM functions and eligibility.

- The Campus Transportation Coordinator’s duties would include, but not be limited to, the following:
 - Conduct transportation/mobility options orientation for new employees and new residents.
 - Assist with rideshare matching for employees commuting to the project and residents commuting from their homes.
 - Provide information on transit, bicycling, and walking to and from the project.
 - Act as source of information regarding the TDM Program, including compliance with regulatory requirements and new potential TDM benefits.
 - Coordinate TDM Program monitoring (administer surveys and coordinate data collection).
 - Promote available websites providing transportation options for residents, employees, customers, and guests.
 - Create and distribute a “new resident” and “new employee” information packet addressing non-automobile modes of transportation.
 - Promote a transportation options app for use on mobile devices (tech-enabled mobility app).
 - Assist employees and residents in accessing existing or establishing future TDM programs, such as transit discount or vanpool programs through existing programs such as MTS Ecopass or SANDAG’s iCommute.
- Electric Bike-Share Accommodations—Private vendors currently supply electric bicycles (e-bikes) for short-term rental in the San Diego area. To facilitate the use of e-bikes within the site, the SDSU Mission Valley Campus site plan will provide areas for the temporary storage of e-bikes available for rental and identify specific locations for bike drop off.
- Ridesharing Support—As noted under the Campus Transportation Coordinator element above, rideshare support will be provided as part of this program. This includes making connections with the SANDAG iCommute program for carpool, vanpool, and rideshare programs that are specific to the project’s residents and employees.
- School Pool—As lower-level school facilities are not provided on the site, students will either need to be bused or driven by parents to off-site K-12 schools. Administered by the Campus Transportation Coordinator, a school pool program would pair students traveling to the same school or area to limit the amount of small group school trips made from the project site; thus, reducing the vehicle trips generated by parents driving the students to off-site K-12 school facilities.
- Hotel Shuttle Service—Shuttle service will be provided to and from the hotel on site. This shuttle service will be available to hotel guests and will service the airport and various other tourist locations.
- Transit Pass Programs—CSU will maintain at the Mission Valley campus the existing transit pass program for students in place at the College Area campus (passes are discounted by the MTS and subsidized by CSU/SDSU), and enable purchases by credit card. In addition, CSU/SDSU will establish a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services (e.g., uberPOOL and Lyft Line), provided SDSU meets the state/CSU required minimum participation level. Relatedly, CSU/SDSU will provide reduced cost transit passes for faculty and staff, provided SDSU meets the MTS required minimum participation level. The cost reduction will be between 10% and 25%, depending on participation level. Additionally, the employers with a minimum of 20 employees will be required to provide up to 5% of their employees with a 100% MTS transit pass subsidy.

To determine the effectiveness of the TDM Program and the amount of VMT and trip reduction that would be attributable to the program, the EIR’s transportation engineers Fehr & Peers compared the proposed TDM Program elements to California Air Pollution Control Office Association (CAPCOA) standards. CAPCOA developed the guidance

document Quantifying Greenhouse Gas Mitigation Measures (August 2010), which 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.

The summary of the non-Stadium TDM vehicle trip reductions are included in Table 3 of Draft EIR, Appendix 4.7-2, and reproduced below. For each strategy that is based on the CAPCOA Report, the related CAPCOA strategy code is provided (for example, CAPCOA TRT-6 or SDT-3). Note that the resulting VMT and trip reductions are not simply additive; combinations of strategies in the major categories are multiplicative in that there is a dampening effect based on a variety of studies and, accordingly, the table amounts reflect the appropriate adjustments.

Table 3. Proposed Non-Stadium TDM Trip Reductions

CAPCOA Category	TDM Measure	Initial Reduction	Final Reduction ¹
<i>Neighborhood Site Enhancements</i>	Improve Site Design including: <ul style="list-style-type: none"> • New Bicycle Facilities • Dedicated Land for Bicycle/Multi-Use Trails • Bicycle Parking • Increased Intersection Density 	11.08%	5.00%
	Traffic Calming	0.25%	
	Car Share	0.37%	
	Pedestrian Network	2.00%	
Parking Policy/ Pricing	Unbundle Parking	0.95%	4.07%
	Metered On-Street Parking	3.15%	
<i>Commute Trip Reduction</i>	TDM Marketing with Transportation Coordinator including:		6.09%
	Shower and Locker Facilities	2.21%	
	Carpool Matching/Guaranteed Ride Home	2.80%	
	Bicycle Share	0.50%	
	School Pool	0.70%	
	Hotel Shuttle Service	0.04%	
Combined Total Reduction			14.41%

Note:

¹ Combinations of strategies in the major categories are multiplicative in that there is a dampening effect based on a variety of studies.

² The detailed calculations for each TDM strategy are described in Appendix G of the Traffic Impact Analysis.

Sources: Quantifying Greenhouse Gas Emissions (CAPCOA 2010) and Fehr & Peers 2019.

As shown in Table 3, the proposed project's TDM Program would reduce vehicular trips by 14.41%, which is equivalent to approximately 7,600 average daily trips (ADT), thereby reducing the proposed project's contribution to traffic in the vicinity of the project site and the region.

Vehicle Miles Traveled

Related to the TDM Program, a VMT assessment for the proposed project was completed using output from the San Diego Association of Governments (SANDAG) regional travel demand model. The SANDAG regional travel demand model is the best available planning tool for forecasting travel demand in the greater San Diego area over the next 20 to 30 years and the most appropriate tool for determining how a development project the scope of the SDSU Mission Valley Campus Master Plan would affect regional and area-wide trip-making patterns in terms of VMT. The SANDAG Year 2012 regional travel demand model, which is the latest validation year model available and therefore the best tool for evaluating baseline conditions, was used to establish *existing* conditions, while the Year 2035 model was used to establish the *future* baseline conditions without and with the proposed project.

The results of the VMT analysis are shown in Table 4.15-43 of the Draft EIR, reproduced below, which lists the total regional VMT for the baseline conditions, as well as 2035 conditions without and with the proposed project. Also shown in the table is the proposed project's project-generated VMT, and the project-generated VMT after application of the 14.41% TDM reduction described in Table 3, above.

For the project-level VMT assessment, the 2035 project-generated VMT per service population was calculated at 25.52, which is 25.7% lower than the existing baseline efficiency metric of 34.34. For the cumulative level analysis, the long-range regional VMT per-service population would decrease from 32.95 without the proposed project to 32.89 with the project; therefore, the proposed project would reduce regional VMT based on a service population metric.

In addition to the above analysis, which was conducted based on the SANDAG regional model, an additional evaluation was conducted comparing the project-generated VMT to the City-wide VMT per service population. The results of this supplemental analysis are similar to those based on the SANDAG model. See Appendix K of Draft EIR Appendix 4.15-1 for additional information regarding this supplemental analysis.

Table 4.15-43. VMT Analysis

Metric	Project-Level Assessment		Cumulative Level Assessment	
	2012 Baseline	Project Buildout	2035 No Project	2035 With Project
Vehicle Miles Traveled	157,783,545	358,758	185,304,624	185,460,707
Service Population	4,594,395	14,058	5,623,920	5,637,978
VMT Per Service Population	34.34	25.52	32.95	32.89
% Decrease from 2012 Baseline		25.7%		

Source: SANDAG 2035 Regional Activity-Based Travel Demand Model (Series 13) and Appendix 4.15-1.

Land Use Consistency

In addition to reducing the number and miles traveled of vehicle trips, the proposed project is consistent with more recent planning efforts related to the project site, Mission Valley, the City of San Diego, and the San Diego region as a whole, as described below.

As to the project site, the Draft EIR determined the proposed project would be consistent with San Diego Municipal Code (SDMC) Section 22.0908. The purpose and intent of SDMC Section 22.0908 was to adopt a new legislative City policy authorizing, directing, and providing the means for the City to sell the project site to CSU/SDSU for "Bona Fide Public Purposes," provided such sale complied with the conditions established in the new law and that such sale is at such price and upon such terms and timing as the City Council deems fair and equitable and in the public interest; and that such sale would create jobs and economic synergies in the City and improve the quality of life of Mission Valley residents through the development specified therein. Section 22.0908 defines "Bona Fide Public Purposes" to encompass the proposed project's land uses. Refer to the Draft EIR, Table 4.10-2, San Diego Municipal Code Section 22.0908 Consistency Analysis, for a consistency analysis of the proposed project conformance with SDMC Section 22.0908.

The Draft EIR also determined that the proposed project would be consistent with the site-specific recommendations for the San Diego River Park Master Plan. As described in Draft EIR Section 4.10, "[t]he project site includes areas that are within the river influence area of the San Diego River as identified in the San Diego River Park Master Plan. The San Diego River Park Master Plan includes specific recommendations related to the project site. As shown in Table 4.10-3, the proposed project would implement the recommendations in the San Diego River Park Master Plan."

In addition, the proposed project is consistent with prior proposals for the project site that have been advanced since adoption of the 1984 Mission Valley Community Plan, beginning in the early 2000s. While none of these proposals were adopted, the concept of redeveloping the project site into complementary land uses—stadium/commercial/hotel/office/retail/recreation/parks/open space— has been prevalent for nearly 20 years. Table 1-2, Prior Planning Efforts on the Project Site of the Draft EIR summarizes several of the proposals.

As to Mission Valley, the City of San Diego recently completed a lengthy, planning process to update the 1984 Mission Valley Community Plan. In recognition of the unique nature of the project site, the Mission Valley Community Plan Update (MVCPU) designates the project site as “Specific Plan or Campus Master Plan.” As stated in Figure 3 of the MVCPU, redevelopment of the San Diego County Credit Union (SDCCU) Stadium site is anticipated through a Campus Master Plan, which would include detailed information on the land uses, mobility system, and recreation facilities.

The Mission Valley Community Plan Final Program EIR states that the proposed MVCPU “assumed that 4,800 dwelling units, two million square feet of office space, 300,000 square feet of retail space, 450 hotel rooms, 38.1 acres of active park, 4.9 acres of open space, and a 40,000-seat stadium would be developed on the Stadium site” (City of San Diego 2019). As shown in Table 4.13-7 of the Draft EIR (reproduced below), the MVCP Update Final Program EIR anticipated land uses and intensities comparable to those proposed by the proposed project. Accordingly, as determined in the Draft EIR, Section 4.13, the proposed project would be consistent with the level of development anticipated in the MVCP Update and Final Program EIR.

Table 4.13-7. Mission Valley Community Plan Update EIR versus Proposed Project

Project Component	Unit Count or Square Feet		Difference	% Increase/ (Decrease)
	<i>Mission Valley CPU</i>	<i>Proposed Project</i>		
Residential	4,800 units	4,600 units	(200) units	(4.17%)
Office	2,000,000 square feet	1,565,000 square feet	(435,000) square feet	(21.8%)
Retail/Hotel	300,000 square feet	310,415* square feet	10,415 square feet	3.5%
Parks and Recreation	43 acres	86.1 acres	43.1 acres	100%
Stadium	40,000	35,000 capacity	(5,000 seats)	(12.5%)
Residential Population	8,880	8,510	(170)	(1.9%)

Notes:

* Includes campus hotel uses

As to City-wide programs, the proposed project would be consistent with the City of San Diego Climate Action Plan (CAP). As shown in Appendix B of Draft EIR Appendix 4.7-2, the project site is within a TPA. The proposed project incorporates the Metropolitan Transit System (MTS) Trolley Green Line and existing Stadium Trolley Station and reserves adequate right-of-way for the potential future MTS Trolley Purple Line. The Stadium Trolley Station is within 0.5 miles of all future residents and jobs within the project site (see Draft EIR, Figure 2-11E).

In addition, the proposed project would accommodate a variety of complementary land uses, including academic and administrative buildings and classrooms; commercial, technology, research and development, and office space; complementary retail space to serve neighborhood residents, visitors, businesses, stadium games/events; hotels; faculty and staff housing; undergraduate and graduate student housing; apartment units available for the public; and other market-rate, workforce, and affordable housing. The proposed project would provide recreational opportunities, employment centers, and a concentration of food and shopping opportunities. The estimated employment growth associated with the proposed project would be 7,809 annual jobs (see Draft EIR Appendix 4.13-

1), and the estimated population growth would be approximately 8,510 new residents as a result of the new housing provided by the proposed project's 4,600 residential units. These totals would be more than the existing commercial recreation and public recreation land uses anticipated in the CAP's underlying land use assumptions. This would increase the capacity for transit-supportive residential and employment intensities within the TPA.

Further, as described above under the TDM Program, the proposed project would include transit, bicycle, and pedestrian improvements to encourage alternative modes of transportation. The total trip reduction attributable to transit, bicycle, and pedestrian trips is expected to be 4,599 daily trips. The higher of the inbound or outbound volumes that comprise this reduction are 361 and 407 during the AM and PM peak hours, respectively, which include the transit alightings and boardings at the project site. Using a transit mode share of 85% (with the remaining 15% constituting bicycle and pedestrian trips), the project would add roughly 4,000 daily transit trips ($4,599 \times .85 = 3,909$) to and from the project site, with the majority of those trips expected to be trolley trips due to the location of the Stadium Trolley Station within the project site.

Finally, as to the San Diego region, SANDAG's San Diego Forward plan (the current Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] for the region) contains five basic strategies:

10. Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit.
11. Protect the environment and help ensure the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland.
12. Invest in a transportation network that gives people transportation choices and reduces GHG emissions.
13. Address the housing needs of all economic segments of the population.
14. Implement the Regional Plan through incentives and collaboration.

As determined by the Draft EIR, the proposed project is consistent with Strategy 1 because it co-locates housing and employment on an infill site in an urbanized area that is served by transit. Specifically, the project site is identified as a potential "Town Center" (specifically, "SD MV-5") on SANDAG's Smart Growth Concept Map for the Mid-City and East County Subregion (SANDAG 2016). As described by SANDAG, "Existing/Planned smart growth areas are locations that either contain existing smart growth development or allow planned smart growth in accordance with the identified land use targets, and are accompanied by existing or planned transit services included in San Diego Forward: The Regional Plan" (SANDAG 2015). As described above, the MTS San Diego Trolley Green Line runs through the project site; providing daily service along a 23.6-mile route, with 27 stations (including the Stadium Trolley Station), and operates from the Santee Transit Center through Mission Valley to the 12th and Imperial Transit Center in downtown San Diego. SANDAG also is studying the feasibility of the San Diego Trolley Purple Line. Potential alignments for this future trolley line would enter the project site from the southeast, heading in a west-northwesterly direction, and would include the siting of another trolley station on the project site.

The proposed project is consistent with Strategy 2 because impacts to sensitive habitat/communities are limited to less than 1 acre; no portion of the project site is designated as farmland; and impacts to Cultural (non-Historic) Resources would be reduced to less than significant with implementation of mitigation.

The proposed project is consistent with Strategy 3 because it would provide further enhancements to the existing transportation options located on the project site, and would include walking paths and sidewalks connected to enhanced pedestrian connections to the Stadium Trolley Station, as well as off-site pedestrian improvements and connections. The proposed project would also include biking paths, a new on-site path system along the northern and eastern edges of the site (connecting to San Diego and Rancho Mission roads), and improvements along the San Diego River Park. The proposed hike and bike trail would be located throughout the San Diego River Park. The

trail would connect to the hike and bike loop, which provides access to the rest of the project site. The trail would complete the bikeway connection from Murphy Canyon to Fenton Parkway and connect to the east side of the campus and throughout the campus. Buffered bike lanes would be constructed between Northside and Friars Road.

The proposed project is consistent with Strategy 4 because it would provide a range of housing for faculty, staff, and students, as well as other housing including approximately 10% of the residential units built on-site as affordable housing. Provision of affordable housing accords to SDMC Section 22.0908, which conditions the sale of the Stadium site on such housing.

The proposed project is consistent with Strategy 5 because it includes a TDM Program that incorporates innovative pricing policies discussed in San Diego Forward, such as unbundling parking and alternative transportation (e.g., bicycle share). These measures help further implementation of the RTP/SCS.

Regional Housing Needs Assessment

In addition to reducing the number and length of vehicle trips and complying with recent planning efforts related to the project site, Mission Valley, the City of San Diego, and the San Diego region as a whole, the proposed project would substantially contribute towards providing both market rate and affordable housing stock in consideration of the latest Regional Housing Needs Assessment (RHNA) requirements.

For the current (Fifth) Housing Element Cycle (January 1, 2010, to December 31, 2020), the City of San Diego was allocated 88,096 RHNA units (i.e., assigned required production of 88,096 new housing units). The City of San Diego released an annual report on housing inventory in 2018, which provides an overview of progress towards the goals outlined in the City's Housing Element, including progress toward RHNA requirements. At the end of 2017, housing production for the current RHNA cycle was 33,159 units, meaning that housing production has only met 37.6% of the housing needs for the RHNA with less than 3 years remaining in the current cycle (City of San Diego 2018). Using an average of 8,008 units/year to achieve the 11-year goal, the City of San Diego was approximately 30,910 units behind RHNA projections, permitting at an average pace of only 4,149 units/year. To achieve the total allocation, 54,937 more units are needed by 2020, which would require a pace of approximately 18,312 units/year, or more than a 400% increase in annual housing production. This citywide condition is consistent with the region-wide shortage in housing across the SANDAG service area.

In 2018, SANDAG began the RHNA process for the 8-year, sixth housing element cycle (June 30, 2020, to April 15, 2029). On July 5, 2018, the California Department of Housing and Community Development (HCD) sent the Final Regional Housing Need Determination letter to SANDAG, which identified "the minimum regional housing need of 171,685 total units among four income categories for SANDAG to distribute among its local governments" (SANDAG 2018). SANDAG's preliminary recommendation calls for 107,685 of these units to be allocated to the City of San Diego, which represents a 22.5% increase in units from the prior cycle, and increases the City's allocation from 54.4% to 62.8% of the regional share. Of the 107,685 units recommended to be allocated (i.e., required production) to the City of San Diego, 44,818 would be required to be available at the Very Low or Low income levels.

The proposed project would provide up to 4,600 total units (4.3% of the City's RHNA allocation), up to 10% of which (or 460 units) would be affordable housing. These units would assist the City in achieving its future RHNA requirements expected under the Sixth Housing Element Cycle (2021 to 2028).

After SANDAG's release of the Sixth Cycle Housing Element allocation proposal, on August 22, 2019, the HCD issued the Southern California Association of Governments (SCAG), which includes SANDAG's member agencies, determination of the Regional Housing Need Determination. HCD determined the minimum housing need for SCAG is 1,344,740 total units for the period beginning June 30, 2010, and ending October 15, 2029. This total is over

three times greater than HCD determined for the prior 11-year planning period, 439,000 housing units for the period 2010–2021 (which included SANDAG’s 161,980 units).

Summary

As described above, through the provision of 4.3% of the City’s RHNA allocation in an infill, TPA that incorporates project design features to reduce average daily traffic by 14.4% and reduce overall VMT (both project-VMT and region-wide VMT), the project’s effect on regional traffic is reduced to the extent feasible while also complying with recent planning efforts, including the MVCPU.

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Response to Comment Letter A1

Federal Emergency Management Agency (FEMA)

Gregor Blackburn, CFM, Branch Chief

August 12, 2019

- A1-1** The comment is an introduction to comments that follow. No response is required.
- A1-2** The comment requests review of the Flood Insurance Rate Maps (FIRMs) for San Diego County and the City of San Diego. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, Section 4.9, Hydrology and Water Quality. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. Please also refer to Draft EIR Appendix 4.9-5, Hydraulic Analyses for SDSU Mission Valley Campus. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.
- A1-3** The comment provides factual background information about the City of San Diego's participation in the National Flood Insurance Program. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-4** The comment is an introduction to comments that follow. No response is required.
- A1-5** The comment states that buildings within the riverine floodplain must be elevated so the lowest floor is at or above the Base Flood Elevation in accordance with the effective Flood Insurance Rate Map. The proposed project has been designed in accordance with the direction. The campus, stadium, hotel, and residential/retail portions of the proposed project have been located in areas which are proposed to be elevated out of the base flood elevation. The Draft EIR states that such areas will be elevated above the base flood elevation. CSU/SDSU also anticipate processing a Conditional Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR) to remove these portions of the project site out of the Base Flood Elevation. The comment does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-6** The comment provides factual information for areas of construction located within the Regulatory Floodway and states that any such development must not increase base flood elevation levels. Please refer to Response to Comment A1-5. The comment does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-7** The comment states that a hydrologic and hydraulic analysis must be performed prior to the start of development and demonstrate development must not cause any rise in base flood levels. A hydraulic analysis was prepared for the proposed project. Please refer to Draft EIR Appendix 4.9-5, Hydraulic Analysis, prepared by Chang Consultants. As determined in Draft EIR Appendix 4.9-5, and described in the Draft EIR, Section 4.9, Hydrology and Water Quality:

No structures would be built within this floodway or within any other portion of the 100-year flood zone. The River Park will serve as a floodplain buffer between the San Diego River and the developed portions of the proposed project, which will be constructed on pads elevated above the floodplain depths. Therefore, all structures would be set back from the natural floodplain. As a result, the proposed project would not impede or redirect flood flows at the site. Impacts are considered less than significant.

The comment does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.

- A1-8** The comment states no rise within regulatory floodways is permitted. CSU/SDSU understand and note that no rise in the floodplain would occur as a result of implementation of the proposed project. Refer to Responses to Comments A1-5 through A1-7, above. The comment does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-9** The comment provides factual background information for buildings constructed within a coastal high hazard area. The proposed project is not within a coastal high hazard area. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-10** The comment provides factual background information regarding building posts and pilings foundations for buildings in the coastal high hazard area, which is not proposed by the project. The comment does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-11** The comment provides factual background information for development that changes existing Special Flood Hazard Areas and does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. CSU/SDSU refers the commenter to Section 2.5.2, Requested Project Approvals, which notes that the proposed project would file a CLOMR and LOMR through FEMA. Please refer to Responses to Comments A1-5 through A1-7, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-12** The comment provides factual background information regarding local floodplain management building requirements, and does not address the adequacy of the Draft EIR or raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- A1-13** The comment is a conclusion statement. No response is required.

Response to Comment Letter A2

California Department of Fish and Wildlife (CDFW)
Gail Sevens, Environmental Program Manager – South Coast Region
October 2, 2019

- A2-1** The comment provides factual background information regarding CDFW. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-2** The comment restates information from the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-3** The comment identifies biological resources of concern — specifically, project impacts to the San Diego River and Murphy Canyon Creek, and impacts to wildlife corridor functionality, and flora and fauna therein. The comment serves as an introduction to more specific comments that follow. No further response is required.
- A2-4** The comment expresses the opinion regarding the importance of riparian buffers by restating selected text from Section 4.3, Biological Resources, and Chapter 2, Project Description, of the Draft EIR. The comment serves as an introduction to more specific comments that follow. Please refer to Responses to Comments A2-5 through A2-11, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-5** The comment provides factual background information regarding riparian buffers. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-6** The comment provides factual background information regarding the San Diego River corridor. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-7** The comment requests that CSU/SDSU 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 river. CSU/SDSU agrees with the comment and with protecting the San Diego River. The proposed project has been designed with a 100-foot buffer between the San Diego River and active uses within the River Park. Further, most passive trail uses have been removed from the 100-foot buffer; however, stretches of the river pathway encroach as close as approximately 86 feet to the river, which is outside the San Diego River Park Master Plan prescribed 35 feet. Please refer to Responses to Comments A2-8 through A2-11 below for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-8** The comment states that CDFW recommends that the proposed project include a minimum 100-foot wetland buffer. As described in Draft EIR Section 4.3.4, there will be a minimum 100-foot buffer between the proposed fields and the San Diego River:

Within the River Park and Shared Parks and Open Space, several lighted sports fields and courts are proposed. These sports fields include soccer and baseball fields, as well as basketball and tennis courts. ***These fields and courts would be set back a minimum of 100 feet from the San Diego River.*** 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 compliance with the MSCP's Land Use Adjacency Guidelines. For security purposes, trails within the River Park would have nighttime lighting. Similar to the sports fields, lighting would be shielded, low lights with directional LEDs so there is very little light spill. The installation of the River Park and Shared Parks and Open Space will provide a natural buffer between the Stadium, commercial, and residential buildings and the San Diego River and Murphy Canyon Creek. Lighting will be directed away from the San Diego River and Murphy Canyon Creek. (***Emphasis added.***)

Therefore, the proposed project has been designed to conform to the recommended buffer.

- A2-9** The comment states that any proposal for the placement of public trails within the upland buffer be kept to a minimum. CSU/SDSU agree with the comment. See Response to Comment A2-7, which states that the trail is generally 100 feet from the river. Therefore, the proposed project has been designed to conform to the requested buffer.
- A2-10** The comment recommends adding the 100-foot buffer to the Multi-Habitat Planning Area (MHPA) boundary. The comment expresses an opinion and does not raise an issue with respect to the adequacy of the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A2-11** The comment states that CDFW believes a 100-foot buffer is a reasonable minimum for this portion of the San Diego River and requests confirmation that active and recreational uses will remain located a minimum of 100 feet from the MHPA. As described in Response to Comment A2-8, there will be a 100-foot buffer between the parks and the river. The trail is generally 100 feet from the river,. Therefore, the proposed project has been designed to conform to the requested buffer.
- A2-12** The comment states that according to the Draft EIR's Project Description (Chapter 2), there are no planned improvements for Murphy Canyon Creek, which currently flows through a concrete box channel. The comment then provides factual background information on the history of the prior channelization of the San Diego River and Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A2-13** The comment states that CDFW encourages "SDSU to consider returning Murphy Canyon Creek to a more natural configuration as part of the project activities." Please refer to Thematic Response – Murphy Canyon Creek. As noted therein, the proposed project would not impact Murphy Canyon Creek; therefore, there is no nexus that would require the proposed project to accept the extensive costs, regulatory permitting challenges, and overall project schedule delays that improvements to Murphy Canyon Creek would require.

Please refer to Figure 2-5 of the Draft EIR, which shows all of the existing constraints adjacent to Murphy Canyon Creek, precluding the expansion or reconfiguration of the creek. The creek is constrained by Interstate 15 along the east and cannot be expanded in that direction. To the west,

there are several potable water underground pipelines, an existing underground storm drain system, and an existing sewer system, all of which provide major constraints and are infeasible to move in light of project features and objectives. However, even if moving those infrastructure were feasible, there is a high-pressure gas line immediately adjacent to Murphy Canyon Creek that is not feasible to relocate. Further, the existing trolley abutment and electrical station infrastructure that constrains the confluence of Murphy Canyon Creek and the San Diego River would need to be removed to allow for a wider Murphy Canyon Creek. The redesign and relocation of the trolley infrastructure and electrical station would require extensive modifications to the existing trolley and be extremely costly; the project, as proposed, does not impact Murphy Canyon Creek.

- A2-14** The comment states that if returning Murphy Canyon Creek to a more natural configuration is infeasible, consideration should be given to project development being located such that it does not preclude future restoration of Murphy Canyon Creek and the San Diego River to nearer their historic conditions. As described in Response to Comment A2-13, widening Murphy Canyon Creek and the eastern portions of the San Diego River are infeasible. However, as requested, the proposed campus buildings are set back from Murphy Canyon Creek and the San Diego River to allow for natural flooding of these features (refer to Figure 2-9C in the Draft EIR). Please also refer to Thematic Response – Murphy Canyon Creek. Further, the proposed project is revised to realign Street “I,” which formerly ran parallel to Murphy Canyon Creek, such that the future restoration of Murphy Canyon Creek is not precluded. Should an agency or organization choose to redesign and restore Murphy Canyon Creek to nearer its natural channel geometry, the proposed project would not result in the placement of immediately adjacent buildings or habitable structures, and thus would not preclude such a future restoration project; however, such an effort is not part of the proposed project, nor required mitigation.
- A2-15** The comment states that the development footprint should be located outside the 100-year Federal Emergency Management Agency floodway as well as a 35-foot-wide area on either side of the floodway. The proposed project was designed to avoid installation of buildings or habitable structures within the river influence area. No habitable structures would be built within the floodway, within 35-feet of either side of the floodway, or within any portion of the 100-year floodplain. The River Park will serve as a buffer between the San Diego River and the vertically-developed portions of the proposed project, which will be constructed on pads elevated above the floodplain elevation. (See Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-31; and Thematic Response – Murphy Canyon Creek.) Accordingly, the non-River Park portions of the proposed project (i.e., vertical development) is located outside of the 100-year floodway and 35 feet beyond the floodway. See also Response to Comment Letter A1 – FEMA for additional responsive information regarding development within the floodplain.
- A2-16** The comment restates information from the Draft EIR, specifically the comment summarizes mitigation measure MM-BIO-13. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A2-17** The comment states that 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 Multiple Species Conservation Program (MSCP) Subarea Plan should be included in the EIR.

The mitigation ratios provided for direct impacts to riparian and upland habitat are consistent with the mitigation ratios provided in Table 2a of the City’s Biology Guidelines, which requires a 3:1 mitigation

ratio for impacts to riparian forest or woodland, and Table 3, which requires a 1.5:1 mitigation ratio for impacts to coastal sage scrub (located outside the MHPA). Additional mitigation may be required by the agencies during their separate permitting processes.

A2-18 The comment states that CDFW has concern that the project's riparian impacts may occur within a Streambed Alteration Agreement (SAA) mitigation area (i.e., the City of San Diego Stadium Wetland Mitigation Project), and that the EIR should analyze if the project would directly or indirectly impact an existing mitigation site.

As stated in Response to Comment A4-167, the temporary impacts associated with the sewer connection are minor and likely overestimate the actual work area needed to tie into the sewer connection. To be conservative, a 27-foot by 60-foot work area was estimated; however, the actual work will be conducted from the top of the berm and be done to minimize any disturbance within the San Diego River and Stadium Mitigation Site. It is important to note that improvements to existing City-owned/maintained infrastructure, assuming they are conducted in as minimally impactful a manner as possible, is a covered activity in the City of San Diego's MSCP Subarea Plan. Establishment of a connection to the City's existing sewer infrastructure in this single location is the most efficient way to service the increases in flows projected from the proposed project. Further, this extremely minor, temporary impact is the only impact within the MHPA. All other temporary or permanent impacts are located outside of the MHPA. Further, Section 4.3.6 of the Draft EIR includes numerous best management practices, avoidance, and minimization measures in order to ensure there are no indirect impacts to the San Diego River/MHPA or Murphy Canyon Creek.

A2-19 The comment states CDFW will evaluate the adequacy of mitigation ratios proposed in the Draft EIR when CSU/SDSU formally submit a streambed notification package to the Department's Lake and Streambed Alteration Program. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

A2-20 The comment expresses CDFW's opinions that CSU/SDSU should include native plants for landscaping areas adjacent to the MHPA and riparian buffer and requests the Final EIR include a plant palette for project landscaping. In response, please see the Campus Design Guidelines, which have been revised to add a plant palette for the proposed project, including the River Park and areas adjacent to the MHPA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A2-21 The comment is a conclusion statement and provides contact information. No further response is required.

Response to Comment Letter A3

Caltrans
Commenter
October 3, 2019

- A3-1** The comment is an introduction to comments that follow.
- A3-2** The comment addresses numerous components of the Draft EIR transportation analysis in a general manner, subjects which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-3** The comment states that a project that reduces vehicle miles traveled (VMT) should also see a reduction in traffic impacts.

The Transportation Demand Management (TDM) program proposed as part of the proposed project (PDF-TRA-1 and PDF-TRA-2) would result in more than a 14.41% reduction in VMT under non-stadium event conditions (i.e., average weekday conditions). (See Draft EIR section 4.15.1.1, Table 4.15-1.) This translates to a reduction of approximately 7,600 daily trips that otherwise would be generated by the proposed project and, necessarily, a reduction in project impacts to state highways and local roads commensurate with the reduced trips, as the comment suggests (see Draft EIR, Table 4.15-10).

- A3-4** The comment recommends that CSU/SDSU include strategies to reduce VMT by directing housing near available jobs and funding alternative transportation modes.

As an overview, the Draft EIR includes two separate TDM Programs as part of the proposed project at the direction of CSU/SDSU. The first TDM Program (PDF-TRA-1) includes a TDM Program Coordinator to educate, coordinate, and market the TDM Program strategies to ensure effective implementation (Draft EIR, Section 4.15.1.1, p. 4.15-7). This “Non-Stadium TDM Program” would address the campus office, residential, and retail uses that will generate traffic on primarily a weekday basis, and implement the following four primary strategies to reduce project impacts on state highways and local roads: (1) land use diversity, (2) neighborhood site enhancements, (3) parking policies/pricing, and (4) commute/travel reduction services (Draft EIR, Section 4.15.1.1, pp. 4.15-4 through 4.15-9).

Importantly, the TDM Program “Land Use Diversity” strategy includes a mix of land uses, including residential, commercial, education, athletic, research, parks, and recreation, and proximity of such uses, to encourage residents, employees, and visitors to walk, bike, or take transit within the project area without having to travel outside of the project site to obtain goods and services, and to live, work, and play. This land use diversity strategy encourages non-automobile transportation modes to reach the various integrated land uses available within the project site, and if they do need to drive, the trip is shorter. The VMT and trip reduction benefits of this strategy (i.e., trip internalization) is accounted for in the proposed project (see Draft EIR Section 4.15.5.1).

Trip internalization within the project site due to the mix of complementary land uses within a reasonable distance of one another allows residents, employees, and visitors to access multiple uses within a given site without the need for an automobile trip. As an example, residents and employees

(including students and faculty) within the project site may visit the retail/restaurant services on site, as well as work, attend classes, and conduct research on site without the necessity for automobile travel. This trip internalization reduces the overall number of vehicle trips to and from the site compared to the trips generated by each of the uses in an isolated setting (with no complementary land uses) (Draft EIR Section 4.15.5.1).

The Draft EIR calculated trip internalization rates using state-of-the-art modeling and other data. (See Draft EIR Section 4.15.5.1 and Table 4.15-10.) Trip internalization due to the proposed project's complementary land uses result in tangible reductions in daily, AM peak hour, and PM peak hour project trips, which reduce impacts to state highways and local roads. (See Draft EIR Section 4.15.5.1 and Table 4.15-10.) Other project trip reduction methods were used that reduce impacts to state highways and local roads, including implementation of the proposed project's two TDM Programs, discussed below. (See Draft EIR Section 4.15.5.1 and Table 4.15-10, and Draft EIR Section 4.15.5.1.1, p. 4.15-50.)

However, before describing the benefits of the proposed project's TDM programs, another trip reduction "tool" applicable to the proposed project centers on the propensity of people traveling to and from the project site to use transit, bicycling, or walking as their primary travel mode due to the complementary land uses on site. In particular, the proposed project's multimodal facilities such as the on-site trolley station (Green Line) and the network of bicycle and walking paths provide convenient and frequent service to the existing SDSU campus, existing business centers lying between Old Town San Diego and Santee, and downtown San Diego (Draft EIR Section 4.15.5.1). The Draft EIR correctly points out that these alternative modes of travel (transit, bicycle, walking), combined with the complementary land uses on site, reduce trips to and from the project site and thereby reduce project traffic impacts on state highways and local roads. The Draft EIR calculated the estimated reduction in trips due to transit, walking, and bicycling during daily, AM peak hours, and PM peak hours (Draft EIR Section 4.15.5.1.1 and Table 4.15-10).

As noted in Response to Comment A3-3, above, the proposed project includes TDM programs that, in turn, include strategies to encourage alternative transportation modes and reduce project-generated VMT by approximately more than 14.4%. (See Draft EIR, Table 4.15-1, p. 4.15-9.) This reduction does not take into account the additional reductions attributable to the fact that the proposed project would locate housing in the heart of Mission Valley—one of the region's most vibrant job centers. Additionally, the proposed project would be located in the immediate vicinity of the San Diego Trolley Green Line, which, along with Metropolitan Transit Service (MTS) bus routes, would provide the proposed project's residents with public transit access throughout the greater San Diego metropolitan area (Draft EIR Section 4.15.3.4).

As to walking and biking, the proposed project includes a network of bicycle lanes on key north-south streets, and connections to existing off-site facilities (e.g., Murphy Canyon Trail) as part of the campus site plan, which includes a total of nearly one lane-mile of on-street bike lanes within the site (Draft EIR, p. 4.15-6). The site plan also includes a network of multi-use trails through the River Park, dedicated lanes throughout the office plaza area, and a campus loop multi-use path that encircles the project site. Multi-use trails and paths comprise a total of nearly 2 miles within the project site (Draft EIR, p. 4.15-6). All streets within the project site will include either sidewalks on both sides of the street or a multi-use path on one side of the street with enhanced pedestrian crossings (Draft EIR, p. 4.15-6). Additionally, to further facilitate walking, nearly all on-site intersections will include curb extensions and

bulbouts; several on-site roadways will include raised crosswalks; and two roundabouts will help to manage travel speeds and enhance pedestrian safety (Draft EIR, p. 4.15-6). In addition, residential units will include secure bicycle parking, and short-term and long-term bicycle use spaces will be provided for nonresidential uses; changing facilities to support bicycling and walking as commute modes for employees also will be provided (Draft EIR, p. 4.15-6). Additionally, as to off-site improvements, subsequent to release of the Draft EIR, CSU/SDSU agreed to provide additional transportation improvements over and above the proposed project's mitigation requirements that will total \$5 million in improvements. (See FEIR, subsection 4.15.10.5, Community Benefit Improvements.) Specific to bicycle travel, these improvements include the construction and installation of new buffered bike lanes (with a short segment of standard bike lanes) on Rancho Mission Road from the SDSU Mission Valley site to Ward Road. With the cycle track improvements on Ward Road also to be provided as part of the \$5 million improvements, there will be continuous bicycle facilities between SDSU's College Area and Mission Valley campuses.

A3-5

The comment recommends various means of reducing vehicle trips, each of which is addressed in the following responses. (Please refer to Response to Comment A3-4, above, for further responsive information.)

As to van pools, CSU/SDSU will establish, as part of the TDM Program, a pre-tax payroll deduction program for faculty and staff purchase of participation in various alternative transportation modes, including vanpooling, as well as MTS transit passes and on-demand rideshare services, provided SDSU meets the state/CSU required minimum participation level (Draft EIR, p. 4.15-8).

As to mobility hubs, the proposed "Non-Stadium" TDM program provides for shuttles, shared bikes and scooters, and accessible walkways (Draft EIR Section 4.15.1.1). As to shuttles, the TDM program includes a TDM Coordinator, who will provide rideshare support, which includes making connections with the San Diego Association of Governments (SANDAG) iCommute program for carpool, vanpool, and rideshare programs that are specific to the proposed project's residents and employees (Draft EIR, p. 4.15-8). Additionally, shuttle service will be provided to and from the hotel to be located on site. This shuttle service will be available to hotel guests and will service the airport and various other tourist locations (Draft EIR, p. 4.15-8). The proposed project site plan also will provide areas for the temporary storage of e-bikes available for rental, and identify specific locations for bike drop off, which would facilitate the use of e-bikes within the project site; private vendors currently supply electric bicycles for short-term rental in the vicinity of the proposed project.

As to a transit center, the project site will include a bus transit center with four loading/layover bays immediately adjacent to the Stadium Green Line Trolley Station to accommodate future MTS service. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate the bus facility adjacent to the Green Line Trolley Station. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations.

As to an off-site bike and pedestrian connectivity to the SDSU main campus, as previously noted in Response to Comment A3-4, subsequent to release of the Draft EIR, CSU/SDSU agreed to provide additional transportation improvements over and above the proposed project's mitigation requirements at a total cost of \$5 million. (See FEIR, subsection 4.15.10.5, Community Benefit Improvements.) These improvements include the construction and installation of new buffered bike lanes (with a short segment of standard bike lanes) on Rancho Mission Road from the SDSU Mission Valley site to Ward Road. With cycle track

improvements on Ward Road also to be provided as part of the \$5 million improvements, there will be continuous bicycle facilities between SDSU's College Area and Mission Valley campuses.

To ensure TDM Program strategies are implemented and effective, a campus TDM Program Coordinator will be identified to monitor the program (Draft EIR, pp. 4.15-7 to 4.15-8). The Coordinator would be responsible for developing, marketing, implementing, and evaluating TDM programs, thereby making the program more robust, consistent, and effective, and providing residents, employees, and visitors with a designated point of contact (Draft EIR, pp. 4.15-7 to 4.15-8). The TDM Program Coordinator's tasks would include conducting transportation/mobility options orientation for new employees and residents; assisting with rideshare matching for employees commuting to the proposed project and residents commuting from their homes; providing information on transit, bicycling, and walking to and from the proposed project; acting as a source of information regarding the TDM Program; coordinating TDM Program monitoring such as administering surveys and coordinating data collection; promoting available websites providing transportation options for residents, employees, customers, and guests; creating and distributing information packets regarding non-automobile modes of transportation; promoting a transportation options app for use on mobile devices (i.e., a tech enabled mobility app); and assisting employees and residents in accessing existing or establishing future TDM strategies, such as transit discount or vanpool programs through existing programs such as MTS Ecopass or SANDAG's iCommute (Draft EIR, pp. 4.15-7 to 4.15-8).

As noted, rideshare support will be provided as part of the TDM Program. This support includes making connections with the SANDAG iCommute program for carpool, vanpool, and rideshare programs that are specific to the proposed project's residents and employees (Draft EIR, p. 4.15-8). In addition, the TDM Program includes electric bike-share accommodations, K-12 school pool, hotel shuttle service, and transit pass strategies that include maintaining the existing transit pass program for students currently in place at the College Area campus (discounted MTS passes), and a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services, and providing reduced cost transit passes for faculty and staff (Draft EIR, pp. 4.15-7 to 4.15-8). Additionally, employers with a minimum of 20 employees will be required to provide up to 5% of their employees with a 100% MTS transit pass subsidy (Draft EIR, pp. 4.15-7 to 4.15-8).

A3-6 The comment recommends that SDSU coordinate with the City of San Diego, Caltrans, MTS, and SANDAG. CSU/SDSU understands the benefits of coordinating with transportation-related agencies relative to implementation of its TDM Program and would be interested in exploring participation in a working group with such agencies. In addition, CSU/SDSU has provided extensive public and agency outreach throughout the proposed project's environmental review process. For example, SDSU held three public/agency EIR scoping meetings in January and February 2019. The Draft EIR was circulated for public and agency review and comment for a 60-day period (longer than required by CEQA). During the Draft EIR comment period, SDSU hosted three public/agency meetings and provided an overview of the Draft EIR findings, including presentations from the technical team that worked on the EIR analysis. SDSU also made numerous project and EIR presentations to stakeholder groups, community planning groups, town councils, business and chamber organizations, environmental groups, and other agencies. For further information concerning SDSU's outreach, please see <http://missionvalley.sdsu.edu/community-engagement.html>.

A3-7 The comment requests deletion from the Draft EIR of certain text relating to state highway mitigation, and states that CSU/SDSU has responsibility for discussing mitigation measures to the state

transportation system and “it would appear that CSU is making the erroneous assumption that off-site mitigation is solely the responsibility of Caltrans.” While CSU understands the viewpoint, the Draft EIR does discuss mitigation measures relative to Caltrans facilities and demonstrates CSU’s recognition of its responsibility to feasibly mitigate project impacts to these facilities. As explained below, revisions made to the EIR as part of the Final EIR process clarify this point and incorporate requested deletions.

CSU/SDSU recognizes its responsibility under CEQA that the EIR “describe feasible measures which could minimize significant adverse impacts” (CEQA Guidelines Section 15126.4, subd. (a)). To that end, where the proposed project’s transportation engineer (Fehr & Peers) was able to identify capacity enhancing road improvements to Caltrans facilities that would reduce the proposed project’s significant impacts, the Draft EIR identifies such improvements. See Draft EIR Section 4.15.9.3, Mitigation Measures MM-TRA-1, MM-TRA-5, MM-TRA-6, and MM-TRA-12, describing the necessary improvements. In response to Caltrans comments on the Draft EIR, the Final EIR includes revised mitigation measures that reflect CSU/SDSU’s fair-share obligation relative to these improvements. (See Final EIR subsection 4.15.9.3.)

As to freeway segments, as reported in the Draft EIR, page 4.15-160, the mitigation of freeway impacts would involve widening of the freeway facility to provide additional mainline or auxiliary lane capacity to reduce the projected vehicle to capacity (V/C) ratio. However, widening mainline freeway segments is beyond the scope of a single development project due to numerous factors, including the potential complexities of modifying adjacent interchanges, acquiring rights-of-way, proximity of existing building structures and roadways, and construction costs that are out-of-proportion to a single project (CEQA Guidelines Section 15126.4(a)(4)(B)) et seq.). In addition, Caltrans has no adopted fee-based infrastructure mitigation program for purposes of obtaining a fair-share contribution from all new development in an area or region that may affect state highways.

SANDAG, as the regional planning agency in San Diego County, has completed various studies regarding improvements along all the major freeways within the study area. In particular, SANDAG, in collaboration with Caltrans, the City of San Diego, MTS, and other key stakeholders, is developing a multimodal corridor study for the section of Interstate (I-) 8 located within the City of San Diego. The Preliminary Draft Report for the *I-8 Corridor Study* (August 2016) considers future improvements, as well as other feasible concepts; describes existing conditions; identifies future deficiencies; develops multimodal alternatives and measures; performs technical analysis; and proposes an implementation strategy. The study addresses various topics, including right-of-way constraints, transit services, freeway interchanges, select local streets and intersections, bike and pedestrian access (active transportation), TDM, Transportation Systems Management, and other strategies to encourage the use of alternative travel modes.

Additionally, Caltrans recently completed an I-805 Transportation Concept Report that addresses congestion and operations along the entire length of the corridor. A combination of strategies is planned and incorporated in the Regional Transportation Plan, including high-capacity transit projects, managed lanes, active transportation projects, auxiliary lanes, and ramp metering. Many of the concepts addressed in the I-8 and I-805 studies can be applied to other freeways, including I-15. Caltrans is also considering implementing managed lane strategies within the I-15 corridor in the future to address congestion and enhance mobility.

Thus, as there presently are no capacity improvements planned for the affected segments of Interstate 15 (Adams Avenue to Balboa Avenue/Tierrasanta Boulevard) and Interstate 8 (Morena Boulevard to College Avenue), the Final EIR includes CSU/SDSU's fair-share obligation relative to preparation of a Project Study Report-Project Development Support document that would identify and assess available alternatives to increase capacity, improve mobility, and relieve congestion on the impacted segments or adjacent interchanges. (See Final EIR Mitigation Measure MM-TRA-17.)

In furtherance of the proposed project's impacts and related mitigation as proposed in the Final EIR, CSU/SDSU and Caltrans have begun meeting, and related negotiations, to discuss the proposed project's mitigation relative to CSU/SDSU's fair-share. Please see Final EIR, Thematic Response PD-3, Mitigation Negotiations, for additional information in this regard.

CSU/SDSU also notes that it will work with the City of San Diego to provide the funding necessary to construct the Fenton Parkway Bridge extension. (See Response to Comment A4-6.) While construction of the bridge and the related re-distribution of project traffic would result in an overall increase in significant impacts, specific to Caltrans facilities, the bridge would result in improved operations at the I-15 Southbound Ramps/Friars Road intersection as compared to the "no bridge" scenario (Draft EIR pp. 4.15-218 to 4.15-219). As to freeway segments, as discussed at Draft EIR page 4.15-221, the Fenton Parkway Bridge would change the way some vehicles circulate around the project site and, correspondingly, which interchanges would be used to access origins and destinations. This redistribution of traffic would result in some traffic otherwise projected to travel on I-8 east of I-15 shifting to Montezuma Road. Similarly, some traffic projected to travel on I-15 south of Friars Road would shift to the Camino del Rio South interchange. As a result, on the I-8 freeway segments between I-15 and College Avenue, and on the I-15 auxiliary lanes at Friars Road, operations would improve with the Fenton Parkway Bridge in place (Draft EIR p. 4.15-221).

In addition, as previously discussed in Responses to Comments A3-3, A3-4, and A3-5, the proposed project would implement extensive TDM Programs and other project trip reduction features that reduce project vehicle trips and, subsequently, the number of vehicle trips on the state highways. (See, e.g., Draft EIR Section 4.15.1.2.) Additionally, as referenced in Response to Comment A3-5, CSU/SDSU will fund/construct \$5 million in community benefit improvements over and above the proposed project's mitigation requirements that will further facilitate vehicle trip reduction and reduce traffic congestion. These improvements include completion of a campus-to-campus bicycle connection, and adaptive traffic signal controls along the Friars Road corridor that will improve traffic flow on Friars and the related interchanges. (See Final EIR, subsection 4.15.10.5, Community Benefit Improvements.) Further, as a project with an array of complementary land uses located in a Transit Priority Area with a high-capacity transit station centrally located on site, the proposed project will minimize the number of trips and corresponding VMT within the region, including on the state highway system, as compared to other development projects located beyond the reach of a transit station.

Accordingly, the Draft EIR includes appropriate mitigation relative to the state highways, would provide public benefits that reduce traffic congestion on state highways, and includes project features that would reduce project impacts to Caltrans facilities to the extent feasible.

A3-8 The comment states that traffic signal optimization is performed on a continual basis and, therefore, not considered a mitigation measure.

As presented in the Draft EIR, and specific to the intersection of the SR-163 Southbound Ramps/Ulric Street and Friars Road, the subject of mitigation measure MM-TRA-1, the Draft EIR's traffic analysis assumed that traffic signal timing would be unchanged in the future and that implementation of optimization at any particular location cannot be assumed with any degree of certainty. Moreover, the timing of any optimization by Caltrans is uncertain. Because the analysis presented in the Draft EIR is based on current signal timing and did identify that signal optimization would mitigate the proposed project's identified significant impacts at certain intersection locations, based on the comment that Caltrans performs such optimization "on a continual basis," the necessary mitigation will be implemented without CSU/SDSU efforts. However, because CSU cannot guarantee that Caltrans will implement the necessary traffic signal timing optimization prior to the trigger point at which a significant impact would occur, for purposes of CEQA the impacts are considered significant and unavoidable.

A3-9 The comment states that the Draft EIR analysis should address the Friars Road/I-15 interchange "as is" because referenced planned improvements to be implemented by the Quarry Falls project have not yet been implemented.

The Draft EIR traffic analysis *did* analyze the Friars Road/I-15 interchange "as is," as the comment requests. The Draft EIR notes in Section 4.15.7.2.1 that the only Quarry Falls project improvements included in the Horizon Year analysis are those improvements at the intersection of Qualcomm Way and Friars Road. No other Quarry Falls-related improvements were assumed for the Horizon Year baseline (i.e., no project) analysis at any of the other study area intersections. The reference to Quarry Falls improvements in MM-TRA-5 is to show that other projects are contributing to necessary improvements at the Friars Road/I-15 interchange.

A3-10 The comment states that signal optimization at the I-15 Southbound Ramps/Friars Road intersection described in MM-TRA-5 is not considered mitigation.

Draft EIR mitigation measure MM-TRA-5 does not identify signal optimization as mitigation; and instead, assumes it would be implemented in conjunction with the physical improvements recommended as mitigation, noting such as "standard practice with intersection configuration."

A3-11 The comment states that signal optimization at the I-15 Northbound Ramps/Friars Road intersection described in MM-TRA-6 is not considered mitigation.

Draft EIR Mitigation Measure MM-TRA-6 does not identify signal optimization as mitigation; and instead, assumes it would be implemented in conjunction with the physical improvements recommended as mitigation, noting such as "standard practice with intersection configuration."

A3-12 The comment states that a possible mitigation measure at the Friars Road interchange, in addition to physical improvements, is the addition of adaptive signals along Friars Road between I-15 and SR-163.

While adaptive signals may be beneficial to the Friars Road corridor, they are not necessary to mitigate the proposed project's identified significant impacts. However, as noted in prior responses, CSU/SDSU will be funding/constructing \$5 million in community benefit improvements over and above the proposed project's mitigation requirements that will further facilitate vehicle trip reduction and reduce traffic congestion. These improvements include implementation of adaptive signal equipment, new detection cameras, and supporting communications technology along Friars Road at the following six intersections:

River Run Drive/Friars Road; Fenton Parkway/Friars Road; Northside Drive/Friars Road; Santo Road/Friars Road; Riverdale Street/Friars Road; and Mission Gorge Road/Friars Road. (See Final EIR, subsection 4.15.10.5, Community Benefit Improvements.)

A3-13 The comment regards mitigation at the Friars Road/I-15 interchange and requests widening of the bridge in order to add wide sidewalks and bike lanes.

The identified improvements at the Friars Road/I-15 interchange in mitigation measures MM-TRA-5 and MM-TRA-6 include widening the structure to accommodate sidewalks and buffered bike lanes (Draft EIR pp. 4.15-155 through 157).

A3-14 The comment regards the northbound and southbound Friars Road/I-15 interchange ramps, queuing, and the effect of the on-ramp meters.

CSU agrees that ramp metering helps to maintain mainline flow. However, the referenced on-ramp meter does result in queues and congestion on the adjacent arterial roadway, and no feasible mitigation is available to reduce queuing such that the queuing does not affect operations at the signalized intersection.

A3-15 The comment regards the southbound SR-163 ramps/Friars Road intersection and signal optimization to improve operations. Please see Response to Comment A3-8, above, for information responsive to this comment.

A3-16 The comment states the Draft EIR incorrectly determined that impacts would be less than significant at the westbound I-8 exit ramp at Fairmount Avenue/Alvarado Canyon Road/Camino del Rio North intersection.

The comment is incorrect in that the Draft EIR does identify a significant impact at the intersection of Fairmount Avenue/Alvarado Canyon Road/Camino del Rio North (see Draft EIR p. 4.15-103). Mitigation is identified and evaluated in the Draft EIR, page 4.15-158, MM-TRA-12. No further analysis is required.

A3-17 The comment states that a Traffic Management Plan should be developed for event traffic.

The proposed project includes such a plan. Draft EIR Section 4.15.1.3 describes the Transportation and Parking Management Plan (TPMP; PDF-TRA-4) to be developed as part of the proposed project to address event traffic handling. The strategies under the TPMP will help to expedite traffic flow, minimize delays, reduce queuing, enhance safety, and encourage attendees to use other travel modes, including transit, walking, and biking. However, the Draft EIR acknowledges that traffic impacts at selected locations will remain significant and unavoidable even with implementation of a TPMP due to concentrated traffic volumes before and after events, which is consistent with the operation of the existing stadium, as well as other large sports and entertainment venues.

A3-18 The comment requests to review the data used to calculate the TDM VMT reductions shown in the Draft EIR.

The calculations in support of the TDM trip reductions presented in Draft EIR Table 4.15-1 (Transportation Impact Analysis [TIA] Table 1) are included in Appendix I to the TIA. The TIA is included as Appendix 4.15-1 to the Draft EIR.

A3-19 The comment questions why there are no plans to add a bus/transit stop within the site of the proposed project to accommodate MTS Rapid Bus Route 235.

The project site is located on the Green Line trolley, which provides high quality transit service to downtown, which is where Rapid Bus Route 235 terminates. Current timetables show that the trolley is roughly 5 minutes faster to the Route 235 terminus than the Rapid Bus. Existing Route 235 stops generally are located where high-quality service does not exist, or where the bus can quickly exit and enter the freeway. The project's on-site transit center is designed to provide layover/loading space for at least four buses. Thus, the project will accommodate a stop for Route 235 or any other services should MTS determine to add a stop or service to the site.

A3-20 The comment recommends that the proposed project consider a reduction in parking supply in compliance with a recent City of San Diego ordinance.

The residential buildings to be built as part of the proposed project are being built with development partners that require a certain parking supply to be competitive with the area's housing market and to secure financing for the development. The proposed parking ratio is a maximum value that will not be exceeded, but is lower than other similar developments in Mission Valley in order to encourage transit use and reduce traffic near the project site and in the surrounding communities. SDSU will support development partners who wish to provide less parking.

A3-21 The comment requests the data in support of the TDM trip reductions shown in Draft EIR Table 4.15-1. Please see Response to Comment A3-18, above, for information responsive to this comment.

A3-22 The comment requests Synchro files related to the traffic analysis presented in the Draft EIR. The requested files were provided to Caltrans by the proposed project's transportation engineer, Fehr & Peers, on August 13, 2019.

A3-23 The comment states "EB Friars Rd from Ulric Street to SR-163 NB exit ramp to Friars Road missing 2 lanes."

Based on the Draft EIR, under Existing (2018) Conditions, the Friars Road eastbound approach to the SR-163 Northbound ramps was modeled as three through lanes and one left-turn lane per the configuration observed at the time that counts were obtained (before the current Phase 1 interchange improvement construction began). Under Horizon Year Conditions, the same approach was modeled as four through lanes and two left-turn lanes based on the Phase 1 interchange improvement plans obtained from the Caltrans website.

A3-24 The comment states "EB Friars Rd at the I-15 Interchange is incorrect, three through lanes going towards the bridge with only two lanes."

The Draft EIR traffic engineer, Fehr & Peers, modeled three eastbound Friars Road through lanes approaching and crossing the bridge based on the configuration observed at the time that counts were obtained, and the same configuration remains at this time.

A3-25 The comment states "Traffic volumes for the SB Fairmount Ave to WB I-8 and the NB Fairmount Ave to WB I-8 entrance ramps." The Draft (and Final) EIR show these as Figures 6, 9, 10, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, and 24 of Appendix 4.15-1, TIA. These are free movements so they do not contribute

to intersection delay and, accordingly, do not affect the results of the analysis presented in the Draft EIR.

A3-26 The comment states “Traffic volumes for the NB Fairmount Ave to EB I-8 entrance ramps.” The Draft (and Final) EIR show these as Figures 6, 9, 10, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, and 24 of Appendix 4.15-1, TIA. Based on the SANDAG model distribution, no project traffic will utilize this travel route and, accordingly, the volumes do not affect the results of the analysis presented in the Draft EIR.

A3-27/28 The comment regards the analysis of the proposed project’s VMT presented in the Draft EIR and questions the service population metric methodology utilized by the traffic engineers, Fehr & Peers, and the service population metric, to conduct the analysis. Preliminarily, CSU/SDSU notes that the subject analysis was presented for information purposes only as lead agencies are not required to conduct a VMT analysis, which is to replace the current LOS methodology, on July 1, 2020 (CEQA Guidelines Section 15064.3).

As the lead agency, CSU has the discretion under CEQA to establish the methodology for evaluating the proposed project’s transportation VMT impacts. Specific to this point, recently approved CEQA Guidelines section 15064.3, subsection (b)(4), provides:

Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project’s vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section. [*Emphasis added.*]

The CSU Transportation Study Guidelines identify VMT/Service Population as the metric for determining transportation VMT impacts for CSU projects. As further explained below, the VMT per-service population metric is particularly appropriate when addressing a development project such as this with a unique mix of uses (college campus with many different types of uses – e.g., housing, research facilities, offices, retail, hotel, stadium) in order to provide a complete analysis that includes the interaction between all of these uses.

The Office of Planning and Research (OPR) Technical Advisory referenced in the comment provides advice largely related to impact screening with limited recommendations for how to prepare a complete analysis for projects that are not found to meet a presumption of having a less-than-significant VMT impact. As such, lead agencies need to develop their own methodology for a complete analysis. The Technical Advisory provides some guidance related to a complete analysis, such as using the same methodology used to set thresholds for the project analysis (pages 4-5), not truncating trip lengths based on model or political boundaries (page 6), and accounting for the project’s effect on VMT (page 6). Additionally, the Technical Advisory includes support of the use of an “efficiency” metric (page 10). The CSU Guidelines and, accordingly, the analysis presented in the Draft EIR address all these requirements while also considering the unique land use and travel circumstances associated with university campuses in California.

As previously noted, the proposed project is a unique mix of uses (college campus with many different types of uses—e.g., housing, research facilities, offices, retail, hotel, stadium); and therefore, to provide a complete analysis that includes the interaction between all of these uses, VMT/service population is used. The VMT/service population metric is established by dividing the total VMT generated by a project by the population and employees traced to the geographic area being used as the comparison. The total VMT includes all internal VMT: internal to external, and external to internal VMT (in other words, all VMT regardless of geographic boundaries). Service population is intended to include the independent population variables that generate vehicle trips to/from the campus. This is not an arbitrary decision; it simply reflects the generators of the vehicle trips that are used in estimating total VMT in the numerator. The OPR Technical Advisory states that “[l]ead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT for a trip that crosses a jurisdiction boundary” (page 6). Evaluating VMT/service population using the SANDAG model ensures that all VMT regardless of geographic boundary is accounted for.

Specific to use of a per-service population basis rather than an absolute VMT, as stated above, CSU, as the lead agency, has the discretion to establish the methodology for evaluating a project’s transportation VMT impacts. The OPR Technical Advisory does support the use of an “efficiency” metric (page 10). The situations in which the Technical Advisory suggests analyzing absolute total VMT is for a land use that will redistribute trips rather than create new trips (such as most retail uses) or for a redevelopment project where the focus would be the net change in total VMT from that site. Neither of these situations is applicable to the proposed SDSU project. VMT/service population is a form of an efficiency metric. The denominator includes population plus employees of the site and is not arbitrary.

A3-29

The comment states that the proposed 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.” The comment suggests that this be rectified in a recirculated Draft EIR or in the Final EIR.

The Draft EIR states that if a project involves development that is greater than anticipated in the San Diego Association of Governments’ (SANDAG’s) growth projections, the proposed project would be in conflict with the RAQS and SIP, and could potentially result in a significant air quality impact. The Draft EIR recognizes the proposed project—in combination with other projects considered in the cumulative setting—would exceed the growth anticipated in the Mission Valley area by SANDAG projections. Therefore, the proposed project could result in a significant and unavoidable impact associated with implementation of the San Diego Air Pollution Control District’s (SDAPCD’s) regional air quality plans (Draft EIR Section 4.2, Air Quality, pp. 4.2-18 and 4.2-19).

In addition, since SDSU released the Draft EIR for public review, the City certified its Final Program EIR (SCH No. 2017014066), incorporated herein by reference, and as explained below, the City’s certified EIR took into account the proposed project’s mix of land uses as part of the approved Mission Valley Community Plan, also incorporated herein by reference.

Further, the Draft EIR notes the City’s Final Program EIR (SCH No. 2017014066) for the Mission Valley Community Plan Update includes a mitigation measure, MM-AQ-1, which requires the City to provide a revised land use map for the Community Plan Update area to SANDAG “to ensure that any revisions to the population and employment projections used by the SDAPCD in updating the RAQS and the SIP will

accurately reflect anticipated growth due to the proposed CPU” (City of San Diego 2019b). The Draft EIR recognizes that this mitigation measure is not within the discretion of CSU, but notes that “should the City implement MM-AQ-1, impacts as a result of the proposed project would be reduced to less than significant because the type and mix of land uses identified for the proposed project that is the subject of this technical report are within the development parameters of the City’s Final Program EIR.” The Draft EIR also includes mitigation measure MM-AQ-2, which requires CSU/SDSU to provide SANDAG with population and employment projections for the project site; use of the approved site-specific population and employment projections would allow regional planning data to more accurately reflect anticipated growth in the Mission Valley area. However, even with implementation of mitigation measure MM-AQ-2, because CSU/SDSU cannot require SANDAG to update its growth projections and does not have jurisdictional control over the regional air quality plans prepared by SDAPCD, this impact is considered significant and unavoidable.

- A3-30** The comment states the Draft EIR “has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed development.” The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-31** The comment recommends 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 contaminat[ion] from lead-based paint, asbestos, contaminated groundwater and any other constituents of concern identified in the DEIR.” CSU/SDSU refer the commenter to Section 4.8, Hazards and Hazardous materials, as well as Appendices 4.8-1 through 4.8-5. As described therein, the project site has been thoroughly reviewed and analyzed for potential contamination, and Mitigation Measures are provided to reduce potentially significant impacts to less than significant. These mitigation measures include measures to address potential hazards associated with deconstructing the existing Stadium, including asbestos and lead-based paint. Please refer to mitigation measures MM-HAZ-1 (Pre-Demolition Hazardous Materials Abatement), MM-HAZ-3 (Hazardous Materials Contingency Plan), and MM-HAZ-7 (Vapor Mitigation).
- A3-32** The comment states that Caltrans shall be notified if any hazardous waste concerns that may impact Caltrans right-of-way are known during project activities. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-33** The comment states that the proposed 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 1-8 and 1-15.” The comment provides opinions not related to physical effects to the environment. Nonetheless, the comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-34** The comment is introductory in nature and serves as a preface to the specific bulleted comments regarding visual impacts to freeways provided by Caltrans. Please refer to Responses to Comments A3-35 through A3-48, below.
- A3-35** The comment requests that the EIR 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 Draft EIR does not contend that the project components would be “protected” by Senate Bill 743 and Public Resources Code Section 21099. Rather, Senate Bill 743 and Public Resources Code Section 21099 are discussed in the Draft EIR, Section 4.1, Aesthetics, Section 4.1.2, Relevant Plans, Policies,

and Ordinances. As stated in the Draft EIR, these regulations provide that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment. As stated in the Draft EIR (see Section 4.1, Aesthetics), the project site is located within 0.5 miles of two Metropolitan Transit System (MTS) light rail transit stations and as such, the project site is within a Transit Priority Area. Also, the project is located on an infill site because it is currently developed and is located in an urban area. In accordance with Public Resources Code Section 21099, the potential aesthetic impacts of the proposed project (including signage) shall not be considered significant impacts on the environment. Please also refer to Thematic Response PD-1 – Project Refinements for information about updates to the proposed project site plan and aesthetics analysis.

- A3-36** The comment states that the project includes three very large, double-sided illuminated pylon signs adjacent to Friars Road and the I-15 freeway, and asks that the EIR justify why this large-scale, illuminated signage should be protected from a significant impact finding. Please refer to Draft EIR Section 4.1, Aesthetics, pages 4.1-39 through 4.1-42, as well as Draft EIR Appendix 4.1-1, Lighting Study, for analysis of project sign lighting and glare from project sign lighting. As stated therein, the project sign light trespass does not exceed the applicable threshold, except for one location (north of the project property line, at the center of Friars Road), which is not a sensitive use; therefore, exceedance at this location is not a significant impact. The Draft EIR also finds that the project sign lighting would not introduce a new source of high contrast or glare at monitoring sites. Further, the project sign illuminance would not exceed applicable thresholds established by the California Vehicle Code; therefore, project sign lighting would not introduce a source of glare to local area motorists during operation. Please also refer to Response to Comment A3-35, above.
- A3-37** The comment states that the I-15 freeway users are a sensitive viewer group, due to the volume of users and the close proximity of the proposed project, and states that the impact of the proposed project sign pylon at the east perimeter has not been adequately addressed; the comment refers to Sign 3 in Draft EIR Appendix 4.1-1, Lighting Study, Appendix B (Sign Lighting Concept Plan). The referenced project signage identified in Appendix B of the Lighting Study (“Sign 3”) was included in the lighting and glare analysis provided in Appendix B. Please refer to Section 8.2(a), Lighting Trespass Illuminance Analysis – Sign Lighting, and Section 8.2(c) – Glare Analysis Project Signs. The analysis is summarized in the Draft EIR Lighting and Glare analysis (see EIR Section 4.1.4, Impact Analysis). Specifically, the Draft EIR discloses that at the center of the I-15 Freeway right-of-way (i.e., VP-E2; see Table 4.1-8, Project Sign Light Trespass Illuminance (fc)), the average vertical footcandles from project sign lighting would be 0.29 footcandles. New project signage along the eastern project boundary would be visible to mobile receptors on I-15. However, lighting trespass onto I-15 would be well below the analysis threshold of 1.4 footcandles; and as such, impacts from project sign lighting were determined to be less than significant. In addition, the Lighting Study and Draft EIR determined that project sign lighting would not create a new source of glare and not introduce a new source of distracting glare to local area drivers. Please refer to Draft EIR, pages 4.1-41 and 4.1-42.
- A3-38** The comment requests that the EIR discuss the visual impacts of Sign #3 for freeway viewers. Please refer to Response to Comment A3-37, above.
- A3-39** The comment requests that the EIR describe Sign #3. As described in Appendix B of the Lighting Plan (Appendix 4.1-1), the installation of three identical signs at the perimeter of the site at the north and east project boundaries was assumed for purposes of the lighting analysis. All signs would be double-

sided and the assumed project sign surface area would be approximately 40 feet wide by 50 feet high. While the specific sign to be installed has yet to be designed, the sign may have moveable elements and would be designed with a maximum night time sign lighting luminance of 600 candelas per square meter (cd/m²). Advertisements and on-site events would be displayed on project signs.

- A3-40** The comment requests that a Visual Sim be provided to show the double-sided sign pylon with the 40-foot-wide x 50-foot-high sign panel on the 70-foot pole for freeway viewers. An additional visual simulation that would show the double-sided sign pylon as viewed from the freeway has not been prepared. While potentially visible, proposed signage would be secondary elements from I-15 and I-8 compared to the remainder of the development. As with other elements of the proposed project, proposed signage that may be installed at the eastern project boundary would alter the existing character of the site that is currently developed with a Stadium and surface parking lots.
- A3-41** The comment asks if the proposed outdoor advertising signage would be covered by Public Resources Code Section 21099, and if the sign could be considered a significant impact on the environment. As proposed, signage is a component of the project, and pursuant to Public Resources Code Section 21099, the aesthetic impacts of the project (including signage) shall not be considered significant impacts on the environment. In any event, based on the Lighting Study and aesthetics impacts analysis, the Draft EIR concluded that lighting trespass from outdoor signage would not exceed the applicable thresholds, and as such, impacts from project sign lighting were determined to be less than significant. In addition, the Lighting Study and Draft EIR concluded that project sign lighting would not create a new source of glare and would not introduce a new source of distracting glare to local area drivers. Please refer to Responses to Comments A3-35 through A3-37, above, for additional responsive information.
- A3-42** The comment states 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, and references Caltrans Traffic Operations resources for statutes and regulations regarding outdoor advertising. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-43** The comment requests that the pylon sign(s) be added to all affected Visual Sims. As proposed, the project signage that may be installed at the eastern project boundary may be visible from Viewpoints 2, 5, 8, and 9. While potentially visible, proposed signage would be secondary elements in the particular views offered at these viewpoints. As with other elements of the proposed project, proposed signage that may be installed at the eastern project boundary would alter the existing character of the site that is currently developed with a Stadium and surface parking lots. In regards to potential impacts of project signage, please refer to Responses to Comments A3-35 through A3-42, above.
- A3-44** The comment states that Viewpoint #9 appears to be above eye level and is located over the river. The comment states that 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. Viewpoint #9 is indeed located at the eye level of motorists on northbound I-805 over the San Diego River span. On-ramps from eastbound and westbound I-8 are visible in the foreground of the Viewpoint #9 photograph and are approximately 10 to 15 feet lower in elevation than the surface of northbound I-805. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- A3-45** The comment requests that the Viewpoint #9 location be adjusted to be north of the river and to be at eye level. No changes have been made to the location of Viewpoint #9. Please refer to Response to Comment A3-44, above.
- A3-46** The comment requests that Visual Sim #8 be adjusted to correspond to the Viewpoint location, and that the potential visual impacts to the freeway viewer be re-assessed. As shown in Draft EIR Figure 4.1-15, Visual Sim #8 corresponds to the viewpoint location. Viewpoint #8 depicts the northeastward view to the project site from Mission City Parkway; it is not located on the freeway, and thus, is not representative of views available to freeway motorists.
- A3-47** The comment requests that description of Viewpoint #4 in Draft EIR Table 4.1-1, Viewpoints and General Visibility, be revised from “I-5 On-Ramp” to “Friars Road SB On-Ramp to I-8.” The recommended revision to the title of Viewpoint #4 is made in the Final EIR; however, it is noted that the view is from I-15, not I-8.
- A3-48** The comment requests that the Existing Conditions title for “Visual Sim #3” be changed from “I-5 On-Ramp” to “Friars Road SB On-Ramp to I-8.” To the extent the comment relates to Draft EIR Figure 4.1-11, Viewpoint 4, the recommended revision is made in the Final EIR. Please refer to Response to Comment A3-47.
- A3-49** The comment requests that project-related changes to the floodplain be evaluated with respect to I-15 and I-8. The comment also states that the comparison between existing and proposed conditions is not appropriate and that more detailed studies should be completed to determine impacts to Caltrans’ properties, including during interim phases of the project.

As indicated on page 4.9-29 of the Draft EIR, the proposed project would result in a substantial increase in turf/landscape areas, with a decrease in impervious surfaces from approximately 90% to 57% of the project site. Pervious surfaces allow infiltration of stormwater runoff into on-site soils, thus reducing runoff volumes and discharge rates. As a result, the total post-project peak flow would be substantially lower than the total pre-project peak flow, resulting in a net decrease in peak flow rates and volume of runoff (Appendix 4.9-2). Because the proposed project would reduce the peak flow rate from the area and volume of runoff, the proposed project would result in beneficial impacts with respect to stormwater runoff and associated flooding.

In addition, as indicated on page 4.9-30 of the Draft EIR, proposed project development would avoid encroachment into the floodway that would increase water surface elevations, and would also meet the San Diego Municipal Code floodplain and floodway regulations. Since the San Diego River floodplain and floodway are defined based on detailed engineering methods, project development would adhere to applicable floodplain and floodway regulations associated with the San Diego River. Additional hydraulic analyses are not required at the design development stage to assist in understanding development constraints guided by the regulations (Appendix 4.9-5). A triangular portion of the San Diego River floodway currently encroaches into the existing Stadium parking lot (Figure 4.9-3, Existing Flood Zones). Development in the triangular area would not be allowed to increase the 100-year water surface elevation. Therefore, the proposed project would not cause changes to the floodplain such that I-8 and I-15 would be adversely impacted.

- A3-50** The comment 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. Preliminary flood analyses have been provided to the public, including Caltrans, in Appendices 4.9-2, 4.9-3, and 4.9-5. As indicated on page 4.9-30 of the Draft EIR, proposed project development would avoid encroachment into the floodway that would increase water surface elevations and would also meet the San Diego Municipal Code floodplain and floodway regulations. In addition, project development would adhere to applicable floodplain and floodway regulations associated with the San Diego River, which would include notifications of potentially affected property owners. Additional hydraulic analyses are not required at the design development stage to assist in understanding development constraints guided by the regulations (Appendix 4.9-5). Please refer to Response to Comment A3-53, below, for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-51** The comment states that post-project drainage conditions for Caltrans' drainage facilities must remain unchanged from existing conditions. As indicated on page 4.9-29 of the Draft EIR, the proposed project would result in a substantial increase in turf/landscape areas, with a decrease in impervious surfaces from approximately 90% to 57% of the project site. Pervious surfaces allow infiltration of stormwater runoff into on-site soils, thus reducing runoff volumes and discharge rates. As a result, the total post-project peak flow would be substantially lower than the total pre-project peak flow, resulting in a net decrease in peak flow rates and volume of runoff (Appendix 4.9-2). Because the proposed project would reduce the peak flow rate from the area and volume of runoff, the proposed project would result in beneficial impacts with respect to stormwater runoff and associated flooding.
- A3-52** The comment requests that the EIR clarify whether there would be any improvements or alterations to Murphy Canyon Creek. As indicated on page 4.9-28 of the Draft EIR, construction would not necessitate or result in any alterations to Murphy Canyon Creek. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional responsive information.
- A3-53** The comment states that Caltrans must be notified in writing of floodplain impacts during the Conditional Letter of Map Revision/Letter of Map Revision (CLOMR/LOMR) process and that State property does not appear on county property tax rolls. CSU/SDSU will provide floodway public notice to all affected property owners, including to Caltrans, as required by the CLOMR/LOMR public notice requirement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A3-54** The comment states that there should be no floodplain impacts to the trolley under I-15 as a result of the project. See Response to Comment A3-49, above, for responsive information.
- A3-55** The comment requests additional information regarding transit connectivity. The Draft EIR includes a discussion of the proposed Purple Line segment in Section 2, and Figure 2-11E illustrates the planned and proposed alignments of this potential future transit line. While the 2017 Conceptual Planning Study referenced in the Draft EIR is the latest publicly available document on this transit project, SANDAG currently is re-evaluating the specific type of transit service and alignment as part of the new Regional Plan currently in development. As such, no other design details presently are available for the Purple Line. As to buses, no new bus service to the project site currently is planned by MTS; however, the project site will include a bus transit center with loading/layover bays immediately adjacent to the Stadium trolley

station to accommodate future MTS service. For additional information responsive to this comment, please see the Responses to Comments A6-5 through A6-7 (SANDAG).

- A3-56** The comment requests substantiation of the anticipated number of transit and trolley trips related to the proposed project's trip generation. The estimate of transit trip reductions at the site is based on the Fehr & Peers MainStreet web application that incorporates the MXD model and was calculated based on the existing level of trolley service to the project site. The MXD model has been validated at 27 sites across the country, including 15 in California, and the model provides more accurate estimates than any of the standard available methods. The calculations used to estimate the specific number of additional transit riders and available trolley capacity is presented in Draft EIR Section 4.15.7.6.3. Any future bus service directly serving the project site would provide additional opportunities/capacity for the campus population to use transit to access the site.
- A3-57** The comment requests information to ensure that transit connectivity and adjacency is within the campus design and is consistent with local and regional goals. As discussed in Responses to Comments A3-4 and A3-5, above, the proposed project includes a TDM Program that includes various strategies to encourage transit ridership and the related provision of transit services. Please also see Responses to Comments A6-5 through A6-7 (SANDAG) regarding the proposed project's accommodation of the potential future Purple Line trolley, and Response 56, above, for additional information responsive to this comment.
- A3-58** The comment states that the proposed project has a unique opportunity to highlight the state's goals for transit-oriented development but does not raise any issue relating to those goals. The proposed project furthers such goals in that it proposes to develop a mix of campus uses, including retail, office, and housing in the immediate vicinity of the Green Line Trolley Stadium station, a major transit station within Mission Valley. The comment expresses an opinion and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. As the comment does not raise an issue relative to the adequacy of the analysis presented in the Draft EIR, no further response is required.
- A3-59** The comment states that Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility, and encourages CSU/SDSU coordination with Caltrans. CSU/SDSU recognizes that coordination with Caltrans, in locations that may affect both Caltrans and SDSU, is encouraged. In that regard, CSU/SDSU met with Caltrans representatives prior to release of the Draft EIR to provide Caltrans with an overview of the proposed project and related transportation features. Also, as noted in Response to Comment A3-7, CSU/SDSU and Caltrans have begun meeting to discuss the EIR mitigation and negotiations as to CSU/SDSU's fair-share. Please see Final EIR, Thematic Response PD-3, Mitigation Negotiations, for additional information.
- A3-60** The comment states Caltrans recognizes there is a strong link between transportation and land use and that the pattern of land use can affect both local VMT and the number of trips. The comment further states that SDSU should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges, as well as coordinate with Caltrans as campus development proceeds.
- The proposed project land uses, in combination with proximity to transit and jobs, is consistent with the suggested land use patterns. Please see Responses to Comments A3-4 and A3-5, above, for additional information regarding the project's land uses and TDM program to reduce vehicle trips and related

VMT. Additionally, CSU/SDSU recognizes that SDSU should continue to coordinate with Caltrans regarding necessary improvements, and to ensure that all modes of transportation are accounted for as part of the proposed project mitigation. To that end, please see Response to Comment A3-7, above, and Final EIR Thematic Response PD-3 – Mitigation Negotiations.

A3-61 The comment requests CSU provide “fair share” funds for direct and cumulative impacts towards future improvements associated with state highways. Please see Response to Comment A3-7 for information responsive to this comment.

A3-62 The comment states that in light of the identified significant impacts, feasible mitigation to state facilities should be identified in the Draft EIR, and lists several examples. Please see Response to Comment A3-7 for information responsive to this comment.

Additionally, CSU/SDSU recognizes that CEQA requires consideration of feasible mitigation measures in the Draft EIR and related TIA and that in the case of impacts identified as significant and unavoidable, the EIR is to consider alternative feasible mitigation.

As to paying a fair-share towards implementation of adaptive signal controls along Friars Road from I-15 to SR-163, as noted in Response to Comment A3-12, CSU/SDSU will be funding/constructing \$5 million in community benefit improvements that include implementation of adaptive signal equipment, new detection cameras, and supporting communications technology along Friars Road at the following six intersections: River Run Drive/Friars Road; Fenton Parkway/Friars Road; Northside Drive/Friars Road; Santo Road/Friars Road; Riverdale Street/Friars Road; and Mission Gorge Road/Friars Road. (See Final EIR, subsection 4.15.10.5, Community Benefit Improvements.)

A3-63 The comment identifies the payment of a fair-share towards Phase 2 of the City of San Diego SR-163/Friars Road interchange project as feasible mitigation.

Preliminarily, the EIR traffic impact analysis did not identify significant impacts at the SR-163/Friars Road interchange project and, therefore, mitigation at this particular location is not required to mitigate a specific impact. Additionally, as explained in Response to Comment A3-7, the EIR identifies feasible intersection improvements that if implemented would mitigate the proposed project’s impacts. Moreover, as further explained in Responses to Comments A3-4 and A3-5, above, the proposed project includes project design features that will reduce project traffic impacts on state highways and local roads; and such features will be part of the proposed project’s commitments should the Board of Trustees approve the proposed project.

It also is noted that Caltrans has no adopted fee-based infrastructure mitigation program for purposes of obtaining a fair-share contribution from all new development in an area or region that may affect state highways. While fee-based infrastructure mitigation programs have been found to be adequate mitigation under CEQA (*Save our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 140), there is no such Caltrans program. Further, commitments to pay fees on an *ad hoc* basis without evidence that the mitigation will actually be implemented is inadequate (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692). The reason is that *ad hoc* fee payments do not ensure that the mitigation will actually occur and be applied equitably to all development in an area or region. Even adopted fee-based infrastructure mitigation programs need to be sufficient to provide actual on-the-ground mitigation. (See *Napa Citizens for Honest Government v.*

Board of Supervisors (2001) 91 Cal.App.4th 342, 363-365.) Also, importantly, mitigation measures must be roughly proportional to the impacts of a project (CEQA Guidelines Section 15126.4(a)(4)(B)), and fee payments without evidence of actual mitigation and equitable implementation across-the-board to an area or region is not proportional or reasonable.

A3-64 The comment identifies the payment of a fair-share towards bike/pedestrian improvements to Fairmount Avenue near I-8/Fairmount Avenue to Camino de la Reina between the SDSU Main campus and the proposed Mission Valley campus as feasible mitigation. Please see Response to Comment A3-4 for information responsive to this comment.

A3-65 The comment identifies the payment of a fair-share towards improvements at the I-15/Friars Road northbound and southbound on-ramps and off-ramps as feasible mitigation. Draft EIR mitigation measures MM-TRA-5 and MM-TRA-6 would provide for these improvements (Draft EIR, pp. 4.15-155 to 4.15-156). Please see Response to Comment A3-7 for information regarding FEIR mitigation measures MM-TRA-5 and MM-TRA-6 that is responsive to this comment. For further responsive information, please see Response to Comment A3-63, above.

A3-66 The comment identifies the payment of a fair share towards widening the I-15/Friars Road Bridge for bike and pedestrian safety as feasible mitigation. Draft EIR mitigation measures MM-TRA-5 and MM-TRA-6 would provide for these improvements (Draft EIR, pp. 4.15-155 to 4.15-156). Please see Response to Comment A3-7 for information regarding FEIR mitigation measures MM-TRA-5 and MM-TRA-6 that is responsive to this comment. For further responsive information, please see Response to Comment A3-63, above.

A3-67 The comment states Caltrans supports providing stadium event ticket holders with transit passes to park at the SDSU main campus and take the Green Line Trolley to the proposed stadium.

The proposed Stadium TDM Program, which is in addition to the TDM Program discussed above in Responses to Comments A3-3, A3-4, and A3-5 and is specifically focused on stadium event traffic (see Draft EIR section 4.15.1.1.2, Stadium TDM Program PDF-TRA-2), would encourage off-site parking at the main campus through a marketing program, reduced rates (relative to stadium parking) for event attendees and employees, and possibly discounted/reduced fare or free MTS fare with proof of event ticket/parking payment or employee badge. (Draft EIR, p. 4.15-11.)

In addition to discounted or free use of MTS transit services for attendees on the event date with proof of purchase of an event ticket, the TDM Program encourages the use of trolley or bus/shuttle transit to and from stadium events via giveaways for transit users, gaming opportunities for event attendees to compete for prizes based on their transportation choice, vanpool subsidies and coordination of vanpool programs, and marketing and outreach campaign for transit (Draft EIR, p. 4.15-10).

The Stadium TDM Program also includes additional strategies to encourage carpools and zero-emission vehicles and active transportation (bicycling and walking) (Draft EIR, pp. 4.15-10 to 4.15-11). CSU acknowledges Caltrans support for the SDSU main campus parking strategy that is part of the Stadium TDM Program.

A3-68 The comment states that mitigation identified in the Draft EIR should be coordinated with Caltrans. CSU/SDSU acknowledges the comment and will coordinate with Caltrans as necessary. To that end, as

previously noted, SDSU has met, and is continuing to meet, with Caltrans to discuss various topics related to the proposed project, including the EIR mitigation. See Final EIR Thematic Response PD-3 – Mitigation Negotiations for additional information.

- A3-69** The comment states that mitigation for proposed intersection modifications is subject to the Caltrans Intersection Control Evaluation policy. CSU/SDSU acknowledges the policy and will refer to the policy as necessary.
- A3-70** The comment states that mitigation conditioned as part of a local agency's approval for improvements to state facilities can be implemented through agreement with Caltrans. CSU/SDSU acknowledges the comment; however, CSU/SDSU notes that the proposed project is subject to approval by CSU, a state agency, rather than a local agency as referenced in the comment. Nonetheless, as previously noted, CSU/SDSU is presently meeting with Caltrans to discuss the proposed project's mitigation. See Final EIR Thematic Response PD-3 – Mitigation Negotiations for additional information.
- A3-71** The comment states that any work performed within Caltrans right-of-way will require discretionary review and approval by Caltrans, and an encroachment permit prior to construction. CSU/SDSU acknowledges the comment and will coordinate with Caltrans as necessary.
- A3-72** The comment provides Caltrans contact information. CSU/SDSU acknowledges the contact information and will contact Ms. Dodson as necessary.

Response to Comment Letter A4

City of San Diego
Mr. Mike Hansen, Director, Planning Department
October 3, 2019

A4-1 The comment states the City of San Diego (City) is appreciative of the opportunity to work with SDSU on the Purchase and Sale Agreement (PSA) and that the City owns the project site and is working with CSU/SDSU on the terms of the PSA. The comment adds that the City has reviewed the Draft EIR as it relates to the City Council's discretionary action for the PSA and has the following comments about the analysis contained the Draft EIR and the Draft EIR's consistency with adopted City plans, policies, environmental documentation, and San Diego Municipal Code (SDMC) Section 22.0908. SDSU reciprocates the appreciation for the opportunity to work with City and will take the City's comments into consideration in preparing the Final EIR. The comment is an introduction to comments that follow. Please refer to Responses to Comments A4-2 through A4-250, below.

A4-2 The comment restates findings from the Draft EIR that certain off-site traffic improvements were determined to be infeasible. The comment notes language from SDMC Section 22.0908 regarding fair share contributions for off-site impacts. The comment requests additional detail regarding the underlying traffic analysis and further coordination to confirm whether these improvements are infeasible. The comment serves as an introduction to more specific comments which follow.

Draft EIR Section 4.15, Transportation, addresses mitigation in subsection 4.15.9, Mitigation Measures. The comment is correct that the Draft EIR identifies the mitigation measures for off-site traffic impacts to City facilities as "infeasible." However, the primary reason the mitigation is identified as "infeasible" is because the lead agency in this case, California State University (CSU), does not have jurisdiction over City streets to implement the recommended improvements. That is, CSU lacks the power to construct infrastructure improvements away from campus on land it does not own or control. As such, even with payment of the funds necessary to implement the necessary improvements, or a CSU/SDSU commitment to construct the improvements, CSU cannot guarantee implementation; for that reason, the mitigation is identified as infeasible. Thus, the mitigation measures include the following statement: "CSU does not have jurisdiction over this City of San Diego facility and, therefore, cannot guarantee implementation of this improvement. Accordingly, the mitigation is considered infeasible" (Draft EIR, pp. 4.15-154 through 4.15-158).

Importantly, however, the Draft EIR provided that if the City approves the recommended mitigation and either grants CSU the necessary authorization to construct the improvements or agrees to implement the improvements following CSU payment of its fair-share funds, the mitigation would then be deemed feasible and, with implementation, the identified impacts, with limited exception, would be reduced to less than significant. This point is made in Draft EIR Section 4.15.10.3, Level of Significance After Mitigation. Specifically, for those mitigation measures within the City's jurisdiction and control that are identified as "infeasible," the Draft EIR includes the following statement: "However, if the City grants authorization, CSU will implement the recommended improvement, thereby reducing the Project's impact to less than significant" (Draft EIR, pp. 4.15-163 and 164). CSU/SDSU will continue to coordinate with the City with respect to the significant traffic impacts identified in the Draft EIR. Further, as suggested by the City, CSU/SDSU and the City have worked through this issue, and have arrived at a resolution, which will be reflected in both the Final EIR and the PSA for the San Diego County Credit

Union (SDCCU) Stadium site in Mission Valley. This resolution ensures the feasibility of off-site traffic improvement mitigation beyond the provisions already included (and cited above) in the Draft EIR.

There are two exceptions to this general EIR framework for traffic impacts. First, as to Northside Drive/Friars Road, MM-TRA-4, one component of the recommended improvement requires optimization of the traffic signal, and the other component requires the addition of a second northbound right-turn lane, though the City prefers that the additional lane not be implemented because it is inconsistent with the City's future circulation plans due, in part, to the future construction of the Fenton Parkway Bridge. Accordingly, addition of a second right-turn lane is considered infeasible (Final EIR p. 4.15-155). Second, the mitigation for significant impacts to Rancho Mission Road/Friars Road, MM-TRA-7, is dependent upon improvements to the Interstate 15 Northbound Ramps/Friars Road intersection, which is a California Department of Transportation (Caltrans) facility (Draft EIR pp. 4.15-156 and 4.15-157). The Draft EIR addresses these issues in Sections 4.15.9.3 (Mitigation Measures) and 4.15.10.3 (Level of Significance After Mitigation); see also mitigation measures MM-TRA-2, MM-TRA-3, MM-TRA-4, MM-TRA-8, MM-TRA-9, MM-TRA-10, MM-TRA-11, and MM-TRA-13.

As to the comment regarding the City's concerns with the underlying methodologies utilized in the Draft EIR for the traffic impact analysis, the comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. To the extent the City raises such concerns with greater specificity in their subsequent comments, the CSU will and does respond to such comments were raised.

As to the provisions of Measure G, CSU/SDSU acknowledges the Initiative and its obligations thereunder. In that regard, CSU/SDSU representatives have met with City officials regularly to address issues related to the Draft EIR and will continue to do so throughout the process. CSU/SDSU acknowledges the opportunity to reach agreement with the City regarding the payment of fair-share mitigation costs for identified off-site significant impacts (Measure G, Section 4, SDMC Section 22.0908(h)), and to comply with applicable development impact fee requirements related to off-site traffic improvements (Measure G, SDMC Section 22.0908(l)).

A4-3

The comment states that the City assumes certain improvements would be constructed under CSU/SDSU's sovereign immunity. The comment requests additional clarification in the Final EIR. In response, CSU/SDSU met with the City and provided additional details regarding the traffic analysis to support certain findings regarding off-site traffic improvements. The Final EIR is clarified to note which improvements have been accepted by the City of San Diego. Refer to Section 4.15, Transportation, of the Final EIR. For further responsive information, please see Final EIR Section see Thematic Response PD-2 – Purchase and Sale Agreement.

As explained in the prior response, CSU acknowledges that it will complete certain transportation improvements pending the City grant of authorization to do so and, as explained, such authorization would lead to a determination that the mitigation is feasible and the impact less than significant with implementation of the mitigation. CSU/SDSU also welcomes the opportunity to coordinate with the City to further discuss the Draft EIR's underlying analysis and methodologies relating to traffic impacts.

As to sovereign land use authority, CSU agrees that it would have full land use authority over infrastructure improvements constructed on land that it owns. It is CSU's practice and policy to work

with local jurisdictions as to those improvements to be constructed on property outside of its ownership. As to subsequent environmental documentation, construction and development permitting, and resources agency permitting authority where necessary and applicable, CSU agrees that such details are incorporated into the Final EIR's responses to comments; and that CSU/SDSU will continue to coordinate with the City as to such issues in the PSA where appropriate.

A4-4 The comment restates SDMC Section 22.0908(g), which requires the provision of necessary public facilities, including drainage and mobility infrastructure prior to the City approving any sale of the project site to SDSU. The comment states that the requirement of the proposed project to provide necessary public facilities therefore stem not just from CEQA but from the SDMC. The Draft EIR analyzed the potential environmental effects of the proposed project in compliance with CEQA and determined necessary improvements, including mobility and drainage improvements, to reduce the identified significant impacts to the extent feasible. Please refer to Draft EIR Section 4.9, Hydrology and Water Quality, and Draft EIR Section 4.15, Transportation, for the analysis. Further, consistency with SDMC Section 22.0908 is analyzed in Draft EIR Section 4.10, Land Use and Planning; specifically, Table 4.10-2. The comment also states that the SDMC requires compliance with certain content requirements of a specific plan pursuant to California Government Code Section 65451(a). CSU/SDSU's proposed master plan complies with these requirements.

A4-5 The comment expresses the City's belief that voters intended to include Murphy Canyon Creek within the area to be sold to SDSU. Pursuant to the terms of PSA being negotiated with the City, CSU/SDSU will acquire the portion of Murphy Canyon Creek described in the comment. The comment further states that drainage issues would be resolved through best management practices (BMPs) in open space and park areas; however, this could expose preserved areas to potential indirect effects. Long-term management and maintenance 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. The City also requests that in order to ensure impacts associated with hydrology, water quality, and flooding would be less than significant, the EIR incorporate SDSU's proposed long-term maintenance of the on-site BMPs.

As stated in Draft EIR Section 4.9.4, page 4.9-23, SDSU would be responsible for ensuring implementation and funding of maintenance of the permanent BMPs, as described in Section 4, Operation and Maintenance Plan, of Draft EIR Appendix 4.9-4. This Operation and Maintenance Plan (OMP), which is considered part of the project description (along with all other components of the hydrology/water quality technical reports/appendices), is eight pages long. Therefore, it seemed more appropriate to leave the plan in the appendix rather than include it within the text of the Draft EIR. The included OMP identifies maintenance for the following permanent BMPs: landscaped areas, outlet protection, concrete stamping, irrigation system, street trees, eight biofiltration basins, and one proprietary compact biofiltration BMP (Modular Wetland System). The BMP information provided in Draft EIR Appendix 4.9-4, Section 4 provides inspection criteria, maintenance indicators, and maintenance activities for the above-listed BMPs that require permanent maintenance. The OMP is incorporated into the Draft EIR and supports the Draft EIR's conclusion that hydrology, water quality, and flooding impacts will be less than significant. However, text is added to the conclusion paragraph on page 4.9-26 of the Final EIR, reiterating that SDSU would be responsible for ensuring implementation and funding of maintenance of the permanent BMPs, as described in Section 4, Operation and Maintenance Plan, of Appendix 4.9-4.

The comment also requests information about CSU/SDSU's ability to permit and implement BMPs within the project parks and open spaces. Education Code Section 66606 confers upon the CSU "full power and responsibility in the construction and development of any state university campus, and any buildings or other facilities or improvements connected with the California State University." The BMPs proposed within project parks and open spaces are part of or "connected with" the proposed campus and therefore within the scope of CSU's sovereign immunity, even to the extent BMPs are located within the River Park, which will be improved and perpetually maintained by CSU in support of the campus. It should be noted that the River Park, though owned in fee by the City, will be a seamless part of the overall CSU project and like the parks located on the portions of the project that CSU will acquire, will be available for use and enjoyment by SDSU students, faculty, staff, and the general public. The River Park and the proposed BMPs that are essential to the hydrological restoration planned as part of the project also serve the educational mission of CSU, which intends to provide interpretive signage and educational opportunities relating to local hydrology, biology, history, and related topics.

A4-6

The comment provides factual information regarding the City's planning for an extension of Fenton Parkway, south of Camino Del Rio North. The comment correctly notes that the Draft EIR does not include the Fenton Parkway extension as either part of the project or feasible mitigation for the project. The comment states that based on analysis and information available to date, the City has determined that the Fenton Parkway extension is feasible for roadway impacts, as well as freeway segment impacts. The comment also expresses the City's belief that construction and implementation of the Fenton Parkway extension is necessary to ensure consistency with previously certified environmental documentation.

The Draft EIR transportation analysis, Section 4.15, properly addresses the Fenton Parkway Bridge. The Draft EIR analyzed the bridge under three separate scenarios — the primary EIR analysis, which is based on horizon year conditions without the bridge (Section 4.15.7.3); and conditions that included a two-lane and four-lane bridge in the horizon year infrastructure (Section 4.15.11). The analysis of the two-lane and four-lane bridge scenarios was conducted at the request of the City.

Draft EIR Primary Analysis

At the outset, the proposed project does not identify the Fenton Parkway Bridge as a component or element of the campus project because it was not proposed or required to implement the campus project, nor was it identified as a required mitigation measure (discussed below).

The Draft EIR's primary analysis, upon which significant impacts and mitigation are identified, did not include the Fenton Parkway Bridge as part of the future background condition because there is no assurance that the bridge would be built by that time (i.e., year 2037, which is anticipated project buildout). As noted by the City, the bridge has been included in the "prior" Mission Valley Community Plan (dating back to 1985); however, the City has not had the funding to construct the bridge nor pursued its construction in the past decade. Therefore, the Draft EIR appropriately relied on the traffic analysis that did *not* include the bridge as part of the City's underlying road network. Said differently, to include the Fenton Parkway Bridge would have required the analysis to assume that unfunded future infrastructure was (or would be) in place, which is contrary to the requirement under CEQA that an EIR not analyze its environmental impacts with a comparison to future development that does not exist. (See *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350; *Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 708.) This is

because when an EIR engages in an analysis of what *could* happen, as opposed to the existing environmental setting, the analysis misleads the public “‘as to the reality of the impacts and subvert[s] full consideration of the actual environmental impacts,’ a result at direct odds with CEQA’s intent.” (*Communities for a Better Environment, supra*, 48 Cal.4th at p. 322.) For all these reasons, the bridge was not included as part of the future background condition. Further, as explained below, the Draft EIR’s traffic analysis did not identify the Fenton Parkway Bridge as a required mitigation measure of the proposed project.

Cost estimates related to bridge construction range from \$20 million to \$75 million, although CSU understands that the City presently has less than \$2 million in funds available for bridge construction. The fact that the bridge is included in the City’s Mission Valley Community Plan Update does not by itself support an assumption that the necessary funding is available such that the bridge will be constructed. As the City itself notes in its comments on the SDSU Draft EIR, infrastructure not currently funded and programmed should not be included in the analysis. (See Comment A4-41 [City Draft EIR Comment Letter (October 3, 2019), Attachment A, Page 5, Other Draft EIR Comments, number 2].)

Accordingly, under the no bridge condition, the Draft EIR analysis determined that the bridge is not necessary as mitigation because the project’s significant impacts could be mitigated without the bridge and, thus, bridge construction is not proposed as mitigation. (See Draft EIR Section 4.15.9, p. 4.15-136 [“the results of the analysis presented here do not propose the extension as mitigation for the SDSU Mission Valley Campus Project since such extension is not required to reduce an identified significant impact”].) See Response to Comment A4-140 for additional information regarding this point.

Nonetheless, the Draft EIR contains for information purposes analysis of a 2-lane and a 4-lane bridge as part of the future background condition. That is, the bridge is included not as part of the proposed project and not as mitigation, but rather as part of the future background condition based on its present status as planned infrastructure. Under these two scenarios, the Draft EIR analysis determined that the bridge would result in a redistribution of project traffic and would reduce or eliminate some of the proposed project’s impacts (e.g., would reduce the level of impact at the I-15/Friars Road interchange) while adding other impacts, resulting in a net increase in the number of intersection impacts as discussed immediately below (Draft EIR Section 4.15.11).

As to the City’s comment that the Fenton Parkway Bridge is feasible mitigation for significant freeway segment impacts, as discussed on Draft EIR page 4.15-221, the bridge would change the way some vehicles circulate around the project site and which interchanges would be used to access origins and destinations in the area extending from west of Qualcomm Way to east of Fairmount Avenue and accessed by Camino Del Rio North and South and Friars Road. More specifically, the redistribution of traffic under the bridge scenario would result in some traffic otherwise projected to travel on I-8 east of I-15 shifting to Montezuma Road. Similarly, some traffic projected to travel on I-15 south of Friars Road would shift to the Camino Del Rio South interchange. Therefore, on the I-8 freeway segments between I-15 and College Avenue, and on the I-15 auxiliary lanes at Friars Road, operations would improve with the bridge in place. However, the addition of the bridge would still result in the same number of significantly impacted freeway segments (Draft EIR p. 4.15-221).

As to intersection impacts, the Draft EIR determined that the addition of the Fenton Parkway Bridge would result in a net *increase* in significant impacts at intersections. Specifically, as reported in the Draft EIR, the addition of the two-lane bridge as compared to the no bridge scenario would cause a

total of four new significant impact locations and one new City threshold exceedance location, and eliminate one significant impact location based on CSU thresholds, though this location would still exceed the City threshold (Draft EIR p. 4.15-219). Under the four-lane bridge scenario, the project would result in a total of four new significant impact locations under the CSU thresholds and one new City threshold exceedance location, and eliminate two significant impact locations based on both CSU and City thresholds (Draft EIR p. 4.15-220).

Additionally, as previously noted, the City presently has less than \$2 million available for bridge construction. Based on a 25% fair-share calculation for the proposed project, there still would be a substantial shortfall in necessary funding. In cases as these, where there is insufficient funding available to construct the subject improvements, the mitigation is considered infeasible. (See *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 364 [upholding agency's determination that mitigation measures were infeasible because the record showed "local funding was inadequate ... and there was simply no reason to assume the funding would be available"]; *San Franciscans for Livable Neighborhoods v. City and County of San Francisco* (2018) 26 Cal.App.5th 596, 637 [mitigation measure with uncertain funding was infeasible]; see also *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1189 [generally discussing how an adequate mitigation measure must ensure appropriate funding is available, accounted for, and enforceable].)

CSU/SDSU to Construct Independent Utility Bridge as Separate City Project

Nonetheless, CSU/SDSU understands that the City desires the Fenton Parkway Bridge as a separate facility that is part of its long-term traffic circulation plan for the Mission Valley Community Plan area; and therefore, the City believes that the bridge has independent utility without regard to the project (i.e., as stated in the City's comment, the bridge—with or without the proposed project—addresses circulation with the project study area, creates additional access, reduced traffic congestion, and lower vehicle miles traveled).

Therefore, on October 14, 2019, CSU submitted an offer to purchase the Mission Valley SDCCU Stadium site that included the provision that SDSU will construct the two-lane, at grade (with turn lane) bridge and fund its environmental review, design, permitting, and construction (estimated cost \$22 million), subject to the necessary CEQA compliance having been completed by or through the City and all other necessary parties. The offer, which was updated on October 28, noted that SDSU does not have detailed information from the City at this time regarding the bridge; that the City will pursue the Fenton Parkway Bridge in the future; and, the bridge will remain a separate City project for CEQA and all other purposes. Further, although the bridge is not required to mitigate significant traffic impacts of the proposed project, the project's share of future traffic under the Draft EIR's "with bridge" scenario is approximately 25%, and on that basis, CSU/SDSU's allocated contribution for bridge costs would be approximately 25% of the total costs. Under the offer, SDSU will receive development impact fee credits or other reimbursement to the extent it incurs costs exceeding the approximately 25% share. SDSU will also be entitled to use the City's existing Capital Improvement Project funds allocated to the bridge (est. \$1.3 million) for bridge costs. The City will grant SDSU an easement, license, and/or other rights necessary for SDSU to construct the bridge. SDSU agrees that it will construct the bridge before occupancy of more than 65% of planned equivalent dwelling units for the project. Copies of the October 14 Original Offer and the October 28 Updated Offer are attached as Attachments A4-A and A4-B.

Additionally, because the Fenton Parkway Bridge is not a functional element of the proposed project such that without it the proposed project could not proceed; and, because the bridge has independent utility and is not dependent on completion of the proposed project, CEQA analysis is not required either as part of the CSU Board of Trustees approval or as part of the City's approval of the PSA. (See, e.g., *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70.) Nor is the purpose of the proposed project a step toward future development of the bridge, nor does it legally compel or practically presume completion of the bridge. (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209.). Nor is the commitment to fund or construct the bridge representative of a support/related facility that should be reviewed under the project's EIR. (*National Parks & Conservation Assn. v. County of Riverside* (1996) 42 Cal.App.4th 1505.).

Lastly, a lead agency is required to recirculate an EIR only when significant new information is added to the EIR (14 CCR 15088.5). Significant new information includes: (1) a new significant environmental impact resulting from the project; (2) a substantial increase in the severity of an environmental impact of the project; (3) a feasible project alternative or mitigation measure the project declined to adopt that is considerably different from those previously analyzed and would clearly reduce significant environmental impacts; or (4) a draft EIR that is fundamentally inadequate and conclusory such that meaningful public review was precluded (14 CCR 15088.5). Further, "recirculation is only required when the information added to the EIR changes the EIR in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible project alternative or mitigation measure" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1119).

Any commitment on the part of CSU/SDSU to fund or construct the bridge is not significant new information within the meaning of CEQA Guidelines Section 15088.5. First, the bridge, if constructed after undergoing federal and state permitting and further environmental review, would not give rise to a new significant environmental impact of the project because the bridge is neither a component of the project, nor required mitigation for a significant project impact; therefore, it could not give rise to a new significant project impact within the meaning of Section 15088.5. Second, the bridge would not cause a substantial increase in the severity of an environmental impact of the project because, again, it is not a project component nor required mitigation. Third, it is neither an alternative or feasible mitigation measure declined to be adopted that is considerably different from those previously analyzed. The bridge, in fact, was analyzed by the Draft EIR and determined not to be a required mitigation measure. Finally, any commitment to fund or construct the bridge does not preclude meaningful public review because: (1) the bridge, if ultimately carried out, will undergo its own environmental review, separate and apart from the proposed project's EIR, prior to construction and City approval; and (2) bridge construction is not an element or component of the proposed project (i.e., the bridge is neither a project component nor a recommended mitigation measure), but rather a subsequent, independent project to be considered, reviewed, and constructed, but only after undertaking separate state and federal permitting and environmental review under both CEQA and the National Environmental Policy Act.

A4-7

The comment states that 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 comment also states that the Final EIR should be updated to analyze the potential impacts, feasible mitigation, and implementation of circulation improvements necessary for the proposed project. The comment is an introduction to comments that follow and addresses general subject areas, circulation improvements, which received extensive analysis in Draft EIR Section 4.15, Transportation.

CSU acknowledges that the City informed it of its position regarding the Fenton Parkway Bridge prior to release of the Draft EIR. However, as explained in the prior response, it would have been inappropriate for the Draft EIR analysis to assume the bridge in place, and the analysis, which is supported by substantial evidence, did not identify the bridge as necessary mitigation. Therefore, the Draft EIR's transportation analysis, including its evaluation of the bridge, is adequate under CEQA, and the City, as a responsible agency, can rely on the Draft EIR as presently structured (14 CCR 15231 [An EIR is adequate for use by a responsible agency (the City of San Diego in this case) unless it is found not to comply with CEQA in a legal proceeding or a subsequent EIR is made necessary under CEQA Guidelines section 15162]). For further responsive information, please see Thematic Response PD-2 – Purchase and Sale Agreement.

A4-8 The comment states the opinion that the Draft EIR 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 Bridge extension. The comment also states that 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. Preliminarily, the Draft EIR did not determine that traffic impacts would be less than significant; significant impacts are identified, and appropriate mitigation is recommended to reduce the identified significant impacts. (See, e.g., Draft EIR Section 4.15.9, Mitigation Measures.) As to the TDM Program, it is a project design feature (PDF-TRA-1 and PDF-TRA-2) that will be implemented as part of the project and be included in the project's Mitigation Monitoring and Reporting Program (MMRP) to be adopted by the CSU Board of Trustees concurrent with project approval. The purpose of the MMRP is to ensure implementation of the adopted mitigation measures, as well as project revisions or components such as the TDM Program (CEQA Guidelines, Section 15097(a)). Moreover, the TDM Program provides for a TDM Program Coordinator to ensure the TDM strategies are implemented and effective (Draft EIR, pp. 4.15-7 and 4.15-8; see also Appendix 4.15-1, Transportation Impact Analysis (TIA), Section 2.1.2, pp. 9-18 [Proposed TDM program]). In addition, a TDM Monitoring Plan has been prepared to further ensure program implementation. See Final EIR Appendix 4.15-2.

A4-9 The comment states that the proposed project is not adequately designed for the bicycle facility on Friars Road to be consistent with the Mission Valley Community Plan Update, 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 comment also states that the proposed project design would directly impact the City's ability to complete essential bicycle infrastructure, and is inconsistent with the Mission Valley Community Plan and the Climate Action Plan (CAP) goals for shifting mode usage to reduce mobile source greenhouse gas (GHG) emissions; the comment states that this impact is not disclosed within the Land Use and Planning, GHG, or the Transportation sections of the Draft EIR, all of which have thresholds for determining significance that include consistency with adopted plans and policies. The proposed project design is consistent with the Mission Valley Community Plan identification of a Class IV bicycle track along Friars Road, including the segment adjacent to the northern boundary of the project site, as it does not preclude it from being added in the future. The proposed project design includes maintaining the existing bike lanes on Friars Road along the project frontage. (See Draft EIR Figures 4.15-10A and 4.15-10B, or Appendix 4.15-1, TIA, Figure 11.) SDSU recognizes the bicycle facilities on Friars Road are best for experienced cyclists. While the specific design details need to be reviewed and potentially refined (e.g., the width of the bikeway and median [7 feet and 3 feet, respectively, or 6 feet and 2 feet]), the proposed project includes a bikeway internal to the project site, with a median separating bicycle and vehicle traffic

that is parallel to the future cycle track on Friars road, which will provide a bike route that is safer and more accessible for less experienced cyclists and provide for a connection to San Diego Mission Road and the Murphy Canyon bike path. Accordingly, the proposed project does not conflict with the Mission Valley Community Plan Update (MVCPU) or the City's CAP.

A4-10 The comment states that 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 comment states that the project design should reflect coordinated efforts with the City and San Diego Association of Governments (SANDAG) to incorporate the recommended trolley alignment into the project. The comment encourages SDSU to work with SANDAG and Metropolitan Transit System (MTS) on the design and operation of the future transit facilities on site, and that 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 CAP. The proposed project design reflects the Trolley Purple Line alignment through the project site. The Draft EIR includes a discussion of the proposed Purple Line segment in Chapter 2, and Figure 2-11E illustrates the planned and proposed alignments of this future transit line. Specific to transportation and circulation, the Draft EIR, Section 4.15.7.4.4 and Figure 4.15-4, acknowledge the proposed Purple Line and describe the project's accommodation of the proposed Purple Line. While the 2017 Conceptual Planning Study referenced in the Draft EIR is the latest publicly available document on this transit project, SANDAG is re-evaluating the specific type of transit service and alignment as part of the new Regional Plan currently in development. As such, no other design details presently are available for the Purple Line.

As to a site plan that integrates the two trolley stations, provides for a bus transit center and mobility hubs, and provides access for bus, pedestrian, and bicycle travel throughout the site and beyond, as previously noted, the proposed project's site plan accommodates the Trolley Green Line through the Project site and the proposed Trolley Purple Line (to the extent information regarding the Purple Line is available). As to buses, the project site will include a bus transit center with four loading/layover bays immediately adjacent to the Stadium Trolley Station to accommodate future MTS service. SDSU has coordinated with the City, SANDAG, and MTS regarding ongoing and future transit planning at the project site. For further responsive information, please see both the MTS and SANDAG comment letters and responses thereto (A5 and A6, respectively). These responses reflect CSU/SDSU's additional coordination efforts and the evaluation of Purple Line alignments, including a potential third alignment — all of which can be accommodated in conjunction with the proposed project.

A4-11 The comment states that after approval of the CAP, incorporation of the new GHG threshold requiring consistency with the CAP, as well as adoption of the CAP Consistency Checklist, secures the City with a Qualified Greenhouse Gas Emissions Reduction Plan under CEQA Guidelines Section 15183.5. The comment further states that when the CAP was developed and the baseline was determined, the project site was a stadium with no accessory development. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-12 The comment states that the project includes significant new development on the SDCCU Stadium site that was not included in the CAP's Citywide GHG emissions assumptions. The comment further states

that SDSU completed the CAP Checklist consistent with City requirements and included it as a technical appendix to the Draft EIR. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. Further, SDSU prepared a CAP Evaluation, which is included in Draft EIR Appendix 4.7-2 and evaluates whether the proposed project would conflict with the City's CAP. The CAP Evaluation demonstrates that the proposed project would not conflict with the City's CAP and would implement multiple design features and strategies that are consistent with those identified by the City for achievement of its GHG reduction goals.

As to the comment that the project includes new development on the SDCCU Stadium site that was not included in the CAP's assumptions, prior to the adoption of the Mission Valley Community Plan Update (MVCPU) (i.e., at the time of the preparation of the City's CAP), the underlying land uses of the project site were those contemplated by the 1985 Mission Valley Community Plan for commercial/recreation and public/recreation (i.e., the existing Stadium use). Therefore, the project's proposed high-density campus village, while consistent with the City of Villages strategy, was inconsistent with the inventory of emissions at the time the City's CAP was prepared. However, the project site is located within a Transit Priority Area (TPA), served by the Stadium Trolley Station on the MTS Green Line, as shown in Attachment B of Appendix 4.7-2, and as explained in Appendix 4.7-2, would result in an increased density within a TPA and implement CAP Strategy 3 actions. Therefore, the proposed project would be consistent with CAP Checklist Step 1, Option B.

Subsequent to the release of the proposed project's Draft EIR, the City of San Diego certified the Program EIR for the MVCPU and adopted the new plan. The MVCPU EIR found that impacts related to GHG emissions would be less than significant because the plan implemented the City of Villages framework, including for the project site. As analyzed in Draft EIR Section 4.10, Land Use and Planning, and Section 4.13, Population and Housing, the proposed project would be consistent with the land uses contemplated for the project site by the MVCPU. Therefore, with adoption of the MVCPU, the proposed project is also consistent with CAP Checklist Step 1, Option A.

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-13

The comment states that the Draft EIR should clearly utilize the City's adopted threshold for determining significance to analyze potential impacts related to GHG emissions. For clarification, the City's threshold determining significance for GHG emissions is as follows:

- 1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- 2) Conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (City of San Diego, CEQA Significance Determination Thresholds, July 2016, page 86).

Further, the City's CEQA Significant Determination Thresholds state that for project-level CEQA analysis, "significance is determined through the CAP Consistency Checklist."

The Draft EIR thresholds for determining significance per Section 4.7.3 are as follows:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

The analysis in the Draft EIR, page 4.7-29 through page 4.7-34, analyzed the proposed project's conformance with the City's CAP. This analysis was supplemented by Appendix 4.7-2, CAP Consistency Memorandum. As analyzed therein, the Draft EIR determined the proposed project would conform with the City of San Diego's CAP under Option B of Step 1 for projects located in a TPA.

Accordingly, the thresholds and analysis contained in the Draft EIR clearly utilized the City's thresholds. Nonetheless, the Final EIR has been revised to provide additional details regarding how the proposed project would comply with the findings of the MVCPU Final EIR regarding increased density in Mission Valley and how projects such as the proposed project comply with the City's CAP and the baseline established therein. Please refer to Section 4.7, Greenhouse Gas Emissions, of the Final EIR.

A4-14

The comment states that no TDM Plan is included as part of the Draft EIR to ensure that assumptions that went into the GHG analysis would be achieved, and impacts would be less than significant. The comment further states that the TDM Plan must include a detailed monitoring program to ensure all assumptions are enforceable. The comment requests that performance standards, timing, and responsibility for implementation be included in the Final EIR and in the Design Guidelines document.

CSU/SDSU agree with the comment that the TDM Plan must be monitored to confirm the expected reductions are being achieved. Accordingly, as described in the Draft EIR (pp. 4.15-8 and 4.15-8):

- TDM Program Coordinator and marketing – To ensure the TDM Program strategies are implemented and effective, a Campus TDM Program Coordinator will be identified to monitor the program. As part of overall campus management, a staff member or outside consultant will be designated to serve as the on-site Coordinator for employees and residents. Coordinators are responsible for developing, marketing, implementing, and evaluating TDM programs; dedicated personnel in this role make TDM programs more robust, consistent, and effective. Additionally, residents and employees would have a designated point of contact for questions about the various TDM strategies, which would allow them to easily stay informed of various TDM functions and eligibility.

The TDM Program Coordinator's duties would include, but not be limited to, the following:

- Conduct transportation/mobility options orientation for new employees and new residents
- Assist with rideshare matching for employees commuting to the proposed project and residents commuting from their homes
- Provide information on transit, bicycling, and walking to and from the project
- Act as a source of information regarding the TDM Program, including compliance with regulatory requirements and new potential TDM benefits

- Coordinate TDM Program monitoring (administer surveys and coordinate data collection)
- Promote available websites providing transportation options for residents, employees, customers and guests
- Create and distribute a “new resident” and “new employee” information packet addressing non-automobile modes of transportation
- Promote a transportation options app for use on mobile devices (tech enabled mobility app)
- Assist employees and residents in accessing existing or establishing future TDM strategies, such as transit discount or vanpool programs through existing programs such as MTS Ecopass or SANDAG’s iCommute.

The TDM Plan also includes a monitoring component to ensure the underlying trip reductions are being achieved. The TDM Monitoring Plan has been included in the Final EIR, as Appendix 4.15-2.

To further ensure the TDM Plan would be implemented as anticipated, including the provision for a TDM Coordinator, all project design features, including PDF-TR-1 (i.e., the TDM Plan) are included in the MMRP and shall be monitored accordingly. Please refer to the Final EIR MMRP.

A4-15 The comment states that the City anticipates ongoing negotiations to culminate in a PSA that may include project features and mitigation measures not currently reflected or analyzed in the Draft EIR. The City looks forward to coordinating with SDSU further to improve the Draft EIR and states that they reserve the right to insist upon necessary revisions to the Draft EIR.

CSU, as the lead agency, has prepared the Draft EIR in accordance with CEQA and has evaluated all potential environmental impacts associated with the project. Mitigation measures have been applied where feasible in order to reduce potential impacts and alternatives to the proposed project have been analyzed accordingly. For further responsive information, please see Thematic Response PD-2 – Purchase and Sale Agreement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-16 The comment states that the City requests working meetings after receipt of the comment letter in order to resolve the analysis within the Draft EIR as necessary under CEQA in preparation of the Final EIR. SDSU has continued, and will continue, to work with the City on the PSA and Final EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-17 The comment states that the City, as a Responsible Agency under CEQA, has reviewed the Draft EIR and appreciates this opportunity to provide comments. The comment is an introduction to comments that follow.

A4-18 The comment states that the MVCPU has retained the Fenton Parkway Extension as a needed connection for circulation within Mission Valley and that the Draft EIR 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. The comment also notes that the bridge is not fully funded and programmed to be in place, and states that

Draft EIR Section 4.15.11 and associated tables 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. Please see Response to Comment A4-6 for information responsive to this comment. As to the referenced tables, Fehr & Peers provided the tables to the City at a meeting on October 17, 2019. For reference purposes, the tables are also attached to these Responses as Attachments A4-C, and A4-D.

A4-19 Regarding Draft EIR Section 4.15.11.2, Traffic Redistribution with Bridge, the comment requests clarification as to whether the new model runs that were performed with a two-lane and four-lane Fenton Parkway Bridge in place were simply network reassignment runs of the without connection scenario or complete model runs. The comment also states that the redistribution should be based on a full model run with the connection in place, then a reassignment to network without the bridge connection. The traffic engineers performed complete model runs for both the without and with Fenton Parkway Bridge connection scenarios included in the Draft EIR (Draft EIR Section 4.15.11; Appendix 4.15-1 [TIA] Section 8).

A4-20 The comment requests details on how Street 'A' (Mission City Street 'I' in the MVCPU) will connect to Fenton Parkway including with the planned Fenton Parkway extension across the river, and notes that the street is apparently used as an access point to the site in the analysis of emergency response times for responding fire stations. The comment also states that 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. The comment also requests information related to California Public Utilities Commission (CPUC) acceptance of the proposal. As to the comment regarding the Street A/Fenton Parkway connection, it is assumed that the Street "A" connection to Fenton Parkway will initially be constructed before the Fenton Parkway extension is in place. At that time, the connection will be designed as a 90-degree turn south of the Trolley Green Line. The existing configuration of Fenton Parkway as a two-lane collector will be extended as an at-grade crossing across the trolley alignment. This section of Street A will be designed as a two-lane collector with a left-turn lane. At the connection to Fenton Parkway, the center left-turn lane on Street A will be a painted median. A sidewalk will be provided on the north side of the street, and a shared-use path will be provided on the south side of the street. Because a shared-use path will be provided, bike lanes are not provided.

Upon completion of the Fenton Parkway extension, the Street A and Fenton Parkway connection will become a T-intersection. Street A will be restriped such that the center left-turn lane will become a left-turn pocket at the Fenton Parkway intersection. Assuming the Fenton Parkway extension is constructed as a two-lane collector with a center left-turn lane, then Fenton Parkway would be designed to have a southbound through lane, a southbound left-turn pocket to Street A, a northbound through lane, and a northbound right-turn pocket to Street A; the southbound left turn is assumed to be permitted. Bike lanes and sidewalks would be provided on the extension.

The final design will be determined in coordination with CPUC and MTS, including the location of the gate arms. The proposed Fenton Parkway Bridge would be built as a two-lane, all weather, at-grade with the trolley crossing (with turn lane) bridge.

A4-21 The comment states that the MVCPU and associated Final EIR assume that a refined circulation network would be defined in a Specific or Master Plan for the Stadium site, but that the MVCPU still

assumed a direct connection between San Diego Mission Road and Mission Village Drive. The comment states that the proposed project and Draft EIR assume a circulation network that removes this connection, and that it is unclear if or how the project addresses the potential re-routing of traffic with the proposed removal of the connection, noting that there currently is significant traffic during the peak periods that use this connection. The comment asks if the traffic would drive through the campus or use Friars Road as an alternate route. As noted in Draft EIR Section 4.15.5.4, the proposed project would include the realignment of San Diego Mission Road to provide a standard four-legged configuration at the Mission Village Drive and Friars Road eastbound ramps. The connection of San Diego Mission Road to Mission Village Drive would be provided via new on-site roadways Street F, Street 4, and Street D. These roads have been planned to accommodate the peak period traffic that currently travels from Mission Village Drive to San Diego Mission Road.

A4-22 The comment states that the proposed project does not provide for Class IV one-way cycle tracks on Friars Road along the frontage of the proposed project site, as envisioned by the MVCPU. The comment also states that the project's proposal of an additional lane on the Friars eastbound ramp from Mission Village Drive will increase the level of stress for cyclists by having them cross two lanes of traffic. The comment recommends that the 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. Please see Response to Comment A4-9.

A4-23 The comment states that the Draft EIR discloses impacts on several freeway segments but due to lack of jurisdiction proposes no mitigation aside from TDM. The comment states that the Draft EIR should evaluate any identified projects in San Diego Forward: The Regional Plan (2015), such as managed lanes on all impacted freeway segments that may partially mitigate the project's impacts.

The comment is correct that the proposed project would result in significant cumulative impacts on the study area freeway segments. However, the Draft EIR included mitigation that CSU will support Caltrans in its efforts to obtain the proposed project's proportionate share of funding from the state Legislature for the costs to prepare a Project Study Report–Project Development Support–Project Initiation Document to evaluate alternatives to increase capacity, improve mobility, and relieve congestion on impacted segments or adjacent interchanges (Draft EIR, p. 4.15-160). In response to the City's comments and related comments from Caltrans, the EIR mitigation has been revised such that CSU/SDSU will provide Caltrans with fair-share funding towards preparation of the reports. Please see Final EIR mitigation measure MM-TRA-17. In addition, construction of the Fenton Parkway Bridge extension would improve operations on the I-8 freeway segments between I-15 and College Avenue, and on the I-15 auxiliary lanes at Friars Road (see Response to Comment A4-6 for additional information regarding the Fenton Parkway Bridge's effect on freeway operations). The proposed project's TDM Programs will also reduce traffic congestion on roads and freeways.

Further, as reported in the Draft EIR, the mitigation of freeway impacts would theoretically involve widening of the freeway facility to provide additional mainline or auxiliary lane capacity to reduce the projected volume to capacity (V/C) ratio(s). However, widening mainline freeway segments is beyond the scope of a single development project due to numerous factors, including the potential complexities of modifying adjacent interchanges, acquiring right-of-way, proximity of existing building structures and roadways, high construction costs, etc. In addition, no established mechanism (i.e., fee program) exists for any of the significantly impacted facilities to obtain a fair-share contribution from all new development in the area and region.

SANDAG, as the regional planning agency in San Diego County, has completed various studies regarding improvements along all the major freeways within the Draft EIR study area. In particular, SANDAG, in collaboration with Caltrans, City of San Diego, MTS, and other key stakeholders, is developing a multimodal corridor study for the section of I-8 located within the City of San Diego. The Preliminary Draft Report for the I-8 Corridor Study (August 2016) considers future improvements, as well as other feasible concepts, describes existing conditions, identifies future deficiencies, develops multimodal alternatives and measures, performs technical analysis, and proposes an implementation strategy. The study addresses various topics, including right-of-way constraints, transit services, freeway interchanges, select local streets and intersections, bike and pedestrian access (active transportation), TDM, Transportation Systems Management, and other strategies to encourage the use of alternative travel modes.

Additionally, Caltrans recently completed an I-805 Transportation Concept Report that addresses congestion and operations along the entire length of the I-805 corridor. A combination of strategies is planned and incorporated in the Regional Transportation Plan, including high-capacity transit projects, managed lanes, active transportation projects, auxiliary lanes, and ramp metering. Many of the concepts addressed in the I-8 and I-805 studies can be applied to other freeways, including I-15. Caltrans also is considering implementing managed lane strategies within the I-15 corridor in the future to address congestion and enhance mobility.

In furtherance of these studies, CSU/SDSU will pay its fair-share of the costs to prepare a Project Study Report–Project Development Support–Project Initiation Document (Study) to evaluate alternatives to increase capacity, improve mobility, and relieve congestion on the impacted segments or adjacent interchanges. Alternatives to be considered include enhanced acceleration/deceleration lanes and interconnecting ramp meters.

In addition, as previously discussed, the proposed project would implement a TDM Program that would reduce the number of site-generated vehicle trips beyond the level used in this analysis (see Section 4.15.1.2). Additionally, as a project involving a mix of uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding vehicle miles traveled (VMT) within the region, including on the freeway system, as compared to other development projects within the County located beyond the reach of a transit station. Accordingly, the SDSU Mission Valley Campus Master Plan Project would reduce its freeway impacts to the greatest extent feasible.

As to the “additional mitigations” suggested by the comment, the addition of managed lanes on all of the impacted freeway segments would entail widening of the freeway facility to provide additional mainline or auxiliary lane capacity to reduce the projected V/C ratio(s). However, as noted above, widening mainline freeway segments is beyond the scope of a single development project due to numerous factors, including the potential complexities of modifying adjacent interchanges, acquiring right-of-way, proximity of existing building structures and roadways, high construction costs, etc. In addition, as previously explained, no established mechanism (i.e., fee program) exists for any of the significantly impacted facilities to obtain a fair-share contribution from all new development in the area and region.

A4-24 The comment states that the Draft EIR should evaluate additional mitigation that would alleviate the impacts on I-15 including the Fenton Parkway Extension and Santo Road connections. The comment

states that these needed local connections would relieve dependence on freeway travel for short distances, which creates overcapacity/breakdown conditions substantially reducing freeway capacity. As to the Fenton Parkway Extension and its effects relative to freeway segment impacts, please see Response to Comment A4-6 for information responsive to this comment.

As to the Santo Road connection, based on the analysis presented in the Draft EIR, the connection is not necessary to mitigate the project's impacts. (See, e.g., Draft EIR Section 4.15.9.) Additionally, the proposed project traffic would comprise only about 4% of the forecasted traffic levels at this location (i.e., the project's fair-share funding) and, according to the Tierrasanta Public Facilities Financing Plan, funding has not been identified to provide the necessary remainder funding. In cases as these where there is insufficient funding available to construct the subject improvements, the mitigation is considered infeasible. (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 364 [upholding agency's determination that mitigation measures were infeasible because the record showed "local funding was inadequate ... and there was simply no reason to assume the funding would be available]; *San Franciscans for Livable Neighborhoods v. City and County of San Francisco* (2018) 26 Cal.App.5th 596, 637 [mitigation measure with uncertain funding was infeasible]; see also *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1189 [generally discussing how an adequate mitigation measure must ensure appropriate funding is available, accounted for, and enforceable].)

A4-25 The comment states that the Draft EIR should evaluate additional mitigation on State Route (SR-) 163 that should include Phases 2 and 3 of the SR-163/Friars interchange. The identified projects would construct additional ramp facilities and auxiliary lanes at the SR-163 interchanges with Friars Road and I-8. The comment notes that these phases are not currently funded, and SDSU concurs that Phases 2 and 3 of the SR-163/Friars interchange improvement project are not currently funded. We note, however, that the significant impacts identified by the EIR at the intersection of the SR-163 Southbound Ramps/Ulric Street and Friars Road would be mitigated with implementation of the recommended signal optimization at the intersection and no further mitigation is required (see EIR Mitigation Measure MM-TRA-1). Beyond that, as noted in Response A4-23, providing additional capacity for freeway facilities is beyond the scope of a single development project due to numerous factors, including the potential complexities of modifying adjacent interchanges, acquiring right-of-way, proximity of existing building structures and roadways, high construction costs, etc. In addition, no established mechanism (i.e., fee program) exists for any of SR-163 to obtain a fair-share contribution from all new development in the area and region.

A4-26 The comment states that Figure 2-9E does not show a trail connection to the western most edge of the project boundary as is envisioned in the San Diego River Park Master Plan. The comment states that impacts associated with extending the trail west of the Fenton Parkway Station should be disclosed and mitigated for in the Draft EIR. CSU/SDSU have considered the comment and do not concur. The connection in question is not part of the proposed project; nor was such an extension identified by SDMC Section 22.0908; nor was the extension requested to be analyzed in the City's Notice of Preparation (NOP) comment letter. Further, the connection in question is both non-contiguous to the project site (the portion between the project site and the River Run development is already completed) and is outside the control of both the City of San Diego and CSU/SDSU because it is on private property.

A4-27 The comment requests that the EIR be revised to include any necessary improvements to Murphy Canyon Creek to address flood risks or easements associated with the proposed storm drain system.

The comment also states that the EIR should assume that the Murphy Canyon Creek Channel and drainage responsibilities will be conveyed to SDSU, as well as all existing storm drain assets in the existing Stadium site and River Park.

As reported in the Draft EIR, no improvements are proposed for Murphy Canyon Creek. Please see Section 4.9.4, page 4.9-30, fourth paragraph, of the Draft EIR, which addresses flood risks associated with the proposed project and assumes that periodic overflow from the Murphy Canyon Creek Channel will be conveyed through the SDSU property as part of the project.

Text relevant to Murphy Canyon Creek includes the following:

The Flood Insurance Rate Map indicates that the 100-year flood flow overflows the banks of Murphy Canyon Creek, approximately 0.5 miles north of Friars Road. The spillover becomes surface runoff that re-enters the project site near the KMEP MVT [Kinder Morgan Energy Partners Mission Valley Terminal] access road. The runoff then continues south across the stadium parking lot to the San Diego River. The proposed project would convey the spillover flow within the proposed River Park (Figure 4.9-8, Post Development Flood Zones). Under proposed conditions, the model shows that flows would spill out of the approaching open channel at the upstream end of the box culverts. The spill would occur at flows above 2,600 cubic feet per second (cfs). Since the 100-year flow approaching the culverts is 3,500 cfs, the spillover is approximately 900 cfs (Appendix 4.9-5).

No structures would be built within this floodway or within any other portion of the 100-year flood zone. The River Park will serve as a floodplain buffer between the San Diego River and the developed portions of the proposed project, which will be constructed on pads elevated above the floodplain depths. Therefore, all structures would be set back from the natural floodplain. As a result, the proposed project would not impede or redirect flood flows at the site. Impacts are considered **less than significant**.

In addition, please see Draft EIR Section 2.3.3, page 2-7, and Section 4.9.4, pages 4.9-28 and 4.9-29, which assume that all existing storm drain assets in the Stadium site and River Park will be conveyed to SDSU, including that SDSU design, permit, construct, and maintain all storm drain improvements.

The following excerpts provide relevant text.

Section 2.3.3, Page 2-7:

In completing the SDSU Mission Valley Campus Master Plan, SDSU prepared the SDSU Mission Valley Campus Guidelines (Guidelines), using the content requirements of a specific plan pursuant to California Government Code section 65451, subdivision (a), as contemplated by SDMC Section 22.0908(g).” Accordingly, the Guidelines include the following content:

(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.

Section 4.9.4, pages 4.9-28 and 4.9-29:

Although the internal drainage patterns would be somewhat altered as a result of project development, the proposed project would maintain the existing outfall structures in the post-construction condition (Figure 4.9-2, Existing Drainage System, and Figure 4.9-7, Proposed Drainage). The proposed project would entail minor alterations to the existing stormwater drainage system so this system can better filter and convey the site's runoff to the San Diego River.

Based on hydrologic analyses completed for the proposed project (Appendices 4.9-2 and 4.9-3), peak stormwater flows were estimated for on-site runoff associated with the 50- and 100-year frequency storm event, in the existing and proposed condition, to assess changes in peak runoff as a result of the proposed project. Post-construction, the proposed River Park would serve as a floodplain buffer between the San Diego River and the developed portions of the proposed project, which would be constructed on building pads elevated above the floodplain levels. As previously discussed, the drainage design for the proposed project includes routing on-site runoff through permanent stormwater quality basins (Figure 4.9-4, LID BMP Drainage Areas), followed by conveyance through proposed pipe drainage systems and discharge through the existing storm drain outfalls. Water quality basins are designed to treat a "low-flow" storm event to address pollutant loads. Flows in excess of the "low-flow" would bypass the basin and be conveyed directly to the storm drain outlets. Therefore, for the purpose of flood condition modeling, the water quality basins were assumed to be full/clogged, and the storage capacity of the basins was excluded from the model (Appendix 4.9-2).

As previously discussed, the existing outfalls for drainage systems A, B, and C penetrate through an 84- to 96-inch diameter sanitary sewer main paralleling the north bank of the San Diego River (Figure 4.9-7, Proposed Drainage). These outfalls would not be modified. The proposed drainage system would similarly tie into these existing outfalls. Flow in excess of the capacity of Outfalls B and C are designed to pond aboveground before discharge, similar to the existing condition. Flow in excess of the capacity of Outfall A would be conveyed in a constructed channel to Outfall D. Similar to the existing condition, the diameter of the three proposed major storm drain outfalls to the San Diego River will be the limiting factor of the drainage systems' discharge capacity in the proposed condition (Appendix 4.9-2). The on-site improvements along with the adjacent improvements associated with Street 'A,' portions of Mission Village Drive/Street 'F,' and portions of Street 'I' would comingle and discharge south to the San Diego River. The adjacent improvements associated with Friars Road, San Diego Mission Road, and portions of Street "I" will be conveyed by separate, existing storm drain systems to the two Murphy Canyon Channel outfalls. (Appendix 4.9-1).

Further, as stated in Draft EIR Section 4.9.4, page 4.9-24, SDSU would be responsible for ensuring implementation and funding of maintenance of the permanent BMPs, as described in Section 4, Operation and Maintenance Plan, of Appendix 4.9-4. Please refer to Thematic Response BIO-1 — Murphy Canyon Creek for additional responsive information.

A4-28 The comment states that Section 2.3.2, Section 2.3.4.3, Figure 2-10D, and Figure 2-10E of the Draft EIR do not provide specifics on improvements in Murphy Canyon Creek. The comment also requests an analysis of environmental impacts associated with potential improvements in Murphy Canyon Creek and associated with the proposed storm drain system for the project. As reported in the Draft EIR, no improvements are proposed for Murphy Canyon Creek. Rather, the project would accommodate (in the project design) periodic overflow flooding from the creek. As indicated in Section 2.3.1, page 2-5, 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.

As indicated in Draft EIR Section 4.9.1.4, page 4.9-3: “There are currently eight major outfalls from the project site, including six that discharge south into the San Diego River and two that discharge east into the Murphy Canyon Channel. However, only four of those outfalls, including Drainage Systems A, B, C, and D (Figure 4.9-2, Existing Drainage System), would be affected by the proposed project.”

As indicated in Draft EIR Section 4.9.4, page 4.9-28: “[c]onstruction would not necessitate or result in any alterations to Murphy Canyon Creek, the San Diego River, or other unnamed drainages that traverse the site.”

As stated in Draft EIR Section 4.9.4, page 4.9-30:

The Flood Insurance Rate Map indicates that the 100-year flood flow overflows the banks of Murphy Canyon Creek, approximately 0.5 miles north of Friars Road. The spillover becomes surface runoff that re-enters the project site near the KMEP MVT access road. The runoff then continues south across the stadium parking lot to the San Diego River. The proposed project would convey the spillover flow within the proposed River Park (Figure 4.9-8, Post Development Flood Zones).

No structures would be built within this floodway or within any other portion of the 100-year flood zone. The River Park will serve as a floodplain buffer between the San Diego River and the developed portions of the proposed project, which will be constructed on pads elevated above the floodplain depths. Therefore, all structures would be set back from the natural floodplain. As a result, the proposed project would not impede or redirect flood flows at the site. Impacts are considered less than significant.

As stated in Draft EIR Section 4.9.4, page 4.9-31:

As previously discussed, the project site is designated as FEMA [Federal Emergency Management Agency] “Zone A” along the eastern perimeter adjacent to Murphy Canyon Creek and FEMA “Zone AE” along the southern perimeter adjacent to the San Diego River. No structures would be built within this floodway or within any other portion of the 100-year flood zone. The River Park will serve as a floodplain buffer between the San Diego River and the developed portions of the proposed project, which will be constructed on pads elevated above the floodplain depths. Therefore, all structures would be set back from the natural floodplain.

As to item No. 2, an access trail would be provided along the western edge along Murphy Canyon Creek in generally the same alignment as the previously identified Street I. Impacts associated with this access point have been analyzed throughout the Draft EIR.

As to items No. 3 and 5, easements do not result in environmental impacts and are not required to be analyzed. As part of the purchase and sale agreement, CSU/SDSU anticipates coordinating all appropriate easements with the City of San Diego.

Item No. 4 within the comment indicates that Storm Water Treatment Control Best Management Practices from the proposed project may not be located on City property. The comment requests that relocation of BMPs noted in Figure 2-10E, which may currently be proposed on City property in the Draft EIR, be addressed. Based on the City of San Diego Transportation and Storm Water Design Manuals, Drainage Design Manual (DDM; 2017), Chapter 12, Green Infrastructure, and Section 12.2, General Design Criteria: “All projects required to build Green Infrastructure (GI) that will be owned and maintained by the City must meet the design criteria presented in this chapter.” Green Infrastructure (GI) refers to Low Impact Development (LID) or permanent stormwater BMPs. This statement indicates that stormwater BMPs, such as those proposed for the project, can be built on City-owned property.

In addition, Section 1.1.4, Cooperative Drainage Project, of the City DDM states that “the City may participate in cooperative projects for storm drains in accordance with Council Policy 800-04.” Council Policy 800-04 establishes guidelines for the construction and maintenance of stormwater drainage facilities and indicates that stormwater BMPs, such as those proposed on City-owned property (i.e., south of the trolley), could be completed as part of the project consistent with a Cooperative Drainage Project. Cooperative Drainage Projects are defined in part as projects that “will benefit the City by eliminating a maintenance problem, a public hazard and/or property damage.” The proposed stormwater BMPs would contribute in reducing existing flooding and water quality impacts at the site.

As to item No. 6, the Draft EIR analyzed necessary improvements for property drainage and water quality purposes in Section 4.9, Hydrology and Water Quality. The comment does not raise any specific issue with the analysis contained therein; therefore, no more specific response can be provided.

Lastly, please refer to Thematic Response BIO-1 — Murphy Canyon Creek for additional responsive information.

A4-29 The comment states that the MVCPU Program EIR includes MM-AQ-2 requiring the specific plan for the Stadium site to include various measures to reduce construction emissions. This comment acknowledges the inclusion of these measures in the Draft EIR as MM-AQ-1. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-30 The comment states that the MVCPU Program EIR includes MM-NOS-2 requiring projects within the MVCPU area implement various measures to reduce construction noise. This comment acknowledges the inclusion of these measures in the Draft EIR as MM-NOI-1 through MM-NOI-5. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A4-31 The comment asks if the athletic fields adjacent to the San Diego River would be lighted and if potential effects to sensitive species from noise or lighting was analyzed.

As stated in Draft EIR Section 4.3, Biological Resources, the existing measured noise levels within the San Diego River south of the project and near the riparian vegetation adjacent to Fenton Parkway ranged from 59 to 64 A-weighted decibels (dBA) equivalent noise level (L_{eq}) (Appendix 4.12-1). These levels are higher than the 60 dBA L_{eq} threshold typically used for analyzing impacts to special-status species, such as least Bell's vireo. The predicted operational noise levels range from 60 dBA L_{eq} to 65 dBA L_{eq} within the San Diego River south of the project and near the riparian vegetation adjacent to Fenton Parkway (Appendix 4.12-1). These noise changes (up to 1 dBA L_{eq}) are not enough to result in long-term impacts to special-status species.

Additionally, as described in Draft EIR Section 4.3.4, there will be a minimum 100-foot buffer between the proposed fields and the San Diego River: "Within the River Park and Shared Parks and Open Space, several lighted sports fields and courts are proposed. These sports fields include soccer and baseball fields, as well as basketball and tennis courts. These fields and courts would be set back a minimum of 100 feet from the San Diego River."

The potential indirect impacts related to preserve adjacency of the River Park have been included in the analysis in Draft EIR Section 4.3.4. Specifically, the Draft EIR states:

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 compliance with the MSCP's [Multiple Species Conservation Program's] Land Use Adjacency Guidelines. For security purposes, trails within the River Park would have nighttime lighting. Similar to the sports fields, lighting would be shielded, low lights with directional LEDs so there is very little light spill. The trail closest to the river is generally 100 feet from the river. The installation of the River Park and Shared Parks and Open Space will provide a natural buffer between the Stadium, commercial, and residential buildings and the San Diego River and Murphy Canyon Creek. Lighting will be directed away from the San Diego River and Murphy Canyon Creek.

As stated in Draft EIR Section 4.1, Aesthetics, Vertical Plane VP-S1 is located at the south project property line adjacent to the San Diego River. The maximum Building Lighting Trespass Illuminance at the south project property line occurs at Vertical Plane VP-S1, at 1.3 foot candle (fc), which is less than the 1.4 fc maximum illuminance threshold established for adjacent residential zoned property and wildlife habitat in Section 4.1.3. Under existing conditions, there are lighted sports fields and lighted parking lots adjacent to this area that generate the high to medium measured luminance noted at monitoring sites MS-2 and MS-3 in Table 4.1-3. The Project Building Lighting Plan includes new recreational athletic fields with sports lighting at similar locations to the existing fields in the southwest corner of the project site. The calculated illuminance at Vertical Plane VP-S1 is similar to the existing measured illuminance at monitoring site MS-3 (i.e., 1.18 fc) and below the 1.4 fc maximum illuminance threshold. The project building lighting would not introduce a new source of light trespass at VP-S1 and lighting levels would be below the established threshold of significance.

A4-32 The comment states that the Draft EIR did not include information on the relocation of existing reoccurring events from the SDCCU Stadium to another location. The comment asks if these events will be programmed at the future Stadium, and if not, would these events be relocated and would impacts

be significant due to relocation or displacement. It has not yet been determined whether recurring events will continue to be accommodated at the new Stadium or relocated, but such leasing and occupancy matters are not expected to have a potentially significant impact on the environment, nor would they substantively be different than existing events in the stadium parking lot.

As stated in Draft EIR Chapter 2, Project Description, as contemplated by the conditions set forth in SDMC Section 22.0908, development of a 35,000-capacity multipurpose Stadium is required within the first 7 years following execution of the PSA. Accordingly, the new Stadium location in the northwest corner of the project site was selected to allow concurrent construction activities while the existing SDCCU Stadium remains in operation hosting events. In addition to allowing for concurrent construction operations, the northwest corner of the project site was selected due to its proximity to Friars Road and Stadium Way, which facilitate traffic flows in and out of Stadium events, and the desire to minimize impacts to future residential neighborhoods on the eastern half of the project site.

In addition, Draft EIR Table 2-2 compares the existing number of annual events to the proposed number of annual events, including SDSU football games, other sporting events (MLS, soccer), concerts, and other major events. As shown therein, annual major events would increase from approx. 19 per year to 38 per year, with the greatest increase being other sporting events (MLS, soccer), which would increase from 5 events to 21 events per year.

A4-33 The comment states that the project includes hydrology and drainage BMPs on site within the project parks and open space areas, and that the City's MSCP allows for essential public infrastructure, such as roads and drainage conveyance infrastructure. The comment then states that such use of the proposed parkland or open space areas 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.

Potentially adverse impacts associated with Murphy Canyon Creek spillover flows into park and open space areas would be infrequent and would be offset by beneficial water quality impacts associated with increased pervious surfaces. Project impervious surfaces would decrease from 90% to 57%, pre- and post-construction, respectively. Replacing the existing stadium asphalt parking lot adjacent to Murphy Canyon Creek with a broad, landscaped, sloped park and open space with trails, fields, native-plant retention basins, and habitat areas would provide beneficial water quality impacts, due to infiltration prior to discharge to the San Diego River. A similar design is being implemented at the Riverwalk golf course, located along the San Diego River. A regional park is being designed at that site that would accommodate up to a 100-year storm event without raising existing water levels.

Project stormwater drainage systems would generally direct stormwater on site to bioretention basins. Any excess water would be directed to catchment basins, as illustrated in Draft EIR Figure 2-10E. The biotreatment features and catchment basins, which would be flooded more frequently than the surrounding open space and park areas, would be confined to specific areas and would not encompass large portions of the River Park. Bioretention basins and catchment basins have been proven to be effective in mitigating potentially significant water quality impacts and are required under the Small Municipal Separate Storm Sewer System (MS4) Permit, as indicated in Draft EIR Section 4.9.2, pages 4.9-12 and 4.9-13. In addition, as indicated in Draft EIR Section 4.9.4, page 4.9-23, the proposed project structural LID BMPs would also incorporate full trash capture (Appendices 4.9-1 and 4.9-4). This is reiterated on page 4.9-33, which states that:

Project BMPs, including source controls (such as common area landscape management and common area litter control) and LID structural BMPs in compliance with the Small MS4 Permit, will prevent or reduce the release of organic materials and nutrients (which might contribute to algal blooms) to receiving waters. As such, the proposed stormwater treatment devices would be sufficient to avoid substantial polluted runoff from the site.

In addition, as explained in Thematic Response PD-1 – Project Refinements, the Concept Design – Site Plan has undergone design refinements during the preparation of the construction drawings and plans for the proposed project. Some of these refinements include changes to the sizing and design of the BMPs, such as the consolidation of two biofiltration basins to one large biofiltration basin in the Concept Design – Site Plan in the Final EIR. The two largest BMPs will be built with the first phase of grading. These biofiltration basins have been designed to protect the basin berms from floodplain impacts. Previously the basin berms were set below the floodplain elevations. The refinements to the Site Plan include the basin berm elevations having been elevated so that they are now higher than the floodplain to ensure floodwaters do not scour into the basin during the 100-year flooding event for the San Diego River. The basins may have a backwater condition for the 100-year event where water could back up through the outfall pipe into the basin during a 100-year San Diego River flooding event, but the basin berms will be elevated above the floodplain so that the river does not scour or wash out the basins. To achieve the basin berm elevations side slopes were changed in order to accommodate the required berm elevation and the required bottom area size. In summary, (1) beneficial water quality impacts associated with reduced impervious surfaces, (2) infrequency of flooding of open space and park area, and (3) implementation of project stormwater quality BMPs would outweigh any potential indirect adverse impacts related to water quality, trash, and contaminants during flooding events.

Additionally, mitigation measure MM-BIO-8 in Section 4.3 of the Draft EIR specifically prohibits invasive plant species within any landscaping, including the open space and park areas: “Invasive Species Prohibition. The final landscape plans shall be reviewed by the project biologist to confirm they comply with the following: (1) no invasive plant species as included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region shall be included and (2) the plant palette shall be composed of species that do not require high irrigation rates. The project biologist shall periodically check landscape products for compliance with this requirement.” See also Response to Comment A4-31, above.

A4-34 The comment requests that Figure 11 in Appendix 4.15-1, TIA, be revised to provide cross-section detail of the Kinder Morgan access road. The requested figure revision is correct. Section 10 on Figure 11 refers to the eastbound on-ramp to Friars Road and not the Kinder Morgan driveway. The Final EIR is revised to include a revised Figure 11 in Appendix 4-15-1, TIA that will include a new Section 17 illustrating the cross-section of the Kinder Morgan driveway, as requested by the comment.

A4-35 The comment states that the project should define how the modified intersection of Mission Village Drive and Friars Road eastbound ramps functions. Specifically, the comment asks how the access to the Kinder Morgan site would operate; whether trucks would utilize the outside southbound left-turn lane of the intersection from Mission Village drive to access the Kinder Morgan site; and whether the EIR evaluated if trucks would block access to the inside left-turn lane. In answer to the question raised by the comment, yes, trucks would use the outside southbound left-turn lane to turn into the private driveway. The number of trucks entering the site from that movement currently is 11 or 12 vehicles

during each peak hour. This equates to an average of one truck every 5 to 6 minutes. With a planned inside left-turn pocket length of 120 feet, two trucks would have to arrive at the same time in order for access to be blocked to the inside lane. This is expected to be a rare occurrence; therefore, trucks are not expected to cause any substantial operational issues for this movement.

A4-36 The comment states that apparently, minimal bicycle and pedestrian facilities are proposed on the Mission Village Drive access to the site. The comment also states that 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. All on-site streets are proposed to have a sidewalk on both sides with two exceptions: the west/north side of Street A along the western edge of the site, and the north side of Street 3 West, which will be located in a tunnel below the campus promenade extending to the Stadium concourse area. All existing sidewalks on streets fronting or connecting to the site (e.g., Friars Road, San Diego Mission Road, Mission Village Drive, etc.) will remain. (See also Draft EIR, pp. 4.15-6 [“All streets within the project site either will include sidewalks on both sides of the street, or will include a multi-use path on one side of the street with enhanced pedestrian crossings.”], 4.15-141, 4.15-149, and 4.15-159.) Where Street D connects with Mission Village Drive, pedestrian and bicycle facilities will be provided continuously to connect with existing facilities. Draft EIR Figure 2-11A illustrates the streets with bicycle facilities. The Final EIR and Appendix 4.15-1 (TIA) will include a new figure that more clearly illustrates the proposed bicycle and shared-use facilities. These facilities include a campus loop that will connect all areas of the site and provide a more comfortable alternative to Friars Road for Grantville area residents who desire to travel to and through the site to other destinations (e.g., Fenton Marketplace). All on-site streets are proposed to have a sidewalk on both sides with two exceptions: the west/north side of Street A along the western edge of the site, and the north side of Street 3 West, which will be located in a tunnel below the campus promenade extending to the Stadium concourse area. Please also refer to Attachment A6-A in Response to Comment Letter A6.

In addition, as part of the Final EIR, CSU/SDSU has agreed to provide \$5 million in additional community benefit improvements relating to transportation, including bicycle and pedestrian facilities. These improvements, which would be provided over and above the project’s mitigation requirements, include installation of new buffered bike lanes on Rancho Mission Road from the Mission Valley site to Ward Road, thereby resulting in continuous bicycle facilities between the College Area and Mission Valley campuses; re-striping Rio San Diego Drive (Qualcomm Way to Fenton Parkway) to remove two existing vehicle lanes and provide buffered bike lanes; and, modification of Rancho Mission Road/Ward Road from Camino del Rio North to Friars Road that would include a one-way cycle track on each side of the road. (See Final EIR subsection 4.15.10.5.)

A4-37 The comment states that Draft EIR identifies mitigation for City intersection impacts, but states that CSU/SDSU has no jurisdiction over these signals and cannot guarantee the funding or implementation of the recommended mitigations, and therefore, the mitigations are infeasible. The comment recommends that CSU/SDSU work with the City to implement these mitigations as the project is developed to the identified Dwelling Unit Equivalent trigger for each mitigation. The comment also requests that CSU/SDSU recommend feasible alternative mitigations where alternative mitigation is identified and also deemed infeasible. As explained in Response A4-2, the mitigation measures have been revised in response to meetings between SDSU and the City and the improvements are now deemed feasible. Additionally, CSU/SDSU agrees to work with the City to implement the mitigation measures recommended in the Draft EIR relating to City facilities. Please see Response to Comment

A4-2 for additional information responsive to this comment. To the extent the Draft EIR notes certain improvements are infeasible due to, for example, inconsistency with the MVCPU, the Draft EIR recommends alternative mitigation. See mitigation measures MM-TRA-2, MM-TRA-3, and MM-TRA-4.

- A4-38** The comment requests why MM-TRA-10, traffic signal installation at Ward Road and Rancho Mission Road, is infeasible if the project's traffic at the defined threshold would warrant a signal at this location. The comment also states that the project should ensure that adequate access is provided to its site. The text on Draft EIR page 4.15-164 includes the statement: "However, if the City grants authorization, CSU will implement the recommended improvement." This text was inadvertently omitted from MM-TRA-10 on page ES-64 in Table ES-2. The Final EIR is revised to note that the mitigation measure is now considered feasible and the table has been revised accordingly. See Final EIR MM-TRA-10.
- A4-39** The comment states that both the Draft EIR and MVCPU Final Program EIR identified impacts at I-15 and Friars Road intersections (northbound and southbound), and that the MVCPU Final Program EIR recommends that a Project Study Report (PSR) be funded to identify the appropriate, more holistic improvements that would address all modes of travel. The comment recommends that the Draft EIR include the PSR and resulting recommended improvements as partial mitigation toward project impacts. Mitigation measures MM-TRA-5 and MM-TRA-6 recommend specific improvements to address the identified significant impacts at the I-15 northbound and southbound ramps at Friars Road intersections. (See Draft EIR, pp. 4.15-154 through 4.15-157.) The MVCPU Final Program EIR does not specifically call for a PSR at this interchange but does recommend one for the I-8/Texas Street-Qualcomm Way interchange. The Draft and Final Program EIR do call for improvements to be identified at the I-15/Friars Road interchange, as part of the Stadium Specific Plan study, although these improvements differ from those proposed by MM-TRA-5 and MM-TRA-6. Nonetheless, MM-TRA-5 and MM-TRA-6 have been revised to provide that CSU/SDSU will pay its fair-share of the recommended improvements, assuming there is a plan or program in place to provide the remainder funding. To the extent Caltrans agrees to preparation of a PSR in place of the identified improvements, CSU will pay its fair-share towards such improvements, and also will work with Caltrans, the City of San Diego, SANDAG and other applicable agencies to help facilitate improvements at this location.
- A4-40** The comment states that the Draft EIR and TIS (TIA, Appendix 4.15-1) 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. The Draft EIR and related TIA (Appendix 4.15-1) largely did follow the City traffic manual and related thresholds and that analysis is provided in the Draft EIR for the City's information; as requested by the comment, the Draft EIR includes analysis using the City's impact analysis guidelines and significance thresholds. (See Draft EIR, pp. 4.15-2, 4.15-3, 4.15-20, 4.15-61, 4.15-103 [Roadway Segments discussion]; Appendix 4.15-1, TIA, Table 16 [Note 3], Table 17 [Note *], Section 5.2.2 ["Roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds."], Table 20 [Note 3], Table 21 [Note 3], Section 6.4 ["Roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds."], Table 25 [Note 3], Table 26 [Note 3], p. 119 [concluding "the same intersections would exceed the thresholds of the City of San Diego impact criteria. Additionally at Intersection 29 – Qualcomm Way & I-8 WB Off-Ramp/Camino del Rio N the Project traffic would exacerbate baseline conditions and increase the delay by more than two (2.0) seconds, exceeding the City of San Diego threshold.], Table 30 [Note 3], Table 31 [Note 3], Section 7.2.2 ["Roadway segment LOS analysis is presented for information purposes only using the City of San

Diego impact thresholds.”], Table 35 [Note 3], Table 36 [Note 3], p. 142 [discussing the Fenton Parkway Bridge stating “Notations are included where the proposed Project may cause an exceedance of City of San Diego threshold criteria under this scenario.”], Section 8.1.4 [“Roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds.”], Table 40 [Note 3], Table 41 [Note 3], Section 8.2.1, Section 8.3.4 [“Roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds.”], Table 45 [Note 3], Section 9.1.2 [“roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds.”], Section 9.2.2 [“roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds.”], Section 9.3.2 [“roadway segment LOS analysis is presented for information purposes only using the City of San Diego impact thresholds.”], Section 9.5.1, Section 9.6.)

As to the 2050 analysis, CSU/SDSU has reviewed the City’s NOP comment letter, and the letter does not include a specific request to include analysis of a 2050 scenario. Moreover, the City’s Traffic Study Guidelines (previous and revised draft currently under review) do not specify the required horizon year analysis. However, relative to long-term analysis scenarios, CEQA is satisfied when an EIR includes analysis of those conditions forecast at project buildout. (See *Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1571-1574 [holding an EIR’s traffic analysis is adequate under CEQA when it analyzes existing traffic conditions plus the project as well as cumulative future conditions]; *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 941 [The traffic analysis analyzed “existing, background, background plus project, cumulative, and general plan build-out conditions ... [t]his was an adequate identification and analysis.”]; see also *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 452 [“It is common for an EIR’s impacts analysis to assume, counterfactually, that the project exists and is in full operation at the time the environmental analysis is conducted.”].) Further, a lead agency does not need to follow other regulatory or interested agency’s recommended methodologies, so long as its chosen methodology is supported by substantial evidence (*North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 642-643).

In this case, as reported in the Draft EIR, the proposed project is anticipated to reach buildout in 2037; that is, the proposed project is anticipated to be developed over approximately 15 years beginning in 2020 and ending in approximately 2037 (Draft EIR, Project Description, pp. 2-24 through 2-28). Accordingly, the Draft EIR transportation analysis properly included a long-term cumulative analysis based on forecasted 2037 conditions (Draft EIR, pp. 4.15-2, 4.15-15, and 4.15-19). CEQA does not require additional analysis of a 2050 scenario.

A4-41

The comment requests clarification if the 2037 analysis assumes the Purple Line Phase 1 project is in place. The comment states that this is not currently funded and programmed; therefore analysis that does not include the Purple Line should be provided. The model run used to develop the 2037 future year forecasts without the project initially included the Purple Line. The analysis presented in the Draft EIR was based on a model run used to develop the 2037 future year forecasts with the Purple Line in place. A subsequent model run was conducted to identify the change in traffic forecasts by excluding this transit improvement. The results of the comparison of the two runs was that the difference in horizon year traffic forecasts was generally negligible. Relative to traffic volumes, the Draft EIR analysis applied an annual growth factor that in most instances exceeded the growth projected using the unadjusted model forecasts after removal of the Purple Line. In only a few cases were the projected average daily traffic (ADT) volumes slightly higher, but typically by 2% or less and only at locations

approximately 1.5 miles from the project site. Based on this evaluation, the traffic engineer concludes that the results of the Draft EIR traffic analysis would not change significantly by excluding the Purple Line from the analysis.

- A4-42** Referring to Draft EIR Table 4.15-1, Proposed Non-Stadium Transportation Demand Management (TDM) Trip Reductions, the comment states that 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, Project-Generated Weekday Trip Generation (Without Stadium Event). The comment then states that reductions applicable to commute trips should only be applied to commute trips. The TDM calculation takes into account that certain measures are relevant to only certain types of trips. For example, the Carpool Matching/Guaranteed Ride Home program reduction was calculated as (% Reduction in Commute VMT) x (% Population Eligible) x (% of VMT Associate with Home-based Work Trips and Employees). The resulting percentage for this measure is only applied to a subset (55%) of the overall project VMT, and in that way this reduction gets applied only to the appropriate trips.
- A4-43** Referring to Draft EIR Table 4.15-43, VMT Analysis, the comment requests clarification on the methodology used to obtain the VMT values in this table as they appear to be double those in the San Diego Forward: The Regional Plan (Regional Plan; 2015) Final EIR and other SANDAG reports on VMT the City has reviewed. The comment also states that the Draft EIR indicates 158 million VMT in the 2012 Baseline, while the Regional Plan Final EIR, which also uses Series 13, indicates a regional VMT of 79 million VMT; likewise, in 2037, the Draft EIR reports a VMT of 185 million VMT while the Regional Plan Final EIR reports 90.5 million VMT (albeit for 2035). The VMT associated with the proposed project was calculated by first multiplying the total of all trips into and out of the project's zone by the average trip distance as calculated by the SANDAG model, then adding the intra-zonal trips and trip distance. To generate a consistent region-wide number, the same method is applied to all zones within the region, and the sum is taken as the regional VMT. This means a particular trip will be counted both in its origin zone and its destination zone. This is an appropriate methodology for calculating VMT as an efficiency metric, but results in a value that is approximately double that of the methodology used for air quality purposes. (See Appendix 4.15-1, TIA, Section 14.3.)
- A4-44** The comment states that 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/Diegueno Nation that was adopted by State Assembly Joint Resolution (SAJR) No. 60 in 2001, and that the Kumeyaay are identified as the Most Likely Descendants (MLDs) by the Native American Heritage Commission (NAHC) for any Native American human remains encountered during construction. The Cultural Context is expanded within the Final EIR to include a discussion of the Kumeyaay Aboriginal Territory, SAJR No. 60, and the NAHC's MLD determination as requested. The revisions do not change the analysis or any determination of significance.
- A4-45** The comment asks for the word "cultural" to be added to Draft EIR page 4.4-3. The requested revision is made in Final EIR. Please refer to page 4.4-3 of the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-46** The comment asks for minor revisions to the third paragraph on Draft EIR page 4.4-3. The comment asks to revise "Mission of San Diego" to "Mission San Diego de Alcala" and to reference the Nipawai tribe in addition to the Nipaguay tribe. Revisions are made in the Final EIR. The revisions do not change the analysis or any determination of significance.

- A4-47** The comment states that reference to the Primary record number for the SDCCU Stadium is not P-37-000035; CA-SDI-35 and should be revised to P-37-035171. This revision is made in the Final EIR on page 4.4-3. The revision does not change the analysis or any determination of significance.
- A4-48** The comment asks that the reference to the “City’s cultural resource regulations” be revised to the “City’s Historical Resource Regulations.” This revision is made on page 4.4-13 of the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-49** The comment asks that the word “Reference” be added to two paragraphs on page 4.4-14 and 4.4-15 where there is a discussion of the City’s designation criterion. This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-50** The comment asks that the phrase “with the lipay Nation of Santa Ysabel” be added as clarification on page 4.4-16 after “Clint Linton.” The comment also asks that “representative of the” be added to lines 2 and 3. These revisions are made in Final EIR. The revision does not change the analysis or any determination of significance.
- A4-51** The comment concurs with the mitigation measures provided for archeological and Native American Kumeyaay monitoring as provided in the Draft EIR. No revisions to the Final EIR are necessary based on this concurrence.
- A4-52** This comment asks that the “City of San Diego, Historical Resources Section” be added to the list of recipients to receive a copy of the Historical American Buildings Survey (HABS) documentation in MM-CUL-1. This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-53** As to MM-CUL-2, the comment asks for clarification on whether the request by Clint Linton to commemorate Jack Murphy in some manner would be included in the interpretive displays identified in this measure, and suggests that perhaps this can be accomplished as part of consultation with the City Historical Resources staff. In response, it is anticipated that Jack Murphy would be commemorated as part of MM-CUL-2. Preliminary, CSU/SDSU intend to relocate the Jack Murphy statue to a location within the new stadium. As described in the mitigation measure in the Draft EIR, “The content, design, and location of such signage may be done in consultation with the City’s Historical Resources staff.” The comment raises no further issue with the recommended mitigation measure; therefore, no more specific response can be provided.
- A4-54** The comment states that the City does not disagree with the conclusions of the Draft EIR. The comment asks that the City’s criteria for determining significance for paleontological resources as identified in the Paleontological Guidelines (2002), Significance Thresholds (2016), and the recently adopted changes to the San Diego Municipal Code Section 142.0151 – General Grading Guidelines for Paleontological Resources, be incorporated into the Geology and Soils section of the Final EIR. These documents are incorporated by reference in Section 4.6, Geology and Soils, in the Final EIR.
- A4-55** The comment states that the City of San Diego concurs with the mitigation measure MM-GEO-3 to reduce potential impacts to paleontological resources during construction. No revisions to the Final EIR are necessary based on this concurrence.

- A4-56** This comment asks to capitalize the first letters of the Tribal Historic Preservation Officer in line 1 of last paragraph on page 4.16-2. This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-57** The comment asks that the following sentence be modified on pages 4.16-16 and 4.16-7 (revisions shown in underline), “No California Register of Historical Resources (CRHR) listed or eligible tribal cultural resources were identified through the South Coastal Information Center.” This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-58** This comment asks that “*Nipaguay*” be added in addition to “*Nipawai*” and that both should be italicized. These revisions are made on pages 4.16-6 and 4-16-7 of the Final EIR. This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-59** The comment asks that the phrase “with the Iipay Nation of Santa Ysabel” be added after “Clint Linton” and “representative of the,” and that the word “the” be inserted before “Kumeyaay trail...” These revisions are made in the Final EIR on page 4-16-7. The revisions do not change the analysis or any determination of significance.
- A4-60** The comment asks that the word “tribal” be added to the first sentence after “CRHR-eligible” on page 4.16-8 under Section 4.16.5, Summary of Impacts Prior to Mitigation. This revision is made in the Final EIR. The revisions do not change the analysis or any determination of significance.
- A4-61** The comment concurs with mitigation measures MM-CUL-4 and MM-CUL-5, which serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture. No revisions to the Final EIR are necessary based on this concurrence.
- A4-62** The comment asks that the word “tribal” be added after the word “eligible” in three places of the first paragraph in Section 4.16.7, Level of Significance After Mitigation. The comment also asks that the following sentence in the same paragraph be modified (revisions shown in underline): “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. These revisions are made to Section 4.16.7. The revisions do not change the analysis or any determination of significance.
- A4-63** The comment states that reference to the Primary record number for the SDCCU Stadium is not P-37-000035; CA-SDI-35 and should be revised to P-37-035171 throughout the Cultural Resources Technical Report (Appendix 4.4-1). This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-64** The comment states that the third paragraph on page 13 under Section 2.2 of the Cultural Resources Technical Report (Appendix 4.4-1) be revised as follows (revisions shown in underline): “...river, is located within the project site...” This revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.
- A4-65** The comment asks that the first paragraph on page 19 of the Cultural Resources Technical Report (Appendix 4.4-1) be revised to reference 2001 as the date for the Historical Resources Guidelines. This

revision is made in the Final EIR. The revision does not change the analysis or any determination of significance.

- A4-66** The comment states that 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/Diegueno Nation that was adopted by SAJR No. 60 in 2001, and that the Kumeyaay are identified as the MLDs by the NAHC for any Native American human remains encountered during construction. The Cultural Context has been expanded to include a discussion of the Kumeyaay Aboriginal Territory, SAJR No. 60, and the NAHC's MLD determination as requested. The revisions do not change the analysis or any determination of significance.
- A4-67** The comment asks for additional information as to the relevance, significance, and association of the Kumeyaay village of *Nipawai*, which is also spelled Nipaguay in historical records, to the Mission San Diego de Alcalá. The comment asks that this information be added to the technical report, as well as Chapter (Section) 4.4, Cultural Resources, and Chapter (Section) 4.16, Tribal Cultural Resources. The comment also asks that reference to the village of Kosay should also include reference to other spellings: *Kosaii/Cosoy/Kosa'aay*. The Final EIR is revised to add other spellings as requested and to describe the relation of the project site to Nipaguay and Kosay. The revisions do not change the analysis or any determination of significance.
- A4-68** The comment asks that "Mission of San Diego" be changed throughout in order to reference "Mission San Diego de Alcalá." This revision is made in the Final EIR. The revisions do not change the analysis or any determination of significance.
- A4-69** The comment asks that the phrase "with the Lipay Nation of Santa Ysabel" be added after "Clint Linton" as clarification on page 38 of the Cultural Resources Technical Report (Appendix 4.4-1). This revision is made in the Final EIR. The revisions do not change the analysis or any determination of significance.
- A4-70** The comment asks that page 39 be revised to reference the National Register of Historical Places (NRHP), California Register of Historical Resources (CRHR), and City-eligible SDCCU Stadium Site as further described in site form P-37-035171 and the Historical Resources Technical Report. This revision is made in the Final EIR. The revisions do not change the analysis or any determination of significance.
- A4-71** The comment concurs with the mitigation measures provided for archaeological and Native American Kumeyaay monitoring as provided in the Draft EIR. No revisions to the Final EIR are necessary based on this concurrence.
- A4-72** The comment states that the City does not disagree with the conclusions of the Draft EIR. The comment asks that the City's criteria for determining significance for paleontological resources as identified in the Paleontological Guidelines (2002), Significance Thresholds (2016), and the recently adopted changes to the San Diego Municipal Code Section 142.0151 – General Grading Guidelines for Paleontological Resources, be incorporated into the Geology and Soils section of the Final EIR. These documents are incorporated by reference in Section 4.6, Geology and Soils. This revision is made in the Final EIR.

- A4-73** The comment states that the City of San Diego concurs with the mitigation measure MM-GEO-3 to reduce potential impacts to paleontological resources during construction. No revisions to the Final EIR are necessary based on this concurrence.
- A4-74** The comment states that the Mission Valley Community Plan was originally adopted in 1985, not 1984 as stated in the Draft EIR. Revisions are made to the Final EIR as requested. The revisions do not change the analysis or any determination of significance.
- A4-75** The comment states that Chapter 2, Table 2-5, Parks, Recreation, and Open Space, needs to be more clear on what area is available to the public versus what is available only to the people affiliated with SDSU (students, faculty, event ticket holders etc.). Preliminarily, all park and open space areas would be available to the general public for use. These include the River Park, Tailgate Park, and the courtyard, quad, and green spaces within the future campus office. Revisions are made in the Final EIR to further clarify. Please refer to Table 2-5 of the Final EIR.
- A4-76** The comment states that Chapter 2 should analyze the inclusion of a Community Recreation Center, even if the proponents do not intend to construct the facility. The comment expresses opinions of the commenter for the analysis to include the Community Recreation Center (and further an Aquatic Center). These facilities were not contemplated by SDMC Section 22.0908 and are not the obligation of the proposed project to construct. The proposed project has identified a location for an approximately 1-acre pad to accommodate these uses. The Draft EIR anticipated such uses and analyzed the impacts associated with a community recreation center. Specifically, the footprint-based impacts are addressed in the following Draft EIR sections: 4.3, Biological Resources; 4.4, Cultural Resources; 4.6, Geology and Soils; 4.8, Hazards and Hazardous Materials; 4.9, Hydrology and Water Quality; 4.11, Mineral Resources; and 4.16, Tribal Cultural Resources. Operational impacts associated with use of the community recreation center have been analyzed in Section 4.15, Transportation, and construction and operation of the community recreation center have been analyzed in Sections 4.2, Air Quality; 4.5, Energy; 4.7, Greenhouse Gas Emissions; and 4.12, Noise (traffic-noise). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-77** The comment states that Chapter 2 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 Update. The comment expresses commenter's opinions. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-78** Regarding Chapter 2, the comment states that it is unclear how the connection at Fenton Parkway will be made recognizing the rail crossing. The comment also states that a permit from the CPUC would likely be required. The comment states there appear to be inconsistencies between figures with some illustrations showing a connection will be made, but Figure 2-11A shows a gap in the connection where the tracks are located. The comment asks if there is a traffic signal at this location and states that details are missing from street sections.

To clarify, the proposed project would include a connection via Street "I" to the terminus of existing Fenton Parkway, including a crossing over the MTS Trolley Green Line. The Final EIR is revised to include the CPUC as a Responsible Agency and that approval will be required for this crossing. Please see Section 2.5.2, Requested Project Approvals. Further, the Final EIR is revised to clarify the intersection

of Street “I” and Fenton Parkway would be connecting as a “T” intersection based on further refinement of the project site plan and additional coordination with the CPUC, which indicated that the Draft EIR “knuckle” design was not a preferable approach to the trolley crossing. Please see Thematic Responses PD-1, Project Refinements.

- A4-79** Regarding Chapter 3, Cumulative Projects and Methods, the comment states that the project list should include a proposed Community Park and Recreation Center on the pad identified on the site plan. The comment states that these facilities are standardized enough throughout the City that enough information can be inferred on what will be there in the future. Please refer to Response to Comment A4-76, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-80** Regarding Chapter (Section) 4.1, the comment states that the current Mission Valley Community Plan calls for the protection of views of the existing Stadium as a recognized landmark, and this information should be noted specifically in the analysis along with any mitigation that may be necessary to address significant impacts. The MVCPU was adopted on September 11, 2019, and no such requirement or policy is contained therein. Further, demolition of the existing Stadium is contemplated by SDMC Section 22.0908, and the proposed project would be consistent with SDMC Section 22.0908 as described in Section 4.10, Land Use and Planning. Finally, as explained in Section 4.1, Aesthetics, of the Draft EIR, Public Resources Code Section 21099(d)(1) states that “aesthetic ... impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered [to have a] significant impact on the environment.” The proposed project would include campus, residential, mixed-use residential and employment opportunities within the campus village and research park, and is located on an infill site, within a TPA as identified by the City of San Diego (see Appendix 4.7-2). Nonetheless, CSU/SDSU note that the existing Stadium has been identified as an historic resource in Section 4.4, Cultural Resources, and that impacts associated with the demolition of the existing Stadium would be significant and unavoidable.
- A4-81** The comment states that figures regarding the ownership of the southwestern area that includes the park, are inconsistent in the Draft EIR, specifically Figures 2-1 and 2-9C. The comment asks that these be revised to both be reflective of the Initiative and PSA. In response, Figures 2-1 and 2-9C are clarified in the Final EIR. Please also refer to Response to Comment A4-75, above, regarding ownership and public access to the parks and open space areas within the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-82** Regarding Section 2.2, the comment states that more specificity should be given to the context and meaning of “shared parks and open space” as an objective. The comment asks if this means something formal, along the lines of a public access agreement with the City for recreation areas outside of the 34-acre City River Park. The comment also asks if this includes an aquatics facility, as shown on the City’s Draft MVCPU. Please refer to Response to Comment A4-75, above, regarding ownership and public access to the parks and open space areas within the project site. Please also refer to Response to Comment A4-76, above, regarding the recreation/aquatics facility. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- A4-83** The comment states that Section 2.3 should discuss a program for the park and inclusion of a recreation center and an aquatic facility per the City's Draft MVCPU and the Public Facilities Financing Plan. The comment also states that per Measure G: "8. The People of the [City of San Diego] also desire the reservation and improvement of an additional minimum of 22 acres within the Existing Stadium Site as publicly accessible active recreation space." These 22 acres are also referenced in the SDMC 22.098. Please refer to Response to comment A4-76, above, regarding the recreation center. Regarding the 22 acres of parks in SDMC Section 22.0908, please refer to the consistency analysis presented in Table 4.10-3 in Section 4.10, Land Use and Planning of the Draft EIR. As described therein, the proposed project would provide for more than 22 acres of parks and open space, in conformance with SDMC Section 22.0908. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-84** The comment states that Section 2.3.4, Community Recreation Center Site, should indicate in further detail this City-owned site in Table 2-5, on Figure 2-9C, and in the narrative description, including acreage of the pad for the recreation and aquatic center. Please refer to Response to Comment A4-76, above.
- The comment also asks for a description of how the design for this site would or would not be per Council Policy 600-33. Regarding compliance with Council Policy 600-33, as stated in Section 2.3.4.3, the proposed project would include a site that would provide a rough-graded pad for a future City-constructed recreation/community/aquatic center envisioned by the MVCPU. Construction of vertical improvements at the community center is not part of the proposed project; however, the construction and operation of the recreation center has been analyzed in the Draft EIR. The design and vertical improvements would be the responsibility of the City and funded through the City's collection of park development fees or other City-funding mechanisms. Until such time as the City secures the funding to build this public improvement, SDSU/CSU will maintain the recreation center site as open space. Further, CSU/SDSU has convened interested stakeholder to participate in the River Park Advisory Group, which has been several times to further refine the River Park plan, which is presented in Attachment PD-1A. CSU/SDSU has also hosted two larger community meetings/workshops to review the refinements to the River Park plan. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-85** The comment asks that the EIR discuss the Public Facilities Financing Plan projects P-4 and P-5, which are applicable to the project site per the MVCPU. Refer to Response to Comment A4-76, above. Section 4.14, Public Services and Recreation, is revised in the Final EIR to add a description of P-5 as requested; however, the proposed project does not propose construction of this facility. Nonetheless, because the recreation center is planned for the project site, the construction and operation of the recreation center has been analyzed in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-86** Regarding Section 4.10, City of San Diego Development Impact Fee Program – Mission Valley (third paragraph), the comment asks that the following statement be revised: "reflects the limited availability of parks and current shortage of park space in Mission Valley." The comment states that this is incorrect, and the fees do not reflect current shortages; rather, it is based on projected future needs, based on projected residential uses (not current parkland deficits) and current (not future) land and construction costs. This statement is revised in the Final EIR to reflect City's suggested edits. The

comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- A4-87** The comment states that the required population-based City of San Diego park acreage requirements are based on “usable” land as defined in the COSD General Plan’s Glossary. The comment asks that Section 4.10, City of San Diego Development Impact Fee Program – Mission Valley (fourth paragraph), be revised to restate narrative and proposed park acreages in terms of usable park acreages. The comment suggests reviewing Section 4.14, Parks and Recreation for language regarding “usable” park acreage cited from the City of San Diego General Plan Recreation Element. The use of this term is revised in the Final EIR to reflect the City’s suggested edits.
- A4-88** The comment states that Table 4.13-7 needs to be revised because it compares “apples to oranges.” The comment states that the MVCPU uses “useable” park acreage, while the proposed project uses gross acreage. The comment asks that Table 4.13-7 be revised to reflect usable acreage. The Final EIR, Section 4.14, is revised and provides a statistical breakdown of park acreage, which qualifies as “usable” under the City’s definition as the comment requests, as well as a discussion of park equivalencies which the MVCPU also uses for other parks areas that do not meet the slope requirements and definition under the useable park acres definition. A total of approximately 40.01 acres meet the strict definition of usable park acres, not including areas within the campus office, which exceeds the park demand generated by the proposed project of 23.8 acres. Please refer to Section 4.14 of the Final EIR for additional discussion.
- A4-89** The comment states that Section 4.14, Park Development, erroneously omits reporting the aquatic facility. Please refer to Responses to Comments A4-76 and A4-85, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-90** The comment states that Design Guidelines in the San Diego River Park Master Plan (SDRPMP) include a 35-foot-wide River Pathway corridor, and that the conformance evaluation with the SDRPMP should address conformance with Section 3.1.2A and Section 3.1.3. The comment also states that the Draft EIR conformance statement should be reevaluated given the vision for a contiguous trail corridor along the River Pathway if the additional trail linkages to the west are not added to the project description. Please see Response to Comment A4-26, above. As noted therein, this connection is not part of the proposed project and would be subject to a future city or other project.
- A4-91** The comment requests clarification as to which entity is anticipated to provide long-term maintenance and management of the 34-acre River Park. If SDSU, the comment requests that the discussion include maintenance standards expected to be used within the active park areas and the San Diego River buffer area. The comment states that if the City is anticipated to provide such maintenance and management, consideration may be needed for additional park access points for maintenance, equipment storage facilities, and parking for maintenance staff; the comment also requests an assessment of potential impacts to the City General Fund, the reduction of park use areas, open space, and/or population-based park acreage requirements. CSU/SDSU clarifies that, as part of the PSA with the City, CSU/SDSU would maintain the 34-acre River Park. The maintenance standards for the River Park have not been finalized yet, but CSU/SDSU anticipates that maintenance will be comparable to maintenance standards for City parks containing similar features and amenities. .

- A4-92** The comment requests mitigation measures to avoid and reduce unintentional edge effects and unwanted human activity in the San Diego River or Murphy Canyon Creek; MM-BIO-10 does not address control measures such as fencing and signage to discourage park users from entering sensitive habitat areas. In addition to mitigation measure MM-BIO-10, Section 4.3.6 of the Draft EIR also includes measures to address construction-related access issues (MM-BIO-4, which requires installation of temporary fencing along the limits of grading) and long-term related access issues (MM-BIO-7, which requires signs and barriers be installed along the River Park and Shared Parks and Open Space interface with the San Diego River and Murphy Canyon Creek. The signage shall state that these areas are native habitat areas, and no trespassing is allowed. Barriers shall be installed where appropriate to deter access into the river and creek).
- A4-93** The comment requests that any access required for the City Fire-Rescue Department's Swift Water Rescue Team to Murphy Canyon Creek and the San Diego River from the site is included in the EIR project description, and that impacts/mitigation to sensitive plant and animal species is included in the EIR. Please refer to Response to Comment A4-94, below.
- A4-94** The comment provides background factual information about incidents related to the rescue of people in or around riparian areas to the east and south of the current stadium parking lot, as well as access requirements and preferences of the Swift Water Rescue Team. The comment requests that emergency vehicle access to the banks of Murphy Canyon Creek and the San Diego River from the area that is currently occupied by the Stadium parking lot be maintained. In response, the design of the River Park has been refined to provide for additional access points for the Swift Water Rescue Team as the comment requests. The locations are approximately every 500 feet with one exception of approximately 1,000 feet in order to identify a location that would provide for access without any environmental impacts to sensitive habitat.
- A4-95** The comment states that the EIR should clearly state how the SDSU Mission Valley Campus Master Plan estimates being able to accommodate 15,000 full-time equivalent students at buildout, especially with such a great magnitude of unmitigated traffic impacts, referencing EIR Executive Summary, p. ES-3, Section ES.3.1. The premise of the comment is incorrect. As discussed in Response to Comment A4-2, most of the proposed project's significant traffic-related impacts to City facilities would be reduced to less than significant based on the City's authorization to implement the mitigation measures recommended in the Draft EIR. (See Response to Comment A4-2.) In addition, the traffic analysis upon which the mitigation is recommended took a conservative approach because it did not consider reduced trip rates related to student usage. (See Draft EIR Section 4.15.5.1.1) If the traffic analysis had considered the campus effect on trip generation, the impacts would have been reduced by nearly 8%. Therefore, the Draft EIR accurately reports that the proposed project would be able over time to accommodate up to 15,000 full-time equivalent students.
- A4-96** The comment suggests that traffic impacts should be categorized in Table ES-2 as either direct or cumulative. The comment also states that all traffic impacts should be mitigated to the extent feasible to the satisfaction of the City Engineer and/or Caltrans. Generally speaking, project impacts identified under the Existing plus Project scenario are considered "direct" impacts as the analysis considers the addition of only project traffic to existing traffic levels, while under the 2037 Horizon Year analysis, the project's impacts are considered "cumulative" because it is not only project traffic that has been added to the roadway network but also traffic from other reasonably foreseeable projects and, as such, the resulting impacts are attributable to both the project and cumulative traffic.

As to the comment that all impacts should be mitigated to the extent feasible, this topic is addressed throughout these responses to comments, including, but not limited to, Responses to Comments A4-A4-2, A4-6, and A4-23 above, and A4-97 to A4-140, below. Please also see the mitigation measures as revised in Final EIR section 4.15.9.3.

A4-97 The comment suggests that Impact TR-1, identified in the Draft EIR as significant and unavoidable, 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. The identification of a significant impact under conditions in which there is an event at the proposed Stadium, and the resulting conclusion that impacts would be significant and unavoidable, is based on both the occurrence of high-attendance events (i.e., 20,000+ attendance) and an increase in the number of such events over existing conditions. (Draft EIR Section 4.15.7.1.3.) As explained in the Draft EIR, even though the proposed project would result in lower attendance levels than the existing Stadium due to the fact that the proposed Stadium capacity under the proposed project would be substantially less than the existing Stadium (proposed 35,000 capacity versus existing 70,000 capacity), a single event with 20,000+ attendees could result in potentially significant impacts. To address such impacts, the Draft EIR includes a Transportation and Parking Management Plan (PDF-TRA-4), which is similar to the existing plan implemented by the City on Stadium event days. (See Draft EIR Section 4.15.1.3.) However, even with implementation of a traffic control plan similar to the one currently implemented by the City, there can be no assurance that the impacts would be reduced to less than significant.

A4-98 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-2/28A, shown as significant and unavoidable in the Draft EIR, such as coordinating traffic signal improvements with the City of San Diego and Caltrans, to reduce the impact to below a level of significance. The mitigation measure for Impact TR-2 does recommend traffic signal improvements, as the comment suggests (see Draft EIR MM-TRA-1), and has been revised in response to comments to provide that CSU/SDSU will pay its fair-share to Caltrans for the recommended improvement.. See Final EIR MM-TRA-1.

In addition to MM-TRA-1, the proposed project would implement a TDM Program to reduce the number of site-generated vehicle trips (see Section 4.15.1.2). Additionally, as the proposed project involves a mix of uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding VMT within the region as compared to other development projects within the County that are located beyond the reach of a transit station. Accordingly, the proposed project would reduce its significant impacts to the extent feasible. Please also see Response to Comment A4-23 for additional information responsive to this comment.

A4-99 The comment suggests that SDSU should implement any feasible measures to mitigate Impacts TR-3/28C and TR-4/28D, shown as significant and unavoidable in the Draft EIR, such as traffic signal improvements in coordination with the City of San Diego, to reduce the impacts to below a level of significance. As explained in Response A4-2, the EIR has been revised and now identifies the improvement as feasible. The City, through coordination with CSU/SDSU, has granted CSU/SDSU the necessary authorization to perform specific mitigation measures, which are reflected in the Final EIR, Section 4.15. Accordingly, the recommended improvements are feasible and CSU/SDSU will implement them in coordination with the City. With implementation, the proposed project's impact would be reduced to less than significant. Additionally, specific to the referenced pages in Table ES-2 in the

Executive Summary, the text on Draft EIR page 4.15-163 includes the statement: “However, if the City grants authorization, CSU will implement the recommended improvement.” This text was inadvertently excluded from MM-TRA-2 on page ES-56 in Table ES-2. The text is modified in the Final EIR consistent with the above information.

A4-100 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-5/28E, shown as significant and unavoidable in the Draft EIR, 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 impacts to below a level of significance. The mitigation measure for Impact TR-5 (MM-TRA-4) does provide for the addition of a second northbound right-turn lane and traffic signal optimization, as the comment requests (Draft EIR p. 4.15-155). However, as discussed in Response to Comment A4-2 and related responses, one component of the recommended improvement requires optimization of the traffic signal at the intersection, and the other component requires the addition of a second northbound right-turn lane, though the City prefers that the additional lane not be implemented because it is inconsistent with the City’s future circulation plans due, in part, to the future construction of the Fenton Parkway Bridge. Accordingly, addition of a second right-turn lane is considered infeasible. Additionally, specific to the referenced pages in Table ES-2 in the Executive Summary, the text on Draft EIR pages 4.15-163 and 4.15-164 includes the statement: “However, if the city grants authorization, CSU will implement the recommended improvement.” This text was inadvertently excluded from MM-TRA-4 on Page ES-57 in Table ES-2. The text is modified in the Final EIR consistent with the above information.

A4-101 The comment suggests that SDSU should implement any feasible measures to mitigate Impacts TR-6/28H and TR-7/28I, shown as significant and unavoidable in the Draft EIR, in coordination with the City and Caltrans, to reduce the impacts to below a level of significance. The mitigation measures for Impacts TR-6 and TR-7 identify the improvements necessary to mitigate the identified impacts (see Draft EIR MM-TRA-5 and MM-TRA-6). As explained in Response A4-39, MM-TRA-5 and MM-TRA-6 have been revised to provide that CSU/SDSU will pay its fair-share of the recommended improvements, assuming there is a plan or program in place to provide the remainder funding. (See Final EIR MM-TRA-5 and MM-TRA-6.)

In addition to MM-TRA-5 and MM-TRA-6, the proposed project would implement a TDM Program to reduce the number of site-generated vehicle trips (see Section 4.15.1.2). Additionally, as a project involving a mix of campus uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding VMT within the region as compared to other development projects within San Diego County located beyond the reach of a transit station. In addition, construction of the Fenton Parkway Bridge extension would improve operations at the I-15 southbound Ramps and Friars Road intersection (Draft EIR pp. 4.15-218 to 4.15-219). Accordingly, the proposed project would reduce its significant impacts to the greatest extent feasible. Please also see Response to Comment A4-23 for additional information responsive to this comment.

A4-102 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-8/28J, shown as significant and unavoidable in the Draft EIR, such as traffic signal improvements in coordination with the City of San Diego and Caltrans, to reduce the impacts to below a level of significance. The mitigation measure for Impact TR-8 does provide for traffic signal improvements at the adjacent I-15 Northbound Ramps/Friars Road intersection. See Draft EIR MM-TRA-7 and MM-TRA-

8, in Section 4.15.9.3. Additionally, MM-TRA-6 has been revised to provide that CSU/SDSU will pay its fair-share of the recommended improvements, assuming there is a plan or program in place to provide the remainder funding.

In addition to MM-TRA-6, the proposed project would implement a TDM Program to reduce the number of site-generated vehicle trips (see Draft EIR Section 4.15.1.2). Additionally, as a project involving a mix of campus uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding VMT within the region as compared to other development projects within the County that are located beyond the reach of a transit station. In addition, construction of the Fenton Parkway Bridge extension would improve operations at the I-15 southbound ramps and Friars Road intersection (Draft EIR pp. 4.15-218 and 4.15-219). Accordingly, the proposed project would reduce its significant impacts to the greatest extent feasible. Please also see Response to Comment A4-23 for additional information responsive to this comment.

A4-103 The comment suggests that SDSU should implement any feasible measures to mitigate Impacts TR-9/28L and TR-10/28M, shown as significant and unavoidable in the Draft EIR, 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. The mitigation measures for Impacts TR-9 and TR-10 (MM-TRA-8 and MM-TRA-9) do provide for re-striping and associated traffic signal improvements, as the comment requests (Draft EIR, p. 4.15-157). As discussed in Response to Comment A4-2 and related responses, for those impacted locations within the City for which CSU/SDSU has no jurisdiction or control to implement improvements, the Draft EIR necessarily concludes that the mitigation is infeasible and the impact significant and unavoidable. However, pending the City's grant to CSU/SDSU of the necessary authorization, the recommended improvements are feasible, and CSU will implement them in coordination with the City. With implementation, the proposed project's impacts would be reduced to less than significant. (See Final EIR MM-TRA-8 and MM-TRA-9; Draft EIR p. 4.15-164; Appendix 4.15-1, TIA, pp. 198–199.) Additionally, specific to the referenced pages in Table ES-2 in the Executive Summary, the text on Draft EIR page 4.15-164 includes the statement: "However, if the city grants authorization, CSU will implement the recommended improvement." This text was inadvertently excluded from MM-TRA-8 and MM-TRA-9 on Page ES-63 to 64 in Table ES-2. The text is modified in the Final EIR consistent with the above information.

A4-104 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-11/28N, shown as significant and unavoidable in the Draft EIR, such as installation of a traffic signal at Ward Road/Rancho Mission Road in coordination with the City of San Diego, to reduce the impacts to below a level of significance. The mitigation measure for impact TR-11 (MM-TRA-10) does provide for installation of a traffic signal at the Ward Road/Rancho Mission Road intersection, as the comment requests (Draft EIR, p. 4.15-157). As discussed in Response to Comment A4-2 and related responses, for those impacted locations within the City for which CSU/SDSU has no jurisdiction or control to implement improvements, the Draft EIR necessarily concludes that the mitigation is infeasible and the impact significant and unavoidable. However, pending the City's grant to CSU/SDSU of the necessary authorization, the recommended improvements are feasible, and CSU will implement them in coordination with the City. With implementation, the proposed project's impact would be reduced to less than significant. (See Final EIR MM-TRA-10; Draft EIR, p. 4.15-164; Appendix 4.15-1, TIA, p. 200.) Additionally, specific to the referenced pages in Table ES-2 in the Executive Summary, the text on Draft EIR page 4.15-164 includes the statement: "However, if the City grants authorization, CSU will

implement the recommended improvement.” This text was inadvertently excluded from MM-TRA-10 on page ES-64 in Table ES-2. The text is modified in the Final EIR consistent with the above information.

A4-105 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-12/280, shown as significant and unavoidable in the Draft EIR, such as traffic signal improvements in coordination with the City of San Diego, to reduce the impacts to below a level of significance. The mitigation measure for impact TR-12 (MM-TRA-11) does provide for traffic signal improvements at the Fairmount Avenue/Mission Gorge Road intersection, as the comment requests (Draft EIR, pp. 4.15-157 to 4.15-158). As discussed in Response to Comment A4-2 and related responses, for those impacted locations within the City for which CSU has no jurisdiction or control to implement improvements, the Draft EIR necessarily concludes that the mitigation is infeasible and the impact significant and unavoidable. However, pending the City’s grant to CSU/SDSU of the necessary authorization, the recommended improvements are feasible, and CSU will implement them in coordination with the City. With implementation, the proposed project’s impact would be reduced to less than significant. (See Final EIR MM-TRA-11; Draft EIR, p. 4.15-164; Appendix 4.15-1, TIA, p. 200.) Additionally, specific to the referenced pages in Table ES-2 in the Executive Summary, the text on Draft EIR page 4.15-164 includes the statement: “However, if the city grants authorization, CSU will implement the recommended improvement.” This text was inadvertently excluded from MM-TRA-11 on pages ES-64 to 65 in Table ES-2. The text is modified in the Final EIR consistent with the above information.

A4-106 The comment suggests that SDSU should implement any feasible measures in coordination with the City of San Diego and Caltrans to mitigate Impact TR-13/28P, shown as significant and unavoidable in the Draft EIR, beyond the stated mitigation of “support[ing] Caltrans in its effort to obtain the project’s proportionate share of funding for the recommended improvements” to reduce the impacts to below a level of significance. The mitigation measure for impact TR-13 identifies the improvements necessary to mitigate the identified impacts (see Draft EIR MM-TRA-12; Draft EIR, Section 4.15.9.3) . Additionally, MM-TRA-12 has been revised to provide that CSU/SDSU will pay its fair-share of the recommended improvements, assuming there is a plan or program in place to provide the remainder funding. (See Final EIR MM-TRA-12.)

In addition to MM-TRA-12, the proposed project would implement a TDM Program to reduce the number of site-generated vehicle trips (see Section 4.15.1.2). Additionally, as a project involving a mix of campus uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding VMT within the region as compared to other development projects within the County that are located beyond the reach of a transit station. Accordingly, the proposed project would reduce its significant impacts to the greatest extent feasible. Please also see Response to Comment A4-23 for additional information responsive to this comment.

A4-107 The comment suggests that SDSU should implement any feasible measures to mitigate Impact TR-14/28Q, shown as significant and unavoidable in the Draft EIR, such as traffic signal improvements in coordination with the City of San Diego, to reduce the impacts to below a level of significance. The mitigation measure for impact TR-14 (MM-TRA-13) does provide for traffic signal improvements at the Ruffin Road/Aero Drive intersection, as the comment requests (Draft EIR, pp. 4.15-158). As discussed in Response to Comment A4-2 and related responses, for those impacted locations within the City for which CSU has no jurisdiction or control to implement improvements, the Draft EIR necessarily

concludes that the mitigation is infeasible and the impact significant and unavoidable. However, pending the City's grant to CSU/SDSU of the necessary authorization, the recommended improvements are feasible, and CSU will implement them in coordination with the City. With implementation, the proposed project's impact would be reduced to less than significant. (See Final EIR MM-TRA-13; Draft EIR p. 4.15-164; Appendix 4.15-1, TIA, p. 201.) Additionally, specific to the referenced pages in Table ES-2 in the Executive Summary, the text on Draft EIR page 4.15-164 includes the statement: "However, if the city grants authorization, CSU will implement the recommended improvement." This text was inadvertently excluded from MM-TRA-13 on page ES-66 in Table ES-2. The text is modified in the Final EIR consistent with the information presented above.

- A4-108** The comment requests that the Draft EIR explain why mitigation measures and levels of significance are listed as "N/A" in Table ES-2 on pages ES-67 to ES-69, and suggests that SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance. The listings under the "Mitigation Measure(s)" column heading in Table ES-2 are "N/A" for impacts TR-28B, TR-28F, TR-28G, and TR-28K because there is no feasible mitigation available beyond the Transportation and Parking and Management Plan (PDF-TRA-4) to be implemented as part of the project to manage Stadium-generated traffic and minimize vehicle delays and congestion to these locations resulting under Stadium event conditions. These impacts are projected to occur during Horizon Plus Project Plus Event conditions and are expected to remain significant and unavoidable, albeit on a temporary and infrequent basis. (See Draft EIR, Section 4.15.1.3, pp. 4.15-3 and 4.15-54, Table 4.15-44.)

The "N/A" listings under the Mitigation Measure(s) column heading in Table ES-2 for Freeway Segments is an error. Mitigation measure MM-TRA-17, which is added to the Final EIR, formalizes as a mitigation measure the requirement that CSU/SDSU pay Caltrans the proposed project's fair-share of funding for the costs to prepare a Project Study Report–Project Development Support–Project Initiation Document (Study) to evaluate alternatives to increase capacity, improve mobility, and relieve congestion on impacted freeway segments or adjacent interchanges. Alternatives to be considered include enhanced acceleration/deceleration lanes and interconnecting ramp meters.

- A4-109** The comment suggests that SDSU should implement any feasible measures to mitigate Impacts TR-25/30B and TR-26/30C, shown as significant and unavoidable in the Draft EIR, beyond the stated mitigation of "support[ing] Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements" to reduce the impacts to below a level of significance. The Draft EIR determined that the improvement necessary to mitigate Impacts TR-25 and TR-26 (I-15 on-ramps at Friars Road) is the addition of a second mixed flow lane to the on ramps (MM-TRA-14 and MM-TRA-15; Draft EIR, Section 4.15.9.3). The mitigation measures have been revised to provide that CSU will pay Caltrans the proposed project's fair-share of funding for the recommended improvements.

In addition to MM-TRA-14 and MM-TRA-15, the proposed project would implement a TDM Program to reduce the number of site-generated vehicle trips (see Section 4.15.1.2). Additionally, as a project involving a mix of campus uses (residential, retail/commercial, institutional, etc.) that would be located in a TPA with a high-capacity transit station that is centrally located in the region, the proposed project will minimize the number of trips and corresponding VMT within the region as compared to other development projects within the County that are located beyond the reach of a transit station. Accordingly, the proposed project would reduce its significant impacts to the greatest extent feasible. Please also see Response to Comment A4-23 for additional information responsive to this comment

- A4-110** The comment requests correction of a discrepancy in Draft EIR references to the seating capacity of SDCCU Stadium, with 68,000 seats listed on page ES-76 and 70,561 seats listed on page 4.15-1. Both statements are correct. The existing SDCCU Stadium contains 68,000 seats, although the existing capacity, when taking into account standing room and Stadium employees, etc. is 70,561. This revision is made in the Final EIR as requested.
- A4-111** The comment restates information contained in the Draft EIR, and states that Table 4.15-10, Project-Generated Weekday Trip Generation, should not be taking both a 14.4% trip reduction for TDM and an additional 7% Daily, 10% AM/10% PM trip reduction for Transit/Bike/Walk Trips. The trip reductions of 7% Daily, 10% AM, and 10% PM are trip reductions for transit, walking, and bicycling (combined) that would be taken regardless of the internal design of the project site and represent a baseline condition. The vast majority of these trips would be transit trips and would occur due to the location of the Green Line Trolley stop, which is centrally located within the project site. (See Draft EIR, pp. 4.15-46 through 4.15-48; Appendix 4.15-1, TIA, Table 11.) The additional reduction of 14.4% is attributed to a combination of TDM measures, including site design and active transportation connections and facilities, parking policies, car share, bike share, and other features (Draft EIR Section 4.15.1.1, Proposed TDM Program [PDF-TRA-1 and PDF-TRA-2]). Implementation of these measures would further encourage campus students, employees, and residents to use non-automobile modes above the baseline condition.
- A4-112** The comment states that the EIR should clearly specify the location of any proposed off-site parking supplies and associated parking agreements, in relation to statements on Page 4.15-3 about “off-site parking supplies near trolley stations” provided for limited events with Stadium attendance levels exceeding 25,000 persons or more. It would be speculative at this time, several years in advance of Stadium opening, to attempt to identify off-site parking supplies and associated parking agreements. However, to the extent the City has such arrangements presently in place to accommodate Stadium overflow parking demands, CSU/SDSU will coordinate with the City as it moves forward with project construction and development. Further, the SDSU Main Campus may be available to provide for off-site parking on weekends and would allow for convenience trolley service to the project site.
- A4-113** The comment states that SDSU should coordinate with the appropriate City of San Diego departments regarding any proposed metered and/or time-limited parking on City streets, as referenced on Draft EIR page 4.15-4, including the San Diego Police Department and the Transportation and Storm Water Department. CSU/SDSU agrees with the comment and would coordinate with the appropriate City departments, including the San Diego Police Department and the Transportation and Storm Water Department, regarding proposed metered and/or time limited parking on City streets.
- A4-114** The comment suggests the project’s proposed TDM Program be identified as required mitigation if it is being used to reduce traffic impacts, rather than as a “project design feature,” as referenced on Draft EIR page 4.15-4. The proposed TDM program is a project design feature rather than a mitigation measure. See Draft EIR, Section 4.15.1.1. With respect to enforcement, the program includes the establishment of a TDM Coordinator to ensure the TDM strategies are implemented (Draft EIR pp. 4.15-7 and 4.15-8). Additionally, the program has been included in the MMRP to be adopted by the CSU Board of Trustees as part of the project approvals, and as such, implementation of the TDM program will be fully enforceable. Please see Response to Comments A4-8 and A4-14 for additional information responsive to this comment.

- A4-115** The comment states that the EIR should clarify that unbundled parking is only required for multifamily residential parking in “Parking Standards Transit Priority Areas” and not all “Transit Priority Areas,” as referenced in Non-Stadium TDM 3 on page 4.15-7. The Final EIR is revised in response to the comment and reflects the requested clarification that unbundled parking is only required for multifamily residential parking in “Parking Standards Transit Priority Areas.”
- A4-116** The comment suggests the EIR should clearly demonstrate how providing limited parking to discourage use of single-occupant vehicles, as referenced in Non-Stadium TDM 3 on page 4.15-7, will not negatively affect adjacent neighborhoods. Draft EIR Section 4.15.7.5, Parking Assessment, analyzes the proposed project parking supply relative to projected demand and concludes that, excluding Stadium event conditions, the proposed project would provide adequate parking to accommodate the projected demand, and as such, parking in neighboring communities is not expected. The other measures in the Non-Stadium TDM program will encourage site employees and residents to use non-automobile modes, thereby further reducing parking demand. (See Draft EIR Section 4.15.1.1.1.) Therefore, based on the evidence provided, it is not expected that the proposed parking supply will negatively affect adjacent neighborhoods.
- A4-117** The comment suggests the EIR should provide additional details on the proposed TDM Program monitoring, as referenced in Non-Stadium TDM 4 on pages 4.15-7 and 4.15-8, including the frequency and type of monitoring, and to whom the results of the monitoring will be reported. Regarding monitoring associated with the Non-Stadium TDM 4 component, Commute/Travel Services, as previously noted, the TDM program provides for a TDM Program Coordinator to ensure the TDM Program strategies are implemented and effective (Draft EIR pp. 4.15-7 and 4.15-8). In addition, the TDM Program in its entirety has been included in the MMRP to be adopted by the CSU Board of Trustees as part of the Project approvals. As to the frequency, type of monitoring, and to whom the results will be reported, please see the MMRP in the Final EIR. Finally, a TDM monitoring program has been prepared to further monitor implementation and timing of the TDM strategies. Please see Response to Comment A4-5 and A4-14 for additional related information.
- A4-118** The comment suggests that Non-Stadium TDM 4 should also provide free shuttle service to students and employees, in addition to the hotel shuttle services listed in the Draft EIR. The request to provide free shuttle service to students and employees, in addition to hotel shuttle services, is added to the TDM Program and would be provided to the extent economically feasible. It is noted that CSU/SDSU operates a “Red & Black” shuttle on the main campus, and that such a program may become feasible at the project site in the future; however, it would be speculative what impacts such a program would have at this time.
- A4-119** The comment suggests Section 4.15.2, Methodology, be revised in the Final EIR to address whether the project is consistent with the MVCPU. The Draft EIR does address the proposed project’s consistency with the MVCPU. Specific to transportation-related issues, please see Section 4.15.7.4. In addition, Section 4.15.9, Mitigation Measures, includes analysis where applicable of potential road improvement consistency with the update. See, for example, mitigation measure MM-TRA-2. For additional information relating to consistency with the MVCPU, please refer to EIR Section 1, Introduction and Existing Environmental Setting, pp. 1-20 through 1-21, and EIR Section 4.10, Land Use and Planning, pp. 4.10-10 through 4.10-11 and pp. 4.10-28 through 4.10-29.

- A4-120** The comment requests correction of a typographic error on Page 4.15-15, Section 4.15.2.1, of the Draft EIR, which incorrectly states that the transportation analysis evaluates operation at 4 existing intersections, instead of 40. The Final EIR is revised to correct the referenced typographical error regarding the number of intersections included within the transportation analysis study area.
- A4-121** The comment states that the Draft EIR does not 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. The Draft EIR includes analysis of “opening day” Stadium-related traffic impacts under an Existing plus Project scenario (see Section 4.15.7.1.3), which CEQA specifically provides is to be based on existing conditions and is not to include reasonably foreseeable cumulative projects (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 454). An analysis that includes full buildout of the proposed project, including the Stadium, as well as reasonably foreseeable cumulative projects, is presented in Draft EIR Section 4.15.7.3. There is no requirement under CEQA to provide an interim year cumulative condition analysis scenario because the focus of a cumulative impact analysis is not on the proposed project’s impacts, but on the impact of the project combined with other projects (*City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal. App. 4th 889, 912; 14 CCR 15130(b) [agencies are given two methods for analyzing cumulative impacts (the list of projects method and the summary of projections method), neither of which requires an interim year cumulative condition analysis]; *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal. App. 4th 889, 905 [upholding a traffic analysis that did not include an interim analysis]; *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 929-930 [upholding a cumulative traffic impact analysis]).
- A4-122** The comment states that the Draft EIR fails to analyze the impact of the proposed project on the Community Buildout Year 2050 Scenario. Please see Response to Comment A4-40 for information responsive to this comment.
- A4-123** The comment states that the Draft EIR 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. Please see Response to Comment A4-121 for information responsive to this comment.
- A4-124** The comment requests correction of a typographical error on Page 4.15-30, Section 4.15.3.5, where the Draft EIR incorrectly states that there are 41 existing study area intersections, when there are 40. The Final EIR is revised to correct the referenced typographical error regarding the number of intersections included within the transportation analysis study area.
- A4-125** The comment suggests Table 4.15-7 should be revised to include a footnote showing where traffic counts were obtained and when they were taken. Draft EIR Section 4.15.2.6 (Appendix 4.15-1 (TIA) Section 2.4.3) notes that the peak hour freeway volumes were obtained from the Caltrans Performance Measurement System (PeMS) count data for the week of April 30, 2018, to May 4, 2018. The Final EIR is revised to include the relevant text/table and provide reference to this source.
- A4-126** The comment suggests the Final EIR should be revised to include information on how the rate of 4.4 daily trips per dwelling unit was developed for “Student Focused Housing,” as referenced in Table 4.15-10. The 4.4 daily trip rate for Student Focused Housing is based on multiple sources, including the certified SDSU Final Additional Analysis to the SDSU 2007 Campus Master Plan Revision Final EIR (May

2018) and the College Community Redevelopment Project Final Program EIR (July 1993) previously certified by the City of San Diego.

- A4-127** The comment suggests Table 4.15-10 should include information documenting the source of the existing Stadium daily trips of 1,089 ADT. The existing Stadium peak hour volumes are based on counts taken at the main entrance to the Stadium opposite Mission Village Drive. Based on the traffic engineer's professional judgment and experience, peak hour volumes were estimated to be roughly 10% of the daily volume (see Appendix 4.15-1, TIA, pp. 64 and 234).
- A4-128** The comment suggests the Draft EIR's discussion of potential long-term lower trip generation in Section 4.15.5.1.1 should be revised to include projected peak hour trips for a 15,000-student campus, if the entire project site were eventually converted to university uses only. No specific timeline for conversion of the site to a full-time university campus has been identified, and the university vision has been generally described as an Innovation District that would not necessarily operate in the same manner as a traditional university campus. However, since the analysis presented in the Draft EIR of campus office and market residential uses would result in a higher trip generation than a university, these higher trip-generating uses were analyzed as a worst-case scenario for CEQA purposes.
- A4-129** The comment suggests the Draft EIR should be revised to provide detail on how the assumption was derived for a 10% mixed use reduction in the Stadium event trip generation, as referenced in Draft Section 4.15.5.1.2 and Table 4.15-11. The 10% reduction is based on professional engineering judgment and includes reductions due to the reasonable assumptions that certain Stadium event attendees will: (1) visit the restaurant and retail uses prior to entering the Stadium, (2) be residents living next to the Stadium, (3) be guests of the adjacent hotels, and/or (4) be employees working next to the Stadium.
- A4-130** The comment requests correction of a discrepancy between references of trip generation information, with Draft EIR Section 4.15.5.3 stating the total trip generation under a university project scenario is 21% less than the analyzed market project scenario, and Draft EIR Section 4.15.5.1.1 stating the university-only project scenario would be expected to generate 8% less than a market project scenario. The Final EIR is revised to correct the referenced typographical error from 21% to 8% regarding trip generation under a university project scenario.
- A4-131** The comment suggests Draft EIR Section 4.15.5.4 be revised to state whether the proposed traffic signal at the intersection of Friars Road and Stadium Way (Street A) would meet traffic signal warrants per Manual on Uniform Traffic Control Devices (MUTCD) guidelines. Based on the projected traffic volumes illustrated on Draft EIR Figure 4.15-8, the MUTCD peak hour signal warrant would be met at the Friars Road/Stadium Way (Street A) intersection under a scenario that includes project volumes alone, without the addition of Horizon Year traffic volumes. The addition of Horizon Year traffic volumes would further exacerbate the need for a traffic signal. The Final EIR is revised to include revisions to the text on page 4.15-53 to add this information.
- A4-132** The comment suggests Draft EIR Section 4.15.5.4 be revised to address whether the project's proposed roadway improvements shown on Figures 4.15-10A and 4.15-10B are consistent with the MVCPU. The proposed cross-section of Friars Road is consistent with the MVCPU. For the remaining streets in the area immediately surrounding the Stadium, there is no applicable consistency basis as the MVCPU indicated that the study for the Stadium Specific Plan area (i.e., the transportation impact

analysis presented in this EIR) would be used to identify the required roadway improvements to serve existing and planned development.

- A4-133** The comment suggests the project's proposed road improvements, as shown on Draft EIR 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. The streets that are within the City's right-of-way will be designed to meet City standards to the greatest extent feasible, or will be constructed such that existing bicycle and sidewalks are consistent with existing conditions. Streets that will be under CSU jurisdiction will be based on City standards but ultimately designed to meet campus needs and guidelines.
- A4-134** The comment suggests the EIR should explain why many of the study intersections are shown in Table 4.15-14 to experience a decrease in delay with the addition of project traffic to existing conditions. The reductions in delay, which are minor, are projected to occur at 7 of the 40 study area intersections because the proposed project would add traffic to movements with lower levels of delay (i.e., typically high volume through movements) and, correspondingly, movements with greater capacity. Because the calculation of overall intersection delay is a weighted calculation based on volume, the additional traffic to the low volume movements causes an overall decrease in delay of between 0.1 and 5.6 seconds. At Intersection 13 (Mission Village Drive/Friars Road eastbound ramps–San Diego Mission Road), the intersection is proposed to be modified to remove a fifth leg, and the overall signal phasing would be modified. These changes would result in a substantial improvement to operations, as shown under Existing plus Project Without Event Conditions. (See Appendix 4.15-1, TIA, Table 20; see also Draft EIR Tables 4.15-29, 4.15-34, and 4.15-46.)
- A4-135** The comment suggests the EIR should explain why the “Requires Additional Analysis” column in Table 4.15-15 is not titled “Significant Impact.” In response to the comment, the Final EIR is revised to add a footnote to the “Requires Additional Analysis” heading of Draft EIR Table 4.15-15 stating:
- “City methodology as to the analysis of road segments consists of a two-step process. First, a vehicle/capacity (V/C) analysis is performed to determine whether the proposed project would result in certain pre-conditions. If the identified pre-conditions are not met, no further analysis is required. If, on the other hand, the pre-conditions are met, the analysis proceeds to step 2, which considers additional operational factors before concluding whether a threshold exceedance would result. The results presented in Table 4.15-15 illustrate the first part of the analysis. Segments labelled “NO” require no further analysis; segments labeled “YES” require step 2 of the analysis. The step 2 analysis and related results are presented in Draft EIR Appendix 15-1, Transportation Impact Analysis, Section 9.3.2.”
- A4-136** The comment requests correction of an inaccurate statement on Draft EIR page 4.15-77, which states that Table 4.15-20 presents results of “project traffic ... added to existing peak hour roadway volumes,” when Table 4.15-20 relates to daily volumes, not peak hour volumes. The Final EIR is revised to correct the referenced error by replacing the phrase “peak hour” with the word “daily” as requested.
- A4-137** The comment suggests the Horizon Year (2037) No Project Conditions Ramp Metering Analysis be revised to include the maximum observed delays and maximum observed queues at each metered on-ramp, to support the note in Table 4.15-27. The footnote in the referenced table is revised as part of

the Final EIR to reflect observed maximum queues of about 8 vehicles and maximum delays of about 35 seconds.

A4-138 The comment suggests the parking supply discussion in Section 4.15.7.5.1 of the Draft EIR should also identify the parking requirement based on City minimum and maximum standards for all proposed on-site uses. In response to the comment, a table has been prepared that compares the parking supply to be provided by the proposed project to the City of San Diego's minimum and maximum parking requirements; the table is attached to these responses to comments (see Attachment A4-E). As shown, when there is no Stadium event, the proposed project is required by City requirements to provide a minimum 8,048 spaces for the office, residential, retail, and hotel uses. The proposed supply of 12,052 is in excess of this requirement by 4,004; this is due to the recently enacted City Ordinance 21057, which reduced the multifamily residential parking requirement to zero for Parking Standards Priority Areas. In order to be competitive with the area's housing market and to secure financing for development, a maximum parking ratio of 1.23 per unit will be allowed. These parking supplies will be unbundled. The table also shows that the office and retail parking supplies fall well below the City of San Diego maximum allowed, which are the only relevant uses with parking maximums. When there is a Stadium event, an additional 1,140 parking spaces would be available for a total supply of 13,192. This amount is short of the City of San Diego requirement of 17,964 total parking spaces by a total of 4,772; this limited supply is meant to encourage carpooling, rideshare, and use of the transit stop provided on site.

A4-139 The comment suggests Draft EIR Table 4.15-40 should be revised to clarify which modes correspond to the percent mode share depicted in the table, and to provide table note text for notes 2 through 5. The Final EIR is revised to include a revised Table 4.15-40, which is revised to duplicate Table 12 of Appendix 4.15-1.

A4-140 The comment disagrees with the Draft EIR conclusion that the Fenton Parkway Bridge is not required as mitigation for the proposed project's impacts, as stated in Section 4.15.11. The comment suggests the analysis in Section 4.15 shows that such project impacts as the intersection impact at Northside Drive and Friars Road in the Horizon Year 2037 (Table 4.15-47) may be mitigated with construction of the bridge. The Draft EIR traffic analysis shows that implementation of the Fenton Parkway Bridge does improve traffic operations at selected intersections though it also degrades operations at others due to the projected changes in areawide traffic volumes. (See Draft EIR, Section 4.15.11.) Thus, while the bridge would improve operations at Northside Drive and Friars Road, it also would result in a net increase in significant impacts.

Specifically, as reported in the Draft EIR, the addition of the two-lane bridge as compared to the no bridge scenario would cause a total of four new significant impact locations and one new City threshold exceedance location, and would eliminate one significant impact location based on CSU thresholds, though this location would still exceed the City threshold (Draft EIR p. 4.15-219).

Under the four-lane bridge scenario, the project would result in a total of four new significant impact locations under the CSU thresholds and one new City threshold exceedance location, and would eliminate two significant impact locations based on both CSU and City thresholds (Draft EIR p. 4.15-220).

With respect to Draft EIR mitigation measure MM-TRA-4 for the Northside Drive/Friars Road intersection, please see Response A4-2 for information regarding this mitigation.

- A4-141** The comment requests that the list of project features on page ES-3, item No. 8, identify what infrastructure is off site. The comment seeks clarification on what improvements would be considered off site of the proposed project. Off-site improvements are largely limited to off-site roadway improvements as shown in Figure 4.15-10 of the Draft EIR. Additional off-site improvements are limited to utility connections, the impacts of which have been analyzed throughout the Draft EIR. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided.
- A4-142** Regarding page ES-3, Table ES-1, the comment states that the FEMA Conditional Letter of Map Revision (CLOMR) will dictate the elevation of building pads, and the County of San Diego Flood Control Department is the start of that process. The comment relates to the process through which CSU/SDSU will process a CLOMR through FEMA. A Hydraulic Analysis (Appendix 4.9-5) was prepared for the proposed project which analyzed the future hydraulic conditions post-construction and determined the future buildings would be out of the modeled floodplain. Please refer to Draft EIR Section 4.9, Hydrology and Water Quality. The Draft EIR considered the CLOMR/Letter of Map Revision (LOMR) and determined that impacts related to hydrology and water quality would be less than significant. Regardless of which local agency (the City of San Diego or County of San Diego) is the start of that process, the analysis of the proposed project's impacts is included in the Draft EIR, and the comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided.
- A4-143** Regarding page ES-4, Table ES-1, the comment requests that the following statement be revised, "Authority to connect existing City-owned infrastructure" to state "confirm capacity in existing infrastructure." The comment states that the City may not have plans for such density. Authority to connect to the City's infrastructure assumes sufficient capacity is available, which the Draft EIR determined to be the case in Section 4.17, Utilities and Service Systems. Regarding the City's plans, CSU/SDSU notes the MVCPU was adopted in September 2019 and that, as shown in Table 4.13-7, the proposed project is consistent with, if not slightly less intense, than the assumptions in the MVCPU.
- A4-144** Regarding impacts to riparian habitat, page ES-21, Table ES-2, the comment asks 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. As noted in Section 4.9, Hydrology and Water Quality, 90% of the project site is currently impervious, covered by parking lot and the existing SDCCU Stadium. Under the proposed project, approximately 57% of the project site would be impervious, and 43% of the project site would be permeable. This would increase the amount of infiltration in the project site and increase groundwater under the project site. Thus, phreatophytic vegetation would not be adversely impacted as the comment suggests.
- A4-145** Regarding page ES-33, Table ES-2, the comment states that water wells were installed at the Stadium site at the turn of the century. The comment further states that certain project elements may remove the geologic layers, used historically by San Diego citizens. The comment addresses water wells and geology, which were analyzed in Draft EIR Section 4.6, Geology and Soils, and Section 4.9, Hazards and Hazardous Materials. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided.

- A4-146** The comments asks if hazardous materials in the existing Stadium will lead to groundwater contamination when demolition occurs. Mitigation measure MM-HAZ-1 requires abatement procedures for the removal of hazardous building materials prior to demolition, implosion, and construction activities. Abatement would remove the hazardous materials, thereby removing the potential impacts to groundwater.
- A4-147** The comment states that care should be exercised so that the removal of any soils does not interrupt the natural flow of groundwater. The comment also states that the creation of any water flow discontinuities should be analyzed closely, citing the Draft EIR Executive Summary, p. ES-36, Table ES-2. Section 4.9.4 is revised in the Final EIR to indicate that construction of subterranean structures below the depth of shallow groundwater, and associated permanent removal of aquifer sediments, would have negligible impacts to the aquifer, as the area of sediment removal is extremely minor in comparison to the size of the aquifer, and groundwater would simply flow around the structure.
- A4-148** The comment asks if there is risk that explosion waves will physically damage the City's two existing monitoring wells or Kinder Morgan's decommissioned and sealed wells. Explosion and implosion activities would be designed by an explosives engineer, ensuring nearby features to remain in place would not be affected by the explosions. To address the potential impact associated with the use of explosives during demolition and implosion activities on the project site (Impact HAZ-2), the EIR identifies mitigation measure MM-HAZ-2, which requires that prior to demolition of the existing Stadium, a Demolition (and Implosion) Plan shall be prepared and submitted to the City Fire-Rescue Department Fire Prevention Bureau for review. The EIR finds that with implementation of MM-HAZ-2, the impact would be mitigated to a less-than-significant level.
- A4-149** The comment asks what is the risk that explosion waves will physically damage Kinder Morgan assets and lead to subsurface leaks. As stated in Response to Comment A4-148, an explosives engineer would design the explosion/implosion, and nearby features would be protected. Please refer to Response to Comment A4-148, above.
- A4-150** The comment asks if excavation activities will affect remaining pollutants. The comment states that at this time, the site has reached a degree of equilibrium, and moving soils around might cause pollutants to dislodge and migrate. The comment requests explanation for how contamination pollutants will be prevented from spreading into the groundwater basin. MM-HAZ-3 defines a Hazardous Material Contingency Plan which will address potential impacts to soil, soil vapor, and groundwater releases on or near the project site. It will include procedures for assessment, training, characterization, management, and disposal of hazardous materials/contaminated media should it be encountered during excavation so that these media do not spread or cause further contamination.
- A4-151** The comment states that the City does not recommend or support the removal/decommissioning of certain 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. The decision and authorization to move, relocate, or otherwise alter the existing well network lies with the Regional Water Quality Control Board (RWQCB). Further, previous remediation efforts on the project site have been satisfied and. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- A4-152** In reference to mitigation measure MM-HAZ-5, which requires a well decommissioning and destruction plan to be prepared for the removal or abandonment of on-site wells and associated piping, the comment asks what entity will be responsible for this plan. As stated in MM-HAZ-5, the decommissioning and destruction plan shall be written in accordance with applicable regulations and submitted to the RWQCB for approval. The owner of the wells/responsible party will prepare the well decommissioning and destruction plan. CSU/SDSU understand that all necessary approvals have been provided and that no subsequent permits or approvals are required to deconstruct the wells in question on the project site.
- A4-153** Referencing MM-HAZ-5, the comment asks how the project will impact wells which have been decommissioned, and asks if the decommissioned wells will be disturbed as part of the project. The comment also states that per County and state regulation, well casings remain in place, and their holes are slurry-filled. The comment notes that the project has subsurface elements. As reported in Draft EIR Section 4.8, Hazards and Hazardous Materials, only four sentinel wells will reportedly remain on site, near the northeastern boundary of the project site, in order to monitor the progress of ongoing remediation at the KMEP MVT property. These four wells, as shown on Figure 4.8-1, are not to be removed or disturbed without authorization of the RWQCB. Removal, damage, or disturbance of these or any other remaining wells could create an upset or accident condition (Impact HAZ-4). A decommissioning and destruction plan for the four sentinel wells would be prepared and approved by the RWQCB, which may also require protection or replacement of the wells, and the plan would be followed, in accordance with MM-HAZ-4, prior to construction activities which could disturb the wells. As to all additional wells identified on site, decommissioning and destruction or transfer of these wells is assumed to be approved by the RWQCB under CAO 92-01 Addendum No. 8; a similar decommissioning and destruction plan would be prepared and approved in accordance with MM-HAZ-5, and wells would be properly decommissioned and destroyed or abandoned in accordance with applicable laws and regulations.
- A4-154** The comment asks what impacts to air quality will be caused by “routing” the toxic vapors around the buildings. This is in reference to MM-HAZ-7. Vapor mitigation systems are designed so that they do not exhaust or “route the toxic vapors” to the environment or other areas. They also have to be permitted so any potential air quality impacts would be mitigated as part of the treatment system. The vapor barriers and mitigation system would be reviewed and approved as part of the permitting process.
- A4-155** The comment asks if the impact of removing the basal gravels on groundwater has been analyzed. The comment also asks about the natural movement of groundwater. Further, the comment states that the City has Pueblo Water Rights, and no discussion about the impact of groundwater storage was identified, referencing Draft EIR Executive Summary, p. ES-45, Table ES-2. SDSU acknowledges the City’s continued retention of its Pueblo Water Rights. Please see Response to Comment A4-147. Regarding Pueblo Water Rights, please refer to Response to Comment A4-218, as well as EIR Section 4.17, Utilities and Service Systems, p. 4.17-11. With respect to the question regarding basal gravels, 90% of the project site is currently impervious, covered by parking lot and the existing SDCCU Stadium. Under the proposed project, approximately 57% of the project site would be impervious, and 43% of the project site would be permeable. This would increase the amount of infiltration in the project site and increase groundwater under the project site.
- A4-156** The comment asks if the project would conflict with or obstruct implementation of a water quality control plan or future sustainable groundwater management plan. The comment states the City may

implement groundwater extraction and water treatment projects in the future. First, with respect to the comment that the City may implement groundwater extraction and water treatment projects in the future, that is a potential future project which would be required to comply with CEQA requirements if it moves forward. With respect to water quality control plans please see Final EIR Section 4.9.4, page 4.9-32, which specifically addresses this comment. As described therein, construction and operation of the proposed project would result in less-than-significant impacts related to conflicts with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. Further, the owner of the wells/responsible party will prepare the well decommissioning and destruction plan. CSU/SDSU understand that all necessary approvals have been provided and that no subsequent permits or approvals are required to deconstruct the wells in question on the project site.

- A4-157** The comment states that the analysis and evaluation of sufficient water must occur now, and that a completed water supply assessment (WSA) is required. The comment references the Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 prepared by California Department of Water Resources (DWR), 2003, as well as the Draft EIR Executive Summary, p. ES-71, Table ES-2, Impact UTL-1.

The Draft EIR, Section 4.17, Utilities and Service Systems, includes an analysis and evaluation of sufficient water. Specifically, pursuant to CEQA Appendix G, Section XIX(b), the Draft EIR analyzed whether the project would “[h]ave sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.” (See Draft EIR pp. 4.17-2 through 4.17-5; pp. 4.17-23 through 4.17-25.) The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to EIR Section 4.17, Utilities and Service Systems for additional information.

As to the comment that a completed WSA is required, and the reference to Senate Bill (SB) 610 and SB 221, the Draft EIR discloses that these statutory provisions do not apply to the proposed project (Draft EIR Section 4.17, Utilities and Service Systems, p. 4.17-9). SB 610 requires any “city or county, acting as a lead agency under CEQA” to request a “water supply assessment” from the urban water supplier most likely to serve the project. As the lead agency under CEQA, CSU is not required by law to prepare WSAs for campus master plan projects; CSU is not a city or county, but rather a state agency. In any case, CSU has considered the WSA already prepared for the MVCPU, which encompasses the entire Mission Valley Community Plan area, including the SDSU Mission Valley Campus Master Plan project site. In addition, SB 221 requires a city, county, or local agency to include a condition to any tentative subdivision map that a sufficient water supply must be available to serve the subdivision, and is equally inapplicable to the proposed CSU campus master plan project. The comment does not raise any specific issue regarding this analysis; therefore, no more specific response can be provided or is required.

- A4-158** The comment requests full explanation as to why the relocation of existing wells is a less-than-significant impact, referencing Draft EIR Executive Summary, p. ES-71, Table ES-2. The comment addresses general issues that were analyzed in Section 4.9, Hazards and Hazardous Materials, and Section 4.17, Utilities and Service Systems, of the Draft EIR. As described therein, decommissioning of

wells may result in potentially significant impacts (Impact HAZ-4) and mitigation measure MM-HAZ-5 is recommended, which states”

MM-HAZ-5 Well Decommissioning, Other Wells. Other wells identified on the project site related to the former Mission Valley Terminal contamination plume are assumed approved for removal or transfer by the Regional Water Quality Control Board under Addendum No. 8 of CAO 92-01. A well decommissioning and destruction plan has been prepared by Kinder Morgan for the removal or abandonment of on-site environmental wells, groundwater monitoring wells, remediation wells, and associated piping. The decommissioning and destruction plan shall be written in accordance with applicable regulations and submitted to the Regional Water Quality Control Board for approval. 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.

It is further noted that the owner of the wells/responsible party will prepare the well decommissioning and destruction plan. CSU/SDSU understand that all necessary approvals have been provided and that no subsequent permits or approvals are required to deconstruct the wells in question on the project site.

A4-159 The comment states an assessment of the cumulative effect on utilities and/or service system resources cannot be made until the WSA is completed. Please refer to Response to Comment A4-157, above, as well as EIR Section 4.17, Utilities and Service Systems, pp. 4.17-2 through 4.17-5; p. 4.17-9; and pp. 4.17-23 through 4.17-25 for responsive information.

A4-160 The comment states that the site is located in a floodplain and subject to flooding, and asks what measures are being taken to make sure potential floods do not affect the project. Please see Response to Comment A4-27.

Further, as part of the continued planning and design of the proposed project, the effective hydraulic analysis for the existing and proposed conditions would be prepared (using the Hydraulic Engineering Center’s River Analysis System [HEC-RAS] or similar) to support on-site design and to compare water surface elevations along San Diego River and Murphy Canyon to ensure compliance with FEMA National Flood Insurance Program (NFIP) requirements. The proposed project would also prepare, process, and obtain approval for a CLOMR, as applicable per FEMA NFIP requirements, prior to issuance of a grading permit.

A4-161 The comment states that runoff to the creek (i.e., Murphy Canyon Creek) would likely change because the slope and landscaping is changing and that these impacts must be evaluated. Detailed analysis and design of the project’s stormwater drainage was performed in the Drainage Study for SDSU Mission Valley Campus (Onsite Improvements), prepared by Rick Engineering in February 2019. The referenced report was incorporated into the Draft EIR as Appendix 4.9-3 and incorporated into Section 4.9. In addition, a project-specific hydraulic analysis of Murphy Canyon Creek by Chang Consultants (Appendix 4.9-5) demonstrates that (with the exception of stormwater flows associated with off-site road improvements) there would be no change in surface flows to Murphy Canyon Creek. Overflow from the creek during storm events that occur upstream of the project site would flow through the project’s open space, which is being designed to accommodate such flows, and would then flow into the San Diego River. Such flows would not be returned to Murphy Canyon Creek. Additionally, the project is reinforcing

the berm adjacent to the creek to further prevent flows from reentering the creek. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional information.

- A4-162** The comment requests explanation as to why the project does not include any project facilities, improvements, or features in the existing creek, nor any other change to any aspect of the creek. Please see Responses to Comments A4-27 and A4-28. Please also refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional information.
- A4-163** The comment suggests adding the following documents to EIR Table 1-3, Summary of Planning Documents: (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; and (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. The documents listed in this comment are added to Table 1-3 in the Final EIR as requested.
- A4-164** The comment states that the City does not have a plan of “environmental remediation” of the existing site, with respect to the MVT facility. The text regarding site remediation referenced in this comment is directly from Municipal Code Section 22.0908; accordingly, no change has been made.
- A4-165** The comment asks what water quality standards are referred to when discussing the River Park. As described on Draft EIR page 4.9-23, “Although the proposed project is only subject to the requirements of the Small (Phase II) MS4 Permit and would not be subject to the requirements of the San Diego Regional MS4 Permit (Order R9-2013-0001), the LID features described above would be consistent with the latter permit requirements, as well as the 2018 City of San Diego Storm Water Standards Manual, where feasible to the maximum extent practicable. SDSU would be responsible for ensuring implementation and funding of maintenance of the permanent BMPs, as described in Section 4.0, Operation and Maintenance Plan, of Appendix 4.9-4.”
- A4-166** With respect to anticipated sewer flows generated from the proposed project, the comment asks when the connection to the North Mission Valley Interceptor will occur. The comment also asks if the City’s planned Pure Water facilities were considered within the analysis for this project. The proposed project would be phased over an approximately 15-year schedule. The first connection would be to the proposed Stadium, which is scheduled to open in August 2022. Thereafter, two additional connections would be made as development occurs in the River Park, campus office, hospitality, commercial, and residential areas. In addition, the City’s planned Pure Water facilities were considered in the Draft EIR. The Pure Water project is identified as a cumulative project in Chapter 3, Cumulative Projects and Methods; see also Section 4.1, Aesthetics, p. 4.1-43, and Section 4.17, Utilities and Service Systems, p. 4.17-4.
- A4-167** The comment states that there are temporary impacts associated with the storm drain improvements within the City’s “Stadium Wetland Mitigation Site” and that the Campus Plan must exclude all areas within the City’s Stadium Mitigation Site. The temporary impacts associated with the sewer connection are very minor and likely an overestimate of the actual work area needed to tie into the sewer connection. To be conservative, a 27-foot by 60-foot work area was estimated; please refer to EIR Figure 4.3-6, Impacts to Biological Resources – Off-Site Sewer and Storm Drain Connections. However, the actual work will be conducted from the top of the berm and will be done to minimize any disturbance

within the San Diego River and Stadium Mitigation Site. It is important to note that improvements to existing City-owned/maintained infrastructure, assuming they are conducted in as minimally impactful a manner as possible, is a covered activity in the City of San Diego's MSCP Subarea Plan. Establishment of a connection to the City's existing sewer infrastructure in this single location is the most efficient way to service the increases in flows projected from the proposed project. Further, this extremely minor, temporary impact is the only impact within the Multi-Habitat Planning Area (MHPA). All other temporary or permanent impacts are located outside of the MHPA. The campus plan excludes the City's Stadium Mitigation Site, and CSU/SDSU will work with the City regarding authority to connect to the existing City-owned infrastructure.

- A4-168** The comment requests clarification on MM-BIO-5(e). The mitigation measure is revised in Appendix 4.3-1 and Section 4.3 of the Final EIR to clarify the City's concerns (revisions shown in ~~strikeout~~ and underline): "Flush ~~special-status~~ wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from occupied habitat areas immediately prior to brush-clearing activities. This does not include disturbance of nesting birds (see MM-BIO-3) or "flushing" of state-listed species (i.e., least Bell's vireo (see MM-BIO-1)." Additionally, the only listed species that occurs on site is least Bell's vireo, which SDSU is pursuing take authorization through Section 7. All measures specified in the Biological Opinion will be adhered to in order to minimize all impacts, direct or indirect, to least Bell's vireo.
- A4-169** The comment states that the City disagrees with the inclusion of the City's proposed groundwater project in the "land subsidence" discussions of the Draft EIR's geotechnical reports: Appendix 4.6-1, Section 4.5, and Appendix 4.6-2, Section 4.6. The comment also states that the City's planned groundwater project would be implemented sustainably, with close, regular monitoring. The referenced sections in the geotechnical reports state as follows: "Subsidence is customarily associated with long term groundwater extraction. The City of San Diego (City) is assessing the feasibility of developing the Mission Valley groundwater basin as a sustainable source of water (Gillingham Water and CH2M, 2018). The City is considering installing three groundwater extraction wells south and southwest of the Stadium site. The City's consultants should address the potential for subsidence considering the proposed SDSU MV [Mission Valley] redevelopment. Group Delta should review the assessment made by the City's consultant." The comment expresses opinions of the commenter and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-170** The comment requests elaboration on when groundwater levels were collected (month, season, rainy years versus dry years, etc.), referencing Draft EIR Section 4.6, Geology and Soils, Table 4.6-4, Depth to Groundwater. As stated on Draft EIR p. 4.6-13, the sources for the groundwater levels reported in Table 4.6-4 are the geotechnical reports supporting the EIR: EIR Appendix 4.6-1 (Geotechnical Investigation Report – Site) and EIR Appendix 4.6-2 (Geotechnical Investigation Report – Stadium). Groundwater was generally measured during drilling in the subsurface explorations completed for the geotechnical investigations (see EIR Appendices 4.6-1 and 4.6-2, Section 3.3 – Groundwater). As stated in the referenced appendices, the subsurface investigations were completed between February and April 2019. The boring records upon which the groundwater elevations are based include the specific drilling dates and are included in EIR Appendices 4.6-1 and 4.6-2. Groundwater monitoring is ongoing and will continue through the winter to obtain an annual variation across the site.
- A4-171** The comment states that any recharging of dewatered groundwater needs to be permitted and comply with water quality standards for groundwater injection. Section 4.6.4 is revised in the Final EIR to

acknowledge that future groundwater recharge would be subject to applicable standards and permitting.

- A4-172** As to soils to be permanently removed from the site, the comment asks that locations, depths, excavation dimensions, and approximate volumes be provided. The comment also asks that impacts to aquifer and the City's Pueblo Water Rights be described. In response, soils are not expected to be permanently removed from the site. As reported in EIR Appendix 4.6-1, Report of Geotechnical Investigation Site Development, cut and fill volumes are estimated to be 750,000 cubic yards (CY) and 1,065,000 CY with a net import of 315,000 CY, exclusive of shrinkage and bulkage, and remedial grading. Please refer to EIR Appendices 4.6-1 and 4.6-2, and EIR Section 2.3.6, Construction Activities and Phasing, for additional responsive information. SDSU acknowledges the City's continued retention of its Pueblo Water Rights. As to the impact of the project on aquifer and Pueblo Water Rights, refer to Response to Comments A4-155 and A4-218 for responsive information. This comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-173** The comment states that the number of groundwater monitoring wells, extraction wells, and soil vapor monitoring probes installed at the project site is around 400, and asks that the Final EIR be revised because it reports the number as "more than 100." The comment is noted and the requested revision is made in the Final EIR. This revision does not change the findings of the report.
- A4-174** The comment states 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. The comment also notes that R-79AS-AM-AD is actually three different wells. The comment provides background information that does not change the impact analysis presented in the EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-175** The comment requests that the City's plans to use groundwater from the Mission Valley groundwater basin be included before Table 4.9-3. As part of the PSA, SDSU understands that the City has delayed implementation of any additional groundwater extraction from the project site, and it will no longer be part of Phase 2 of the Pure Water program. Therefore, it is noted that the City's future groundwater project is not reasonably foreseeable at this time, and that any potential environmental effects of a future program must be analyzed as part of the CEQA analysis undertaken at that time. As such, it would be too speculative at this time to analyze and disclose potential impacts to the proposed project. Nonetheless, text is added from the referenced document in the Final EIR, before Table 4.9-3, in response to the comment.
- A4-176** The comment requests the source of the information in the "Revised TMDL for Indicator Bacteria" discussion set forth in Draft EIR Section 4.9, Hydrology and Water Quality. The comment also asks by what standards is indicator bacteria deemed a common impairment for water bodies in the San Diego Region. Text has been added to Section 4.9 of the Final EIR clarifying the source of the Total Maximum Daily Loads (TMDL) information as requested. Please refer to EIR Section 4.9, Hydrology and Water Quality, pages 4.9-7 through 4.9-9 for additional information.
- A4-177** The comment states that total dissolved solids (TDS) and pollutants such as benzene are known to be contaminants left over from the Kinder Morgan contamination and asks why they are not included in

the analysis of potential impacts of construction activities, construction materials, and non-stormwater runoff on water quality during the demolition and construction phase, which focuses primarily on sediment (total suspended solids and turbidity) and certain non-sediment-related pollutants. As described in the Water Quality Technical Report (WQTR; Appendix 4.9-1), potential impacts to surface waters during construction activities related to groundwater contaminants may be a result of dewatering activities, which would be subject to the General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters within the San Diego Region (Order No. R9-2015-0013, NPDES No. CAG919003; effective October 1, 2015). The General Order regulates groundwater extraction discharges to surface water including construction dewatering. The General Order states for groundwater extraction discharges to surface waters, pollutant concentrations in the discharge shall not cause, have a reasonable potential to cause, or contribute to an excursion above any applicable water quality criterion established by the U.S. Environmental Protection Agency pursuant to Clean Water Act Section 303 or adopted by the state or RWQCBs. Pollutant concentrations in the discharge must comply with the specifications in the General Order. Effluent limitations for groundwater extraction waste discharges vary based on the receiving water type; the four categories are: freshwater inland surface waters, saltwater inland surface waters, bays and estuaries including San Diego Bay, and the surf zone of the Pacific Ocean. As part of obtaining coverage under the General Order, dischargers must include an initial sampling and monitoring report. As stated in Section 7.4.1 of the WQTR (EIR Appendix 4.9-1), if the monitoring data indicate that the dewatering waters are contaminated, they would be contained and off hauled to an appropriate permitted disposal facility.

- A4-178** The comment states that encountering groundwater during excavations, necessitating dewatering, could especially occur if construction was in the winter months, and asks if the values in Table 4.9-7, Project Components Distance to Groundwater, are for dry weather. The source of the information in the table is EIR Appendix 4.6-1, Report of Geotechnical Investigation – Site Development. As stated therein, the subsurface investigations were completed between February and April 2019. The boring records on which the groundwater elevations are based include the specific drilling dates and are included in EIR Appendix 4.6-1. Please refer to Response to Comment A4-170 for additional information.
- A4-179** The comment states that a groundwater sustainability plan may not be required by DWR at this time but that could change if groundwater use increases (for example). The comment also states that if 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. The Draft EIR concluded that construction and operation of the proposed project would have less-than-significant impacts with respect to groundwater supplies and groundwater recharge. Please refer to EIR Section 4.9, Hydrology and Water Quality, pp. 4.9-16 through 4.9-27. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-180** The comment states that the City's needed existing or future capacity in the sewer transmission mains where the SDSU project would send its wastewater flow is not considered. The Draft EIR considers the City's needed existing and future capacity in the sewer transmission mains. Please refer to EIR Section 4.17, Utilities and Service Systems, and EIR Appendix 4.17-1, Sewer Study. As discussed therein, all existing utilities that the proposed project would connect to are adequately sized to serve the proposed project without the need to expand. As discussed in EIR Chapter 2, Project Description, there is sufficient capacity in the North Mission Valley Interceptor to accommodate the anticipated sewer flows generated from the proposed project. Design and construction of the sewer system in the project site

would be performed by CSU/SDSU in coordination with the City. The design of sewer facilities would be coordinated with the City's Utilities Department.

- A4-181** The comment requests that Metropolitan Wastewater Department be changed to Public Utilities Department. The requested change is made in the Final EIR.
- A4-182** The comment states that Figure 4.17-1 should be updated because the 54-inch reinforced concrete pipeline, shown as curving around the Stadium, is abandoned and not part of the Existing Sewer System. In response, Figure 4.17-1 is revised as requested in the Final EIR.
- A4-183** The comment asks if the statistics detailing the City's wastewater system, found on page 4.17-2 of Draft EIR Section 4.17, Utilities and Service Systems, consider the future when Pure Water is in place. The comment also states that, as a known project, the impacts of the Pure Water project must be evaluated in the EIR. The wastewater discussion on Draft EIR page 4.17-2 focuses on the existing conditions and not the City's planned Pure Water program; however, the existing conditions discussion notes that planned improvements will increase wastewater treatment capacity to serve an estimated population of 2.8 million through the year 2050. As to evaluation of the City's Pure Water project in the proposed project EIR, please refer to Response to Comment A4-166, above.
- A4-184** The comment asks where the sources of data are in connection with the "Water Distribution" discussion set forth in Draft EIR Section 4.17, Utilities and Service Systems, p. 4.17-5. The referenced discussion is revised in the Final EIR to cite the source as the City's November 2018 Water Supply Assessment Report for the MVCPU Project.
- A4-185** The comment states that Figure 4.17-2 should be updated, because the easternmost diagonal waterline has been abandoned and is no longer part of the Existing Water System. The figure is revised in the Final as requested.
- A4-186** The comment recommends moving the "Pueblo Water Rights" discussion that is found in EIR Section 4.17, Utilities and Service Systems, to EIR Section 4.9, Hydrology and Water Quality. Section 4.9 is revised in the Final EIR to incorporate the Pueblo Water Rights discussion. That discussion also remains in Section 4.17, as it pertains to the topic of municipal water use.
- A4-187** The comment asks if the project is subject to City of San Diego drought policies discussed in EIR Section 4.17, Utilities and Service Systems, p. 4.17-15. As a state agency, CSU/SDSU is not required to comply with local regulations such as those referenced in the comment; however, as described on page 4.17-25, "SDSU utilizes irrigation controllers that are linked to weather service evapotranspiration data to deliver the irrigation water only when needed [and] will continue to implement conservation measures to reduce the use of water and decrease wastewater flows. Further, CSU/SDSU will be required to comply with the state's water savings laws and regulations for indoor and outdoor water usage to enhance water conservation." In addition, as described in Section 4.17.4, the project is committed to achieving the equivalent of Leadership in Energy and Environmental Design (LEED) Version 4 at a Silver or better level, which requires incorporation of substantial measures to ensure a low water-use footprint. Additionally, native plant materials and warm weather turf are planned for usage within the park and open space areas which will also help reduce the use of water on the site.

- A4-188** The comment asks how much water capacity is already being used from the Alvarado Water Treatment Plant (WTP). The comment also asks if the City already has plans for the extra water capacity. As reported in Draft EIR Section 4.17, Utilities and Service Systems, p. 4.17-3, the Alvarado WTP has a current capacity of 224,028 acre-feet per year (afy). As reported on page 4.17-18, the Alvarado WTP was recently expanded to increase its treatment capacity to 200 million gallons per day (mgd) (i.e., approximately 224,028 afy). Expansion of the Alvarado WTP was undertaken in order to meet current and future water needs of the Alvarado service area. The projected water treatment needs of the Alvarado service area are based primarily on the number of existing and projected water department customers residing in the service area. Existing and projected customer data is based on land uses identified in local planning documents, including general plans and community plans. Please note that the referenced section included a typographical error related to the project water demand's approximate percentage of total treatment capacity at the Alvarado WTP, which is revised in the Final EIR.
- A4-189** The comment states that this project requires a separate water supply assessment. Please refer to Response to Comment A4-157, above, as well as EIR Section 4.17, Utilities and Service Systems, p. 4.17-9.
- A4-190** This comment is a repeat of Comment A4-189, above. See Response to Comment A4-189.
- A4-191** Regarding Appendix 4.9-1, WQTR, page 23, Section 2.5, Paragraph 1, the comment requests clarification of what is meant by "the capacity of the San Diego River Valley groundwater basin." The comment also offers clarification to the statement in this paragraph that groundwater resources are limited, stating that immediately usable groundwater resources are limited, but there are groundwater resources which can be used after treatment. Appendix 4.9-1 is revised in the Final EIR to provide the requested clarification. Please refer to revised Appendix 4.9-1.
- A4-192** The comment states that the project is wholly sited within the Mission Valley Groundwater Basin and requests that EIR Appendix 4.9-1, WQTR, be revised accordingly. The comment also states that other organizations besides the City have used and continue to use Mission Valley groundwater. Figure 2-1 in the WQTR (Appendix 4.9-1) shows the boundary of the Mission Valley Groundwater Basin (9-014, shown in purple) in relation to the project site (shown as a black cross-hatched area). This map illustrates that a portion of the project site is not underlain by the Mission Valley Groundwater Basin. Appendix 4.9-1 is revised in the Final EIR regarding groundwater use since 1993. Please refer to revised Appendix 4.9-1.
- A4-193** The comment states that EIR Appendix 4.9-1, WQTR, page 23, references a settlement agreement between the City and Kinder Morgan, but does not mention the underlying lawsuit. This paragraph is edited as follows (revisions shown in underline): In June 2016, the City of San Diego and Kinder Morgan signed a settlement agreement to resolve a lawsuit filed against Kinder Morgan for groundwater contamination under the project site. The settlement agreement specified conditions and arrangements for future development of the stadium area and Mission Valley groundwater (City of San Diego, 2018). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A4-194** The comment expresses the commenter's opinions with respect to Note 1 and Note 2 of Table 2-17 of the WQTR (Appendix 4.9-1). Table 2-17 summarizes expected source water concentrations in the Mission Valley Groundwater Basin, based on available groundwater monitoring data provided in the

Mission Valley Groundwater Feasibility Study (City of San Diego, 2018). Table 2-17, including its footnotes, was taken directly from the City's Mission Valley Groundwater Feasibility Study 2018 (see Table 2-1 in Technical Memorandum No. 2 (Draft), dated June 26, 2017). The two footnotes are removed from Table 2-17 in Appendix 4.9-1 of the Final EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- A4-195** The comment clarifies that the project site, and not the project, contains 100 to 150 monitoring wells; the comment also states that these wells will be removed, and it is likely that they will not be sampled in the future. Text in Section 2.5.2 of Appendix 4.9-1 is revised to correctly state that the project site, not the project, contains the wells. The rest of this comment provides accurate background information regarding well removal at the site, but this does not pertain to the discussion of existing groundwater depth presented in the referenced section, and no additional revisions are warranted.
- A4-196** The comment states that testing the quality of dewatered shallow groundwater may be prudent to ensure it is appropriately handled, and if pollutants are present, water shall not be allowed to infiltrate back into the aquifer. Please refer to Response to Comment A4-177, above.
- A4-197** The comment requests confirmation that construction of any LID BMPs takes into account state requirements regarding clearance from wells. Construction of LID BMPs will take into account all applicable state requirements, including regarding clearance from wells.
- A4-198** The comment references page 92, Section 7.7.2, Paragraph 4 of EIR Appendix 4.9-1, WQTR, and expresses the need to understand what impacts, if any, the potential increased discharge to the San Diego River might have on surface flows and on pollutant migration. As stated in Section 5.3.2, the impact analysis assumes a "no infiltration" condition for the project BMPs. During final engineering for the project BMPs, infiltration feasibility will be assessed based on the approved infiltration methods in Appendices C and D of the City of San Diego Stormwater Standards, as well as an assessment of the potential to cause groundwater pollutant migration to the San Diego River through increased subsurface flows.
- A4-199** The comment states that removal of the 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, and suggests computer modeling to analyze these impacts.

Section 4.9, Hydrology and Water Quality, of the Final EIR is revised to indicate that the amount of groundwater recharge associated with removal of existing pavement would be negligible with respect to the volume of the aquifer. Computer modeling of such a scenario would not be appropriate, as the amount of water recharged to groundwater, in comparison to the volume of the aquifer, would similarly be negligible. Evapotranspiration associated with proposed vegetation and biofiltration features would reduce the amount of recharge to groundwater. In addition, stormwater recharge and subsequent discharge to the San Diego River would provide a dampening effect in comparison to existing conditions in which stormwater flows directly over the pavement and into the river over a relatively short period of time.

The impact of development of the proposed project, including changes in impervious surface area, on surface water discharges and flooding patterns was analyzed using computer modeling (HEC-RAS) in Appendix 4.9-5, Hydraulic Analyses for SDSU Mission Valley Campus (Chang Consultants). Appendix 4.9-2, Hydrology Report, and Appendix 4.9-3, Onsite Drainage Study, also analyze the effects of project

development on the stormwater conveyance system and potential flooding impacts using modeling. As stated in Response to Comment A4-198, it is unknown at this time if the project BMPs will allow for infiltration. If the BMPs are designed to allow for partial or full infiltration of the water quality design storm (the 85th percentile event, which is approximately a 0.6-inch storm), then the effect of this would be to detain flows in the BMP and to slowly infiltrate that stormwater to groundwater, which could then slowly discharge to the San Diego River. This would effectively provide some peak flow control for the water quality design storms, which now discharge without any detention directly to the river. Thus, project development should reduce flooding patterns downgradient of the existing outfalls to the river for the small storms that are captured in the treatment BMPs.

- A4-200** The comment references Draft EIR Appendix 4.8-5, Limited Soil and Groundwater Investigation Along Fuel Pipeline, page 8, Section 5.2.1, and states that the depth to groundwater is different from the groundwater elevation used in the Construction Excavation Impacts on Groundwater Storage (Draft EIR Appendix 4.9-6). As stated in Appendix 4.8-5, Section 5.2.1: “The depth to groundwater ranged from approximately 8 to 13 feet below ground surface. The depth to groundwater was consistent with historical ranges previously reported at the Site near the Murphy Canyon Creek.” The groundwater levels described in Draft EIR Appendix 4.8-5 are the levels reported at the time of sampling, for the area where the sampling occurred – near a known high-pressure fuel pipeline at the eastern project site boundary (see Appendix 4.8-5, Figure 3). In contrast, Appendix 4.9-6 summarizes the groundwater levels within the development areas of the project site. The Groundwater Elevations figure (Plate No. 3) in Draft EIR Appendix 4.6-1, Geotechnical Investigation Report – Site Development, provides a contour map of the expected groundwater elevations across the site.
- A4-201** The comment requests confirmation that the distance between finished subgrade and groundwater level, which is as little as 7 feet, is acceptable and will cover natural subsidence/expansion, particularly given the “ebb and flow” of groundwater levels. The comment also asks if expansion/contraction of soils would become an issue due to the measured water level. The conditions noted in the comment, including the groundwater depth reported at the time of sampling, will be considered as part of project design development and addressed in the final geotechnical analysis and design.
- A4-202** The comment states that any structure deeper than the groundwater depth is impacting the groundwater in the basin and asks for an explanation. The comment also asks if the measured groundwater elevations are representative of the natural variability of groundwater conditions in the area, or if they are “snapshot” measurements. Please refer to Response to Comment A4-147, above, regarding impacts to the groundwater basin of any subterranean structures deeper than the groundwater depth. Please refer to Response to Comment A4-170, above, regarding the measured groundwater elevations.
- A4-203** The comment states that the date of when groundwater was measured will have a big impact on the accuracy of the measurement, and the date is not provided, referencing Draft EIR Appendix 4.9-6, SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage, page 2, paragraph before Table 1. Please refer to Response to Comment A4-170, above, regarding the measured groundwater elevations.
- A4-204** The comment states that Draft EIR Appendix 4.17-1, Sewer Study, does not 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. The comment also states that the existing capacity of the 84/96 sewer is not discussed. Please refer to Response to Comment A4-180, above.

- A4-205** The comment asks what is meant by the proposed Mission Valley sewer system will be private. The proposed project would be served by existing sewer infrastructure located in area roadways surrounding the project site and the main trunk sewer on the northern edge of the San Diego River; however, connections to the nearest available facility through new service laterals would be required to provide sewer collection to the proposed project. The sewer mains are proposed to be a combination of public and private. For private mains, a Memo of Understanding will be required between the City and SDSU (Appendix 4.17-2). SDSU would own, operate, and maintain the sewer system needed to support the proposed project.
- A4-206** The comment states that Draft EIR Appendix 4.17-5, Water Study, Table 1 and Appendix B should be verified in a WSA. The comment also questions why residential demand (1,117,650) is different from Table 1 (1,117,725) in Draft EIR Appendix 4.17-5. The comment states that the parks water demand also do not match in these documents. In response to the comment that Appendix 4.17-5 should be verified in a WSA, please refer to Response to Comment A4-157, above, as well as EIR Section 4.17, Utilities and Service Systems, p. 4.17-9. As to the water demand numbers, the apparent water demand discrepancy between the two documents is a result of rounding. For residential demand, the Water Study uses population; the Water Use Estimation Tech Memo uses dwelling units. Similarly, for the parks water demand, the difference is based on rounding the park acreage to 31 acres (Water Study) or using 30.6 acres (Water Use Estimation Tech Memo).
- A4-207** The comment asks where the City's existing/future demands/usage is evaluated or accounted for on the proposed public water system, separate from Conclusion No. 3. of Draft EIR Appendix 4.17-5. The comment also asks if, for the City's 390 Pressure Zone, the pipes have enough capacity to accommodate SDSU's demands. The comment further asks what water conservation assumptions have been used for future/buildout demands. In the Water Study, the proposed water demands for the project site are included in the hydraulic analyses, which demonstrate that the existing Public Water System can deliver Maximum Day Demand plus 4,000 gallons per minute fire flow. The Maximum Day Demand in the hydraulic computer model includes existing demand in the vicinity of the project plus the calculated demand for the proposed project. Therefore, analyzing the Public Water System and concluding that the system can supply the project means that the pipes have enough capacity in the future to accommodate the project's demands. No reduction in water demands due to water conservation was accounted for in the hydraulic modeling analyses so that the hydraulic analyses would have the most conservative results.
- A4-208** The comment asks where the quantities in Attachment A of Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, are coming from and if they need to be shown in the report. The numbers used in the report come from the February 2019 Development Design Concept prepared by Carrier Johnson. A site plan map and development summary is included as Attachment A4-F. This site plan map and development summary is the source of quantities in Attachment A of Appendix 4.17-5.
- A4-209** The comment states that Attachment B of Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, is not readable and does not explain how the acreages were achieved that were used in the table. The comment also asks why a reduction is assumed in footnote 4. The unreadability of the exhibits in Appendix B may be due to their being presented as 8.5 x 11 size instead of their original

size closer to 11 x 14. The version of the attachment that is publicly available at the SDSU Mission Valley website is readable electronically. In addition, two acreage values were crossed out that makes it difficult to follow the acreage calculation, which goes like this: 21.48 acres – 0.85 Rec Center – 1.3 MTD Land + 18.82 acres = 38.15 acres rounds up to 38.2 acres. The 20% reduction is a typical reduction of irrigated area for such things as access roads, pathways, and other hardscape or otherwise non-irrigated spaces.

A4-210 The comment requests details and backup for the statement in Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, that “several completed developments in the City have been shown to use less water than calculated in the City’s Design Guidelines.” An example of a project in the City using less water than calculated in the City’s Design Guidelines is the Ocean View Hills development in Otay Mesa. The entire project and vicinity is currently served by a single pump station, hence water use is easily measured. Included as Attachment A4-G is water meter data from the pump station serving Ocean View Hills and an overview map showing the current developed area the pump station serves. The water use measured for the Ocean View Hills development is approximately 300 gallons per day (gpd) per EDU [equivalent dwelling unit], a 40% decrease from the City’s Design Guidelines of 525 gpd/EDU.

A4-211 As to “Methodology 2” set forth in Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, the comment requests documentation to prove the statement that “this methodology using the City’s WSA water use factors is a more accurate estimation of water use for the project compared to the City’s Facility Design Guidelines described as Methodology 1.”

WSAs in California utilize SB 610 in instances of procuring large project’s CEQA and EIR documentation. SB 610 “suggests that Urban Water Management Plans (UWMP) may be a good source of information for developing water assessments and verifications.” The City’s UWMP utilizes per-capita water use and incorporates said per-capita water use into more appropriate and realistic water use factors in WSAs.

A4-212 The comment asks various questions regarding the statement that there has been a 30% overall decline in indoor water use since 2000, as stated in Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, page 7, paragraph 1. The comment asks for a reference for this statement. The comment states that the cited references only extend to 2014, and asks to include the last 5 years in this percentage. The comment also states that this percentage differs depending on the previous years’ weather conditions and asks if this is taken into account. Finally, the comment states that this number needs to be verified.

1. The 30% overall decline in indoor water use since 2000 is directly referenced from the 2015 City of San Diego UWMP. The UWMP states that annual daily per-capita water use has reduced from 176 gallons in 2000 to 123 gallons in 2015. Note that 2015 is the most recent published UWMP from the City.
2. 2014 reflects the year in which the current codes and adopted building standards have been universally implemented. There have indeed been further water conservation efforts since then, but it cannot be conservatively assumed that all current construction would reflect these recent water conservation developments.
3. For long-term forecasting of projected water use, there are droughts and wet weather periods built into the estimations. Over a 20-plus year period, any extreme seasonal precipitation swings will balance out and an appropriate average will be established. Further, outdoor water

use is only projected to make up 7% to 20% of overall water use depending on water use estimation methodology. Therefore, seasonal variations in precipitation will have a minor effect on water use for the project.

4. See response (3) above.

A4-213 The comment asks what 2018 San Diego County Water Authority (SDCWA) document is referenced as Reference 9 to Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo.

Specifically it is SDCWA data that was gathered by a University of San Diego research project found here: <https://www.sandiego.edu/soles/hub-nonprofit/initiatives/dashboard/water-use.php#measuring>.

The graph “San Diego County Urban Water Suppliers residential gallons per capita/day” is the particular graph from which 65 gpd is referenced.

A4-214 The comment states that the analysis in Draft EIR Appendix 4.17-5, SDSU Water Use Estimation Memo, should include what has happened in the last 5 years, claiming that the referenced Code and standards were from 2014. The comment notes the statement in Appendix 4.17-5 that Methodology 3/Table 3 reflects the most recent and best water savings technologies that state and local municipalities have adopted.

See Response to Comment A4-212 above; 2014 reflects the year in which the current codes and adopted building standards have been universally implemented. There have indeed been further water conservation efforts since then, but it cannot be conservatively assumed that all current construction would reflect these recent water conservation developments. In addition, water use estimation must work with published data, and usually there is a delay between actual practice and published data.

A4-215 The comment requests confirmation that Draft EIR Appendix 4.17-2, Water Study, uses a different method to calculate project water demand than the one used in Appendix 4.17-5, SDSU Water Use Estimation Memo. The comment then asks why this was done, and where is the “new demand” of Appendix 4.17-5, Table 3, used.

The method used in Appendix 4.17-2, Water Study, is the same as is presented in Table 1 of Appendix 4.17-5, SDSU Water Use Estimation Memo. Tables 2 and 3 of Appendix 4.17-5 present two different approaches to estimating actual water use. These were prepared in order to provide the project proponent with a more realistic estimate of actual water use, which could be used to determine water expenditures for the life of the project.

A4-216 The comment references DWR Bulletin 74, providing that no wastewater lines shall be built within a certain distance of water wells (includes monitoring wells), and states that certain proposed sewer lines running south through the park might come too close to proposed wells. CSU/SDSU notes that the State of California is not subject to the referenced DWR Bulletin.

A4-217 The comment requests additional details regarding what impact additional flows into the San Diego River will have on the groundwater flow trends, referencing Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-5. As reported in Section 4.9, Hydrology and Water Quality, p. 4.9-29, the total post-project peak flow would be substantially lower than the total pre-project peak flow, resulting in a net decrease in peak flow rates and volume of runoff (Appendix 4.9-2). Because the proposed project would

reduce the peak flow rate from the area and volume of runoff, the proposed project would result in beneficial impacts with respect to stormwater runoff and associated flooding.

A4-218 The comment claims that certain project elements and activities will impact groundwater flows, that this is an impact on the City's Pueblo Water Rights, and that these impacts must be evaluated in the EIR. The comment notes that the City's Pueblo Water Right is addressed on page 4.17-11 in EIR Section 4.17, Utilities and Service Systems. CSU/SDSU does not intend to utilize groundwater or interfere with the City's Pueblo Water Rights. 90% of the project site is currently impervious, covered by parking lot and the existing SDCCU Stadium. Under the proposed project, approximately 57% of the project site would be impervious, and 43% of the project site would be permeable. This would increase the amount of infiltration in the project site and may increase groundwater under the project site. Moreover, the impact of the project on Pueblo Water Rights raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

A4-219 The comment asks that the types of soils the proposed project would remove in its cut/fill activities be identified. The comment asks if this removal will diminish groundwater storage volume or the water's ability to infiltrate into the basin. The comment references Draft EIR Appendix 4.9-6, SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage. Soil types within the site subsurface are described in detail in Draft EIR Appendix 4.6-1, Geotechnical Report – Site Development, and Appendix 4.6-2, Geotechnical Report – Stadium Development. It is noted that soils are not expected to be removed from the site, but rather re-compacted in place. Please refer to Appendix 4.6-1, as well as Response to Comment A4-172, above, for additional information.

A4-220 The comment states that the Draft EIR suggests that the project may exacerbate area flooding issues. The comment asks how will the project handle the potentially increased flooding in the area, and states that the Draft EIR alternatives are insufficient to address this impact.

The project has been designed to accommodate flooding from Murphy Canyon Creek. Please see Responses to Comments A4-27 and A4-28. The project would actually decrease the potential for flooding as replacement of existing paved areas with turf, landscaping, and biofiltration features would result in increased infiltration of stormwater and decreased flooding. Please refer to Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-29. Please also refer to Thematic Response BIO-1 – Murphy Canyon Creek. In addition, the Draft EIR alternatives analysis considered but rejected a "Single Channel" Murphy Canyon Creek Alternative. (See Draft EIR Section 6.3.2.) This alternative involved an alternative project design that would widen Murphy Canyon Creek and consolidate drainage in a "single channel," rather than diverting drainage west of the existing berm on the eastern edge of the project site. The intent of this alternative was to widen and improve Murphy Canyon Creek to address the 100-year storm event and avoid potential flooding of the project site (i.e., design Murphy Canyon Creek to convey all flows to the San Diego River). Under this alternative, the River Park area would be substantially reduced to accommodate a widened Murphy Canyon Creek, and the access road west of Murphy Canyon Creek (i.e., the extension of Rancho Mission Road) would be realigned out of the widened Murphy Canyon Creek area.

The alternative is considered infeasible because flooding of a portion of the project site is largely the result of floodwaters that occur north of the project site due to an undersized culvert (see Draft EIR

Figure 6-1B), as well as the confluence of Murphy Canyon Creek and the San Diego River. The existing undersized culvert results in floodwaters “jumping” Murphy Canyon Creek approximately 3,000 feet north of the project site, at the northern edge of the KMEP MVT facility. At this point, floodwaters surface drain through the Kinder Morgan site, across San Diego Mission Road, and continue to surface flow onto a portion of the project site as shown in Figure 6-1B. CSU lacks site control necessary to make the off-site improvements needed to address the issue. In any event, the proposed project has accommodated this flooding through the provision of open space, which allows for the flooding to infiltrate and drain into the San Diego River; the proposed project would thus convey any overflow in a more natural flow pattern, allowing for the flooding waters to permeate into the open area and deliver “cleaner” water to the San Diego River.

- A4-221** The comment states that MM-BIO-10, Indirect Edge Effects, 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. Mitigation measure MM-BIO-10 requires a 100-foot buffer from the San Diego River in order to be consistent with the City’s MHPA adjacency guidelines. Murphy Canyon Creek is not designated as MHPA. However, the road located parallel along Murphy Canyon Creek (Street H in the Draft EIR) has been realigned through the River Park and will no longer run along Murphy Canyon Creek, resulting in a buffer of approximately 140 feet to 740 feet between Murphy Canyon Creek and the development. Please refer to Thematic Response PD-1 – Project Refinements for more information about this revision to the proposed project. In any event, MM-BIO-10 is revised in the Final EIR in response to comments to include a setback from Murphy Canyon Creek.
- A4-222** The comment asks that the Executive Summary – Biological Resources section be updated to clearly document, disclose, and mitigate impacts to Murphy Canyon Creek, “[u]pon inclusion of any necessary Murphy Canyon Creek improvements.” Please see Responses to Comments A4-27 and A4-28 and Thematic Response BIO-1 – Murphy Canyon Creek.
- A4-223** The comment asks how the conclusion in the Executive Summary was reached that the proposed “SDSU recreation field 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 and no improvements are proposed to correct this. The comment asks what evidence substantiates this conclusion.
- As reported in Draft EIR Section 2.3.1, p. 2-5, 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. In short, no structures would be built in the floodplain, and the project would be designed to accommodate flooding from Murphy Canyon Creek. Please see Responses to Comments A4-27 and A4-28, above
- A4-224** The comment requests that the EIR 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 other project features that are being constructed on site. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek, and Response to Comment A4-6, above.
- A4-225** The comment states that the EIR should assume that all existing storm drain system assets will be conveyed to SDSU, including requiring SDSU to design, permit, construct and maintain all necessary

storm drain improvements. For information regarding the existing storm drain system, please refer to Draft EIR Section 4.17, Utilities and Service Systems, including Figure 4.17-3, Existing Storm Drain System. Existing stormwater systems would be augmented to support anticipated changes in stormwater discharge quantities (see Draft EIR Project Description, Section 2.3.4.6, p. 2-20). Figure 2-10D, Site Utilities – Concept Drainage Plan, depicts the locations of the proposed project’s stormwater facility infrastructure. Stormwater drainage systems would be located throughout the project site and generally direct all stormwater on site to bioretention basins. Any excess water such as generated during larger storms would be directed to catchment basins near the southern edge of the project site, which would outlet into the existing storm drain connections to the San Diego River, located at the southern edge of the project site as shown on Figure 2-10E, Site Utilities – Stormwater Quality Treatment Plan. For further information regarding the proposed project’s stormwater system and related issues, please refer to Draft EIR, Section 4.9, Hydrology and Water Quality. Conveyance of ownership of storm drain system assets is not an environmental issue within the meaning of CEQA and does not impact the analysis or conclusions of the EIR; instead, these issues will be addressed as part of the PSA.

- A4-226** The comment requests that the Murphy Canyon Creek Channel Master Storm Water System Maintenance Plan (MSWSMP) be removed from Draft EIR Section 3, Cumulative Projects, Table 3-1, as this project/program was completed as of September 2018. In accordance with Section 15130(b) of the CEQA Guidelines, the list of cumulative projects considered in the project’s cumulative impact analysis includes “past, present, and probable future projects,” as stated in Section 3.3 of the Draft EIR. The Table 3-1 entry for the MSWSMP correctly references this as a “completed” project. Section 3.4 is revised in the Final EIR to clarify that Table 3-1 includes completed projects. Section 4.1.4 is revised in the Final EIR to remove reference to future City improvements associated with the MSWSMP.
- A4-227** The comment notes a typo in Draft EIR Section 4.3, Biological Resources, p. 4.3-41. Section 4.3 is revised in the Final EIR to correct the typo referenced in this comment.
- A4-228** The comment states that once Murphy Canyon Creek becomes part of the project, restoration along the creek could be potentially used for mitigation; however, if the creek were to remain part of the City’s inventory, mitigation would not be allowed in or along the asset. As analyzed in Section 4.3, Biological Resources, the Draft EIR identified minor temporary and permanent impacts to wetlands and provided recommended mitigation (e.g., MM-BIO-12 and MM-BIO-13), including the potential for on-site or off-site re-creation and restoration/enhancement or the purchase of credits through an approved bank.
- A4-229** As to EIR Figure 4.3-6, Impacts to Biological Resources – Off-Site Sewer and Storm Drain Connections, the comment states that part of the figure appears to be missing. The comment also asks it be ensured that there is no impact to the existing Stadium Mitigation Site, which occurs in close proximity to this area. Figure 4.3-6 zooms in on the two off-site impacts, and the extents of both the sewer and storm drain connections are shown on this figure. As to the Stadium Mitigation Site, please refer to Response to Comment A4-167, above.
- A4-230** The comment requests that the correct name be noted for the “City of San Diego Storm Water Division.” Section 4.9 is revised in the Final EIR to make the requested correction.

- A4-231** The comment notes typographical errors and an undefined term. Section 4.9 is revised in the Final EIR to correct these typographical errors and define “San Diego River TWAS station,” in response to this comment.
- A4-232** The comment states that upon inclusion of Murphy Canyon Creek improvements, the analysis should ensure compliance with water quality standards. The comment states SDSU should design, construct, and maintain a “stream restoration” channel with soft channel side slopes and bottom, and restored channel: (i) should assume a fully vegetated state with a corresponding roughness coefficient used in the sizing calculations; (ii) should be designed not to accumulate sediment or cause in-stream erosion per the City’s Drainage Design Manual (DDM) Section 7.2.5; and (iii) should be aligned in a southwesterly direction to allow for a more efficient and less erosive transition into the San Diego River. Please refer to Responses to Comments A4-27 and A4-28, above, regarding inclusion of Murphy Canyon Creek Improvements. No improvements are proposed for Murphy Canyon Creek. As to compliance with water quality standards, please refer to Draft EIR Section 4.9, Hydrology and Water Quality, and Appendix 4.9-1, WQTR.
- A4-233** The comment states that SDSU should expand the capacity of Murphy Canyon Creek channel to mitigate drainage impacts and provide sufficient drainage through the site to the San Diego River in accordance with the City’s DDM (e.g., convey the 100-year design capacity), and SDMC Section 142.0610.
- Please see Responses to Comments A4-27 and A4-28, above, regarding changes to Murphy Canyon Creek. Please refer to Response to Comment A4-220 regarding the Draft EIR’s alternatives analysis that considered but rejected a “Single Channel” Murphy Canyon Creek Alternative that involved an alternative project design that would widen Murphy Canyon Creek and consolidate drainage in a “single channel.” Regarding the reference to SDMC Section 142.0610, it is noted that this municipal code section relates to when public improvements may be required incidental to a building permit, and the proposed project’s drainage does not conflict with its provisions.
- A4-234** The comment states that 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. CSU/SDSU concurs that improvements constructed within the 100-year floodplain should comply with applicable federal floodplain regulations and SDMC sections. Indemnity agreements between CSU/SDSU and the City will be made in connection with the PSA. The comment is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional responsive information.
- A4-235** The comment states that Figure 4.9-2 fails to depict the outfalls at Murphy Canyon Creek, and requests that the figure be revised so that project impacts may be analyzed and disclosed appropriately. The comment is correct and Figure 4.9-2 in the Final EIR is revised to depict the existing outlets in Murphy Canyon Creek. Analysis for existing and proposed conditions associated with storm drain facilities that discharge to Murphy Canyon Creek are included in the report titled Drainage Study for SDSU Mission Valley Campus Adjacent Improvements, dated February 12, 2019. As stated on page 2 of that report, “The adjacent improvements associated with Friars Road, San Diego Mission Road, and portions of Murphy Creek Road will be conveyed by separate, existing storm drain systems to the two Murphy

Canyon Channel outfalls.” As stated in Appendix 4.9-2, Hydrology Technical Report, “There is no project impact to the two outfalls into Murphy Canyon Channel.” The Final EIR is revised to clarify this point.

- A4-236** The comment states that Figure 4.9-4 depicts several BMPs in an area that may be retained under City ownership, and that these BMPs should be located on SDSU property, outside the 100-year FEMA floodplain, and maintained by SDSU. Please refer to Response to Comment A4-33, above. The proposed project has been revised to move some of these facilities as the comment suggests; however, several remain in the same or similar locations as presented in the Draft EIR. After further review, CSU/SDU note that the City of San Diego has agreed with the location of these basins within the River Park to provide for water quality and passive recreation and educational opportunities as expressed by participants in the River Park Advisory Group.
- A4-237** The comment questions how the conclusion was reached that the modification or vacation of easements are beyond the scope of the EIR. The comment states that the EIR should assume conveyance of Murphy Canyon Creek to SDSU, which would require vacating current easements and the granting of a flowage easement to the City. As stated in Draft EIR Section 4.10, Land Use and Planning, p. 4.10-23, this provision of SDMC 22.0908, which requires the City and SDSU to cooperate to modify or vacate easements, is beyond the scope of CEQA analysis because it does not relate to physical impacts to the environment. The impacts of the proposed project, such as conveyance of drainage to the water quality treatments basins, the physical construction of those basins, and the treatment of water within those basins, is analyzed and disclosed throughout the Draft EIR. Further, the conveyance of Murphy Canyon Creek to SDSU and transfer of ownership does not create a physical effect on the environment and therefore is not required to be analyzed under CEQA.
- A4-238** Referring to Draft EIR Section 4.17, Utilities and Service Systems, the comment states that page 4.17-6 gives the impression that the three existing underground storm drain systems that drain to the San Diego River are the only storm drain discharges from the site, even though page 4.17-21 also notes that some of the runoff goes to outfalls that discharge to Murphy Canyon Creek. The comment also states that off-site runoff should be managed according to Section 3.3.3 of the City’s Storm Water Standards Manual (SWSM). Please refer to Response to Comment A4-235, above, for information responsive to this comment.
- A4-239** The comment states that the EIR should assume that all existing storm drain assets and associated drainage responsibilities would be conveyed to SDSU. It also states a cleanout should be installed at the property line where pipe enters the Stadium property per the City’s DDM. The comment also states that a flowage easement in accordance with the City’s DDM per SDMC Section 143.0146.a.4 would be required. Please refer to Response to Comment A4-225 regarding the conveyance of existing storm drain assets. Please refer to Response to Comment A4-237 regarding flowage easements.
- A4-240** The comment states that 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. The comment is noted.
- A4-241** The comment states that Draft EIR Figure 4.17-3, Existing Storm Drain System, only shows the systems that discharge to San Diego River and does not show the existing systems that discharge to Murphy Canyon Creek, and requests revisions to include these systems to appropriately analyze the project’s impacts. Please refer to Responses to Comments A4-235 and A4-238, above.

- A4-242** The comment states that the City Offsite Storm Water Alternative Compliance Program is currently in development; however, credits would only be traded under the Phase I MS4 Permit. Further, the SDSU site is under the Phase II Small MS4 Permit; SDSU will need to develop its own alternative compliance program. The comment is noted. This section of Appendix 4.9-1 summarizes the Phase I MS4 Permit for background purposes only. The WQTR (Appendix 4.9-1) clearly states that the Phase II permit applies to the project, that treatment of the project's stormwater runoff will occur on the project site, and that off-site mitigation is not anticipated (see top of page 39). The proposed project has voluntarily elected to implement permanent stormwater BMPs consistent with the requirements of the 2013 Regional MS4 Permit (R9-2013-0001) and the 2018 City of San Diego SWSM by routing runoff from the proposed project towards a series of biofiltration basins along the perimeter of the project site and integrated into the River Park design to provide water quality treatment prior to discharging back into the San Diego River.
- A4-243** The comment states that the project may be partially located in the FEMA floodplain in the proposed condition, and requests that this be considered during the design and that applicable environmental regulations (i.e., City SWSM, FEMA, DDM) be complied with. The comment is correct that the project site is currently within the FEMA 100-year and 500-year floodplain. Accordingly, the proposed project has been designed such that the campus office, stadium, hospitality, and residential components of the project would be elevated above the floodplain, and the River Park area would remain in the floodplain. The final BMP design, which is typically complete with final engineering once project approvals are granted, would comply with all applicable environmental regulations and would be consistent with the analysis presented in the Draft EIR, as refined in the Final EIR.
- A4-244** The comment states that benchmark water quality objectives are mentioned throughout Draft EIR Appendix 4.9-1, WQTR, which is not terminology used in the San Diego Region Basin Plan. The comment requests verification that this is the correct terminology for the region. As stated on page 30 of the WQTR (Appendix 4.9-1), the water quality criteria in the Basin Plan apply within receiving waters as opposed to applying directly to runoff; therefore, water quality criteria from the Basin Plan are utilized as "benchmarks" as one method to evaluate the potential ecological impacts of project runoff on the receiving waters of the proposed project. Water quality criteria can be used to set numeric effluent limitations in a National Pollutant Discharge Elimination System (NPDES) permit, but no such effluent limitations are contained in the Phase II MS4 Permit.
- A4-245** The comment states that all BMPs should be appropriately sized for pollutant and hydromodification controls and designed according to specifics in the City's SWSM. All BMPs will be appropriately sized and designed in compliance with all applicable environmental regulations at the time of final design. As stated in the SDSU Onsite Water Quality Report (Appendix 4.9-4), SDSU is considered a Phase 2 entity with regards to MS4 Permit requirements even though the project is within the City of San Diego. Therefore, the proposed project is not subject to the requirements of the San Diego Regional MS4 Permit (Order R9-2013-0001); however, the proposed project would implement permanent stormwater BMPs consistent with the requirements of the 2013 Regional MS4 Permit (R9-2013-0001) and the 2018 City of San Diego SWSM, where feasible, to the maximum extent practicable. This includes LID site design BMPs, source control BMPs, and pollutant control BMPs for water quality treatment. Hydromodification management will not be required for the project since it discharges directly to the San Diego River, which has been identified as an exempt receiving water along the lower portion of the River. Appendix 4.9-4 describes the permanent stormwater BMPs that will be incorporated into the

project in order to mitigate the impacts of pollutants in stormwater runoff from the proposed project. Preliminary BMP sizing is also presented in Appendix 4.9.4.

- A4-246** The comment requests that the analysis ensure that the on-site biofiltration with partial retention BMPs are sized and designed appropriately, and references the City's SWSM Section 5.5.2 for additional information. The comment is noted. See Response to Comment A4-245.
- A4-247** The comment requests that the analysis ensure that onsite biofiltration BMPs are sized and designed appropriately, and references the City's SWSM Section 5.5.3 for additional information. The comment is noted. See Response A4-245.
- A4-248** The comment states that Draft EIR Appendix 4.9-4, Water Quality Report for SDSU Mission Valley Campus, does not include Rows 20 and 21 from Worksheet B.5-1 of the City's SWSM, and requests that these be added to show BMPs meet minimum footprint requirement. The comment also states that the footprint of some BMPs is below the minimum required footprint ($0.03 \times \text{area draining to BMP} \times \text{adjusted runoff factor}$), and requests that Worksheet B.5-4 be filled out to show that BMP will not clog or increase BMP footprint. On-site BMPs were sized per the 2018 City of San Diego SWSM to provide the requisite volume and footprint for the tributary areas, where feasible. Specifically, biofiltration BMPs 4 and 5B would use the Design Capture Volume (DCV) reduction gained by implementing appropriate site design LID features (impervious area dispersion, street trees, etc.) in their respective Drainage Management Areas (4 and 5B) to satisfy the DCV requirements outlined in Worksheet B.5-1. Furthermore, the excess volume provided in BMP 5C would be used to offset the remaining required volume in BMP 5B.
- A4-249** The comment requests that volume retention worksheets be provided for BMPs that are less than 3% of effective drainage area, including the modular wetland system. In response, SDSU has met with the City and provided additional details regarding the BMPs and modular wetland system.
- A4-250** The comment references page B-46 in Appendix B of the City's SWSM for guidance. The comment is noted. Please refer to Responses to Comments A4-248 and A4-249, above.

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Tom McCarron
Senior Vice President
SDSU Mission Valley Development

OFFER TO PURCHASE
MISSION VALLEY STADIUM SITE

This offer identifies fair and equitable terms upon which San Diego State University ("SDSU")¹ proposes to purchase the stadium site in Mission Valley from the City of San Diego ("City"). Terms with initial capital letters that are not otherwise defined in this offer have the meaning given in San Diego Municipal Code section 22.0908 (the "Code"), the law that governs the City's sale of the Existing Stadium Site to SDSU. SDSU believes the terms of this offer are consistent with the Code, which codified the Measure G Initiative that was approved by a majority of the electorate. SDSU looks forward to implementing the mandate of our mutual constituents by completing the purchase and sale of the Existing Stadium Site so that SDSU can proceed with timely development of the Project described below.

1. **Property:** Approximately 132.63 acres out of the approximately 232.77 acres Existing Stadium Site (see attachment). This includes the portion of Murphy Canyon Creek running along the eastern perimeter of the site adjacent to Interstate 15. The City will retain ownership of approximately 34.6 acres of River Park land and a portion of the Murphy Canyon Creek land.
2. **Purchase Price.** Sixty-Eight Million Two Hundred Thousand Dollars (\$68,200,000). This is the appraised fair market value of the Property.
3. **Existing Stadium Maintenance and Capital Costs:** Concurrent with the closing of the transaction, SDSU will take responsibility for the ongoing maintenance and upkeep of the Existing Stadium estimated at an annual cost of \$5mm-\$10mm. From and after the Closing Date, the City shall not be required to pay for any Joint Use Existing Stadium operating costs, Joint Use Existing Stadium maintenance costs or Joint Use Existing Stadium capital improvement expenses. The City shall continue to provide public safety, fire and emergency management services to the Project as required by Applicable Law.
4. **Fenton Parkway Bridge:** The Draft Environmental Impact Report ("DEIR") does not include the Fenton Parkway Bridge as a Project component. Nevertheless, SDSU understands the City desires the Bridge as a separate facility that is part of its long-term traffic circulation plan for the Mission Valley Community Plan area, and the City therefore believes that the Bridge has independent utility without regard to the Project. SDSU does not have detailed information from the City at this time regarding the Bridge. With the

¹ San Diego State University, a California State University, with authority delegated by the Board of Trustees of the California State University, which is the State of California acting in its higher education capacity

cooperation/collaboration/support of SDSU, the City will pursue the Fenton Parkway Bridge as a separate City facility in the future and the Bridge must be and remain a separate City project for CEQA and all other purposes. Subject to the necessary CEQA compliance having been completed by or through the City and all other necessary parties, SDSU will construct the 2-lane, all weather, at grade with the trolley crossing (with turn lane) Bridge and fund its environmental review, design, permitting and construction (est. cost \$22mm). SDSU believes that the Project's share of future traffic under the DEIR's "with bridge" scenario is approximately 25%, and on that basis, SDSU's allocated contribution for Bridge costs would be approximately 25% of the total costs. SDSU will receive development impact fee credits or other reimbursement from the City to the extent it incurs costs exceeding the approximately 25% share. SDSU will also be entitled to use the City's existing Capital Improvement Project funds allocated to the Bridge (est. \$1.3mm) for Bridge costs. The City will grant SDSU an easement, license and/or other rights necessary for SDSU to construct the Bridge. SDSU agrees that it will construct the Bridge before occupancy of more than 65% of planned equivalent dwelling units for the Project.

5. **Murphy Canyon Creek:** As discussed in the DEIR, the Project does not impact Murphy Canyon Creek. However, at the City's request, SDSU will acquire the approximately 2.6-acre Murphy Canyon Creek property owned by the City, provided the City remains responsible to perform any deferred maintenance and agrees to design, permit and construct any previously identified capital improvements at its cost. The capital improvements will be completed in a manner that does not negatively impact any proposed Project improvements. SDSU will maintain the Murphy Canyon Creek property on a go-forward basis at an estimated annual cost of \$125,000 (after the City's completion of the deferred maintenance and capital improvement obligations).
6. **No New or Additional City Taxes:** The Sale will not raise or impose any new or additional taxes on City residents.
7. **Possessory Interest and Other Taxes:** SDSU's non-state private development partners constructing improvements in the Project solely for private use and not for the benefit of or in support of SDSU's governmental mission ("Non-SDSU Facilities") will be required to pay sales tax, possessory interest tax, and/or transient occupancy tax, as required by applicable law. SDSU and other publicly developed property will be exempt from paying property or possessory interest taxes.
8. **Project.** SDSU will construct the following project ("Project") to further its educational mission: (i) a new multi-use stadium for SDSU Division I collegiate football and other sports; (ii) a River Park; (iii) other shared parks and open space; (iv) facilities for educational, research, entrepreneurial and technology programs; (v) residential housing for faculty and staff, graduate and undergraduate students and the local community; (vi) campus and neighborhood serving retail; (vii) hotels for campus uses, conferences, programs, and other community uses, and (viii) other uses as further described in the Code and the San Diego State University Mission Valley Campus Master Plan Draft

Environmental Impact Report (“DEIR”). The new stadium will be completed within 7 years after execution of the PSA.

9. **River Park Construction and Maintenance.** SDSU will design and construct the 34-acre River Park (est. cost \$30mm). The River Park will be completed no later than 7 years after execution of the PSA and prior to occupancy of any building in the Project other than the stadium. SDSU will also maintain the River Park in perpetuity (annual cost \$578k). The River Park will contain storm water retention and bioswales serving the Project, which SDSU will also maintain. The City will retain ownership of the River Park after the closing and will grant SDSU an easement to construct and maintain the River Park.
10. **Other Recreation Space:** SDSU will design, improve and maintain at least 22 additional acres of parkland/recreation space. This additional park space will be owned by SDSU, but made available for general community use and enjoyment.
11. **Future City Recreation Center Site:** SDSU will reserve an approximately one-acre site upon which the City may construct and operate a Recreation Center in the future, as called for in the Mission Valley Community Plan.
12. **Additional Traffic Improvements.** As described in the DEIR, SDSU intends to provide approximately \$21,000,000 in off-site and major on-site traffic improvements, pursuant to the mitigation measures identified in the DEIR. SDSU will also provide \$5,000,000 in additional traffic improvements as an accommodation to the City, provided SDSU does not become responsible for other traffic improvements.
13. **Development Impact Fees.** SDSU’s non-state private development partners constructing Non-SDSU Facilities will pay development impact fees (“DIFs”) (excluding park DIFs, as discussed in the next sentence), but SDSU and other publicly developed and occupied facilities will be exempt. The Project will contain parks in excess of the City’s requirements and therefore no party constructing any improvements in the Project will be required to pay park DIFs. A credit against all other DIFs will be given to the extent SDSU incurs costs for the Fenton Parkway Bridge exceeding its approximately 25% contribution amount.
14. **Affordable Housing:** At least ten percent (10%) of housing units, which may include student housing units, will be set aside as affordable housing and built on site (no in-lieu fee option) as follows: Rental Units- for a period of 55-years to tenants with an average household income that is 65% of the area median income (“AMI”); For-Sale Units- an initial buyer whose household income does not exceed one hundred percent (100%) of AMI, or an initial buyer whose household income does not exceed 150% of AMI for units containing two or more bedrooms; For Student Housing - students eligible for Cal Grant A or Cal Grant B awards (similar to what is provided in State Density Bonus Law, Government Code section 69519(b)(1)(F)), and students who were previously in the foster care program, or students enrolled in a job training program receiving assistance under the

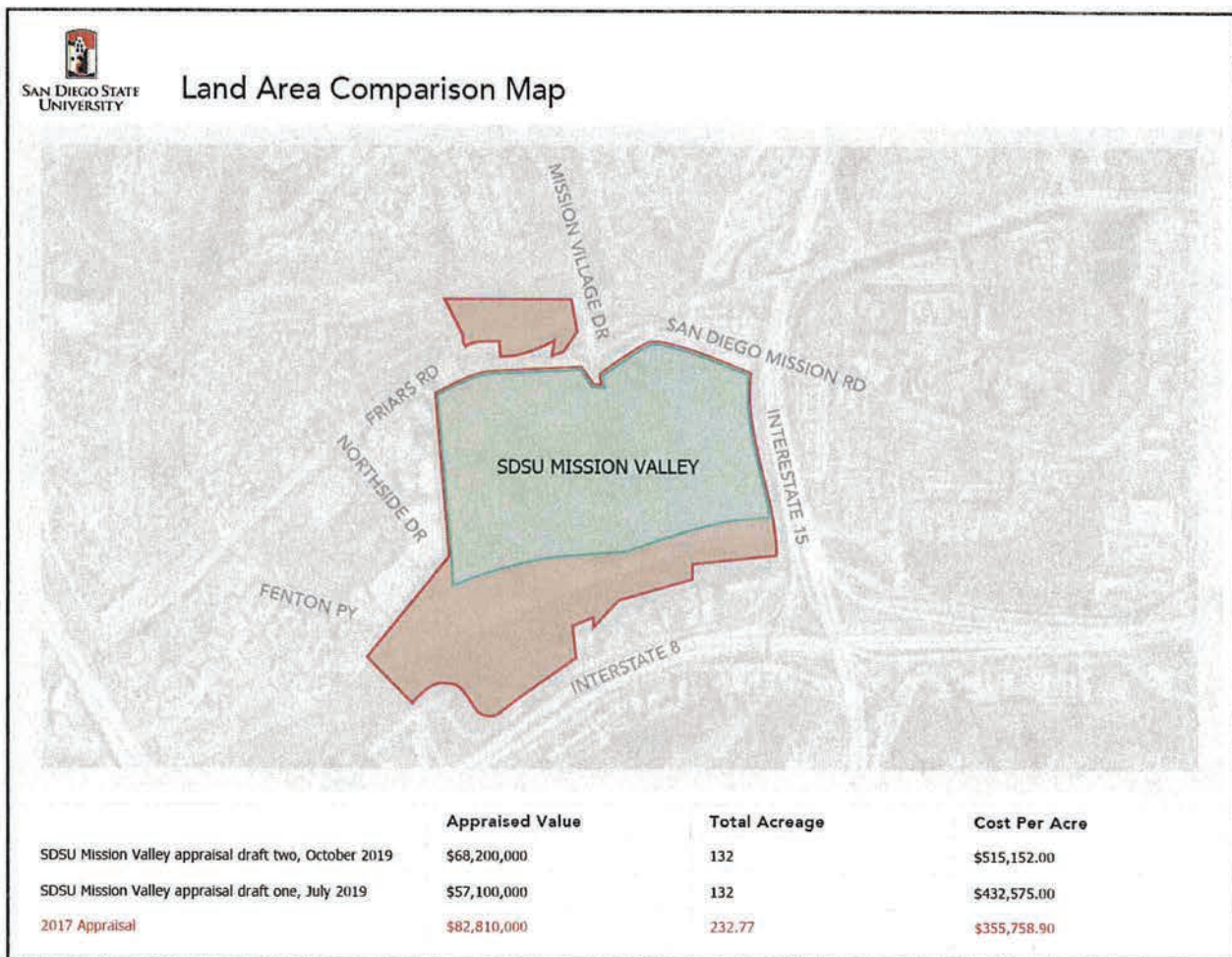
Job Training Partnership Act or under other Federal, State or local laws, or other metric as the parties may agree.


15. **Groundwater Wells for Pure Water.** City will be permitted to install groundwater wells within a predetermined area of the Property that will not impact Project development or improvements.
16. **Monitoring and Extraction Wells:** City will remove and close, or cause the removal and closure of all monitoring and extraction wells and related facilities existing on the Property on a timeline and in a manner reasonably acceptable to SDSU.
17. **Environmental:** SDSU will not assume liability for existing environmental contamination of a nature similar to that which was previously the subject of on-site remediation.
18. **City Cooperation Commitments:** Although SDSU will be the party issuing grading, building and all other permits for the Project, the City agrees to timely cooperate with SDSU in all of its efforts to facilitate and implement the terms of this offer. In particular, the City will actively cooperate on the following: (i) expedited Development Services Department Review and Permitting for Non-SDSU Facilities (SDSU and other publicly developed improvements will not require any City permits), (ii) River Park Right of Entry Access and Operational Agreement, and (iii) the relocation of existing onsite utility lines and recordation of associated easements.
19. **Connection Fees:** SDSU will receive a credit against water and sewer connection fees and charges for all existing facilities.
20. **Compliance with CEQA:** The execution and closing of the PSA is conditioned upon compliance with CEQA, which will include the Board of Trustee's certification of the Mission Valley Campus Master Plan Final EIR and the City's making of Responsible Agency findings under the Final EIR, among other things. SDSU, by delivering this offer, and the City, by accepting this offer, are not bound or committed to a definite course of action with respect to the PSA or the Project. Consistent with CEQA Guidelines 15004(b)(4), nothing in this offer shall commit or be interpreted to commit SDSU or the City formally or as a practical matter to a definite course of action, to preclude the consideration of feasible mitigation measures and alternatives, or to restrict denial of the PSA or the Project, prior to the certification or approval of said Final EIR. The terms proposed in this offer are subject to CEQA compliance through the DEIR and Final EIR, and do not constrain meaningful consideration during the CEQA review process of all feasible mitigation measures or alternatives, including the "No Project" alternative required by CEQA.

21. **Code Compliance:** In addition to the items described above, SDSU will comply with all other Code requirements, including GHG reduction goals and applicable prevailing wage laws consistent with SDSU's policies.

Please note this offer assumes the following: (i) SDSU and City staff will finalize negotiating the terms of a purchase and sale agreement ("PSA") by November 2019, (ii) the Board of Trustees will review, approve and certify the Final EIR for the Project and approve the PSA in January 2020, (iii) the City will make responsible agency findings under the Final EIR and approve the PSA shortly after the Board of Trustees' certification and approval, and (iv) the closing will occur in February 2020. The economics of SDSU's offer are greatly impacted if the above scheduling milestones are not achieved. SDSU is fully committed to working with the City beginning this week to meet this schedule.

SDSU believes these terms proposed above are fair and equitable. We look forward to working with City staff on a PSA that implements these terms as soon as possible.




Tom McCarron, Senior Vice President, SDSU Mission Valley Development

10/14/2019



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THE PRESIDENT

October 28, 2019

Mayor Kevin Faulconer
City of San Diego
202 C Street
11th Floor
San Diego, CA 92101

Subject: Proposed Sale of the Mission Valley Stadium Property

(Please note an earlier version of this letter had a clerical error, which has been fixed in this updated version.)

Dear Mayor Faulconer,

San Diego State University (“SDSU”) wants to thank you and your staff for a tremendous amount of work since the passage of Measure G. SDSU has listened to the comments of the City Council and greatly values the input of our City leaders. SDSU believes a great opportunity awaits the citizens of San Diego with the transformation of the Mission Valley stadium site into a vibrant campus community. SDSU’s proposed Mission Valley Campus Master Plan project (“Project”) has the opportunity to provide our region with increased educational access, advance our innovation economy and realize a vision that will serve San Diego for generations to come.

It is with these thoughts in mind, that SDSU offers the following revisions to the terms of the “Offer to Purchase Mission Valley Stadium Site” delivered to the City on October 14, 2019.

- **Parties:** The City of San Diego, as seller, and San Diego State University/California State University (“CSU”),¹ as buyer.
- **Property:** Contains 135.12 acres, as generally depicted on the map attached to the Measure G initiative and in the appraisal from David Davis dated October 11, 2019 (“Property”).
- **Purchase Price:** \$86,200,000, plus a time value adjustment on the Public Utilities Department 37% portion of the Property, using a 2.149% annual index factor from 9/30/17 through the actual close of escrow (“Closing Date”) (estimated adjustment of \$1,500,000).
- **Murphy Canyon Creek:** The Murphy Canyon Creek parcel will be included in the sale “as is”, and SDSU will not be required to make any improvements to Murphy Canyon Creek.

¹ The Board of Trustees of the California State University, the State of California acting in its higher education capacity, on behalf of San Diego State University.

- Stadium Demolition and Maintenance: Upon the Closing Date, SDSU will assume responsibility for ongoing maintenance, up-keep and demolition of the existing stadium.
- Fenton Parkway Bridge: The Draft Environmental Impact Report (“DEIR”) does not include the Fenton Parkway Bridge (“Bridge”) as a Project component. Nevertheless, SDSU understands the City desires the Bridge as a separate facility, that is part of its long-term traffic circulation plan for the Mission Valley Community Plan area, and the City therefore believes that the Bridge has independent utility without regard to the Project. SDSU does not have detailed information from the City regarding the Bridge. With the cooperation, collaboration and support of SDSU, the City will pursue the Fenton Parkway Bridge as a separate City facility in the future and the Bridge must be and remain a separate City project for CEQA and all other purposes. Subject to the necessary CEQA compliance having been completed by or through the City and all other necessary parties, SDSU will construct a 2-lane, all weather, at grade with the trolley crossing (with turn lane) Bridge and fund its environmental review, design, permitting and construction. SDSU believes the Project’s share of future traffic under the DEIR’s “with bridge” scenario is approximately 25%, and on that basis, SDSU’s allocated contribution for Bridge costs would be approximately 25% of the total costs. SDSU will receive development impact fee credits. SDSU will also be entitled to use the City’s existing capital improvement project funds allocated to the Bridge (approximately \$1.3 million) for Bridge costs. The City will grant SDSU an easement, license and/or other rights necessary for SDSU to construct the Bridge. SDSU agrees it will construct the Bridge before occupancy of more than 65% of planned equivalent dwelling units for the Project. SDSU requests that the City allocate a maximum \$8.5 million of the purchase price proceeds towards construction of the Bridge. This represents the maximum City contribution for the bridge apart from applicable DIF credits.
- Additional Project Improvements: SDSU requests that the City allocate \$1.5 million of the purchase price proceeds in a separate account jointly controlled by the City and SDSU to be held for other related Project improvements.
- Transportation Improvements: In addition to the transportation mitigation responsibilities under the Final Environmental Impact Report (“FEIR”), SDSU will provide \$5,000,000 for additional traffic improvements in coordination with the City.
- River Park: SDSU will design, construct and maintain in perpetuity, the 34-acre River Park, and pay 100% of those costs. The River Park improvements will be completed no later than seven (7) years after the Purchase and Sale Agreement’s (“PSA”) effective date and prior to occupancy of any building on the Property, other than the new stadium.
- Additional 22 Acres of Parks: SDSU will design, construct and maintain at least 22 acres of population-based park facilities, owned by SDSU and available for general community use and enjoyment.
- Future City Recreation Center Site: SDSU will reserve an approximately one-acre site upon which the City may construct and operate a recreation center in the future, as called for in the Mission Valley Community Plan.

- Development Impact Fees: SDSU's non-state private development partners constructing non-SDSU facilities will pay development impact fees ("DIF"), but SDSU and other publicly developed and occupied facilities will be exempt. Because of the timing of construction of the River Park and the additional park improvements, it is anticipated the Project will contain completed parks in excess of the City's requirements and therefore it is anticipated no party constructing any improvements in the Project will be required to pay park DIF fees. SDSU shall be entitled to cash reimbursement or DIF credits for the reimbursable costs expended by SDSU and approved by the City in accordance with the PSA and the Mission Valley Impact Fee Study.
- Affordable Housing: SDSU will provide onsite, 10% of the total number of housing units developed to be set aside as affordable housing units, which may include student housing units. Affordable housing units will be reasonably phased in to coincide with market-rate units.
- Groundwater Management: SDSU will grant appropriate easements to the City, without expense to the City, to install groundwater wells and related facilities within the agreed upon easement location on the Property, and to allow retention of two existing monitoring wells. SDSU will also acknowledge the City's continued retention of its Pueblo water rights.
- Removal of Kinder Morgan Wells: The City will use reasonable efforts to cause Kinder Morgan to timely remove and close all monitoring and extraction wells and related facilities on the Property.
- Environmental Contamination: SDSU will purchase the Property "as is", with all faults. SDSU will defend and indemnify the City against all claims regarding Property's condition and waive all environmental claims against the City. Without incurring any expense or liability, the City will tender written claims to Kinder Morgan for reimbursement of any Property remediation costs arising from Kinder Morgan's environmental contamination.
- Compliance with CEQA: The execution and closing of the PSA is conditioned upon compliance with CEQA, which will include the Board of Trustees of the California State University's certification of the Mission Valley Campus Master Plan FEIR and the City's making of responsible agency findings under the FEIR, among other things. SDSU, by delivering this offer, and the City, by accepting this offer, are not bound or committed to a definite course of action with respect to the PSA or the Project. Consistent with CEQA Guidelines 15004(b)(4), nothing in this offer shall commit or be interpreted to commit SDSU or the City formally or as a practical matter to a definite course of action, to preclude the consideration of feasible mitigation measures and alternatives, or to restrict denial of the PSA or the Project, prior to the certification or approval of said FEIR. The terms proposed in this offer are subject to CEQA compliance through the DEIR and FEIR, and do not constrain meaningful consideration during the CEQA review process of all feasible mitigation measures or alternatives, including the "No Project" alternative required by CEQA.
- Possessory Interest and Other Taxes: SDSU's non-state private development partners constructing improvements in the Project solely for private use and not for the benefit of or in support of SDSU's governmental mission will be required to pay sales tax, possessory interest tax, and/or transit occupancy tax, as required by applicable law. SDSU and other publicly developed property will be exempt from paying property or possessory interest taxes.

- Legal Challenges: SDSU will defend and indemnify the City for all legal challenges with respect to approval of the FEIR, PSA, and Campus Master Plan.
- Sovereignty: Consistent with SDMC section 22.0908 and CSU's status as a sovereign state public agency, nothing in the PSA will abrogate the authority of the California State University Board of Trustees. CSU alone will issue all development related permits and collect all DIFs (for disbursement to the City if required by SDMC section 22.0908) for all aspects of the Project.
- Measure G Compliance: The PSA will incorporate all other conditions and requirements as required by SDMC section 22.0908 and related Measure G campaign promises.

Other proposed PSA details will include:

- CSU Approval: The California State University Board of Trustees must accept and approve if at all, the FEIR, Campus Master Plan and PSA. The target date for such California State University Board of Trustees action is January 28, 2020.
- Council Approval: The City Council must accept and approve if at all, the Final EIR findings and related mitigation measures, and PSA. The target month for such City Council action is February 2020. Such action will require the introduction and adoption of a Charter section 221 ordinance.
- Closing Date: The closing will occur shortly after the parties enter into the PSA with a target Closing Date of no later than March 27, 2020.
- Potential Delay in Closing: If the Closing Date does not occur by June 30, 2020, through no fault (including unreasonable delays) of either party, (a) the City will lease the Property to SDSU for \$1.00 per month; (b) SDSU will assume all ongoing costs of maintaining and operating the Property, including the stadium; and (c) unless the delay is the City's fault, the purchase price will increase on prorated basis, applying an index factor of 2.149% from July 1, 2020 until the Closing Date.

SDSU is truly excited about the opportunity to purchase the Property and develop this transformational Project. We are hopeful the changes we are proposing to our offer will be acceptable. We stand ready to move forward and again, we appreciate all the hard work you, the Council and the City staff have provided to get us to this point.

Sincerely,



Adela de la Torre, Ph.D.
President
San Diego State University

cc:

Honorable Council President Georgette Gómez
Council President Pro-Tem Barbara Bry
Councilmember Jennifer Campbell
Councilmember Chris Ward
Councilmember Monica Montgomery
Councilmember Mark Kersey
Councilmember Chris Cate
Councilmember Scott Sherman
Councilmember Vivian Moreno
Mara Elliott, City Attorney
Aimee Faucett, Chief of Staff
Kris Michell, Chief Operating Officer
Mike Hansen, Director, Planning Department
Cybele Thompson, Director, Real Estate Assets
Kevin Reisch, Senior Chief Deputy City Attorney
Melissa Ables, Deputy City Attorney

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE LEVELS OF SERVICE							
Intersection	Traffic Control	Peak Hour	Horizon Year + Project Conditions No Bridge		Horizon Year + Project Conditions with Fenton Bridge		Delay Delta w/o and w/Bridge
			(sec/veh) ¹	LOS ^{2,3}	(sec/veh) ¹	LOS ^{2,3}	
1. SR-163 SB Ramps/Ulric St & Friars Rd*	Signalized	AM	45.3	D	45.3	D	0.0
		PM	62.1	E	62.1	E	0.0
2. SR-163 NB Ramps & Friars Rd*	Signalized	AM	29.5	C	29.5	C	0.0
		PM	36.2	D	36.2	D	0.0
3. Frazee Rd & Friars Rd*	Signalized	AM	50.6	D	50.6	D	0.0
		PM	46.9	D	46.9	D	0.0
4. Mission Center Rd & Friars Rd WB Ramps	Signalized	AM	13.3	B	13.3	B	0.0
		PM	15.0	B	15.0	B	0.0
5. Mission Center Rd & Friars Rd EB Ramps	Signalized	AM	16.7	B	16.7	B	0.0
		PM	38.1	D	38.1	D	0.0
6. Qualcomm Way & Friars Rd WB Ramps	Signalized	AM	17.0	B	16.7	B	-0.3
		PM	24.9	C	24.5	C	-0.4
7. Qualcomm Way & Friars Rd EB Ramps	Signalized	AM	6.2	A	6.6	A	0.4
		PM	13.3	B	11.6	B	-1.7
8. River Run Dr & Friars Rd	Signalized	AM	25.0	C	27.3	C	2.3
		PM	94.9	F	95.9	F	1.0
9. Fenton Pkwy & Friars Rd	Signalized	AM	22.1	C	41.4	D	19.3
		PM	126.6	F	92.5	F	-34.1
10. Northside Dr & Friars Rd	Signalized	AM	26.6	C	27.4	C	0.8
		PM	97.5	F	79.5	E	-18.0
11. Stadium Way (Street A) & Friars Rd ⁴	Signalized	AM	10.4	B	9.7	A	-0.7
		PM	22.9	C	14.3	B	-8.6
12. Mission Village Dr & Friars Rd WB Ramps	Signalized	AM	28.8	C	28.4	C	-0.4
		PM	33.6	C	32.7	C	-0.9
13. Mission Village Dr/Street D & Friars Rd EB Ramps*	Signalized	AM	17.0	B	16.9	B	-0.1
		PM	30.0	C	25.5	C	-4.5
14. Street D & Street 4	Signalized	AM	23.7	C	21.3	C	-2.4
		PM	40.9	D	51.7	D	10.8
15. Street F & Street 4	Signalized	AM	27.0	C	25.9	C	-1.1
		PM	35.1	D	30.6	C	-4.5
16. Street F/San Diego Mission Rd & Street 6	Roundabout	AM	8.1	A	7.2	A	-0.9
		PM	9.3	A	8.0	A	-1.3
17. I-15 SB Ramps & Friars Rd	Signalized	AM	124.6	F	93.7	F	-30.9
		PM	100.6	F (F)	85.4	F (F)	-15.2
18. I-15 NB Ramps & Friars Rd	Signalized	AM	137.6	F (F)	140.6	F (F)	3.0
		PM	208.4**	F (F)	206.3**	F (F)	-2.1
19. Rancho Mission Rd & Friars Rd	Signalized	AM	33.8	C (F)	35.1	D (F)	1.3
		PM	83.2	F (F)	75.8	E (F)	-7.4
20. Santo Rd & Friars Rd	Signalized	AM	47.1	D	47.1	D	0.0
		PM	19.0	B	19.0	B	0.0
21. Riverdale St & Friars Rd	Signalized	AM	43.8	D	43.8	D	0.0
		PM	43.8	D	43.8	D	0.0
22. Mission Gorge Rd & Friars Rd	Signalized	AM	46.5	D	46.5	D	0.0
		PM	54.2	D	54.2	D	0.0
23. Qualcomm Way & Rio San Diego Dr	Signalized	AM	22.1	C	22.4	C	0.3
		PM	49.6	D	42.9	D	-6.7
24. Rio San Diego Dr & River Run Dr	AWSC	AM	13.6	B	14.1	B	0.5
		PM	30.8	D	45.9	E	15.1
25. Fenton Pkwy & Rio San Diego Dr/Fenton Marketplace Dwy	Signalized	AM	17.0	B	20.5	C	3.5
		PM	28.7	C	43.5	D	14.8
26. Rancho Mission Rd & San Diego Mission Rd	Signalized	AM	46.0	D	33.6	C	-12.4
		PM	48.4	D	34.2	C	-14.2
27. Fairmount Ave & San Diego Mission Rd/Twain Ave	Signalized	AM	101.1	F	55.5	E	-45.6
		PM	73.2	E	41.1	D	-32.1
28. Qualcomm Way & Camino del Rio N/Camino de la Reina	Signalized	AM	21.8	C	20.7	C	-1.1
		PM	71.0	E	70.8	E	-0.2
29. Qualcomm Way & I-8 WB Off-Ramp/Camino del Rio N	Signalized	AM	21.8	C	21.1	C	-0.7
		PM	77.2	E	77.6	E	0.4
30. Texas St & I-8 EB Off-Ramp	Signalized	AM	1.2	A	1.1	A	-0.1
		PM	4.9	A	4.8	A	-0.1
31. Texas St & Camino del Rio S	Signalized	AM	111.7	F	119.6	F	7.9
		PM	103.3	F	107.2	F	3.9
32. Ward Rd & Rancho Mission Rd	SSSC	AM	131.2	F	65.1	F	-66.1
		PM	321.1**	F	165.9**	F	-155.2
33. Camino del Rio N & Ward Ave	Signalized	AM	25.3	C	20.3	C	-5.0
		PM	29.6	C	24.8	C	-4.8
34. Fairmount Ave & Mission Gorge Rd	Signalized	AM	27.6	C	27.0	C	-0.6
		PM	62.1	E	58.2	E	-3.9
35. Fairmount Ave & Camino del Rio N*	Signalized	AM	122.5	F	133.2	F	10.7
		PM	121.7	F	187.6**	F	65.9
36. I-8 EB Off-Ramp & Fairmount Ave	Signalized	AM	20.5	C	22.9	C	2.4
		PM	52.7	D	54.8	D	2.1
37. Montezuma Rd & Collwood Blvd	Signalized	AM	49.2	D	48.6	D	-0.6
		PM	53.5	D	53.3	D	-0.2
38. Mission Village Dr & Shawn Ave	Signalized	AM	6.4	A	6.4	A	0.0
		PM	13.6	B	13.6	B	0.0

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE LEVELS OF SERVICE							
Intersection	Traffic Control	Peak Hour	Horizon Year + Project Conditions No Bridge		Horizon Year + Project Conditions with Fenton Bridge		Delay Delta w/o and w/Bridge
			(sec/veh) ¹	LOS ^{2,3}	(sec/veh) ¹	LOS ^{2,3}	
39. Mission Village Dr & Fermi Ave	Signalized	AM	15.5	B	15.5	B	0.0
		PM	13.9	B	13.9	B	0.0
40. Gramercy Dr/Mission Village Dr & Ruffin Rd	Signalized	AM	32.6	C	32.6	C	0.0
		PM	36.4	D	36.4	D	0.0
41. Ruffin Rd & Aero Dr	Signalized	AM	36.8	D	36.8	D	0.0
		PM	63.2	E	63.2	E	0.0
42. Gramercy Dr & Mobley St	Signalized	AM	7.2	A	7.2	A	0.0
		PM	6.1	A	6.1	A	0.0
43. Gramercy Dr/Greyling Dr & Sandrock Rd	Signalized	AM	9.3	A	9.3	A	0.0
		PM	11.9	B	11.9	B	0.0
44. Mission City Pkwy & Camino del Rio N	Signalized	AM	16.9	B	105.1	F	88.2
		PM	12.4	B	58.9	E	46.5
45. Mission City Pkwy & Camino del Rio S	Signalized	AM	8.2	A	10.9	B	2.7
		PM	27.1	C	55.8	E	28.7
46. I-15 SB Off-Ramp & Camino del Rio S	Signalized	AM	43.1	D	68.1	E	25.0
		PM	35.2	D	46.8	D	11.6
47. I-15 SB On-Ramp & Camino del Rio S	Signalized	AM	2.2	A	2.3	A	0.1
		PM	7.9	A	10.8	B	2.9
48. I-15 NB Ramps & Camino del Rio S	Signalized	AM	18.9	B	29.0	C	10.1
		PM	15.4	B	33.8	C	18.4
49. Fenton Pkwy & River Park Rd	Signalized	AM	DNE	N/A	5.4	A	N/A
		PM		N/A	6.1	A	N/A

Source: Fehr & Peers, 2019. TIA Table 29 and Table 44.

Notes:

- ¹ Whole intersection weighted average stopped delay expressed in seconds per vehicle for signalized intersections, the all-way-stop-controlled intersection, and the roundabout intersection. Worst movement delay reported for the side-street-stop-controlled intersection
- ² LOS calculations performed using the *Highway Capacity Manual (HCM)* method.
- ³ Below-standard seconds of delay per vehicle and LOS highlighted in **bold**.
- ⁴ Under Existing Conditions, the Stadium Way (Street A) & Friars Road intersection is only used d
- * Existing or proposed signal phasing prevents the use of *HCM 6* at this intersection. The *HCM 2000* method was applied instead.
- ** Calculated delays above 150 seconds may not be accurate and should be used with caution.
- *** Ramp metering during the peak hours under existing conditions results in queues back to and through the adjacent arterial intersection causing additional delay for selected movements that is not reflected in the calculation. This additional delay is estimated to result in operations as shown in parentheses.

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE CONDITIONS ROADWAY SEGMENT LEVEL OF SERVICE											
Study Segments			Roadway Classification (# of Lanes) ¹	Capacity	Horizon Year Plus Project Conditions without Bridge			Horizon Year Plus Project Conditions with Fenton Bridge			Delta V/C w/o and w/Bridge
					ADT	V/C ²	LOS ^{3,4}	ADT	V/C ²	LOS ^{3,4}	
ID	Extent (from/to)										
Friars Rd											
1	Frazee Rd	Mission Center Rd	8P	80,000	56,839	0.71	C	56,839	0.71	C	0.00
2	Mission Center Rd	Qualcomm Way	6E	80,000	54,081	0.68	C	54,081	0.68	C	0.00
3	Qualcomm Way	River Run Dr	6E	80,000	50,015	0.63	C	50,777	0.63	C	0.00
4	River Run Dr	Fenton Pkwy	6P	60,000	50,820	0.85	D	51,434	0.86	D	0.01
5	Fenton Pkwy	Northside Dr	6P	60,000	52,875	0.88	D	48,200	0.80	C	-0.08
6	Northside Dr	Stadium Way	6E	80,000	62,520	1.04	F	58,129	0.97	E	-0.07
7	Stadium Way	Mission Village Dr	6E	80,000	66,403	0.83	D	60,918	0.76	D	-0.07
8	Mission Village Dr	I-15 Ramps	6E	80,000	72,125	0.90	E	68,252	0.85	D	-0.05
9	I-15 Ramps	Rancho Mission Rd	7P	70,000	78,407	1.12	F	79,951	1.14	F	0.02
10	Rancho Mission Rd	Santo Rd	7P	70,000	63,700	0.91	D	63,700	0.91	D	0.00
11	Santo Rd	Riverdale St	6P	60,000	61,873	1.03	F	61,873	1.03	F	0.00
12	Riverdale St	Mission Gorge Rd	6P	60,000	56,252	0.94	E	56,252	0.94	E	0.00
Qualcomm Way											
13	Friars Rd	Rio San Diego Dr	6M	50,000	24,047	0.48	B	21,209	0.42	B	-0.06
Rio San Diego Dr											
14	Qualcomm Way	River Run Dr	4M	40,000	16,673	0.42	B	17,528	0.44	B	0.02
15	River Run Dr	Fenton Pkwy	4C/M	30,000	14,120	0.47	C	15,292	0.51	C	0.04
Fenton Pkwy											
16	Rio San Diego Dr/ Fenton Marketplace Dwy	Trolley Crossing/River Park Rd	4M	40,000	7,434	0.19	A	16,071	0.40	B	0.21
	16a	River Park Rd	2C w/CLTL	15,000	DNE	N/A	N/A	14,194	0.95	E	N/A
San Diego Mission Rd											
17	Mission Village Dr	Rancho Mission Rd	4C w/o CLTL	15,000	15,925	1.06	F	14,076	0.94	E	-0.12
18	Rancho Mission Rd	Fairmount Ave	2C w/CLTL	15,000	18,294	1.22	F	16,479	1.10	F	-0.12
Rancho Mission Rd											
19	Friars Rd	San Diego Mission Rd	3C w/CLTL	22,500	22,983	1.02	F	21,318	0.95	E	-0.07
20	San Diego Mission Rd	Ward Rd	4C w/o CLTL	15,000	13,301	0.89	E	11,647	0.78	D	-0.11
21	West of Ward Rd		2C	10,000	6,275	0.63	C	5,968	0.60	C	-0.03
Ward Rd											
22	Rancho Mission Rd	Camino del Rio N	4C w/o CLTL	15,000	16,741	1.12	F	14,696	0.98	E	-0.14
Fairmount Ave											
23	San Diego Mission Rd/Twain Ave	Mission Gorge Rd	4C	30,000	12,174	0.41	B	12,164	0.41	B	0.00
Mission Village Dr											
24	Ruffin Rd	Shawn Ave	4C	30,000	22,623	0.75	D	22,623	0.75	D	0.00
25	Shawn Ave	Ronda Ave	4C	30,000	19,399	0.65	C	19,399	0.65	C	0.00
26	Ronda Ave	Friars Rd	4M	40,000	21,709	0.54	C	21,709	0.54	C	0.00
Ruffin Rd											
27	Aero Dr	Mission Village Dr	4C	30,000	19,086	0.64	C	19,086	0.64	C	0.00
Gramercy Dr											
28	Mobley St	Ruffin Rd	4M	40,000	10,812	0.27	A	10,812	0.27	A	0.00
Aero Dr											
29	Sandrock Rd	Ruffin Rd	4M	40,000	25,505	0.64	C	25,505	0.64	C	0.00
30	Ruffin Rd	W Canyon Ave	4M	40,000	32,625	0.82	D	32,625	0.82	D	0.00
Camino del Rio N											
31	Qualcomm Way	Mission City Pkwy	4C	30,000	12,063	0.40	B	10,538	0.35	B	-0.05
32	Mission City Pkwy	Ward Rd	2C w/CLTL	15,000	11,237	0.75	D	12,943	0.86	D	0.11
33	Ward Rd	Fairmount Ave	4C	30,000	18,940	0.63	C	21,757	0.73	D	0.10
Camino del Rio S											
34	Texas St	Mission City Pkwy	2C	10,000	14,109	1.41	F	15,389	1.54	F	0.13
35	Mission City Pkwy	I-15 Ramps	3C w/CLTL	22,500	12,341	0.55	C	15,284	0.68	D	0.13
36	I-15 Ramps	Caminito Pintoresco	2C w/CLTL	15,000	8,372	0.56	C	8,372	0.56	C	0.00

Source: *Fehr & Peers, 2019*. TIA Table 30 and Table 45.

Notes:

- 1

2C = 2-lane collector

2C w/CLTL = 2-lane collector with center left-turn lane

3C w/CLTL = 3-lane collector (2 lanes in one direction and 1 in opposing direction) with center left-turn lane

4C w/o CLTL = 4-lane collector without center left-turn lane

4C = 4-lane collector

4M = 4-lane major arterial

6M = 6-lane major arterial

6P = 6-lane primary arterial

7P = 7-lane primary arterial (4 lanes in one direction and 3 in opposing direction); the additional lane is assumed to add 5,000 ADT for LOS A, 7,500 ADT for LOS B, and 10,000 ADT for LOS C, D, and E per the Mission Valley Community Plan Update

8P = 8-lane primary arterial

6E = 6-lane expressway
- 2

Volume-to-capacity ratio. Worst-case is shown on segments with multiple classifications
- 3

LOS calculations performed using *City of San Diego Traffic Impact Study Manual (1998)* and the *Mission Valley Community Plan Update (2019)*
- 4

Unacceptable ADT volumes per segment and LOS highlighted in **bold**.

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE CONDITIONS FREEWAY LEVEL OF SERVICE																		
Freeway Segment	Direction	Number of Lanes	Capacity ¹	Horizon Year Plus Project Without Bridge						Horizon Year Plus Project With Bridge						Change in V/C w/o and w/bridge		
				Peak Hour Volume		V/ C Ratio ^{2,4}		LOS ^{3,4}		Peak Hour Volume		V/ C Ratio ^{2,4}		LOS ^{3,4}		AM	PM	
				AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM			
SR-163																		
1	6th Ave to I-8	NB	3M+1A	6,600	6,407	6,942	0.97	1.05	E	F(0)	6,407	6,942	0.97	1.05	E	F(0)	0.00	0.00
		SB	3M+2A	7,800	10,868	9,757	1.39	1.25	F(2)	F(1)	10,868	9,757	1.39	1.25	F(2)	F(1)	0.00	0.00
2	I-8 to Friars Rd	NB	2A	2,400	2,083	2,206	0.87	0.92	D	D	2,083	2,206	0.87	0.92	D	D	0.00	0.00
		SB	4M+2A	9,600	9,944	9,122	1.04	0.95	F(0)	E* (F)	9,944	9,122	1.04	0.95	F(0)	E (F)	0.00	0.00
3	Friars Rd to Mesa College Dr5	NB	5M	9,000	11,154	9,005	1.24	1.00	F(0)	F(0)	11,154	9,005	1.24	1.00	F(0)	F(0)	0.00	0.00
		SB	4M	7,200	7,464	7,731	1.04	1.07	F(0)	F(0)* (F)	7,464	7,731	1.04	1.07	F(0)	F(0) (F)	0.00	0.00
4	Mesa College Dr to I-805	NB	4M+2A	9,600	9,403	8,747	0.98	0.91	E	D	9,403	8,747	0.98	0.91	E	D	0.00	0.00
		SB	4M+1A	8,400	8,567	7,488	1.02	0.89	F(0)	D* (F)	8,567	7,488	1.02	0.89	F(0)	D (F)	0.00	0.00
I-805																		
5	Madison Ave to I-8	NB	4M+1A	8,400	10,275	6,006	1.22	0.71	F(0)	C	10,275	6,006	1.22	0.71	F(0)	C	0.00	0.00
		SB	6M	10,800	5,475	11,493	0.51	1.06	B	F(0)* (F)	5,475	11,493	0.51	1.06	B	F(0) (F)	0.00	0.00
6	I-8 to Murray Ridge Rd/Phyllis Pl	NB	5M	9,000	11,886	6,907	1.32	0.77	F(1)	C	11,886	6,907	1.32	0.77	F(1)	C	0.00	0.00
		SB	4M+2A	9,600	6,232	11,131	0.65	1.16	C	F(0)	6,232	11,131	0.65	1.16	C	F(0)	0.00	0.00
7	Murray Ridge Rd/Phyllis Pl to Mesa College Dr/Kearny Villa Rd	NB	5M	9,000	11,875	6,876	1.32	0.76	F(1)	C	11,875	6,876	1.32	0.76	F(1)	C	0.00	0.00
		SB	5M	9,000	5,992	10,862	0.67	1.21	C	F(0)	5,992	10,862	0.67	1.21	C	F(0)	0.00	0.00
8	Mesa College Dr/Kearny Villa Rd to SR-163	NB	5M	9,000	9,905	5,851	1.10	0.65	F(0)* (F)	C	9,905	5,851	1.10	0.65	F(0) (F)	C	0.00	0.00
		SB	4M	7,200	4,305	6,712	0.60	0.93	B	E* (F)	4,305	6,712	0.60	0.93	B	E (F)	0.00	0.00
9	SR-163 to Balboa Ave	NB	4M+1A	8,400	7,098	6,002	0.84	0.71	D* (F)	C	7,098	6,002	0.84	0.71	D (F)	C	0.00	0.00
		SB	4M+2A	9,600	6,724	9,095	0.70	0.95	C	E	6,724	9,095	0.70	0.95	C	E (F)	0.00	0.00
I-15																		
10	Adams Ave to I-8	NB	3M+2A	7,800	7,978	8,775	1.02	1.13	F(0)	F(0)	7,978	8,775	1.02	1.13	F(0)	F(0)	0.00	0.00
		SB	5M	9,000	6,298	10,563	0.70	1.17	C	F(0)	6,298	10,563	0.70	1.17	C	F(0)	0.00	0.00
11	NB Off-Ramp to Friars Rd	NB	2A	2,400	1,880	2,590	0.78	1.08	C	F(0)	1,639	2,364	0.68	0.99	C	E	-0.10	-0.09
	Friars Rd Auxiliary Lanes to I-8	SB	3A	3,600	4,504	5,985	1.25	1.66	F(1)	F(3)	4,454	5,944	1.24	1.65	F(0)	F(3)	-0.01	-0.01
	Friars Rd Direct Ramp to I-15 SB	SB	1A	1,200	954	1,494	0.80	1.24	C	F(0)	855	1,248	0.71	1.04	C	F(0)	-0.08	-0.20
12	Friars Rd to Aero Dr	NB	4M+1A	8,400	9,964	7,620	1.19	0.91	F(0)	D	9,964	7,620	1.19	0.91	F(0)	D	0.00	0.00
		SB	5M+1A	10,200	8,680	11,718	0.85	1.15	D	F(0)	8,680	11,718	0.85	1.15	D	F(0)	0.00	0.00
13	Aero Dr to Balboa Ave/Tierrasanta Blvd	NB	4M+1A	8,400	11,125	8,657	1.32	1.03	F(1)	F(0)	11,125	8,657	1.32	1.03	F(1)	F(0)	0.00	0.00
		SB	4M+1A	8,400	8,835	10,503	1.05	1.25	F(0)	F(1)	8,835	10,503	1.05	1.25	F(0)	F(1)	0.00	0.00
I-8																		
14	Morena Blvd to Taylor St	EB	4M+1A	8,400	7,382	9,179	0.88	1.09	D	F(0)	7,382	9,179	0.88	1.09	D	F(0)	0.00	0.00
		WB	5M	9,000	8,630	7,604	0.96	0.84	E	D	8,630	7,604	0.96	0.84	E	D	0.00	0.00
15	Taylor St to Hotel Cir	EB	4M	7,200	7,243	9,629	1.01	1.34	F(0)	F(1)	7,243	9,629	1.01	1.34	F(0)	F(1)	0.00	0.00
		WB	4M+1A	8,400	9,942	8,562	1.18	1.02	F(0)	F(0)	9,942	8,562	1.18	1.02	F(0)	F(0)	0.00	0.00
16	Hotel Cir to SR-163	EB	4M+2A	9,600	8,956	11,071	0.93	1.15	E	F(0)	8,956	11,071	0.93	1.15	E	F(0)	0.00	0.00
		WB	5M	9,000	10,101	8,378	1.12	0.93	F(0)	E	10,101	8,378	1.12	0.93	F(0)	E	0.00	0.00
17	SR-163 to Mission Center Rd	EB	4M	7,200	3,834	7,155	0.53	0.99	B	E* (F)	3,834	7,155	0.53	0.99	B	E (F)	0.00	0.00
		WB	3M+2A	7,800	10,435	9,669	1.34	1.24	F(1)	F(0)	10,435	9,669	1.34	1.24	F(1)	F(0)	0.00	0.00
18	Mission Center Rd to Texas St	EB	4M+1A	8,400	6,344	11,897	0.76	1.42	C	F(2)	6,344	11,897	0.76	1.42	C	F(2)	0.00	0.00
		WB	4M+1A	8,400	10,857	10,121	1.29	1.20	F(1)	F(0)	10,857	10,121	1.29	1.20	F(1)	F(0)	0.00	0.00
19	Texas St to I-805	EB	4M	7,200	4,044	7,836	0.56	1.09	B	F(0)* (F)	4,044	7,836	0.56	1.09	B	F(0) (F)	0.00	0.00
		WB	4M	7,200	7,625	6,122	1.06	0.85	F(0)* (F)	D	7,625	6,122	1.06	0.85	F(0) (F)	D	0.00	0.00
20	I-805 to I-15	EB	4M+2A	9,600	7,489	12,574	0.78	1.31	C	F(1)	7,489	12,574	0.78	1.31	C	F(1)	0.00	0.00
		WB	4M+2A	9,600	12,742	10,409	1.33	1.08	F(3)	F(3)	12,742	10,409	1.33	1.08	F(3)	F(3)	0.00	0.00
21	I-15 to Fairmount Ave	EB	4M+2A	9,600	7,406	11,595	0.77	1.21	C	F(0)	7,356	11,554	0.77	1.20	C	F(0)	0.00	0.00
		WB	4M+2A	9,600	9,017	6,696	0.94	0.70	E* (F)	C	8,938	6,666	0.93	0.69	E (F)	C	-0.01	0.00
22	Fairmount Ave to Waring Rd	EB	5M	9,000	8,161	13,048	0.91	1.45	D	F(2)	8,112	13,007	0.90	1.45	D	F(2)	-0.01	0.00
		WB	6M	10,800	12,345	9,769	1.14	0.90	F(0)	D	12,265	9,738	1.14	0.90	F(0)	D	0.00	0.00
23	Waring Rd to College Ave	EB	5M	9,000	7,864	12,318	0.87	1.37	D	F(2)	7,814	12,277	0.87	1.36	D	F(2)	0.00	0.00
		WB	5M	9,000	11,533	9,246	1.28	1.03	F(1)	F(0)	11,454	9,216	1.27	1.02	F(1)	F(0)	-0.01	0.00

Source: Fehr & Peers, 2019. TIA Table 31 and Table 46.

Notes:

1 Capacity calculated at 1,800 vehicles/hour per mainline lane and 1,200 vehicles/hour per auxilliary lane

M = mainline lane

A = auxilliary lane

2 Volume-to-capacity ratio. Worst-case is shown on segments with multiple classifications

3 LOS calculations performed using *City of San Diego Traffic Impact Study Manual (1998)*

4 Unacceptable V/C and LOS highlighted in **bold**.

5 No data available from Genesee Ave to Mesa College Dr - assumed equivalent to the segment from Friars Rd to Genesee Ave

* Traffic data indicate existing operations are worse than calculated. Peak hour volumes likely do not represent actual demand due to heavy congestion. Estimated operations are shown in parentheses.

LOS	V/C	LOS	V/C
A	<0.41	F(0)	1.25
B	0.62	F(1)	1.35
C	0.80	F(2)	1.45
D	0.92	F(3)	>1.46
E	1.00		

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE CONDITIONS RAMP METERING ANALYSIS

Location	Peak Hour	Total # of Mixed Flow Lanes	Meter Rate ¹ (veh/hr)	Horizon Year Plus Project Without Bridge					Horizon Year Plus Project With Bridge					Delay Delta
				Demand ² (veh/hr)		Excess Demand ³ (veh/hr)	Delay ⁴ (min)	Queue ⁵ (ft)	Demand ² (veh/hr)		Excess Demand ³ (veh/hr)	Delay ⁴ (min)	Queue ⁵ (ft)	
				Mixed Flow & HOV	Mixed Flow only				Mixed Flow & HOV	Mixed Flow only				
I-15 NB - Friars Rd On-Ramp	AM	2	1,450	2,617	2,213	763	31.6	11,050	2,617	2,213	763	31.6	11,050	0.0
	PM	2	888	2,010	1,770	882	59.6	12,800	2,010	1,770	882	59.6	12,800	0.0
I-15 SB / I-8 - Friars Rd Loop On-Ramp	AM	1	N/A	1,028	1,028	N/A	N/A	N/A	979	979	N/A	N/A	N/A	N/A
	PM	1	660	1,118	1,118	458	41.7	13,300	1,077	1,077	417	38.0	12,100	-3.7
I-15 SB - Friars Rd Direct On-Ramp	AM	1	N/A	954	954	N/A	N/A	N/A	855	855	N/A	N/A	N/A	N/A
	PM	1	996	1,494	1,494	498	30.0	14,425	1,248	1,248	252.1	15.2	7,300	-14.8
I-8 EB - SB Fairmount Ave	AM	1	N/A	432	432	N/A	N/A	N/A	432	432	N/A	N/A	N/A	N/A
	PM	1	492	900	900	408	49.7	11,825*	900	900	408	49.7	11,825*	0.0

Source: Fehr & Peers, 2019. Analysis based on Caltrans District 11 Ramp Meter methodology. TIA Table 32 and Table 47.

Notes:

1. Meter Rate is the peak hour capacity for the ramp meter. This value was obtained from Caltrans. The most restrictive meter rate was assumed.
 2. Demand is the peak hour demand projected to use the on-ramp.
 3. Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
 4. Delay = (Excess Demand / Meter Rate) X 60 min/hr. Undesirable delays in excess of 15 minutes are highlighted in **bold**.
 5. Queue = Excess Demand / # of Lanes * 29 ft/veh, rounded to the nearest multiple of 25'
- * Field observations of existing conditions indicate that operations may be better than calculated. Observed maximum queues were 250 feet and maximum delays were less than one (1) minute.

HORIZON YEAR PLUS PROJECT WITHOUT AND WITH 2-LANE FENTON BRIDGE CONDITIONS OFF-RAMP QUEUES

Intersection	Peak Hour	Movement	Capacity (ft)	95th %ile Queue (ft)		Queue Delta w/o and w/Bridge
				HY Plus Project Without Bridge	HY Plus Project With Bridge	
1. SR-163 SB Ramps/Ulric St & Friars Rd	AM	NBL	1,200	211	211	0
		NBT		104	104	0
		NBR		502	502	0
	PM	NBL	1,200	263	263	0
		NBT		62	62	0
		NBR		523	523	0
2. Friars Rd & SR-163 NB Ramps	AM	SBL	700	505	505	0
		SBT		0	0	0
		SBR		318	318	0
	PM	SBL	700	456	456	0
		SBT		0	0	0
		SBR		456	456	0
17. I-15 SB Ramps & Friars Rd	AM	SBL	1,200	482	482	0
		SBT		470	470	0
		SBR		500	500	0
	PM	SBL	1,200	911	911	0
		SBT		911	911	0
		SBR		168	168	0
18. I-15 NB Ramps & Friars Rd	AM	NBR	1,500	0	0	0
		SBR	1,300	0	0	0
	PM	NBR	1,500	0	0	0
		SBR	1,300	0	0	0
29. Qualcomm Way & Camino del Rio N/I-8 WB Off-ramp	AM	WBL	3,200	0	0	0
		WBT		243	236	-7
		WBR		824	797	-27
	PM	WBL	3,200	0	0	0
		WBT		411	411	0
		WBR		585	556	-29
30. Texas St/Qualcomm Way & I-8 EB Off-Ramp	AM	EBR	900	169	167	-2
	PM	EBR	900	270	269	-1
35. Fairmount Ave & Camino del Rio N/Alvarado Canyon Rd	AM	WBL	3,200	713	713	0
		WBT		680	680	0
		WBR		394	394	0
	PM	WBL	3,200	714	714	0
		WBT		601	601	0
		WBR		468	468	0
36. Fairmount Ave & I-8E Off-Ramp	AM	EBL	900	505	505	0
		EBR		508	508	0
	PM	EBL	900	1,113	1,113	0
		EBR		1,665	1,665	0
46. Camino del Rio S & I-15 SB Off-Ramp	AM	SBL	900	0	0	0
		SBR		570	798	228
	PM	SBL	900	0	0	0
		SBR		50	59	9
48. I-15 NB Ramps & Camino del Rio S	AM	NBL	1,300	420	676	256
		NBT		28	27	-1
	PM	NBL	1,300	122	343	221
		NBT		63	75	12

Source: Fehr & Peers, 2019. TIA Table 33 and Table 48.

SDSU Mission Valley Campus Master Plan DEIR
Parking Supply Analysis
October 16, 2019

Project Parking Supply				City of SD Required		Delta from City	City of SD Required		Delta from City	Other Comparison			Delta from other
Land Use	Quantity	Unit	Parking Provided	Minimum Multiplier	Minimum Required Spaces	Minimum Required	Maximum Multiplier	Maximum Allowed Spaces	Maximum Allowed	Source	Multiplier	Total	
Campus Office (shared with stadium for events)	1,565,800	SF	5,065	4.3/1,000 GSF	6,733	(1,668)	6.5/1,000 GSF	10,178	(5,113)				
Campus Residential	4,600	dwelling unit	5,662	-	-	5,662	-	-	-	MV Average	1.7	7,820	(2,158)
Campus Retail*	95,000	SF	420	4.3/1,000 GSF	409	12	6.5/1,000 GSF	618	(198)				
Parks													
Health Club*	25,000	SF	420	85% of 5/1,000 GSF	106	314	-	-	-				
Park Space	84	acre	-	-	-	-	-	-	-				
Campus hotels													
Hotel rooms	400	rooms	485	1/room	400	85	-	-	-				
Conference facilities	40,000	SF	-	10/1,000 GSF	400	(400)	-	-	-				
Total - No Stadium Event			12,052		8,048	4,004							
Campus Stadium (capacity event overflow)	35,000		1,140	85% of 1/3 Seats	9,917	(8,777)				Existing	N/A	18,000	(16,860)
Total - With Stadium Event			13,192		17,964	(4,772)							

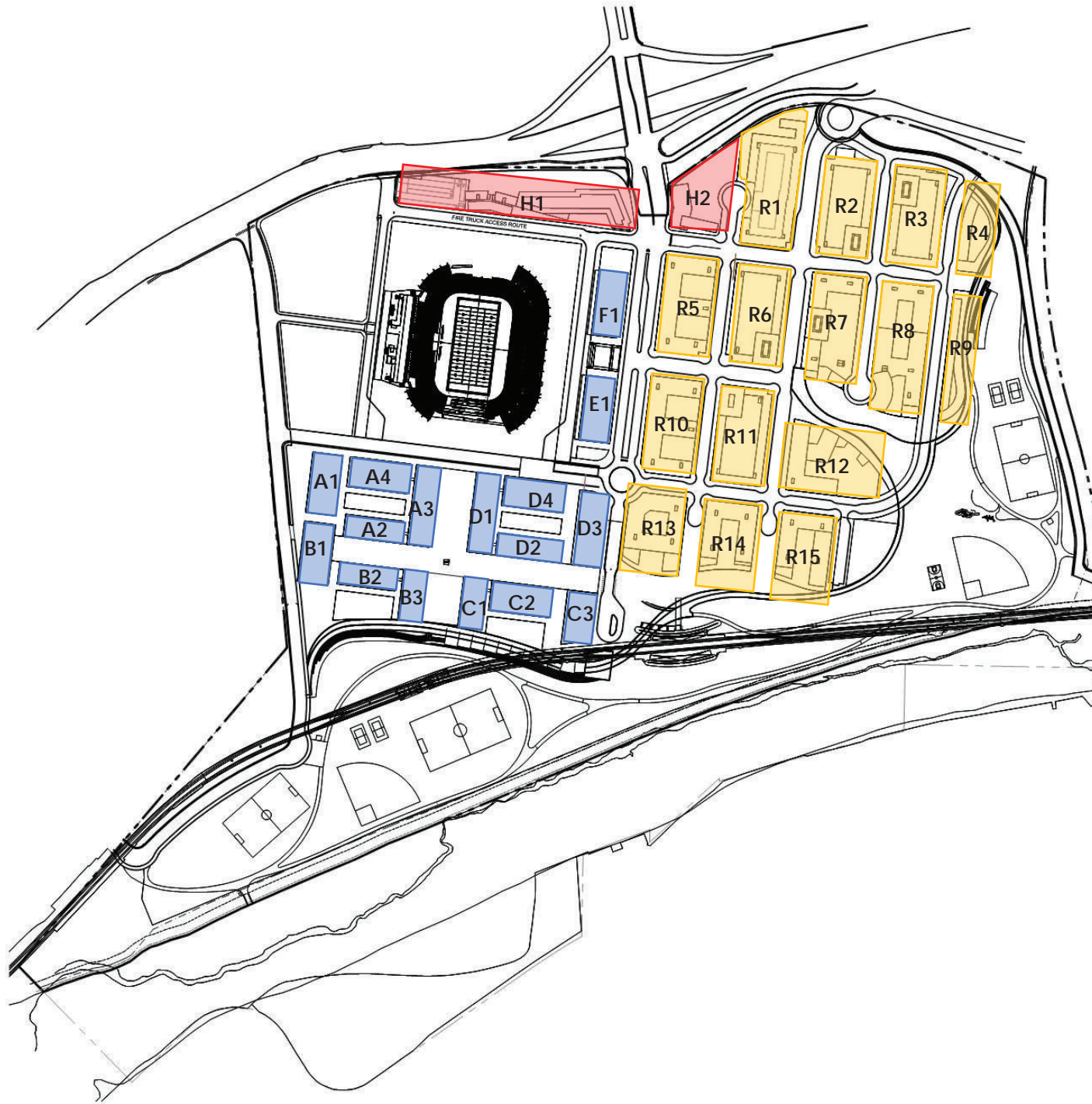
Sources: Fehr & Peers, City of San Diego Municipal Code, Ordinance 21057

Notes:

* 840 on-street parking spaces are expected to be shared between retail uses, park uses, and other project uses. For the purposes of this analysis, they were split evenly between retail and park assignment.

SITE PLAN

DEVELOPMENT SUMMARY

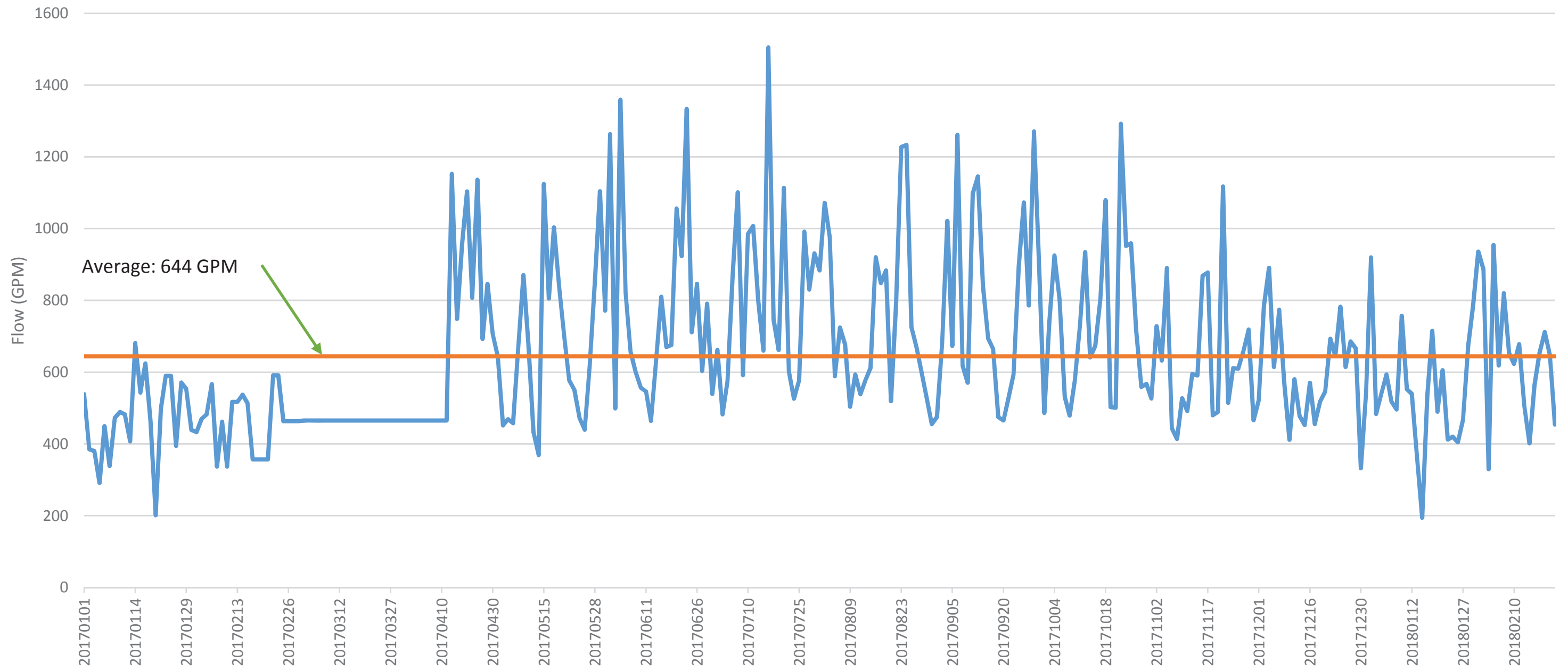


Parcel	Type	Site Area	Level	Gross	Net Rentable	Lobby/Amenity	Retail	Core	Efficiency	Units	Parking SF	Stalls	Stalls/DU	FAR	Avg SF	
Residential																
R1	III-Podium	118,102 sf	6	298,765 sf	249,500 sf	4,835 sf		44,430 sf	84%	302	95,016 sf	253	0.8	2.5	825	
R2	V-Wrap	81,911 sf	22	356,302 sf	291,330 sf	5,100 sf		59,872 sf	82%	353	170,470 sf	455	1.3	4.3	825	
R3	III-Wrap	77,895 sf	22	358,735 sf	293,763 sf	5,100 sf		59,872 sf	82%	356	170,470 sf	455	1.3	4.6	825	
R4	V	47,483 sf	3	71,250 sf	71,250 sf	0 sf		0 sf	100%	29	15,860 sf	63	2.2	1.5	2500	
R5	III	76,000 sf	8	327,673 sf	258,607 sf	5,000 sf	30,000 sf	45,236 sf	79%	313	170,470 sf	455	1.5	4.3	825	
R6	I-Podium	76,000 sf	24	489,976 sf	402,480 sf	5,400 sf		82,096 sf	82%	488	272,752 sf	727	1.5	6.4	825	
R7	I-Podium	82,930 sf	22	489,559 sf	399,957 sf	11,715 sf		77,887 sf	82%	485	204,564 sf	546	1.1	5.9	825	
R8	III-Wrap	101,102 sf	5	341,623 sf	285,976 sf	6,417 sf		49,230 sf	83%	347	136,376 sf	364	1.0	3.4	825	
R9	V-Wrap	32,351 sf	3	69,336 sf	60,362 sf	1,600 sf		7,374 sf	52%	40	16,839 sf	45	1.1	2.1	1500	
R10	I-Podium	75,573 sf	8	330,140 sf	263,403 sf	4,820 sf	30,000 sf	41,844 sf	80%	319	170,470 sf	455	1.4	4.4	825	
R11	I-Podium	76,000 sf	22	467,528 sf	384,000 sf	5,400 sf		78,128 sf	82%	465	272,752 sf	727	1.6	6.2	825	
R12	V	81,240 sf	5	201,935 sf	172,555 sf	2,020 sf		27,360 sf	86%	209	95,334 sf	254	1.2	2.5	825	
R13	I	67,288 sf	8	308,211 sf	256,833 sf	4,734 sf	5,000 sf	39,387 sf	83%	311	105,198 sf	301	1.0	4.6	825	
R14	I	52,295 sf	8	254,546 sf	214,328 sf	5,060 sf		33,053 sf	84%	260	69,525 sf	252	1.0	4.9	825	
R15	I	57,935 sf	8	260,085 sf	215,495 sf	5,060 sf		32,273 sf	83%	261	81,522 sf	311	1.2	4.5	825	
H1 Res			21	108,518 sf	84,848 sf	20,257 sf		481,595 sf	78%	71						
Total				4,734,182 sf	3,904,687 sf		65,000 sf			4,600		5,662	1.23			
Hotel																
H1	I-Tower	174,934 sf	9	155,539 sf	95,454 sf	2,040 sf	Conference									375
H2	V	63,644 sf	3	59,876 sf	49,149 sf	1,967 sf		40,000 sf	0 sf	18,045 sf	84%	255	159,250 sf	425		
								8,760 sf	82%	145	22,445 sf	60	0.4	0.9	340	
				215,415 sf	144,603 sf		40,000 sf			400		485				
Campus																
Building	Dimensions (ft)		Stories	Area (sf)	Area (sf)	Retail										
	Width	Length		per floor	Total											
Campus Zone																
A1	118	238	5	28,084 sf	140,420 sf	4,000 sf										
A2	88	228	3	20,064 sf	60,192 sf											
A3	88	315	3	27,720 sf	83,160 sf											
A4	118	238	4	28,084 sf	112,336 sf											
B1	118	238	5	28,084 sf	140,420 sf											
B2	88	228	3	20,064 sf	60,192 sf											
B3	88	190	3	16,720 sf	50,160 sf											
C1	88	190	3	16,720 sf	50,160 sf											
C2	118	238	3	28,084 sf	84,252 sf											
C3	118	201	5	23,718 sf	118,590 sf											
D1	88	315	3	27,720 sf	83,160 sf											
D2	88	260	3	22,880 sf	68,640 sf											
D3	118	285	3	33,630 sf	100,890 sf											
D4	118	238	4	28,084 sf	112,336 sf											
					1,264,908 sf											
Stadium Zone																
E1	118	255	5	30,090 sf	150,450 sf	13,000 sf										
F1	118	255	5	30,090 sf	150,450 sf											
					300,900 sf	30,000 sf										
Total					1,565,808 sf											

Actual EDUs in Development at time of Flow Metering: 4,232
- 644 gpm/4,232 EDUs = 220 gpd/EDU

FIGURE 3-1A
EXISTING OTAY MESA WATER FACILITIES
AND 680 PRESSURE ZONE LAND USE
SOUTHWEST VILLAGE

Flow Meter on Ocean View Hills Pump Station
Jan. 2017 through Feb. 2018



Response to Comment Letter A5

Metropolitan Transit System (MTS)

Denis Desmond

October 3, 2019

A5-1 The comment is an introduction to comments that follow. The comment is noted for the record, and included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A5-2 The comment regards the planned Purple Line trolley and notes that MTS is not supportive of an alignment adjacent to Interstate 15. CSU/SDSU acknowledges the comment and commits to working with both MTS and the San Diego Association of Governments (SANDAG) on the Purple Line alignment and station location. CSU/SDSU also acknowledges the benefit of locating the alignment as close as possible to the stadium and other campus uses. The preferred location illustrated in the Draft EIR helps to minimize impacts to the proposed site plan and reduce potential impacts to planned residential and campus office uses if the line is constructed as an elevated guideway.

As to the comment that a new interchange station with the Green Line would be too close to the Mission San Diego Station, the comment is acknowledged. As to the third storage track comment, the proposed project does not include relocation of the existing Green Line trolley station. CSU/SDSU understands the benefit of the storage tracks for stadium and campus special events. Regarding the location of trackway and station infrastructure, the comment is acknowledged.

Please see the Responses to Comments A6-5 through A6-7 (SANDAG) for additional information responsive to this comment regarding the Purple Line. The full comment is noted for the record and included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A5-3 The comment states that MTS wants to ensure that the Mission Village Drive extension is designed with the necessary parameters required for a future elevated transit guideway. Please refer to Attachment A5-A showing potential alignments for the Purple Line trolley. As shown therein, the “D Street” median has been designed to accommodate footings for a potential elevated trolley. In addition, SDSU met with MTS on November 3, 2019, and identified an additional alignment along Street A. Please also see Responses to Comments A6-5 through A6-7 (SANDAG) for additional information responsive to this comment regarding the Purple Line.

A5-4 The comment states it is not clear how the Purple Line station or curve would be accommodated within the available footprint at the south end of Street D based on the planned Purple Line alignment shown in Draft EIR Figure 2-11E. CSU/SDSU understands that planning for the Purple Line is still in the conceptual stage and that the alignment and station location design details still need to be developed and completed. CSU/SDSU also understands that the proposed technology, including whether the line is above or below grade, is in flux based on SANDAG's recent proposed changes to the Regional Plan process and the “5 Big Moves” strategy. As explained in Section 3.4, List of Cumulative Projects, of the Draft EIR, little information presently is available relative to the Purple Line:

[The Purple Line is not] at the stage where a project application has been filed, or where environmental review has been commenced to implement ... as a “project”; and [the Purple Line is not] under environmental review for development, approved for construction, under construction, or completed. In addition, [the Purple Line is not] funded, such that it is “ready” to be submitted as a project application; therefore, [the Purple Line is not] “ready” to be the subject of environmental review at this time. Furthermore, [the Purple Line does not have] any set design or construction plans in place for study purposes; as a result, there is uncertainty as to design, location, configuration, timing, and other factors.... Moreover, there is no known funding to implement the MTS Trolley Purple Line at this time or in the future. For all of the above reasons, [the Purple Line is not] considered a “cumulative” project for CEQA purposes.

Accordingly, CSU/SDSU is not able to provide any more information regarding station location feasibility and how the new system would integrate with the proposed campus. As noted in Response to Comment A5-3, above, SDSU met with MTS on November 3, 2019, and identified an additional alignment along Street A. Please refer to Attachment A5-A showing potential alignments for the Purple Line trolley. CSU/SDSU remain committed to working with MTS to identify the ultimate alignment of the Purple Line trolley, and as shown in Attachment A5-A, the proposed project would not impede the Purple Line through the project site. Please also see the Responses to Comments A6-5 through A6-7 (SANDAG) for additional information responsive to this comment regarding the Purple Line.

A5-5 The comment states that proposed Buildings 518, 519, and 531 shown in Draft EIR Figure 2-8 may be within the Purple Line alignment based on SANDAG’s 2017 Final Purple Line Conceptual Planning Study. Please see Responses to Comments A5-3 and A5-4 for information responsive to this comment.

A5-6 The comment refers to the Green Line trolley and requests information regarding the future interaction between the proposed Mission Valley campus and the existing main campus relative to available capacity. As noted in the Draft EIR, over time the site of the proposed project will transition to primarily campus/university uses. While specific class schedules have not been developed for the Mission Valley campus as of this time, the Mission Valley campus is expected to have a research focus and to primarily serve upper division and graduate level students; the existing main campus will continue to serve primarily undergraduate students as it does now. Therefore, the Mission Valley campus is expected to serve a different student body than the existing campus. For these reasons, it is difficult to anticipate at this time the interaction between the two campuses, generally, and specific to the comment, interaction relative to trolley use.

Nonetheless, the Draft EIR transportation analysis, in combination with supplemental analyses conducted in response to comments, show that there is adequate trolley capacity to accommodate the number of trolley riders projected under the proposed Project. (See Draft EIR Section 4.15.7.6.3; and Transportation Impact Analysis, Draft EIR Appendix 15-1, Section 11.3.)

In response to comments, Fehr & Peers conducted supplemental analyses based on consideration of transit load factors. Attachment A5-B to this response (Trolley Capacity Estimates for Horizon Year plus Project Conditions) is a table illustrating the results of the analysis, which was conducted based, in part, on data obtained from SANDAG. The table illustrates Existing Capacity (expressed as riders per hour), Existing Year (2018) Peak Hour Volumes, Horizon Year (2037) Peak Hour Volumes, Project Ridership, and Horizon Year (2037) plus Project Peak Hour Volumes. The information is presented

under two different scenarios – one based on projected ridership for the initial campus market-based uses to be developed as part of the proposed project, and the other based on a university buildout scenario, which, for purposes of the analysis, assumes double (i.e., two times) the projected market-based uses ridership. The table shows that under existing conditions, the trains arriving and departing during the peak hours at the trolley station located at the Stadium station carry passenger loads of up to 508 riders in the peak direction (see Existing Year (2018) Peak Hour Volume). As shown on the table, this number is less than 50% of the existing hourly capacity of 1,239 after accounting for variations throughout the hour.

Specific to transit load factors, as shown in Attachment A5-B, at project buildout, passenger loads under the campus market-based uses scenario potentially would be as high as 905 riders per hour in the peak direction and peak hour. (See Horizon Year (2037) + Project Peak Hr Volume.) As the *existing* capacity for that direction and time is 1,368 total riders per hour (see Existing Capacity), even assuming no increase in capacity over the intervening years, the trains would have sufficient capacity to accommodate the projected number of passengers that would be added by the proposed project.

Furthermore, by the time the proposed project transitions to a fully-functioning university campus, the Regional Transportation Plan forecasts that the train frequency is expected to double from the existing capacity, thereby providing substantial additional capacity. See the relevant excerpt from the Regional Transportation Plan, Attachment A5-C to this Response to Comment. Lastly, even if one assumes the campus trolley trip generation would be double that estimated for the campus market uses, the trolley would still be able to accommodate the project's transit ridership within even the existing trolley capacity (see Attachment A5-B, Capacity Estimates for Horizon Year plus Project Conditions and Doubled Project). While it is highly unlikely that the campus transit trip generation would be double that of the market-based uses in the peak hours, this hypothetical analysis demonstrates the ample capacity available to accommodate additional trolley ridership.

Thus, adequate trolley capacity is expected to be available to serve the additional riders that would be generated by the proposed project. Therefore, the MTS Green Line trolley is expected to be able to accommodate the project's forecasted ridership, and the proposed project would not result in significant impacts to trolley operations.

A5-7

The comment states that MTS anticipates that buses will be needed to handle a sizable portion of transit ridership and questions the adequacy of planned bus infrastructure for the proposed project site. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate a bus transfer center adjacent to the Green Line trolley station, with space for at least four stop/layover spaces. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations.

As to bus priority measures, the length and character of Street D is not conducive to transit elements such as dedicated transit lanes and queue jump lanes. Signal priority on this facility is a possible improvement that could be implemented with the provision of bus service to the Green Line trolley station. In addition, future connections to planned Express Lanes and Rapid Bus Service on the I-15 freeway could be made via the San Diego Mission Road bridge (via direct access ramps) and Street F. CSU/SDSU commits to working with MTS to coordinate bus service operations to/from the site.

Regarding bus stops, CSU/SDSU will work with MTS to identify potential locations within the site for bus stops and associated amenities.

A5-8 The comment states that an interconnected roadway network is important to providing the most flexibility in the routing of bus services. CSU/SDSU acknowledges that MTS supports the extension of Fenton Parkway south across the San Diego River to facilitate multi-modal connectivity, including future transit service. As to the requested connection from Rancho Mission Road to Street 3, the Final EIR includes a revised site plan that includes the requested connection. Please refer to Figure 2-1, Concept Design Site Plan. CSU/SDSU acknowledges the comment, which will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

A5-9 CSU acknowledges the contact information and looks forward to working with Mr. Desmond and other MTS staff as necessary.

To: Greg Shields, Project Design Consultants

From: David Berryman, RailPros

Date: December 13, 2019

Subject: **SDSU Mission Valley Campus Master Plan Project
Purple Line Trolley Alignment Alternatives**

I. Introduction

RailPros was asked by PDC, on behalf of CSU/SDSU, to set forth conceptual alignments for the San Diego Trolley Purple Line through the proposed SDSU Mission Valley Campus Master Plan site. Three alignment alternatives were explored (1) the “A Street” Alignment, which runs along the western edge of the SDSU Mission Valley Campus Master Plan project site, (2) the “D Street” Alignment, which runs through the middle of the project site, and (3) the “Murphy Canyon Creek” Alignment, which runs along the eastern edge of SDSU Mission Valley along I-15. See the attached Exhibit for the conceptual layout of each alignment.

SANDAG published a Purple Line Conceptual Planning Study in January 2017. While the 2017 SANDAG study is the latest publicly available document on this potential future transit option, SANDAG currently is evaluating the specific type of transit service and alignment as part of the new Regional Plan currently in development. The “D Street” Alignment set forth on the attached Exhibit is within the general Purple Line alignment shown in the 2017 SANDAG study.

RailPros designed each alignment alternative to comply with the horizontal geometry requirements listed in the SANDAG Light Rail Transit (LRT) Design Criteria. From these criteria and considering given horizontal site constraints, RailPros determined a “best fit” for each of the three alignments and calculated the design speed for each curve. Vertical site constraints were only considered from what could be assumed from the 2017 SANDAG study and observations from Google Earth.

II. Alignments

A Street Alignment

From south-to-north, this alignment initially mimics the 2017 SANDAG study by crossing over the existing Green Line and turning west to approach the north-side of the existing on-site elevated Stadium Station. Continuing west as a viaduct, the alignment turns north and crosses over to the west side of the proposed A Street and runs parallel north, in the embankment, toward Friars Road. As it approaches Friars Road, it begins a new viaduct to cross back over A Street and turn to the east through the

northwest corner of the proposed tailgate park, and into the median of Friars Road. The alignment then turns slightly south and follows the existing off-ramp to Mission Village Drive. It continues over Mission Village Drive and along the on-ramp before crossing over Friars Road to connect back in with the 2017 SANDAG study alignment.

This alignment alternative is the longest of the three; roughly twice the length of the shortest alternative (Murphy Canyon Creek). It allows for medium-speed operations with all curves able to handle 30 mph to 40 mph. This alignment parallels the existing Green Line alignment for the longest distance, permitting a new trolley station to be built directly adjacent to the existing Green Line Stadium Station. The parallel distance would also be enough to support a Green Line to Purple Line connector track. The alignment is constrained by a proposed building approximately 175' west of the current Stadium Station, possibly requiring the south side of that building to be adjusted slightly to the north, if this alignment were ultimately selected.

D Street Alignment

This alignment is similar to the "A Street" Alignment except that it remains viaduct the entire length and runs up the middle of the new campus D Street, instead of the western slope of A Street as in the previous alignment. This alignment alternative provides a shorter route through the proposed SDSU Mission Valley Campus Master Plan project site but at lower speeds due to tighter site constraints; most curves would be able to support 20 mph design speeds. This alignment parallels the existing Green Line for a shorter distance, requiring the Purple Line station to be offset from the existing Green Line Stadium Station and connected via a pedestrian walkway. The shorter parallel distance may also prove to make a Green Line to Purple Line connector track infeasible.

The D Street median width has been designed to accommodate footings for a potential elevated trolley in the general alignment shown on 2017 SANDAG planning study. D Street would include a 24' Urban Parkway median, which would be wide enough to accommodate the Purple Line trolley.

Murphy Canyon Creek Alignment

This alignment maintains the parallel route along Interstate 15 and crosses through the east side of campus. Traveling north, it then passes over and through an existing petroleum storage facility located along San Diego Mission Road. It then crosses over Friars Road and connects in with the 2017 SANDAG study alignment.

This alignment alternative is the shortest and fastest of the three, with only one 30 mph curve requiring a reduction from the maximum trolley speed of 55 mph. The new Purple Line trolley station would be separate from the existing Stadium Station. However, if the Green Line Stadium Station is nearing the end of its service life, there may be an opportunity to relocate the Stadium Station nearer to the crossing point of both the Green and Purple lines. Because the alignment at this crossing is at a near

right angle in an area constrained by the I-15 Freeway, a Green Line to Purple Line connector track would likely be infeasible. However, the two stations could be double-stacked to provide passenger transfers.

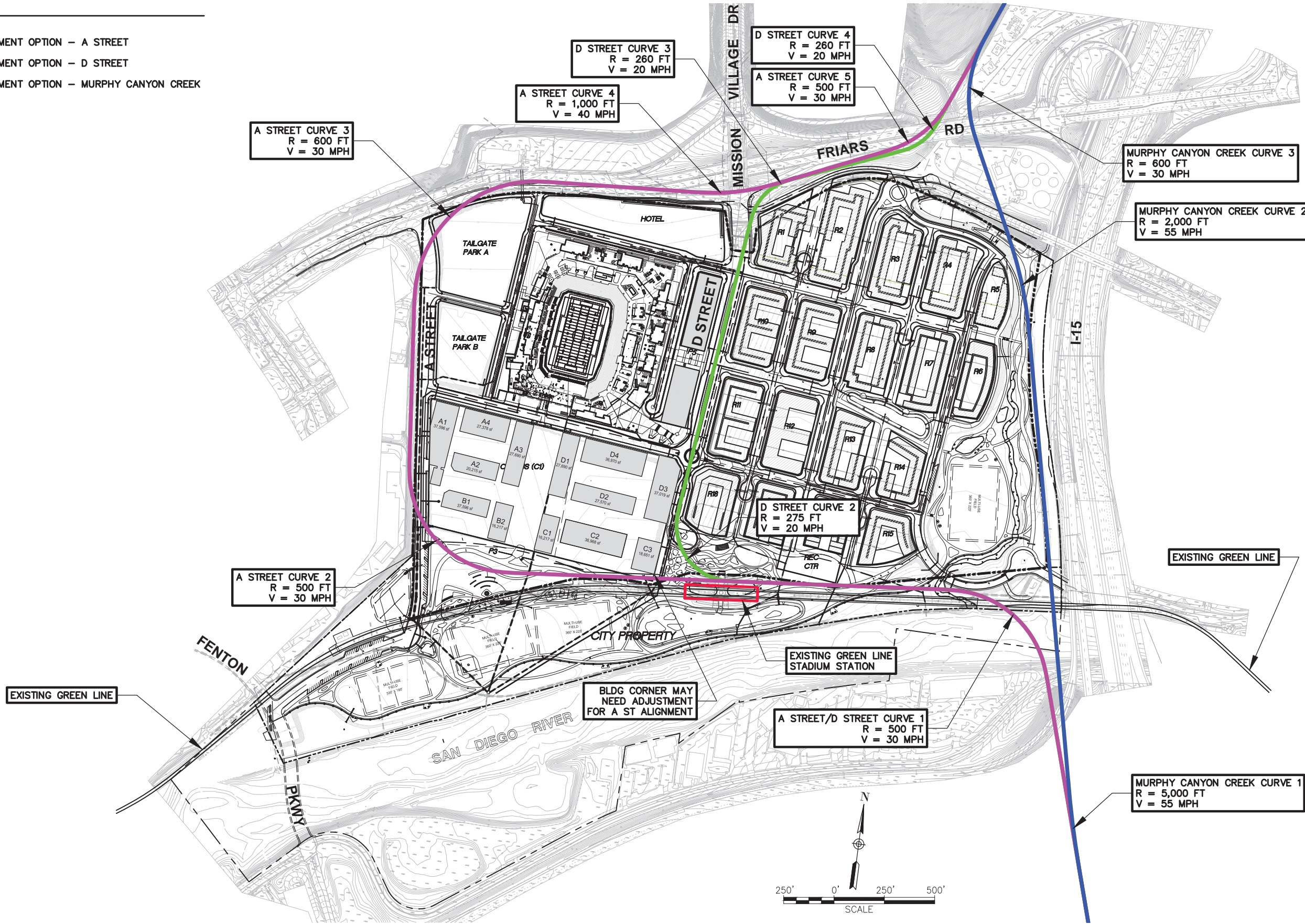
III. Conclusion

The SDSU Campus Master Plan project site can accommodate the three Purple Line alignments shown on the attached Exhibit. Further study is required by SANDAG and MTS as the planning and funding for the Purple Line are further developed. CSU/SDSU will continue to work cooperatively with SANDAG, MTS, and other stakeholders as this planning process unfolds over the long-term.

Attachment: SDSU MV Development – Purple Line Alternatives Exhibit

LEGEND

- ALIGNMENT OPTION - A STREET
- ALIGNMENT OPTION - D STREET
- ALIGNMENT OPTION - MURPHY CANYON CREEK



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SDSU MV CAMPUS
PURPLE LINE ALTERNATIVES

SCALE: 1" = 250' DATE: 12-12-2019 SHEET: 1 OF 1

Trolley Capacity Estimates for Horizon Year Plus Project Conditions

10/17/2019

Direction	Peak Hour	Existing Capacity (Riders/hr) ^a		Existing Year (2018) Peak Hour Volume (Riders/peak hr) ^b		Horizon Year (2037) Peak Hour Volume (Riders/peak hr) ^c		Project Ridership (Riders/peak hr)		Horizon Year (2037) + Project Peak Hr Volume (Riders/peak hr)		V>C?	
		INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND
Eastbound	AM	1,268	1,268	220	216	321	315	108	124	429	439	No	No
	PM	1,368	1,368	481	466	701	679	89	226	790	905	No	No
Westbound	AM	1,239	1,239	465	508	678	740	202	66	880	806	No	No
	PM	1,181	1,181	322	341	469	497	167	120	636	617	No	No

Source: Fehr & Peers, 2019

Notes:

a Capacities calculated based on detailed ridership data from the 2007 SDSU Campus Master Plan EIR

b Existing peak hour ridership calculated from Fall 2018 data provided by SANDAG and data from the 2007 SDSU Campus Master Plan EIR

c Annual growth of 2% per year assumed per the 2007 SDSU Campus Master Plan EIR

Trolley Capacity Estimates for Horizon Year Plus Project Conditions and Doubled Project Ridership

Direction	Peak Hour	Existing Capacity (Riders/hr) ^a		Existing Year (2018) Peak Hour Volume (Riders/peak hr) ^b		Horizon Year (2037) Peak Hour Volume (Riders/peak hr) ^c		Doubled Project Ridership (Riders/peak hr)		Horizon Year (2037) + Project Peak Hr Volume (Riders/peak hr)		V>C?	
		INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND
Eastbound	AM	1,268	1,268	220	216	321	315	216	248	537	563	No	No
	PM	1,368	1,368	481	466	701	679	178	452	879	1,131	No	No
Westbound	AM	1,239	1,239	465	508	678	740	404	132	1,082	872	No	No
	PM	1,181	1,181	322	341	469	497	334	240	803	737	No	No

Source: Fehr & Peers, 2019

Notes:

a Capacities calculated based on detailed ridership data from the 2007 SDSU Campus Master Plan EIR

b Existing peak hour ridership calculated from Fall 2018 data provided by SANDAG and data from the 2007 SDSU Campus Master Plan EIR

c Annual growth of 2% per year assumed per the 2007 SDSU Campus Master Plan EIR

Table A.5 – Phased Transit Services – Revenue Constrained Plan (Continued)

Decade	Service	Route	Description	Peak Headway (Minutes)	Off-Peak Headway (Minutes)
2030	COASTER	398	Additional Double tracking/Increased Frequency	20	60
2030	SPRINTER	399	Double tracking (Oceanside-Escondido) Increased Frequencies	10	10
2030	Trolley	561	UTC to Mira Mesa via Sorrento Mesa/Carroll Canyon (extension of route 510)	7.5	7.5
2030	Trolley	520	Orange Line - Increased Frequency (existing 15/15)	7.5	15
2030	Streetcar	553	Downtown San Diego: Little Italy to East Village	10	10
2030	SPRINTER	588	SPRINTER Express	10	15
2030	BRT	890	El Cajon to Sorrento Mesa via SR 52, Kearny Mesa	10	-
2030	Rapid	2	North Park to downtown San Diego via North Park, Golden Hill	10	10
2030	Rapid	28	Point Loma to Kearny Mesa via Old Town, Linda Vista	10	10
2030	Rapid	30	Old Town to Sorrento Mesa via Pacific Beach, La Jolla, UTC	10	10
2030	Rapid	120	Kearny Mesa to downtown via Mission Valley	10	10
2030	Rapid	473	Oceanside to UTC via Hwy 101 Coastal Communities, Carmel Valley	10	10
2030	Rapid	709	H Street Trolley to Otay Ranch/Millenia via H Street Corridor, Southwestern College	10	10
2030	Rapid	910	Coronado to downtown via Coronado Bridge	10	10
2035	Trolley	520	Orange Line - Extend to Airport Intermodal Transit Center	7.5	15
2035	Streetcar	555	30 th St to downtown San Diego via North Park/Golden Hill	10	10
2035	Trolley	560	Mid-City to downtown (Phase 1) via El Cajon and Park Blvds	7.5	7.5
2035	Trolley	563	Pacific Beach to El Cajon via Clairemont, Kearny Mesa, Mission Valley, SDSU	7.5	10
2035	BRT	653	Mid-City to Palomar Airport Road via Kearny Mesa/I-805/I-5	15	-
2035	Rapid	11	Spring Valley to SDSU via Southeastern San Diego, Downtown, Hillcrest, Mid-City	10	10
2035	Rapid	201/202	UTC Area Super Loop - Increase Frequencies	10	10
2035	Rapid	471	Downtown Escondido to East Escondido	10	10
2035	Rapid	474	Oceanside to Vista via Mission Ave/Santa Fe Road Corridor	10	10
2035	Rapid	635	Eastlake/EUC to Palomar Trolley via Main Street Corridor	10	10
2035	Rapid	636	SDSU to Spring Valley via East San Diego, Lemon Grove, Skyline	10	10
2035	Rapid	637	North Park to 32nd Street Trolley via Golden Hill	10	10

Table A.5 – Phased Transit Services – Revenue Constrained Plan (Continued)

Decade	Service	Route	Description	Peak Headway (Minutes)	Off-Peak Headway (Minutes)
2035	Rapid	638	San Ysidro to Otay Mesa via Otay, SR 905 Corridor	10	10
2035	Shuttle	448/449	San Marcos - Increase Frequencies	10	10
2035			Local Bus Routes - 10 minutes in key corridors	10	10
2040	Trolley	520	Orange Line - Increased Frequencies	7.5	7.5
2040	Trolley	522	Orange Line Express - El Cajon to downtown San Diego	10	10
2040	Trolley	530	Green Line Extend to downtown - Bayside	7.5	7.5
2040	Trolley	540	Blue Line Express - UTC to San Ysidro via downtown	10	10
2050	Trolley	560	SDSU to downtown (Phase 2) via Mid-City, El Cajon and Park Blvds	7.5	7.5
2050	Trolley	562	UTC to San Ysidro via Kearny Mesa, Mission Valley, Mid-City, Southeastern San Diego, National City/Chula Vista via Highland Ave/4th Ave	7.5	10

Response to Comment Letter A6

San Diego Association of Governments (SANDAG)

Seth Litchany (for Coleen Clementson)

October 3, 2019

A6-1 The comment provides introductory statements and is an introduction to comments that follow. In addition, SANDAG refers to state law requiring SANDAG's 2015 San Diego Forward – The Regional Plan (Regional Plan) to reduce vehicle miles traveled (VMT) and meet greenhouse gas (GHG) emission reduction targets as determined by the California Air Resources Board (CARB). CSU/SDSU concurs with the referenced state law requirements, and the Draft EIR summarizes the regulatory setting at pages 4.7-14, 4.7-18, and 4.7-45 through 4.7-48. In summary, the Draft EIR summarizes SANDAG's 2015 Regional Plan and associated Sustainable Communities Strategy (SCS) (pages 4.7-14 and 4.7-18). In addition, the proposed project would not conflict with SANDAG's 2015 Regional Plan or SCS because of the project's location on an infill site in Mission Valley served by transit, the project's implementation of Transportation Demand Management programs that reduce VMT at a level consistent with the objectives of Senate Bill (SB) 743 and SANDAG's 2015 Regional Plan and SCS, and the project's exceedance of existing regulatory compliance standards (page 4.7-48).

A6-2 The comment states that the proposed project will have an impact on the entire region, stating that future transit and bikeways will be needed, along with feasible mitigation measures to reduce VMT and GHG emissions in compliance with the 2015 Regional Plan. The comment also serves as an introduction to the specific comments that follow. Draft EIR Section 4.5, Energy; Section 4.7, Greenhouse Gas Emissions; and Section 4.15, Transportation, provide information responsive to SANDAG's comments.

For example, Draft EIR Energy section provides that the proposed project would develop residential and nonresidential land uses in an in-fill setting served by multimodal transportation options (trolley and bus) and further enhance other multimodal options by designing the project site to encourage pedestrian- and bicycle-oriented connectivity (page 4.5-21); the proposed project would comply with all applicable state plans for renewable energy and energy efficiency (page 4.5-22); the proposed project is consistent with the renewable energy and energy efficiency provisions of the City's Climate Action Plan and Mission Valley Community Plan (page 4.5-22 and see Draft EIR Table 4.5-9); and the project is consistent with state plans, as shown in Draft EIR Table 4.5-10.

In addition, the Draft EIR's GHG section describes SANDAG's 2015 Regional Plan SCS (pages 4.7-18, 4.7-45 through 4.7-48), and provides:

Further, the project design itself advances many of the state's primary policies directed towards the reduction of GHG emissions. For example, approximately 68% of the proposed project's emissions profile is attributable to transportation-related emissions. The proposed project addresses that emissions source in two complementary ways: First, the proposed project would facilitate the use of ZEVs [zero-emissions vehicles] through the provision of on-site charging infrastructure. The extension of ZEV infrastructure is critical to the transition of the vehicle fleet from internal combustion engines to zero emission engines. Second, the SB 743 analysis prepared for the proposed project (see Fehr & Peers' Transportation Impact Analysis

[2019]) confirms that—with implementation of the TDM [Transportation Demand Management] Program—the project-generated VMT per service population would represent an approximately 25% reduction from the regional baseline VMT per service population level and an approximately 21% reduction from the citywide baseline VMT per service population level. Further, when viewed in the cumulative setting, the proposed project would reduce regional VMT as compared to regional VMT without the proposed project, illustrating the benefits of the locational attributes of developing residential and nonresidential uses on the project site. The proposed project's reduction from baseline VMT per service population levels is consistent with the focus of CARB [California Air Resources Board], in its 2017 Scoping Plan, on reducing statewide VMT through a suite of strategies. The proposed project also would provide on-site renewable energy (through the installation of solar PV panels) and be designed to achieve LEED [Leadership in Energy and Environmental Design] Version 4 at a Silver or better certification level (this commitment extends to individual buildings, including the Stadium, on the project site, and also includes a Neighborhood Development designation for sitewide design). These PDFs illustrate that the built environment will go beyond the bounds of existing regulatory compliance in pursuit of sustainability.

Finally, the location of the project site is compatible with and complementary of the state's GHG reduction goals. More specifically, the proposed campus project would develop residential and nonresidential land uses in an infill setting that is served by multimodal transportation options (trolley and bus) and would further enhance other multimodal options by designing the site to encourage pedestrian- and bicycle-oriented connectivity. The infill location allows the City of San Diego specifically, and the San Diego region generally, to accommodate existing and projected population and employment growth within a developed, urbanized area (i.e., Mission Valley), thereby avoiding the conversion of undeveloped land to developed uses, which also is consistent with CARB's objectives in the 2017 Scoping Plan.

In summary, the proposed project would not conflict with the statewide emissions reduction targets for 2020, 2030, and 2050.

(See Draft EIR, Section 4.7, Greenhouse Gas Emissions, pp. 4.7-47 through 4.7-48.)

CSU/SDSU includes the comment in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Responses to the specific comments are provided below.

A6-3

The comment discusses SANDAG's update to the 2015 Regional Plan, provides information regarding its 2015 Regional Plan, and recommends that the proposed project be "at the forefront" of transit improvements.

The proposed project is consistent with SANDAG's comment. The project co-locates housing and employment on an infill site in an urbanized area that is served by transit. The Draft EIR, Section 4.7, Greenhouse Gas Emissions, page 4.7-45, also provides that the project site is identified as a potential "Town Center" (specifically, "SD MV-5") on SANDAG's Smart Growth Concept Map for the Mid-City and East County Subregion (SANDAG 2016a). As described by SANDAG, "[e]xisting/Planned smart growth areas are locations that either contain existing smart growth development or allow planned smart

growth in accordance with the identified land use targets, and are accompanied by existing or planned transit services included in San Diego Forward: The Regional Plan” (SANDAG 2016b).

In addition, the Draft EIR’s GHG section (page 4.7-45) explains that the existing San Diego Metropolitan Transit System (MTS) Trolley Green Line runs through the project site and that the Stadium Trolley Station is located on site and presently is frequented by the traveling public during Stadium events. The Green Line provides daily service along a 23.6-mile route, with 27 stations, and operates from the Santee Transit Center through Mission Valley to the 12th and Imperial Transit Center in downtown San Diego. In addition to the Green Line, MTS Bus Route 14 is in the vicinity of the project site; the closest bus stop is located at Rancho Mission Road/San Diego Mission Road, which is an approximately 0.5-mile walk from the existing Stadium’s main gate. MTS Bus Route 14 connects to other bus routes and several trolley stations. SANDAG also is studying the feasibility of the San Diego Trolley Purple Line. Potential alignments for this future trolley line would enter the project site from the southeast, heading in a west-northwesterly direction.

Further, the Draft EIR GHG section (page 4.7-45) states that the proposed project would include walking paths and sidewalks connected to enhanced pedestrian connections to the existing light rail transit center at the Stadium Trolley Station and off-site pedestrian improvements and connections. The proposed project would also include biking paths, including a new on-site path system along the northern and eastern edges of the project site (connecting to San Diego and Rancho Mission Roads) and improvements along the San Diego River Park, which would include 8- to 10-foot-wide linear walking and biking trails. The proposed hike and bike trail would be located throughout the San Diego River Park. The trail would connect to the hike and bike loop, which would provide access to the rest of the project site. The trail would complete the bikeway connection from Murphy Canyon to Fenton Parkway and connect to the east side of the campus and throughout the campus. Buffered bike lanes would be constructed between Northside and Friars Road to increase the safety of bicyclists by adding a barrier between the car and bike lanes of travel. Additionally, through implementation of the non-Stadium TDM Program, the proposed project would reduce its VMT by approximately 14%.

A6-4 The comment encourages SDSU to work with SANDAG, the City of San Diego, California Department of Transportation (Caltrans), and MTS to ensure the transportation infrastructure is designed in a way that maximizes ridership and efficiency. CSU/SDSU acknowledges the comment and intends to work with the identified agencies in implementing feasible improvements to the transportation infrastructure of the proposed project.

A6-5 The comment regards the potential future MTS trolley Purple Line. Draft EIR Chapter 2, Project Description, includes a discussion of the proposed Purple Line segment, and Draft EIR Figure 2-11E illustrates the planned and proposed alignments of this future transit line that would be able to be accommodated by the design of the proposed project. Draft EIR Section 4.7, Greenhouse Gas Emissions, also addresses the possible future Purple Line transit line and trolley station at pages 4.7-25, 4.7-30 and 4.7-31, and 4.7-45. While the 2017 Conceptual Planning Study referenced in the Draft EIR is the latest publicly available document on this potential future transit option, SDSU notes that SANDAG currently is evaluating the specific type of transit service and alignment as part of the new Regional Plan currently in development. As such, no other design details presently are available for the Purple Line, and the planned future line has been addressed in the transportation analysis to the extent possible based on the information presently available.

As to the Green Line, the proposed project does not include relocation of the existing Green Line Trolley Station. In addition, the proposed project design provides an activated trolley plaza with commercial uses extended further south and space for at least four bus bays. Please refer to Thematic Response PD-1 – Project Refinements for additional information.

A6-6 The comment states that the Draft EIR should define the median width needed to accommodate the trolley. The Street “D” median width has been designed to accommodate footings for a potential elevated trolley in the general alignment shown on current SANDAG plans for the Purple Line. As shown in Figure 2-11B in Draft EIR Chapter 2, Project Description, Street “D” would include a 24-foot Urban Parkway median, which would be wide enough to accommodate the Purple Line Trolley. Please refer to Response to Comment A5-3 (MTS), as well as Attachment A5-A to the MTS comment responses, for additional information.

A6-7 The comment refers to the Purple Line “preferred alignment” presented in the Draft EIR. As noted in Response to Comment A6-5, above, SANDAG currently is evaluating the specific alignment of the future Purple Line Trolley as part of the Regional Plan, and it has been addressed in the analysis of the proposed project to the extent possible. The “preferred alignment” would not reduce active park space; rather, it has been designed along more passive park and open space areas. As analyzed in Draft EIR Section 4.14, Public Services and Recreation, the proposed project would include more parkland than required to meet the project resident’s park demand; thus, any potential reduction in parkland due to the future extension of the Purple Line along this alignment would not be required to be replaced to avoid impacts to parks and recreation. Further, under the SANDAG proposed alignment, the same potential to reduce available park and recreation uses would occur and that, similarly, would not require replacement park land due to the amount of park land to be provided by the proposed project. CSU/SDSU has also met with MTS and SANDAG to coordinate, and has identified a third optional alignment for the future Purple Line Trolley. Please refer to Attachment A5-A to the MTS comment responses (Comment Letter A5) for additional information.

As to the comment regarding accessibility for residents, no credit has been taken for any usage of the Purple Line; thus, the analysis in the Draft EIR does not rely upon any such trip reductions. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A6-8 The comment requests a revision to Draft EIR text. The Final EIR has been revised to add the phrase “in coordination with SANDAG and MTS”.

A6-9 The comment requests that MTS be notified as part of Stadium event day parking management plans, and that off-site lots near trolley stations be identified to accommodate overflow demand. The proposed project includes a stadium TDM Program that would be implemented as part of the proposed project to reduce the number of vehicle trips generated during Stadium events (Draft EIR Section 4.15.1.1.2). The program includes a component to utilize parking at the main SDSU campus, which has a Green Line trolley stop, encouraged through a marketing program, reduced rates for event attendees and employees, and possibly free MTS fare with proof of event ticket (Draft EIR p. 4.15-11). Beyond this Green Line location, it would be speculative at this time, several years in advance of Stadium opening, to attempt to identify off-site parking supplies and associated parking agreements. As to MTS notification, the proposed Stadium TDM Program and TPMP is modified to include such requirement.

A6-10 The comment states that the proposed project should reduce the proposed 1.23 parking spaces per unit, and incorporate mobility hub features to ensure future residents can live on the site without a car. As to parking, the residential buildings to be built as part of the proposed project are being built with partners that require a certain parking supply to be competitive with the area's housing market and in order to secure development financing. However, SDSU notes that the proposed parking ratio is a *maximum* value that will not be exceeded, and it is *lower* than other similar developments in Mission Valley with a goal of encouraging transit use and reducing traffic near the project site and in the surrounding communities.

As to the requested mobility hub features, the proposed project includes TDM Programs (PDF-TRA-1 and PDF-TRA-2) that provide for shuttles, shared bikes and scooters, and accessible walkways, as requested (Draft EIR Section 4.15.1.1). As to shuttles, the TDM Coordinator will provide rideshare support, which includes making connections with the SANDAG iCommute program for carpool, vanpool, and rideshare programs that are specific to the proposed project's residents and employees (Draft EIR, p. 4.15-8). Additionally, shuttle service will be provided to and from the hotel to be located on site. This shuttle service will be available to hotel guests and service the airport and various other tourist locations (Draft EIR, p. 4.15-8). The proposed project site plan also will provide areas for the temporary storage of e-bikes available for rental and identify specific locations for bike drop off, which would facilitate the use of e-bikes within the project site; private vendors currently supply electric bicycles for short-term rental in the vicinity of the proposed project. As to accessible walkways, please see Response to Comment A6-12 for information responsive to this comment.

As to transit passes for students and faculty, at the Mission Valley campus, CSU/SDSU will maintain the existing transit pass program for students in place at the existing campus (passes are discounted by MTS and subsidized by CSU/SDSU), and enable purchases by credit card. In addition, CSU/SDSU will establish a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services (e.g., uberPOOL and Lyft Line), provided SDSU meets the state/CSU-required minimum participation level. Relatedly, CSU/SDSU will provide reduced cost transit passes for faculty and staff, provided SDSU meets the MTS required minimum participation level. The cost reduction will be between 10% and 25%, depending on participation level. Additionally, non-CSU/SDSU employers with a minimum of 20 employees will be required to provide up to 5% of their employees with a 100% MTS transit pass subsidy.

A6-11 The comment states that the Draft EIR does not address local bus services or include any discussion of local bus service. Draft EIR Section 4.15.3.4 addresses existing transit services, including bus service; and Section 4.15.7.6.3 addresses the proposed project's potential impacts on that service.

Additionally, SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate a bus transfer center adjacent to the Green Line Trolley Station, with space for up to four stop/layover spaces. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations.

A6-12 The comment states bicycle connections are important at the project site, and active transportation connections on all connecting streets leading to the site should be improved. CSU/SDSU acknowledges the comment and notes that the proposed project includes a network of bicycle lanes on key north-south streets and connections to existing off-site facilities (e.g., Murphy Canyon Trail) as part of the proposed

campus site plan (Draft EIR, p. 4.15-6). CSU/SDSU would also install/construct new buffered bike lanes (with a short segment of standard bike lanes) on Rancho Mission Road from the Mission Valley site to Ward Road, which would complete the bike connection between the SDSU campuses. The project's proposed bicycle facilities also include a campus loop that will connect all areas of the site and provide a more comfortable alternative to Friars Road for Grantville area residents who desire to travel to and through the site to other destinations (e.g., Fenton Marketplace); a total of nearly one lane mile of on-street bike lanes within the site is proposed. Draft EIR Figure 2-11A illustrates the streets with bicycle facilities. The Final EIR and TIA have been revised to more clearly illustrate the proposed bicycle and shared-use facilities. Please also see Attachment A6-A.

Internal roads will be wide enough to accommodate bikes and pedestrians and will use best practices of complete street design as feasible. All on-site streets are proposed to have a sidewalk on both sides with two exceptions: the west/north side of Street A along the western edge of the site, and the north side of Street 3 West, which will be located in a tunnel below the campus promenade extending to the stadium concourse area.

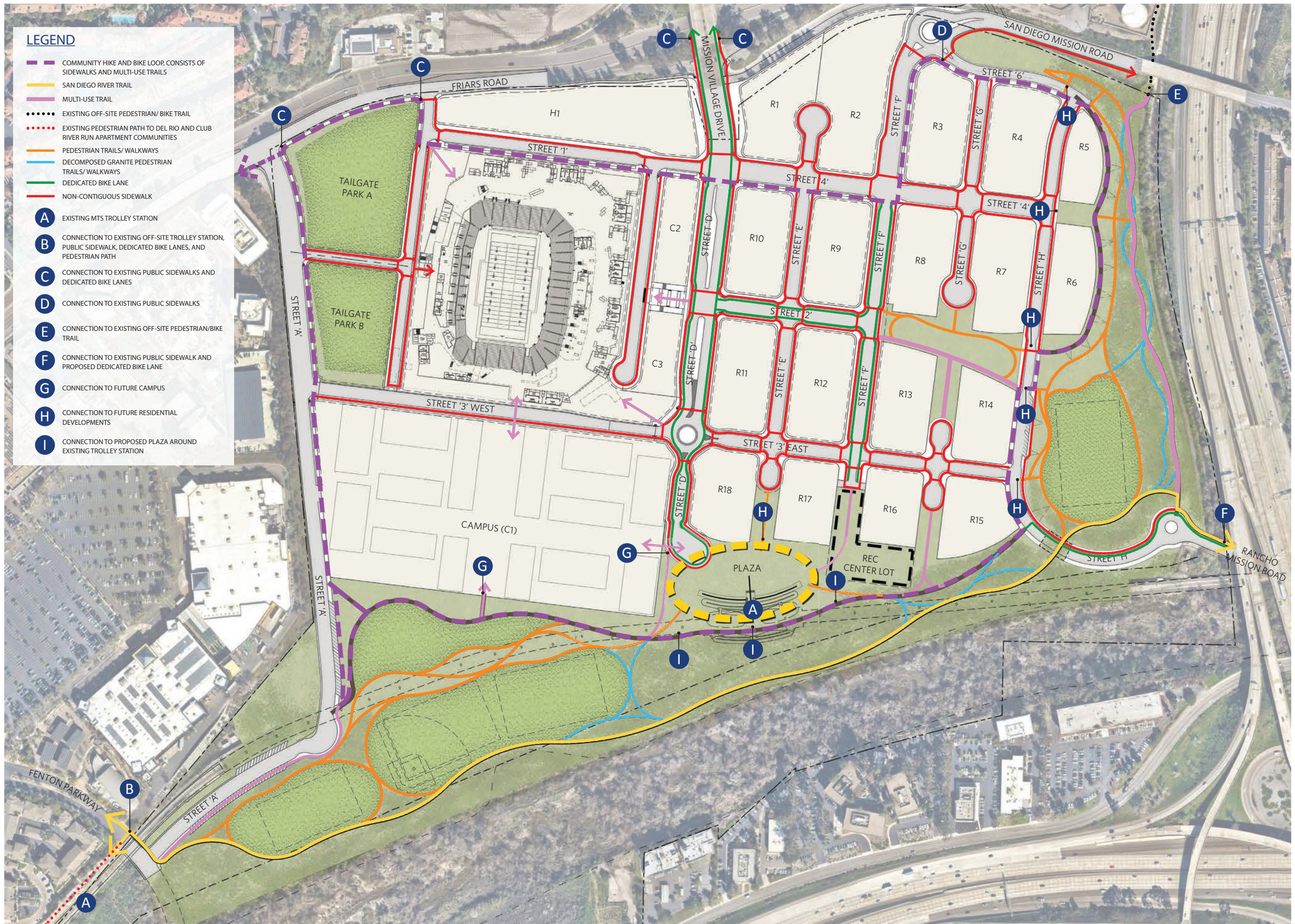
As to the comment that the active transportation connections on all connecting streets leading to the site should be improved, while all existing sidewalks on streets fronting or connecting to the site (e.g., Friars Road, San Diego Mission Road) will be maintained, the referenced conditions are part of the existing condition and not an impact of the proposed project. CSU/SDSU will work to improve bicycle facilities in the vicinity of the proposed project and to the extent feasible.

A6-13 The comment acknowledges the proposed project's San Diego River Trail connections and states the width of the bikeway should be no less than 16 feet. For reference, the San Diego River Park Master Plan states, "[t]he San Diego River Pathway should be a minimum 14-foot wide and consist of a minimum 10-foot wide concrete surface (porous concrete material preferred where feasible), with a minimum 2-foot wide shoulder area of decomposed granite" (City of San Diego 2013). The width of the proposed San Diego River Trail connection east and west through the River Park along the river will be 14 feet, which includes a 10-foot-wide concrete trail and 2 feet of concrete on either side to serve as a buffer. The 2-foot buffer is proposed as concrete because the trail is proposed in the floodplain, and using decomposed granite or another soft surface presents potential maintenance issues in the event of future flooding. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A6-14 The comment regards active transportation connections in the area of the proposed project, including across the San Diego River and Interstate (I-) 8, and to the Murphy Canyon Trail. As to a connection across the San Diego River and I-8, SDSU currently is in discussions with the City of San Diego regarding potential bicycle/pedestrian improvements to certain roads and sidewalks, including off-site improvements on San Diego Mission Road, Ward Road, and adjacent to Fairmont Avenue to an existing paved but dilapidated section of trail, located between the SDSU main campus and the proposed Mission Valley Campus that would traverse the San Diego River and I-8. CSU/SDSU would also install/construct new buffered bike lanes (with a short segment of standard bike lanes) on Rancho Mission Road from the project site to Ward Road, which would complete the bike connection between the SDSU campuses, which is also described in Thematic Response PD-1 – Project Refinements. Please see Response to Comment A6-12 for information responsive to the comment regarding a bike connection to the Murphy Canyon trail.

- A6-15** The comment calls for a bike path/trail between the main SDSU campus and the proposed Mission Valley campus as part of the proposed project. Please see Response to Comment A6-14 for information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please also refer to Thematic Response PD-1 – Project Refinements, which includes a summary of proposed improvements along Rancho Mission Road and Ward Road to create a campus-to-campus bike path as requested by the comment.
- A6-16** CSU/SDSU acknowledges the comment and will contact SANDAG as necessary as project development moves forward.

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LEGEND

- COMMUNITY HIKE AND BIKE LOOP. CONSISTS OF SIDEWALKS AND MULTI-USE TRAILS
- SAN DIEGO RIVER TRAIL
- MULTI-USE TRAIL
- EXISTING OFF-SITE PEDESTRIAN/ BIKE TRAIL
- EXISTING PEDESTRIAN PATH TO DEL RIO AND CLUB RIVER RUN APARTMENT COMMUNITIES
- PEDESTRIAN TRAILS/ WALKWAYS
- DECOMPOSED GRANITE PEDESTRIAN TRAILS/ WALKWAYS
- DEDICATED BIKE LANE
- NON-CONTIGUOUS SIDEWALK

- EXISTING MTS TROLLEY STATION
- CONNECTION TO EXISTING OFF-SITE TROLLEY STATION, PUBLIC SIDEWALK, DEDICATED BIKE LANES, AND PEDESTRIAN PATH
- CONNECTION TO EXISTING PUBLIC SIDEWALKS AND DEDICATED BIKE LANES
- CONNECTION TO EXISTING PUBLIC SIDEWALKS
- CONNECTION TO EXISTING OFF-SITE PEDESTRIAN/BIKE TRAIL
- CONNECTION TO EXISTING PUBLIC SIDEWALK AND PROPOSED DEDICATED BIKE LANE
- CONNECTION TO FUTURE CAMPUS
- CONNECTION TO FUTURE RESIDENTIAL DEVELOPMENTS
- CONNECTION TO PROPOSED PLAZA AROUND EXISTING TROLLEY STATION

SDSU MISSION VALLEY SITE - PRELIMINARY PEDESTRIAN & BIKE CIRCULATION EXHIBIT

DATE: 27 SEPTEMBER 2019



Response to Comment Letter A7

San Diego Regional Water Quality Control Board (RWQCB)

Commenter

October 3, 2019

- A7-1** The comment is an introduction to comments that follow.
- A7-2** The comment restates information regarding the proposed project and that information is provided in the Project Description section of the Draft EIR. The information does not question the adequacy of any environmental issue addressed in the Draft EIR. Nonetheless, the comment is included in this Final EIR as background for review and consideration by the decision makers prior to a final decision on the proposed project.
- A7-3** The comment is an introduction to comments that follow.
- A7-4** The comment expresses the commenter's expectation that the project "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." As described in the Draft EIR (see e.g., Section 4.17.4, Utilities and Service Systems), the project is committed to Leadership in Energy and Environmental Design (LEED) certification at a Silver level or above, which requires incorporation of substantial measures to preserve water quality and consider climate change adaptation, generally including the types of measures suggested in this comment. Subsequent to the release of the Draft EIR, CSU/SDSU committed to several additional Project Design Features (PDFs) related to sustainability. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which provides detail on additional commitments that have been incorporated into the Final EIR for the proposed project. These commitments include nine additional or updated project design features in the Final EIR, including a commitment to achieve LEED Gold certification for the Stadium and other PDFs that would further limit and restrict the proposed project's use of natural gas. For example, electric heating, ventilation, and air conditioning (HVAC) systems will be used throughout the development area, and the use of natural gas fireplaces has been eliminated. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. For further responsive information, please generally refer to the Draft EIR, Section 4.9, Hydrology and Water Quality; Section 4.7, Greenhouse Gas Emissions; and Section 4.5, Energy.
- A7-5** The comment suggests the project design should consider some of the approaches recently implemented at the San Diego International Airport relative to stormwater and strategic energy resiliency planning. CSU/SDSU has considered the referenced San Diego International Airport measures to inform the proposed project's planning and environmental review process. CSU/SDSU has not identified any inconsistency between the proposed project and referenced measures. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A7-6** The comment states that Silver LEED certification is the least acceptable standard for a redevelopment opportunity like the proposed project. In response, the Final EIR is revised to include a PDF to achieve

LEED Gold certification on the Stadium. Further, the RWQCB is referred to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which notes that LEED Silver or equivalent is a baseline and that future developers/builders at the project site would be incentivized to exceed this baseline through a Request for Proposals selection processes that includes sustainability as a component of the scoring system. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A7-7 The comment states that the project should strive for a higher LEED rating than Silver. See Response to Comment A7-6, above. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments.

A7-8 The comment states Section 4.8.1.1 of the Draft EIR did not fully identify the issues associated with the existing groundwater and vapor monitoring well network and piping conveyance system located on the SDCCU Stadium property. For example, the Draft EIR (pg. 4.8-2) states that more 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 connects wells located near the San Diego River, up to the north western portion of the stadium property, to the Mission Valley Terminal.” This comment is noted, and the description in the Final EIR is revised accordingly.

A7-9 The comment restates information contained in the Draft EIR regarding RWQCB approval of the decommissioning of the monitoring and extraction wells and soil vapor monitoring probes. The comment states that the Draft EIR 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. The comment also states that if this work is not completed and the wells are not properly destroyed in accordance with State and County regulations before the property transfer, RWQCB may take action under the Water Code against potentially responsible parties to resolve this matter and protect water quality in affected areas;

SDSU is aware of the ongoing discussions between Kinder Morgan Energy Partners and the City of San Diego and understands the risk associated with taking ownership of the property without having this issue fully resolved. The comment relates to the transfer of ownership and the potential liability of the property owner, but is related to an existing condition of the project site and not to the physical environmental effects of the proposed project; therefore, no further response is required.

A7-10 In reference to Draft EIR Section 4.8.6, the comment states that 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 the property, and that 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.

This comment is included in the record, and mitigation measures have been recommended, including MM-HAZ-3, which requires a Hazardous Materials Contingency Plan (HMCP) to be developed prior to any construction and demolition that addresses potential impacts in soil, soil vapor, and groundwater from releases on or near the project site, as well as the potential for existing hazardous materials on site. In addition, a well decommissioning and destruction plan, which may include procedures for

protection and/or replacement of the four wells to remain under Addendum No. 8 of CAO 92-01, would be in place, as approved by RWQCB, to properly manage, decommission, and/or destroy these four on-site monitoring wells (MM-HAZ-4), and a separate plan would be developed for any other environmental wells identified on the project site (MM-HAZ-5).

- A7-11** The comment suggests the Draft EIR omits mitigation measures or permanent road improvements to address the existing hazard of gasoline tanker truck rollovers at the intersection of Mission Village Drive and San Diego Mission Road, as described in Draft EIR Section 4.8.1.4. Please see Draft EIR Section 4.15.5.4, which explains that the project would involve realigning San Diego Mission Road to provide access to the northeastern corner of the project site. This would eliminate the existing public intersection of Mission Village Drive and San Diego Mission Road. Access from Mission Village Drive to the tank facilities northeast of the site would be maintained by a reconfigured road. The proposed configuration of San Diego Mission Road and the access to the tank facilities is shown in Draft EIR Figure 4.15-10A and Figure 4.15-11. Project-related road improvements, including the reconfiguration of the subject intersection and proposed access to the tank facilities, will be designed and implemented pursuant to applicable road standards. Infrequent tanker accidents referenced in this comment are an existing condition unrelated to the on-site improvements that would occur with the project.
- A7-12** The comment restates information contained in Draft EIR Section 4.9, including the that impacts to hydrology and water quality would be less than significant based on meeting standards required in the Phase II Small Municipal Separate Storm Sewer System (MS4) Permit requirements for structural and non-structural best management practices (BMPs) in the Construction General Permit to prevent any significant impacts during construction and post-construction meeting corresponding water quality standards contained in the San Diego Water Board's Basin Plan and/or the California Toxic Rule based on computer water quality modeling for pollutants with available data, and through qualitative analysis based on literature information and professional judgment to show less-than-significant impacts to water quality for pollutants with insufficient data. The comment is an introduction to comments follow, and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A7-13** The comment states that the San Diego RWQCB generally agrees with the evaluation methodologies presented in the Draft EIR and "*does not anticipate impacts on receiving water quality from the proposed project*" (emphasis added). The comment notes the RWQCB's acceptance is based on the proposed project being designed and operated in accordance with the applicable Statewide Phase II Small MS4 permit and the Construction General Plan, and San Diego RWQCB General Waste Discharge Requirements for Groundwater Extraction Discharges to Surface Waters in the San Diego Region permit requirements, and that the existing well network will be destroyed appropriately. This comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A7-14** The comment expresses concern that project design features with respect to water quality are not effective and efficient to adapt to climate change. Please see Response to Comment A7-4 above. CSU/SDSU notes that water quality project design features are designed for smaller storm events and are bypassed in larger storm events such as those may occur as a result of climate change. The design storm event is the 85th percentile event, which is reasonably foreseeable and which is a generally accepted design event for purposes of water quality modeling and treatment. Further, the exact nature of how climate change will affect the frequency and severity of storms is still uncertain and cannot be

reasonably predicted at this time. With proper maintenance and operation of the proposed water quality treatment features on the project site, these project design features are anticipated to effectively and efficiently treat water quality as analyzed in the Draft EIR.

- A7-15** The comment states the Draft EIR lacks clarity and thoroughness in the discussion of the proposed project's impacts on water quality with respect to the construction phase of the project and that information in the Draft EIR is incomplete or out of date. With respect to construction impacts to water quality, the Draft EIR analyzed water quality during construction on pages 4.9-18 through 4.9-21, and concludes that "[t]hrough implementation of the requirements outlined in the [Construction General Permit] CGP, construction-related impacts to surface water and groundwater would be minimized and impacts would be less than significant." Comment A7-13 notes the RWQCB's agreement with this conclusion based on compliance with the CGP. The comment is an introduction to comments that follow.
- A7-16** The comment states the project should consider and address effects of climate change, in particular those associated with increased flooding predicted for the region. Please see Response to Comment A7-4, above, regarding the project's LEED design, which would incorporate various measures related to climate change resiliency. Specific to flooding, the project has been designed with vegetated buffers along the eastern edge, adjacent to Murphy Canyon Creek, and the southern edge, adjacent to the San Diego River, to accommodate anticipated periodic overflow during flood events. The proposed buildings have been designed to be elevated above the 100-year floodplain with additional freeboard. Please see Draft EIR Section 4.9.4, page 4.9-30, regarding the project's impacts with respect to flooding. Please also refer to Response to Comment A7-14, above, regarding the project's water quality design with respect to climate change.
- A7-17** The comment suggests that the project's on-site sewer system should be designed in consideration of future increases in flooding, including by making facilities waterproof and impermeable, and by placing manhole rims at appropriate elevations to prevent infiltration of flood waters.
- The majority of the new SDSU Mission Valley site will be elevated above the 100-year floodplain, and all areas of the campus, including residential, office, hospitality, and Stadium areas, will be above the 100-year floodplain. However, it is not possible to elevate all sewer manholes above the 100-year water surface elevation. The proposed on-site sewer system will make three connections to the existing Mission Valley Interceptor sewer, which is in the 100-year floodplain. To the maximum extent practicable, new sewer manholes will be placed at locations that prevent infiltration of flood waters. All proposed sewer manholes for SDSU Mission Valley that will be within the 100-year floodplain will be designed to be as waterproof and impermeable as is practical without adverse impacts on the overall site design.
- A7-18** The comment states that in addition to biofiltration basins, the project should consider "all forms of Low Impact Development" (LID) design options (e.g., green roof and porous pavement) to minimize the impacts associated with flooding of the project site. All LID design options, including those noted in the comment, such as green roofs and porous pavement, were considered in the project design. See Section 5.3.1 of Draft EIR Appendix 4.9-1. It is noted that the proposed project includes solar photovoltaic panels on roofs, which precludes the ability to install green roofs. Also, the existing condition of the project site is a parking lot, and the proposed project would significantly reduce the imperviousness below pre-project conditions. Accordingly, as stated in Draft EIR Section 4.9, Hydrology

and Water Quality, pages 4.9-28 through 4.9-30, the proposed project would have a positive impact on flooding when compared to existing conditions. The proposed project would also incorporate various LID design strategies in addition to biofiltration basins. LID will be implemented by minimizing impervious areas, utilizing impervious area dispersion to minimize directly connected impervious areas, landscaping with drought-tolerant species, and using porous surfaces in a variety of applications. The Tailgate Park parking lot will be designed to be a permeable drivable surface. The proposed River Park areas will also incorporate LID opportunities.

Please also refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments and Thematic Response BIO-1 – Murphy Canyon Creek for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

A7-19 The comment states the project should consider restoration opportunities in Murphy Canyon Creek and the San Diego River, which could include stream reestablishment, earthen berm removal to reestablish flood plain, and removal of hardened surfaces like concrete within these streams. The Draft EIR does not identify impacts in either Murphy Canyon Creek or the San Diego River; therefore, channel restoration is not warranted as impact mitigation pursuant to CEQA. Restoration of either watercourse also would add a significant cost to the proposed project due to the need to relocate costly gas, water, sewer, drainage, and San Diego MTS Trolley infrastructure, and such restoration activity would be in direct conflict with the City of San Diego’s established and approved Stadium Mitigation Bank in the San Diego River. Due to the lack of nexus coupled by the extreme costs associated with such restoration efforts, this suggestion will be noted for decision-makers’ consideration although it is not currently part of the proposed project. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for further responsive information. Further, the site plan has been revised in the Final EIR to re-align Street H so that it no longer parallels Murphy Canyon Creek, which effectively provides a wider buffer area between the existing drainage and future vertical development. The redesign also would include a low-flow dry creek and a culvert structure to allow for connectivity. Please refer to Thematic Response PD-1 – Project Refinements. Finally, Draft EIR Section 4.3, Biological Resources, recommends construction and operational mitigation measures to reduce indirect impacts adjacent to the project site, which would reduce such impacts along Murphy Canyon Creek and the San Diego River. Please also refer to Responses to Comments A7-4, A7-14, and A7-16, above, for additional responsive information.

A7-20 The comment states that the project should evaluate if and how post-construction operation may affect implementation of the existing Total Maximum Daily Load (TMDL) for the Lower San Diego River and the San Diego River Watershed Management Area Water Quality Improvement Plan (WQIP). As shown on Table 4.9-5 of the Draft EIR, TMDLs for the Lower San Diego River include fecal coliform, total coliform, and enterococcus. Project-related impacts related to pollutant discharge during the operational phase, including discharge of bacteria and other pathogens, was addressed in Draft EIR Section 4.9.4 (see discussion occurring on pages 4.9-21 and 4.9-25). Specifically, Draft EIR page 4.9-25 indicates that Basin Plan Fecal Indicator Bacteria objectives for the San Diego River could potentially be exceeded in the absence of BMPs. However, these fecal concentrations would be reduced through the implementation of source control and LID structural BMPs, in comparison to existing conditions. This is explained in further detail on page 24 of Draft EIR Appendix 4.9-1. This reduction in bacterial concentrations would be considered a beneficial impact under CEQA.

A7-21 The comment states the EIR should consider the project's impacts on water quality associated with bacteria from human fecal waste, particularly from the local homeless population, noting that parks, open space, and commercial land use tend to attract more homeless population than other types of land uses.

The Draft EIR presents an analysis of the project conditions compared to existing conditions, as required by CEQA. Section 4.9.4 of the EIR concludes the project would generally result in improved water quality conditions compared to existing conditions at the project site, including from fecal bacteria discharge. The project site currently houses a large impervious parking lot, the infrequent use of which is likely an attractant to local homeless populations that inhabit the adjacent San Diego River corridor. The project would not only replace impervious asphalt adjacent to the river with a considerable expanse of active park uses and native vegetation, but would also increase the presence of sanctioned activities that would deter establishment of encampments that exist throughout the river corridor, including the site under existing conditions. Thus, the project would not result in an increase in fecal bacteria discharge into adjacent surface waters due to human fecal waste associated with homeless encampments. As the project would incorporate modern sanitary sewer installation and maintenance practices, the project's wastewater discharges would not impact surface water quality associated with bacteria from human fecal waste.

Section 7.2.6 of Appendix 4.9-1 (page 85) addresses the impacts of homeless encampments on trash and debris. As described in this section, the City of San Diego participates in a variety of trash mitigation efforts in the San Diego River Watershed, including public education, facilitating organized trash clean-up and recycling events, municipal street sweeping, storm drain cleaning, encampment sweeps conducted by local law enforcement (i.e., sheriff, police), and installation and maintenance of structural BMPs, such as booms, hydrodynamic separators, and infiltration BMPs, that capture trash. The City of San Diego plans to increase the effectiveness and reach of trash/beach cleanups and community-based efforts by engaging community groups to self-define and carry-out trash clean-ups. Cleanups target trash; however, a reduction in trash also reduces other pollutants such as bacteria and nutrients that can attach to food waste wrappers and yard waste.

The comment also states that Table 5-1 of Appendix 4.9-1 does not identify source control measures to reduce pathogen and fecal indicator bacteria discharges to the environment.

Table 5-1 of Appendix 4.9-1 summarizes the source control requirements of the Small MS4 Permit and the corresponding standard permanent and/or operational source control BMPs that are incorporated into the project for pollutant-generating activities and sources. Table 5-2 (Appendix 4.9-1) lists source control measures that are incorporated into the project from the City of San Diego Stormwater Standards. Source control measures that address pathogen and fecal indicator bacteria discharges into the environment include the following:

- Refuse areas can be a source of bacteria in stormwater. Dumpsters or other receptacles that are outdoors will be covered, graded, and paved to prevent run-on. Berms will be provided to prevent runoff from the area.
- Storm drain inlet and catch basin stenciling to discourage illegal dumping. As noted above, bacteria can be associated with trash.

A key source control for bacteria is education of pet owners and providing products and disposal containers that encourage and facilitate cleaning up after pets. Education regarding feeding (and therefore attracting) of waterfowl near waterbodies may also assist in managing wildlife sources of bacteria. The following design features would be included in the River Park area to provide

additional source control measures that address these potential sources of bacteria in the project's stormwater runoff:

- The proposed project will provide animal waste bag stations.
- Education signage will be implemented that includes an emphasis on animal waste management, such as the importance of cleaning up after pets and not feeding birds, and the importance of preventing non-stormwater discharges into the project's receiving waters.

A7-22 The comment states the EIR should discuss BMPs, such as elimination of over-irrigation and a public-education program that would effectively prohibit non-stormwater discharges, which are a key component of the WQIP.

Table 5-1 of Appendix 4.9-1 identifies the following non-structural BMPs, which will be incorporated into the project pursuant to requirements of the Small MS4 Permit. These BMPs will address native or climate-appropriate vegetation or plants approved in the City's River Park Master Plan, which will be utilized within the project's landscaped areas. The use of native or climate-appropriate plants will reduce irrigation and the potential for excess irrigation non-stormwater discharges.

- Landscape watering in common areas, commercial areas, multiple family residential areas, and in parks will use efficient irrigation technology to minimize excess watering and the potential for excess irrigation non-stormwater discharges.
- When draining pools, fountains, and other water features, water will not be discharged to a street or storm drain.
- Commercial facilities having vehicle/equipment cleaning needs will either provide a covered, bermed area for washing activities or discourage vehicle/equipment washing by removing hose bibs and installing signs prohibiting such uses.
- Multi-dwelling complexes will have a paved, bermed, and covered car wash area (unless car washing is prohibited on site and hoses are provided with an automatic shutoff to discourage such use).
- Washing areas for cars, vehicles, and equipment will be paved, designed to prevent run-on to or runoff from the area, and plumbed to drain to the sanitary sewer.
- Fire sprinkler test water will be drained to the sanitary sewer.
- Boiler drain lines will be directly or indirectly connected to the sanitary sewer system and will not discharge to the storm drain system.
- Condensate drain lines may discharge to landscaped areas if the flow is small enough that runoff will not occur. Condensate drain lines will not discharge to the storm drain system.
- In situations where soaps or detergents are needed to pressure wash commercial buildings, rooftops, and other large objects and the surrounding area is paved, pressure washers will use a water collection device that enables collection of wash water and associated solids. A sump pump, wet vacuum or similarly effective device will be used to collect the runoff and loose materials. The collected runoff and solids will be disposed of properly.
- Commercial building repair, remodeling, and construction will be conducted such that no toxic substance or liquid water is dumped on the pavement, the ground, or toward a storm drain.

Also, as described in Table 5-3 and Table 5-4 of Appendix 4.9-1, impervious surfaces within the project will drain to BMPs prior to discharge, which would promote retention of any non-stormwater flows. In addition, the proposed project includes landscaped vegetation to be incorporated throughout the project site, which will reduce directly connected impervious areas. Runoff from surface parking areas will be directed, where feasible, to adjacent landscaping areas prior to discharge into the storm drain system for additional water quality pre-treatment and conveyance. Such areas may utilize zero-inch curb in combination with wheel stops (with drainage openings) to help facilitate sheet flow across vegetated strips; or, for locations where a 6-inch curb is desirable, as part of the drive aisle configuration, curb cuts can be used to direct runoff into landscaped areas.

A7-23 The comment reiterates information and statements made in comment A7-9 regarding well abandonment. Please see Response to Comment A7-9, above.

A7-24 The comment states that source-control water quality measures of preventing illicit discharges into the MS4 and stormwater stenciling or signage, which are identified in Table 5-2 of Draft EIR Appendix 4.9-1, should also be included in Table 5-1 of the same document, as they are also requirements of the Small MS4 Phase II permit. The comment notes that under the Small MS4 Phase II permit, permittees are required to develop an Illicit Discharge Detection and Elimination program.

Table 5-1 of Appendix 4.9-1 includes source control measures to address prevention of illicit discharges into the MS4 and stormwater stenciling or signage in the 17th row (top of page 61), which states:

- All storm drain inlets and catch basins will be marked with prohibitive language and/or graphical icons to discourage illegal dumping.
- Signs and prohibitive language and/or graphical icons which prohibit illegal dumping will be posted at public access points along channels and creeks within the Project area.
- Legibility of stencils and signs will be maintained by the City, CSU/SDSU or Homeowner's Associations (HOAs).

A7-25 The comment states the EIR should identify what non-structural BMPs will be incorporated into the project to prevent trash and debris pollution from the site, particularly in the post-construction operational phase. The comment notes that City of San Diego measures to reduce trash in the San Diego River are discussed in detail in Section 7.2.6 of Appendix 4.9-1, but requests additional discussion of actions that will be taken by the project itself.

See Response to Comment A7-24, above. Also, as stated on page 66 of Appendix 4.9-1, the proposed project's structural BMPs will be designed to incorporate capture of trash and debris.

A7-26 The comment states that existing surface water quality information presented in Appendix 4.9-1 of the EIR appears to have omitted data from the mass loading station located along the San Diego River at Fashion Valley, which has conducted long-term monitoring of several constituents since at least 2008.

The water quality data from the mass loading station located at Fashion Valley on the San Diego River is included in the summary of water quality data in the Final EIR, Appendix 4.9-1 (see Table 2-5). Table 2-5 is re-created below.

Table 2-5: Monitoring Station Locations in the Vicinity of the Project

Station Name	Latitude (°N)	Longitude (°E)	Station Location Relative to Project	Approximate Distance to the Project ¹ (miles)
San Diego River 15	32.76194	-117.1927	Downstream of Project	4.5
Fashion Valley Road	32.764332	-117.17008	Downstream of Project	3.25
San Diego River Mass Loading Station	32.765244	-117.16863	Downstream of Project	3.15
Lower San Diego River at Camino Del Este	32.772549	-117.14456	Downstream of Project	1.5
San Diego River at Ward Road	32.780319	-117.11046	Upstream of Project	0.5
San Diego River TWAS 1	32.7836	-117.104	Upstream of Project	1.0

Note:

¹ Distance is measured to the centroid of the Project boundary.

- A7-27** The comment requests that Table 2-7 through Table 2-16 of Appendix 4.9-1 be updated to include percentage of exceedance (compared with corresponding water quality objectives) of pollutants observed in receiving waters, to demonstrate the severity of pollution in receiving waters for each pollutant. In response, these tables have been revised to include the number of exceedances. The tables do not reflect the percentage of exceedances because this type of information is not useful to add sufficient value. Please refer to Appendix 4.9-1 of the Final EIR for the revisions to Table 2-7 through Table 2-16.
- A7-28** The comment requests that Figure 2-10E (Stormwater Quality Treatment Plan) be revised to show “adequate supporting information” such as stormwater flow directions, and that the EIR be revised to include information on assumptions for runoff reduction volume associated with street trees. As indicated on page 67 of Appendix 4.9-1, the biofiltration BMPs 4 and 5B will use the runoff design control volume (DCV) reduction gained by implementing street trees in their respective Drainage Management Areas (DMAs) 4 and 5B, to satisfy the DCV requirements outlined in Worksheet B.5-1 of the San Diego Stormwater Standards.
- A7-29** The comment suggests that BMP2 is not adequate to capture the volume in DMA 2, as depicted in Figure 2-10E of the Draft EIR. The site plan has been refined, and the sizing calculations for the proprietary BMP to treat the lower bowl of the stadium meet the BMP sizing standards. This information will be provided in the Final Storm Water Quality Management Plan.
- A7-30** The comment states that BMP design calculations provided in Appendix 4.9-4 show that biofiltration BMPs 4 and 5B do not meet the sizing requirements, and as a result, the proposed project includes street tree planting in the respective drainage areas to reduce runoff volume entering the BMPs. The comment suggests that the adequacy of this approach cannot be evaluated because stormwater flow information is not provided on Figure 2-10E of the Draft EIR. The site plan has been refined and the BMPs will be sized to accommodate the required treatment volumes to reflect the new BMP locations and new BMP tributary drainage areas. As indicated on page 67 of Appendix 4.9-1, the biofiltration BMPs 4 and 5B will use the runoff DCV reduction gained by implementing street trees in their respective DMAs 4 and 5B, to

satisfy the DCV requirements outlined in Worksheet B.5-1 of the San Diego Stormwater Standards. This information will be provided in the Final Storm Water Quality Management Plan.

- A7-31** The comment reiterates a comment from A7-28 regarding omission from the Draft EIR of assumptions for runoff volume reduction due to presence of street trees. See Response to Comment A7-28, above.
- A7-32** The comment states that the design capture volume not reliably retained by BMP2 should be mitigated in accordance with Section E.3.c.(1).(b) of the MS4 Phase I permit. In response, the site plan has been refined, and the sizing calculations for the proprietary BMP to treat the lower bowl of the Stadium now meets the BMP sizing standards. This information will be provided in the Final Storm Water Quality Management Plan.
- A7-33** The comment is an introduction to comments that follow.
- A7-34** The comment requests clarification in Appendix 4.9-1 regarding a potential discrepancy between the project-related reduction in impervious surface (Table A-7) and the reduction in modeled average annual runoff (Table 7-1), pointing out a lack of supporting calculations that could verify these results. The statistical Monte Carlo modeling methodology combines long-term simulations of runoff coefficients with BMP runoff capture and volume reduction to calculate statistically robust estimates of average annual volume, as described in Appendix A of Appendix 4.9-1.
- A7-35** The comment requests Appendix 4.9-1 be revised to provide the 95% confidence intervals from the distributions of Monte Carlo simulations, pertaining to the modeling results for pollutant concentrations and loads presented in Tables 7-1 and 7-2. Based on the substantial reductions in project-related pollutant load, as summarized in the tables, water quality impacts would be beneficial with respect to CEQA. The intent and value of data in the tables is obvious without providing a 95% confidence level. Also, see Response to Comment A7-36, below.
- A7-36** The comment requests additional information in Appendix 4.9-1 regarding model validation or sensitivity analysis, to allow thorough evaluation of the modeling results.

Model validation requires monitoring data representative of the project simulation. Data that could provide average annual stormwater pollutant concentrations or loads for just the project site for the existing condition are not available. Validation could not be performed for any future condition. Due to the robust statistical nature of the analysis, the model inherently has a high level of potential reliability as compared to more simplistic analysis, as described in Appendix A, Section A.4, of Draft EIR Appendix 4.9-1. Also as described in this section, stormwater pollutant concentrations and loads have been demonstrated to be highly variable. The statistical approach conducted is believed to capture the variability appropriately for the scale of planning. No sensitivity analyses can be conducted on the water quality (i.e., pollutant concentration) inputs used in the model, as the approach simply relies on empirical data.

Sensitivity analyses on hydrologic inputs can be conducted to identify whether hydrologic model parameters are reasonable. Another check for reasonableness of hydrologic inputs is to compare the simulated runoff coefficient to an expected runoff coefficient. This check was performed and is summarized in Appendix A, Table A-6, of Draft EIR Appendix 4.9-1. As the results in Table A-6 demonstrate, runoff coefficient model outputs are consistent with or more conservative than the runoff coefficients that would be calculated using the San Diego County Hydrology Manual.

- A7-37** The comment suggests that Appendix 4.9-1 be revised to separately evaluate datasets of pollutants for which regional data is available for both San Diego and Los Angeles.
- As stated in the introductory paragraph of Appendix A, Section A.2.4, of Draft EIR Appendix 4.9-1, stormwater monitoring data collected by San Diego Municipal Stormwater Permit co-permittees was used in the model where available. When San Diego Municipal Stormwater Permit co-permittee data were available (as noted in blue in Tables A-11 and A-12), these data were used to derive event mean concentrations. Los Angeles County data were only used where San Diego Municipal Stormwater Permit co-permittee data were not available. Therefore, the two data sets have been separately evaluated, as suggested by the comment.
- A7-38** The comment states the Draft EIR does not appropriately consider water quality impacts during demolition of the existing on-site facilities. CSU/SDSU does not concur with the comment. The proposed project is required to comply with the Construction General Permit and construction phase BMPs.
- Demolition of the existing on-site facilities is part of the construction phase of the proposed project. Water quality impacts during construction are analyzed in Section 7.4 of Appendix 4.9-1 and pages 4.9-18 through 4.9-21 of the Draft EIR.
- A7-39** The comment states that the discussion of the Kinder Morgan Energy Partners investigation and remediation of the project site, and the San Diego RWQCB's determination of compliance with Cleanup and Abatement Order (CAO) 92-01, provided in Section 2.5 of Appendix 4.9-1, is not accurately described. The comment states the historical summary on page 23 of the referenced document should be revised to include the details about the investigation and remediation activities. The comment also notes that the referenced section does not acknowledge that the San Diego RWQCB determined Kinder Morgan complied with CAO 92-01, Addendum No. 5, Directive Nos. 2 and 3 in the off-Terminal area.
- The comment provides background information related to previous contamination and remediation efforts on the project site, which are discussed in detail in Draft EIR Section 4.8, Hazards and Hazards Materials, and associated appendices. The comment does not raise any specific issue regarding that analysis or relate to a physical effect of the environment as a result of the proposed project; therefore, no further response is required or can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- A7-40** The comment indicates the San Diego RWQCB currently prefers that analysis of impacts on benthic communities follow the California Stream Condition Index (CSCI), as opposed to the Index of Biotic Integrity (IBI) evaluation used in Appendix 4.9-1. RWQCB's preference is noted for the record and for future project analysis needs. See pages 88 and 89 of the revised Appendix 4.9-1 in the Final EIR.
- A7-41** This is a conclusion statement closing the letter.

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Response to Comment Letter A8

San Diego Unified School District

Commenter

October 2, 2019

A8-1 The comment states that the San Diego Unified School District (SDUSD) Facilities Planning and Construction Department (FPC) and Instructional Facilities and Planning Department (IFPD) has received and distributed the Draft EIR to applicable SDUSD departments for review and comment. The comment also states that the SDUSD has reviewed the Draft EIR and in response to the request for public comments, has comments on the Draft EIR for CSU/SDSU consideration.

The comment is an introduction to comments that follow. No further response is required.

A8-2 The comment states that the Draft EIR relies on outdated information from the Mission Valley Community Plan Update (MVCPU) Draft EIR. The comment states that on May 7, 2019, the SDUSD provided SDSU a letter with up-to-date student enrollment, capacity, and generation data to be incorporated into the Draft EIR. SDUSD re-attached the May 2019 letter for reference. The comment states that Draft EIR Table 4.14-3, Project Area Public Schools and Enrollment (2018), lists schools in the proposed project vicinity with identified enrollments and capacity. The comment states that this table is largely duplicated from a table in the MVCPU Final Program EIR, and a few schools that were in the MVCPU Draft EIR table are not included in proposed project Draft EIR Table 4.14-3.

The Draft EIR incorporated SDUSD's student enrollment information in its May 2019 correspondence. The up-to-date student enrollment information, incorporating the information provided by SDUSD, is found in Draft EIR Table 4.14-10, Schools That Currently Serve the Project Site, p. 4.14-24. Further, Tables 4.14-3 and 4.14-9 have been updated to reflect the same totals in Table 4.14-10 provided by SDUSD. The comment summarizes comments that follow. Please refer to Responses to Comments A8-10 through A8-11, below, for additional responsive information to this comment.

A8-3 The comment states that enrollment information from the MVCPU is from the 2016–2017 school year and is not consistent with the proposed project Draft EIR baseline. The comment also states that SDUSD did not provide capacity information to the City for the MVCPU and cannot verify the accuracy of the capacity data referenced in the proposed project Draft EIR.

Draft EIR Tables 4.14-3, 4.14-9, and 4.14-13 reference enrollment information for the 2016–2017 school year. This data remains the best available SDUSD-wide information as SDUSD has not provided updated information. Importantly, however, for the schools that currently serve the proposed Project site, Draft EIR Table 4.14-10 identifies the existing enrollment for the 2018–2019 school year and the enrollment projection for 2019–2020. The enrollment information from Table 4.14-10 is based on SDUSD's May 2019 letter to SDSU (see Response to Comment A8-2, above).

A8-4 The comment states that Draft EIR Table 4.14-3, Project Area Public Schools and Enrollment (2018), lists Grant as an elementary school but it is a K–8 school. The Final EIR has been revised as requested. Please see Final EIR Table 4.14-3. The revision does not change the analysis or conclusions of the Final EIR.

A8-5 The comment states that Draft EIR Table 4.14-3, Project Area Public Schools and Enrollment (2018), contains the incorrect enrollment capacity for Henry High. The comment also states that Kearny High

School's information appears to be duplicated in the Henry High School row. The comment states that this error skews the data for the entire table and the analysis in the Draft EIR. The Final EIR has been revised as requested. Please see Final EIR Table 4.14-3. The revision does not change the analysis or conclusions of the Final EIR.

A8-6 The comment requests that Draft EIR Section 4.14.1.3, specifically Table 4.14-3, be updated to include current enrollment and capacity information and correct errors. Please see Responses to Comments A8-2 through A8-5, above, for responsive information.

A8-7 The comment requests that the EIR be revised to incorporate the more relevant and up-to-date information provided by SDUSD to SDSU in May 2019. As noted in Responses to Comments A8-2, A8-3, A8-8, and A8-11, the Draft EIR incorporated SDUSD's information in May 2019.

A8-8 The comment acknowledges that the Draft EIR uses the current student generation rates for the 2018–2019 school year, provided by SDUSD in May 2019. These student generation rates are used in the Draft EIR Table 4.14-8. However, the comment states that the Draft EIR is confusing because the analysis associated with the table incorrectly describes the rates as coming from the MVCPU.

The Draft EIR states: “The student generation rates provided by SDUSD, and included in Table 4.14-8, were used to determine the projected number of elementary, middle, and high school students per housing unit generated by the proposed project” (Draft EIR Section 4.14, p. 4.14-23). The EIR has been revised to include the correspondence from SDUSD as Appendix 4.14-1 of the Final EIR, and the sources have been revised to clarify that the student generation rates shown in Table 4.14-8 are based on the information provided by SDUSD in May 2019.

A8-9 The comment states 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. The comment states that the totals are wrong.

The comment summarizes comments that follow. Please refer to Responses to Comments A8-10 through A8-12, below, for information responsive to this comment.

A8-10 The comment states that the existing conditions table, Draft EIR Table 4.14-3, did not include all of the schools from Table 4.11-1 of the MVCPU Final Program EIR, so the totals were different. The comment also states that, however, Draft EIR Table 4.14-9 is using the totals directly from the MVCPU Final Program EIR table, which is not appropriate because it includes schools not included in the proposed project Draft EIR analysis.

Table 4.14-9 has been revised in the Final EIR to reflect the totals from Table 4.14-3. It is noted that the totals in EIR Tables 4.14-3 and 4.14-9 did not include all schools in the MVCPU Final Program EIR; rather, the Draft EIR focused on schools within 5.0 miles of the project site because those are the schools likely to serve the project site.

A8-11 The comment states that the potential students generated shown in Draft EIR Table 4.14-13 does not match student figures provided by SDUSD.

SDSU does not agree with this comment. Draft EIR Table 4.14-10 includes the same enrollment information set forth in Table 1 of SDUSD's May 7, 2019, letter to SDSU. The differences between the

two tables are that the Draft EIR table does not include the 2017–18 enrollment column from SDUSD’s letter, and adds two additional columns that are not included in the SDUSD letter (the “Project Students” and “Difference” columns); however, the overlapping columns between the two tables are identical.

A8-12 The comment states that Draft EIR Tables 4.14-9 and 4.14-13 overestimate available capacity by including other school clusters that do not, and are not projected to, serve the project area. The comment also states that Table 4.14-10 more accurately represents the impacts on schools associated with the proposed project analyzed in the Draft EIR.

CSU/SDSU agree that Table 4.14-10 represents the most likely direct project impacts on the nearest schools, including Juarez Elementary, Taft Middle, and Kearney High. As noted in the Draft EIR, and in conformance with SDUSD’s correspondence, “attendance boundaries are reviewed annually and subject to change, and the proposed project is likely to result in the need to adjust attendance boundaries at the elementary level.” The Final EIR also has been revised to note that Jones Elementary, Fletcher Elementary, and Carson Elementary are less than 3 miles from the project site and are within the Kearny Cluster with capacity of approximately 397 students, which would accommodate project students.

Further, Section 4.14.4 of the Final EIR has been revised to clarify that the proposed project would be built out over approximately 15 years (see Chapter 2, Project Description). This would provide for a gradual increase in potential students over a 15-year planning period, which would enable SDUSD to project estimated enrollment levels on an annual basis and determine appropriate school boundaries. In addition, SDSU anticipates that a portion of the proposed residential uses would be occupied by SDSU students, which would reduce the actual student generation in these student housing units. Specifically, CSU/SDSU anticipate at least 300 units would be reserved for student housing.

Finally, the analysis in the Draft EIR and Final EIR do not include the planned Civita Elementary School, which is approximately 1.25 miles west of the Project site and would accommodate 500 students.

A8-13 The comment states that, generally, SDUSD disagrees with the Draft EIR 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. The comment states that this is not consistent with the May 2019 letter provided to SDSU from SDUSD Instructional Facilities Planning Department, which indicated that the cumulative potential increase in students in the area, when considering other projects, could impact SDUSD schools at all levels to the point of reaching capacity. This scenario would require additional planning for sufficient facilities.

The comment expresses general disagreement with the Draft EIR, which found that: “Overall, there is sufficient capacity in schools surrounding the project site to accommodate K–12 students generated by the proposed project. SDUSD may adjust attendance boundaries for area elementary schools. However, impacts to schools would be less than significant” (EIR, Section 4.14, Public Services, p. 4.14-24). The comment states that this is inconsistent with SDUSD’s May 2019 letter; however, as the comment notes, SDUSD’s letter indicated that “cumulative” potential student increases, when considering other projects, could impact SDUSD schools. The Draft EIR is consistent with SDUSD’s comment and May 2019 letter because the Draft EIR found that the proposed project would contribute to a cumulatively considerable impact to schools (Impact PS-2). The comment does not raise any issue with the Draft EIR’s finding that the proposed project’s direct impacts to schools would be less than significant, or with the Draft EIR’s finding that the proposed project would contribute to a cumulatively considerable impact to schools.

- A8-14** The comment states that SDUSD agrees with the conclusion in Section 4.14.4.6.3 of the Draft EIR that the impact of the proposed project on schools would be cumulatively considerable. The comment also states that 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. The comment also states that these impacts, and all feasible mitigation measures, should be analyzed and identified in the Draft EIR.
- The comment expresses general agreement with the Draft EIR's finding that the proposed project would contribute to a cumulatively considerable impact to schools; see Response to Comment A8-13, above, regarding the Draft EIR's consistency with the information provided by SDUSD. As to the comment that the Draft EIR should identify and analyze all impacts and mitigation measures associated with the cumulative impacts, as stated in the Draft EIR, "impacts associated with the construction and operation of any future new or expanded facility or facilities are not known at the time." The specific locations or plans for future schools are not yet determined (Draft EIR Section 4.14, Public Services, p. 4.14-32). Accordingly, consistent with the MVCPU Final Program EIR, the cumulative impact to schools is conservatively determined to be significant, and no mitigation measures are available at this time because there is not enough information for environmental assessment of such potential impacts. However, the Draft EIR notes that the construction or expansion of future schools would be subject to separate CEQA reviews and applicable regulatory requirements and permits at the time that the new school facilities are proposed; and it is expected that impacts associated with such new schools would be reduced to less than significant with mitigation measures imposed through a subsequent CEQA process (EIR Section 4.14, Public Services, p. 4.14-32).
- A8-15** The comment states that 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.
- The comment expresses an opinion regarding the adequacy of relying on funding sources to reduce impacts related to school facilities. The Draft EIR states that because impacts associated with the construction and operation of any future new or expanded school facility or facilities are not known at the time, the cumulative impact to schools is conservatively determined to be significant. The Draft EIR discusses the MVCPU Final Program EIR, which concluded that, even with collection of fees from future development to fund school facilities, if needed, impacts to schools from the implementation of the MVCPU would be significant and unavoidable because the construction and operation of any future facility is not known at this time. The specific locations or plans for future schools are not yet determined; therefore, project-specific impacts of new or expanded school facilities are not known at this time (EIR, Section 4.14, Public Services and Recreation, p. 4.14-32). The Draft EIR is consistent with this comment.
- A8-16** The comment is a conclusion statement appreciating the opportunity to comment on the Draft EIR. No further response is required.

Response to Comment Letter A9

State Clearinghouse
Scott Morgan, Director
October 4, 2019

- A9-1** The comment is a closure letter from the Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (State Clearinghouse). The letter acknowledges the proposed project has complied with the State Clearinghouse review requirements for draft environmental documents under CEQA and provides information on comments received by the State Clearinghouse on the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter A10

California Public Utilities Commission (CPUC)

Kevin Schumacher, Senior Utilities Engineer

October 9, 2019

- A10-1** The comment provides factual background information about CPUC and states that CPUC received the Draft EIR for the proposed project for which CSU/SDSU is the lead agency. The comment is an introduction to comments that follow. No further response is required.
- A10-2** The comment restates information about the project description contained in the Draft EIR, Chapter 2, Project Description, and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- A10-3** The comment notes that CPUC recently became aware of the Draft EIR for the proposed project and states CPUC has jurisdiction over rail transit safety. The comment states that the project site has existing rail transit tracks within the project area and that the project would construct and modify rail crossings. In response, the Final EIR is revised to clarify that the connection to Fenton Parkway would include crossing the existing Metropolitan Transit System (MTS) Trolley Green Line, and that such improvements would be subject to CPUC's authorization. Please see Section 2.5.2, Requested Project Approvals.
- A10-4** The comment states that CPUC was not identified on the list of Reviewing Agencies and requests to be included on future notices. CSU/SDSU will include CPUC on all future environmental notices. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue as defined by CEQA.
- A10-5** The comment states that construction or modification of public crossing of rail transit requires authorization from CPUC and that representatives are available to discuss any potential safety concerns at crossings. CSU/SDSU appreciates the comment and has met with CPUC. As noted above in Response to Comment A10-3, the Final EIR is revised to clarify that the proposed project would include crossing the existing MTS Trolley Green Line and that such improvements would be subject to authorization of the CPUC. Please see Section 2.5.2, Requested Project Approvals.
- A10-6** The comment is a conclusion statement referencing previous comments. No further response is required.

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Response to Comment Letter T1

Viejas Tribal Government

Ray Teran

August 6, 2019

- T1-1** The comment states that the Viejas Band of Kumeyaay Indians has reviewed the proposed project and determined the project site has cultural significance or ties to Viejas. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise an issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- T1-2** The comment requests a Kumeyaay Cultural Monitor during ground-disturbing activities. The comment restates information contained in the draft environmental documentation, specifically Mitigation Measure MM-CUL-4, which requires “An archaeological monitor *and a Kumeyaay Native American monitor* shall be present full-time during all initial ground-disturbing activities” (emphasis added). SDSU is also developing a rotating schedule to ensure that all interested Kumeyaay bands will have the opportunity to participate in the Native American monitoring. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise any further environmental issue. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- T1-3** The comment provides contact information. No further response is required.

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Response to Comment Letter T2

Campo Band of Mission Indians

Harry P. Cuero, Chairman

August 20, 2019

- T2-1** The comment states that the Campo Band of Mission Indians has reviewed the Draft EIR and concluded that the area has rich history for the Kumeyaay people, and included villages and ceremonial areas including Kosaaii. The comment restates information contained in the Draft EIR, in particular Section 4.16, Tribal Cultural Resources (Impacts TCR-1 and TCR-2), and does not address the adequacy of the analysis in the Draft EIR or raise an issue within the meaning of CEQA. Mitigation for Impacts TCR-1 and TCR-2 is recommended in Section 4.4, Cultural Resources, specifically, MM-CUL-4 (Monitoring, Examination and Data Recovery) and MM-CUL-5 (Human Remains). The comment included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- T2-2** The comment requests that cultural resources affected by the project be handled respectfully. Mitigation measure MM-CUL-4, in Draft EIR Section 4.4, Cultural Resources, outlines procedures for proper treatment of unanticipated archaeological finds that would comply with the CEQA Guidelines. In addition, MM-CUL-5 outlines procedures to ensure proper treatment of unanticipated human remains finds during construction activities and compliance with applicable regulations. Adherence to these requirements during initial earth-disturbing activities would ensure the proper treatment of unanticipated archaeological or Native American cultural material. The comment does not raise a specific issue regarding the analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- T2-3** The comment requests a Kumeyaay monitor from the Campo Band be present for ground-disturbing activities. The Draft EIR recommends Native American monitoring as mitigation for potential impacts (see MM-CUL-4 on p. 4.4-18). SDSU is also developing a rotating schedule to ensure that all interested Kumeyaay bands will have the opportunity to participate in the Native American monitoring. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- T2-4** The comment states that when ancestral remains are found, there is a lot of work done to care for them. The comment requests payment of financial mitigation for the project disturbing and displacing those remains. As noted in Response to Comment T2-1 above, mitigation for cultural and tribal cultural resources is recommended in Section 4.4, Cultural Resources, specifically, MM-CUL-4 (Monitoring, Examination and Data Recovery) and MM-CUL-5 (Human Remains). With implementation of these measures, impacts were determined to be reduced to below a level of significance. Further, the Campus Design Guidelines include provisions for incorporating Kumeyaay history into the project design, including the River Park. Additional payment of financial mitigation would be outside of the requirements of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

- T2-5** The comment is a conclusion statement providing contact information. The comment does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

Response to Comment Letter T3

Manzanita Band of Kumeyaay Indians

Ms. Angela Elliott Santos, Chairwoman

October 3, 2019

- T3-1** The comment provides information about the Manzanita Band of the Kumeyaay Nation. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- T3-2** The comment states the Manzanita Band of Kumeyaay Indians submitted comments during the Notice of Preparation (NOP) comment period and that the comments are incorporated for reference. The comment is an introduction to comments that follow. Please refer to Responses T3-3 through T3-18, below.
- T3-3** The comment states the Manzanita Band of Kumeyaay Indians was disappointed the NOP comments were not addressed in the Draft EIR or through government-to-government consultation. SDSU used the scoping comments to inform the Draft EIR and Cultural Resources technical report. Examples include SDSU's concern for the presence of a nearby village of Nipaguay, the lack of environmental studies prior to the construction of the existing San Diego County Credit Union (SDCCU) Stadium, the request that SDSU retain a Kumeyaay Native American monitor rather than a non-descript Native American monitor, and the additional request that SDSU reach out to individual bands requesting information about Tribal Cultural Resources (TCRs) within or adjacent to the project area. CSU/SDSU acknowledges the scoping comments should have been referenced for providing the important concerns and helping to inform the cultural resources study. Please refer to Response to Comments T3-19 through T3-33. The Final EIR is revised accordingly.
- T3-4** The comment states the Manzanita Band of Kumeyaay Indians has not had contact with SDSU or the EIR preparer since submittal of the comments. The comment provides information that will be included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. The balance of the responses below are also responsive to this comment.
- T3-5** The comment states the Manzanita Band of Kumeyaay Indians has not received copies of the records search and confidential appendices. CSU/SDSU did not receive a document request from the Manzanita Band during the NOP comment period, the 60-day Draft EIR public review period, or the Assembly Bill (AB) 52 consultation time period. After receiving the comment letter, CSU/SDSU met with the Manzanita Band on November 15, 2019, and provided the requested files.
- T3-6** The comment states these are not a complete listing of the Manzanita Band of Kumeyaay Indians' concerns and requests a meeting with SDSU. After receiving the comment letter, CSU/SDSU met with the Manzanita Band of Kumeyaay Indians on November 15, 2019. The Final EIR is revised to address comments raised during that meeting. Please refer to Sections 4.4, Cultural Resources, and 4.16, Tribal Cultural Resources, of the Final EIR, and the following responses.
- T3-7** The comment provides background information is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. See further responses below.

- T3-8** The comment expresses concern that the Native American Heritage Commission (NAHC) advised the project archaeologist 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. It should be noted that SDSU must rely on the NAHC for the appropriate list of tribes and their contacts to conduct the AB 52 process. That said, SDSU has consulted with any Kumeyaay band that was not listed on the NAHC's list that has expressed an interest in the project, attended a meeting, or otherwise reached out to SDSU.
- T3-9** The comment expresses concern about a conflict of interest with Mr. Linton as the principle of Red Tail Environmental and a Native American commenter on the Draft EIR. The comment further objects to his identifying of only four Kumeyaay bands for monitoring. It should be noted that Mr. Linton's comments were made as the Director of Cultural Resources of the Lipay Nation of Santa Ysabel and as a representative of the Kumeyaay Cultural Repatriation Committee. It should also be noted that SDSU must rely on the NAHC for the appropriate list of tribes and their contacts to conduct Native American outreach. SDSU is not authorized to recuse anyone from the NAHC list. SDSU has already discussed the use of a rotating monitoring schedule where all interested Kumeyaay bands may participate in construction monitoring.
- T3-10** The comment states that while the Draft EIR notes SDSU is a state agency and not subject to local planning and land use plans, policies, or regulations, SDSU is required to follow state law and policies on consultation. SDSU agrees with the comment and did comply with all state laws regarding AB 52 tribal consultation. Sections 4.4, Cultural Resources, and 4.16, Tribal Cultural Resources, of the Draft EIR summarize SDSU's consultation process, including meetings and correspondence with tribal representatives resulting from the formal AB 52 outreach.
- T3-11** The comment states the Draft EIR does not adequately address TCRs through a Tribal Cultural Resources Technical Report. SDSU does not concur with the comment. The Cultural Resources technical report inventoried both archaeological resources and TCRs, as explained in the opening paragraph of the Cultural Resources technical report. Both resource types are described collectively throughout the report as "cultural resources." TCRs are also described separately where appropriate, including any information gathered from tribal members through NAHC outreach or AB 52 consultation. The Cultural Resources technical report extensively examines the project's potential to impact TCRs in Section 5, Impact Analysis. The analysis of TCRs in the Cultural Resources technical report complies with the requirements of CEQA.
- T3-12** The comment states that the Draft EIR references the Kumeyaay people being in the region dating back 10,000 years; however, records indicate that the Kumeyaay have been in the region for 12,000 to 130,000 years. The Draft EIR states that "evidence indicates that **continuous** human occupation in the San Diego region" (emphasis added). SDSU acknowledges that there is evidence of earlier human occupation in San Diego. The cultural chronology further described in the Draft EIR includes "Paleoindian," which encompasses all occupations pre-5,500 BC.
- T3-13** The comment states mitigation for impacts to TCRs is limited to initial ground disturbing and does not reduce the potential for impacts on cultural resources. SDSU is requiring Kumeyaay Native American and archaeological monitoring during the initial ground disturbance. It is at this juncture that potential buried TCRs would be identified. The presence of the monitoring team will ensure identification and

proper treatment/documentation of the TCRs. CSU/SDSU note that the comment does not describe why monitoring during initial ground disturbance is inadequate to reduce impacts to TCRs.

- T3-14** The comment states the Draft EIR places greater emphasis on historical resources rather than TCRs. After meeting with the Manzanita Band, the Final EIR is revised to clarify that mitigation measures MM-CUL-4 and MM-CUL-5 are predominately intended to mitigate known impacts to TCRs as analyzed in Section 4.16 of the Draft and Final EIR, and secondarily to reduce potentially significant impacts to unknown archaeological resources. Accordingly, these mitigation measures have been added to Section 4.16 and as MM-TCR-1 and MM-TCR-2. Further, additional language and clarification is added to Section 4.16 of the Final EIR regarding impacts to TCRs.
- T3-15** The comment states the records search did not include contacting the local tribal record centers on each reservation. SDSU contacted all tribal bands and representatives listed on the NAHC contact list requesting any information pertaining to TCRs within or near the project area. SDSU further requested AB 52 consultation with listed Native American representatives. These outreach efforts provided a venue in which any information present in tribal record centers could have been communicated to SDSU.
- T3-16** The comment states that the description of the pedestrian survey as “intensive” is misleading and notes that the southwestern portion of the project site was not surveyed due to dense brush. As described in the Draft EIR and Cultural Resources Technical Report, all portions of the project site not covered by buildings, asphalt, or landscaping were subject to intensive pedestrian survey. These methods are clearly defined to prevent any confusion. The southwestern portion of the project area was dense with vegetation; however, the area was subject to survey. Portions of this section with less dense vegetation allowed visual inspection of the ground surface. Inspection of this portion of the project area shows many signs that the terrain has been completely disturbed and the hilly landform itself is the result of adjacent San Diego River channeling efforts and rail station construction. It is unlikely that cultural resources will be present; however, mitigation measure MM-CUL-4 (now MM-TCR-1) ensures that a Kumeyaay Native American monitor and archaeological monitor will be present during construction efforts to identify and properly treat any cultural resources that may be present in the disturbed context.
- T3-17** The comment states that the Draft EIR references the development of interpretive displays that describe the history and significance of cultural resources, but does not include interpretive displays of the Kumeyaay history or development of displays in conjunction with the Kumeyaay Nation. The Draft EIR evaluates a conceptual site plan, details of which have yet to be developed. In mid-2019, SDSU began planning for the River Park and engaged a River Park Advisory Group that has met every 4 to 5 weeks to discuss details of the proposed park. Representatives of the Kumeyaay Diegueno Land Conservancy are on this advisory committee and are actively participating in park planning, a significant element being interpretive signage. SDSU has every intention to incorporate the Kumeyaay historical context into the park design and interpretive signage.
- T3-18** The comment provides contact information for additional questions.
- T3-19** The comment provides information about the Manzanita Band of the Kumeyaay Nation. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- T3-20** The comment commends SDSU for attending the Kumeyaay Diegueño Land Conservancy and the Kumeyaay Heritage Preservation Committee Board of Directors meeting on Monday, February 11, 2019. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- T3-21** The comment states that 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 Mission Valley Campus Master Plan Project. It also states that Manzanita Band has provided information to improve the project scoping and Environmental Impact Review. The comment is an introduction to comments that follow. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- T3-22** The comment states that the Manzanita Band is concerned that there is no reference in the Notice of Preparation of the Draft EIR and Initial Study to the date of construction of the SDCCU Stadium, which opened in 1967, prior to the NEPA and CEQA environmental protection laws. The comment also states that the Initial Study describes the project area as “previously disturbed” and that the environmental evaluations are heavily based on the project occurring within a disturbed area. The comment expresses concern that, because the SDCCU Stadium was constructed prior to the enactment of CEQA, the previously disturbed areas were not subject to cultural review. As such, the comment states there is an increased probability that the proposed project will uncover Kumeyaay cultural items or Kumeyaay human remains. SDSU recognizes the probability that Kumeyaay cultural resources may be unearthed during project construction. Mitigation measures MM-CUL-4 and MM-CUL-5 of the Draft EIR (MM-TCR-1 and MM-TCR-2 of the Final EIR) require the presence of a Qualified Kumeyaay Cultural Monitor and an archaeological monitor full-time during all initial ground-disturbing activities to ensure the proper analysis and treatment of any uncovered cultural items or human remains in accordance with CEQA and other regulations.
- T3-23** The comment states that the Draft EIR should document the source of known old fill and new imported fill and the process to evaluate cultural resources occurring in either source. The source of import materials is not yet known; however, it will be from local (within California) sources and thus subject to CEQA requirements for cultural resource evaluation prior to arriving at the project site. In addition, MM-CUL-4/MM-TCR-1 requires a Qualified Kumeyaay Cultural Monitor and an archaeological monitor to be present full-time during all initial ground-disturbing activities, which will ensure that all fill accumulated on-site will have been evaluated for cultural materials.
- T3-24** The comment requests that a land tenure study of the project area and adjacent lands be conducted to fully understand the pre-contact and historic context of the project area. Of particular importance is the proximity of the ethnographic Kumeyaay Village of *Nipaguay* and the San Diego River corridor, an important thoroughfare for the pre-contact Kumeyaay. The cultural and historical technical reports conducted for the proposed project present archival research describing the pre-contact and historical context of the project area and the greater Mission Valley area. SDSU recognizes the cultural importance of *Nipaguay* and the San Diego River corridor and the possibility that elements of these resources may be present within the project area. MM-CUL-4/MM-TCR-1 requires that a Qualified Kumeyaay Cultural Monitor and an archaeological monitor to be present full-time during all initial ground-disturbing activities to identify any cultural or tribal cultural material associated with these important resources.

- T3-25** The comment states that archaeologists and the Kumeyaay can interpret cultural materials differently and that prior to field work, SDSU should consult with the Kumeyaay Nation to ensure the consultants adequately analyze project impacts. SDSU invited Kumeyaay monitors to participate in all archaeological field work for the analysis to ensure that Kumeyaay perspective was included in the analysis. Mitigation measure MM-CUL-4/MM-TCR-1 further requires the presence of a Qualified Kumeyaay Cultural Monitor full-time during all initial ground-disturbing activities to ensure the Kumeyaay perspective and interpretation of cultural material is included in the analysis.
- T3-26** The comment states that the project documents should require that a Kumeyaay Cultural Monitor be present rather than a more general “Native American Monitor.” The comment further states that the Kumeyaay Cultural Monitor should be vetted by tribal leadership and all interested Kumeyaay Bands should have the opportunity to participate in the monitoring program. MM-CUL-4/MM-TCR-1 specifically states that a Qualified Kumeyaay Cultural Monitor will be present during ground disturbance, and SDSU is constructing a rotating schedule so that all interested Kumeyaay Bands can participate in the monitoring program. Further, CSU/SDSU anticipate and have already discussed the use of a rotating monitoring schedule where all interested Kumeyaay bands may participate in construction monitoring.
- T3-27** The comment states that the importance of tribal cultural resources (TCRs) is determined by the importance of the resources to Native American tribes culturally affiliated with the project area. Further, the comment notes that the California Historical Resources Information System (CHRIS) and the Sacred Lands File at the Native American Heritage Commission (NAHC) are not exhaustive and that many Kumeyaay Bands maintain their own records. In response, SDSU sent outreach letters to all Kumeyaay Bands identified by the NAHC requesting any information the Bands may have pertaining to cultural resources within or adjacent to the project site. SDSU also attempted to contact all Kumeyaay Bands to consult under Assembly Bill 52. This consultation with interested Kumeyaay representatives ensured that Kumeyaay values were considered prior to an evaluation of potential significant impacts.
- T3-28** The comment states that the determination of impacts to TCRs should be prepared by the Kumeyaay Nation with the assistance of CSU, SDSU, or their consultants. Further, the comment states the Tribal Cultural Resources section of the Draft EIR should include a discussion of native plants and animals native to the project area and their use by the Kumeyaay before and after European contact. SDSU attempted to conduct project consultation with all interested Kumeyaay Bands. Through meetings and other communications with these Bands, SDSU has collected information concerning the Kumeyaay concerns for impacts to potential TCRs within the project area. Information collected in consultation with Kumeyaay Bands has prompted SDSU to require Kumeyaay Native American and archaeological monitoring during initial ground disturbance (see MM-CUL-4 and MM-TCR-1). Section 3.3.4 of the Cultural Resources Technical Report discusses native plants and animals utilized by Kumeyaay.
- T3-29** The comment states that the EIR should include a plan for the long-term curation and collection management for all cultural material recovered from the project site. Mitigation measure MM-CUL-4/MM-TCR-1 states that if significant cultural resources are identified during project construction, a Research Design and Data Recovery Program will be developed to mitigate impacts. Curation specifics will be determined in consultation with SDSU, the Kumeyaay, and the archaeological consultant and outlined in the Data Recovery Program.
- T3-30** The comment restates information in the Initial Study regarding the proximity of the project site to the Kinder Morgan Energy Partners (KMEP) Mission Valley Terminal (MVT), Interstate (I) 15, and I-8. The

comment states that all three facilities may result in the risk of exposing receptors to potentially hazardous materials, which will be analyzed in the Draft EIR. Consistent with the comment, the Draft EIR analyzes potential hazards associated with the KMEP MVT in Section 4.8, Hazards and Hazardous Materials, and the potential health risks associated with the project's proximity to I-8 and I-15 in Section 4.2, Air Quality. The comment does not address the adequacy of the analysis contained in the Draft EIR; therefore, no further response can be provided or is required.

- T3-31** The comment requests the Draft EIR analyze potential hazardous materials impacts to Kumeyaay plants, the gathering of plants and their processing by the Kumeyaay, and potential impacts during inadvertent discovery of Kumeyaay cultural items and individuals through the entire construction process. Regarding potential risks to individuals, please refer to Response to Comment T3-30, above. The Draft EIR, Section 4.8, determined there was the potential for hazardous materials impacts during construction and recommends mitigation measures, including MM-HAZ-3, which requires the preparation and implementation of a Hazardous Materials Contingency Plan; MM-HAZ-4 and MM-HAZ-5, requiring decommissioning of wells; and MM-HAZ-6, regarding coordination with KMEP regarding construction near the existing fuel pipeline. With implementation of these measures, impacts related to hazards and hazardous materials were determined to be reduced to less than significant. With respect to potential hazardous materials impacts to Kumeyaay plants, their gathering and processing by the Kumeyaay, as analyzed in Section 4.3, Biological Resources, the project site is predominantly developed and disturbed habitat, and direct, project-related impacts to plants are limited. Further, CSU/SDSU note the request to analyze the potential impacts of off-site hazardous materials is outside the scope of the proposed project and is an existing condition.
- T3-32** The comment states that the proposed project includes development of parks, recreation, open space, and trails, which offer an opportunity to develop a range of "Kumeyaay Culture and Heritage Interpretive elements" to compliment educational programs and reinforce the importance of the San Diego River as the lifeline for the Kumeyaay. The comment states that during the initial planning and design phases there are opportunities to incorporate Kumeyaay designs into construction elements such as buildings, the Stadium, sidewalks, and intersections. The comment recommends CSU/SDSU review the Immediate Use Program for the former California Department of Transportation (Caltrans) building in Old Town State Historic Park as an example of positive collaboration. Representatives of the Kumeyaay Diegueno Land Conservancy serve on the River Park Advisory Group and are actively participating in park planning, a significant element of which is interpretive signage. CSU/SDSU have every intention of incorporating the Kumeyaay historical context into the park design and interpretive signage. The Design Guidelines have been revised to reflect this as well.
- T3-33** The comment requests copies of all records searches and provides contact information for additional questions. SDSU has sent both electronic and paper copies of the records searches to the provided contact person.

Response to Comment Letter T4

Kumeyaay Diegueno Land Conservancy (KDLC)
Mr. John EagleSpirit Elliott, Chairman KDLC Board of Director
October 3, 2019

- T4-1** The comment thanks SDSU for attending a joint KDLC and Kumeyaay Heritage Preservation Committee meeting on February 11, 2019, but expresses surprise that comments provided during several of the advisory board meetings have not been included in the Draft EIR. The comment is included in the Final EIR. Further responses are provided below.
- T4-2** The comment expresses concern that the Native American Heritage Commission (NAHC) advised the project archaeologist to contact two Kumeyaay Bands by name in addition to the NAHC contact list. The comment states that government-to-government consultation should be conducted on a fair and equitable basis with all the Kumeyaay Bands. It should be noted that SDSU must rely on the NAHC for the appropriate list of tribes and their contacts to conduct the Assembly Bill (AB) 52 process. That said, any Kumeyaay band not identified on the NAHC's list that has expressed an interest in the project has been invited to participate in AB 52 process. SDSU has heard and taken into account the concerns raised by these groups, and will continue to do so throughout the project's planning and design process.
- T4-3** The comment states the commenter "would like to ensure that all Bands of the Kumeyaay Nation have an equal opportunity to provide Qualified Kumeyaay Monitors during the initial construction phases and throughout the project." The Draft EIR recommends Native American monitoring as mitigation for potential impacts. Specifically, mitigation measure MM-CUL-4 states (as revised in the Final EIR) "[a]n archaeological monitor *and a Qualified Kumeyaay Cultural monitor* shall be present full-time during all initial ground-disturbing activities" (emphasis added; see Draft EIR page 4.4-18). SDSU has not yet determined a process by which it will hire Native American monitors. However, SDSU appreciates all input regarding an equitable process by which to involve any interested Kumeyaay bands in the monitoring process. These details will be worked out prior to the start of construction.
- T4-4** The comment states that while the Draft EIR notes SDSU is a state agency and not subject to local planning and land use plans, policies or regulations, CSU/SDSU is required to follow state law and policies on consultation. CSU/SDSU agrees with the comment and notes that it did comply with all state laws regarding AB 52 tribal consultation. Section 4.4, Cultural Resources, and Section 4.16, Tribal Cultural Resources, of the Draft EIR summarize SDSU's consultation process, including meetings and correspondence with tribal representatives resulting from the formal AB 52 outreach.
- T4-5** The comment states the Draft EIR does not adequately address Tribal Cultural Resources through a Tribal Cultural Resources Technical Report. CSU/SDSU does not concur with the comment. The Draft EIR includes a Cultural Resources Technical Report as Appendix 4.4-1, and this report inventoried both archaeological resources and Tribal Cultural Resources. Both resource types are described collectively throughout the report as "cultural resources." Where appropriate, however, the report describes Tribal Cultural Resources separately and identifies information gathered from tribal members through NAHC outreach or AB 52 consultation. The Cultural Resources Technical Report extensively examines the project's potential to impact Tribal Cultural Resources within Section 5, Impact Analysis.

- T4-6** The comment states that the Draft EIR refers to the Kumeyaay people as being in the region dating back 10,000 years. According to the comment, however, there are records indicating that the Kumeyaay have been in the region for 12,000 to 130,000 years. The Draft EIR is not inconsistent with this position. Rather, the Draft EIR states that **continuous** human occupation in the San Diego region dates back 10,000 years, but that there is evidence of earlier human occupation in San Diego. The Draft EIR includes a cultural chronology showing that the “Paleoindian” period encompasses all occupations pre-5,500 BC.
- T4-7** The comment states that the Draft EIR references development of interpretive displays that describe the history and significance of cultural resources, but does not include interpretive displays of the Kumeyaay history or development of displays in conjunction with the Kumeyaay Nation. The Draft EIR evaluates a conceptual site plan, details of which have yet to be developed. In mid-2019, SDSU began planning for the River Park and has engaged a River Park Advisory Group that has met every 4 to 5 weeks to discuss details of the proposed park. Representatives of the Kumeyaay people are on this advisory committee and are actively participating in park planning, a significant element being interpretive signage displays. SDSU has every intention to incorporate, and will incorporate, the Kumeyaay historical context into the park design and interpretive signage displays.
- T4-8** The comment provides contact information for additional questions.

Response to Comment Letter 01

San Diego Audubon Society (1)

James A. Peugh

August 12, 2019

- 01-1** The comment is an introduction to comments that follow. No further response is required.
- 01-2** The comment provides factual background information about the commenter and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 01-3** The comment is an introduction to comments that follow regarding the proposed project and its proximity to Murphy Canyon Creek. Please refer to Responses 01-4 through 01-10, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 01-4** The comment provides factual background information about the project site's location "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." The comment does not raise an environmental issue on the Draft EIR within the meaning of CEQA; however, CSU/SDSU acknowledge the proposed project would introduce an urban campus in a transit priority area adjacent to Murphy Canyon Creek and the San Diego River. Accordingly, and as analyzed in Section 4.3, Biological Resources, of the Draft EIR, the proposed project has been designed taking into consideration the MHPA Adjacency Guidelines, which generally provides for a 100-foot buffer between preserved areas and active uses. The proposed project has been designed with a park around the southern and eastern project boundaries, adjacent to the San Diego River and Murphy Canyon Creek. Further, the Draft EIR recommends mitigation measures to reduce indirect and temporary impacts to these areas to less than significant, including fencing and signage, restrictions on invasive plant species, and limitations on lighting and light spillage. Further, as explained in Thematic Response PD-1 – Project Refinements, the proposed site plan has been refined to re-align Street H so that it no longer parallels Murphy Canyon Creek, which provides more passive open space adjacent to the existing drainage. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 01-5** The comment notes that the proposed project should prioritize habitat protection and restoration, and lists types of wildlife observed by the San Diego Tracking Team on the project site. The comment generally addresses topics related to biological resources, which received extensive analysis in Section 4.3, Biological Resources, of the Draft EIR. As analyzed therein, the proposed project would limit impacts to native habitat communities to less than 0.4 acres (see Draft EIR, Table 4.3-4) and impacts to jurisdictional aquatic resources to 0.35 acres (Table 4.3-6). Further, as noted above, mitigation is provided to reduce and avoid potentially significant indirect and temporary impacts to the San Diego River and Murphy Canyon Creek, including fencing and signage, restrictions on invasive plant species, and limitations on lighting and light spillage. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

01-6 The comment expresses suggestions for the proposed project including the use of native plants in all landscaping to reduce invasive species, the incorporation of interpretative and information signage, and the creation of a “living laboratory” for SDSU students. The comment addresses the general subject area of biological resources, which received extensive analysis in Section 4.4, Biological Resources, of the Draft EIR.

Regarding the use of native plants, the Draft EIR recommends mitigation measure MM-BIO-8, Invasive Species Prohibition, which requires that final landscape plans be reviewed by the project biologist to confirm that no invasive plant species as included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region shall be included and that the plant palette is composed of species that do not require high irrigation rates.

Regarding interpretive and information signage and the concept of a living laboratory, an ongoing public park planning process, with an Audubon Society representative, has been established to receive feedback and finalize park designs. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

01-7 The comment provides factual background information about the Murphy Canyon Wildlife Corridor and Murphy Canyon Creek. The comment states “[i]ts important to keep these habitats open, wild, and secured to protect genetic diversity by preventing species isolation.” As described in Section 1.3.4, Murphy Canyon Creek, the proposed project would not impact Murphy Canyon Creek; the proposed project does not include any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek. Therefore, improving Murphy Canyon Creek is not a part of or required by the proposed project. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional information. Further, as noted in Response to Comment 01-4, above, the proposed site plan has been refined to re-align Street H so that it no longer parallels Murphy Canyon Creek, which provides more passive open space adjacent to the existing Murphy Canyon Creek drainage. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

01-8 The comment expresses opinions of the commenter about widening the Murphy Canyon Corridor and improving it with native plants, wildlife ramps, and other wildlife mitigation strategies. The comment recommends consulting with the Lewison Lab and The Nature Conservancy about “how these protected wildlife areas and corridors connect to the wider efforts to support wildlife species and their movements throughout the region.” Please refer to Response to Comment 01-4, above, regarding how the proposed project would implement mitigation to reduce and avoid indirect and temporary impacts along Murphy Canon Creek, and about further refinements to the site plan to provide additional buffer to the existing drainage.

Further, as described in EIR Section 1.3.4, Murphy Canyon Creek, and Thematic Response BIO-1 – Murphy Canyon Creek, the proposed project would not impact Murphy Canyon Creek; the proposed project does not include any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek. Therefore, improving Murphy Canyon Creek is not a part of or required by the proposed project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

01-9 The comment addresses the general subject area of anti-bird strike methods, which received extensive analysis in the Draft EIR. Refer to Draft EIR, page 4.3-27, which determined that bird strike was a potentially significant impact, and MM-BIO-15 (Draft EIR, p. 4.3-41) which requires anti-bird strike practices. The

comment does not raise any specific issue regarding that analysis; therefore, no more specific response is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

01-10

The comment addresses general subject areas regarding sustainability, which received extensive analysis in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR. The comment recommends several strategies, including green technology/ Leadership in Energy and Environmental Design (LEED), following the City of San Diego Climate Action Plan (CAP), reducing greenhouse gas (GHG) emissions, implementing energy and water efficiency, co-locating housing and transit, use of solar panels, use of non-motorized travel, and supporting green lifestyles.

The proposed project includes a number of project design features to reduce operational GHG emissions, which are analyzed in Section 4.7, Greenhouse Gas Emissions of the Draft EIR. Certain project design features set forth therein would result in quantifiable reductions, including the use of solar photovoltaic (PV) panels, electric vehicle (EV)-ready and EV chargers, a Transportation Demand Management (TDM) program, and restrictions on residential hearths.

The proposed project also includes a number of project design features with GHG reduction benefits that have not been quantified and only are considered qualitatively, including:

- The site plan maximizes the unique infill opportunity presented at this Mission Valley location, including benefits from the existing Metropolitan Transit System Trolley Green Line.
- 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.
- The SDSU Mission Valley campus locates buildings in close proximity to one another, which would facilitate the use of common heating/cooling sources, where feasible, as project-level development proceeds.
- Project development areas would maximize natural ventilation.
- The proposed project would include adaptive lighting controls, where appropriate and feasible, to maximize energy efficiency and minimize light pollution.

Further, with respect to the City's CAP, the proposed project would be consistent with the CAP as analyzed in Appendix 4.7-2 of the Draft EIR, and summarized in the Draft EIR, Section 4.7.4. More specifically, under Option B of Step 1 of the CAP, projects may be found to comply with the CAP if they are located within a designated transit priority area (TPA) and implement strategies that would be consistent with the assumptions in the CAP (i.e., though not consistent with the underlying land use, these projects would be developed in TPAs and generally would be considered to implement strategies that reduce GHG emissions). Relative to the proposed project, the project site is located within a TPA, as it is served by the Stadium Trolley Station on the Trolley Green Line (Figure 2-4 of Chapter 2), as well as the Fenton Parkway Trolley Station. Subsequent to the release of the proposed project's Draft EIR, the City of San Diego certified the Program EIR for the Mission Valley Community Plan Update (MVCPU) and adopted the MVCPU. The MVCPU Program EIR found that impacts related to GHG emissions would be less than significant because the MVCPU implemented the City of Villages framework, including for the project site. As analyzed in Section 4.10, Land Use and Planning, and Section 4.13, Population and Housing, of the Draft EIR, the proposed project would be consistent with the land uses contemplated

for the project site by the Mission Valley Community Plan Update. Therefore, with the adoption of the MVCPU, the proposed project is also consistent with Option A of Step 1 of the CAP Checklist and is only subject to Step 2 of the CAP Consistency analysis.

Step 2 of the CAP consistency review is to evaluate a project's consistency with the applicable strategies and checklist items of the CAP. As explained in Appendix 4.7-2, the proposed project would be consistent with the strategies under Step 2. For Strategy 1, Energy and Water Efficient Buildings, the proposed project would provide for cool and/or green roofs (Checklist Item 1) and would install low-flow plumbing fixtures and appliances (Checklist Item 2). As to Strategy 3, the proposed project would designate approximately 901 parking spaces as "EV ready," and 451 of the "EV ready" spaces would be equipped with operable EV charging stations (Checklist Item 3); would provide short and long-term bicycle parking spaces above those required in the Municipal Code (Checklist Item 4); would include shower/changing facilities consistent with the voluntary measures under the California Green Building Code (Checklist Item 5); would designate parking for low-emitting, fuel efficient, and carpool-vanpool vehicles (Checklist Item 6) and would include a TDM program (Checklist Item 7) as detailed in Section 4.15, Transportation.

Lastly, Step 3 assesses whether a project is located in a TPA, and includes a land use plan and/or zoning designation amendment that is nevertheless consistent with the assumptions in the CAP because it would implement CAP Strategy 3 actions. Refer to Draft EIR, pages 4.7-30 through 4.7-34 to review how the proposed project addresses Step 3.

- 01-11** The comment is a conclusion statement referencing previous comments. No further response is required.

Response to Comment Letter O2

Allied Gardens/Grantville Community Council (1)

Shain Haug, President

August 19, 2019

O2-1 The comment questions why five roadway segments east of Mission Gorge Road were not included in the study area evaluated in the traffic analysis prepared as part of the Draft EIR. Preliminarily, the distribution of traffic from the proposed project throughout the study area roadways presented in the Transportation Impact Analysis (TIA; provided in Appendix 4.15-1 of the Draft EIR and summarized in Section 4.15, Transportation, of the Draft EIR) was derived based on the San Diego Association of Governments (SANDAG) Series 13 traffic model, a computerized travel demand model developed for this purpose. The model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques. The SANDAG model is the primary tool used for forecasting traffic volumes in the city and county of San Diego. As stated in Section 4.2.1 of Appendix 4.15-1, Traffic Impact Analysis, and page 4.15-52 of the Draft EIR:

A trip distribution estimate was prepared based on a “select zone” analysis of the SANDAG Series 13 Year 2035 travel demand model, where the proposed non-Stadium land uses were coded into the model, and the model roadway network was modified to exclude the potential Fenton Parkway bridge.⁴ The select zone process identifies the number of trips on each roadway segment that would be generated by the single traffic analysis zone (TAZ) representing the project site. Figure 4.15-6, Trip Distribution illustrates the vehicle trip distribution pattern for the non-stadium project uses.

Based on the SANDAG model traffic distribution, the roadway segments identified in the comment were determined not to experience sufficient project-related traffic to require additional project-level analysis. This is due to multiple factors, including distance from the project site, logical paths of travel to regional roadways, the distribution of traffic from the project area and the lack of “trip attractor”-type uses to the east, where the segments in question are located, etc. Please refer to Responses O2-2 through O2-5, below, for further discussion of project traffic distribution and associated impacts on the roadway segments cited in this comment. As to the Fenton Parkway Bridge and its role in the analysis, please see Response to City of San Diego Comment A4-6.

O2-2 The comment states that traffic in the project area will not “evaporate” at Mission Gorge Road. CSU/SDU agree with the comment. As shown on Draft EIR Figure 4.15-6 (TIA Figure 7), Project Trip Distribution, based on the SANDAG model described above, the majority of traffic from the proposed project that distributes from the project site easterly to Mission Gorge Road is expected to continue on Mission Gorge Road to the northeast. While some proposed-project traffic would dissipate into neighborhoods south of Mission Gorge Road, the level of traffic from the proposed project added to the individual streets in these neighborhoods is modeled and projected to be below the threshold levels

⁴ While the Fenton Parkway bridge is planned as part of the future network in Mission Valley and would improve area connectivity, the timing of its implementation is not defined due to required environmental studies and funding sources that have not been identified. Accordingly, the Fenton Parkway bridge was excluded from the model for purposes of distributing project traffic.

(i.e., 50 trips through any intersection during the AM or PM peak hour) requiring further analysis and, correspondingly, below levels that would cause significant impacts under CEQA.

Please refer to Responses to Comments 02-3 and 02-4, which address specific roadway segments identified by the commenter.

02-3

The comment states that Zion Avenue and Twain Avenue are “heavily trafficked” during the AM and PM commutes, as well as after stadium events. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Nonetheless, based on output data from the SANDAG Series 13 traffic model, the proposed project’s traffic distribution on Zion Avenue is projected to be 0.6%. This would result in a PM peak hour traffic assignment on Zion Avenue of 32 vehicles, which is approximately one additional vehicle every 2 minutes. This number is below the City of San Diego’s threshold of 50 peak hour trips on a roadway segment, which is the required number for analysis.

As to Twain Avenue, based on output data from the SANDAG Series 13 traffic model, the proposed project’s traffic distribution on Twain Avenue is projected to be 0.7%. This would result in a PM peak hour project traffic assignment on Twain Avenue of 40 vehicles, or one additional vehicle every 1.5 minutes. This number also is below the City’s threshold for inclusion in the study area intersections and roadways.

Specific to Stadium events, which typically end in the late evening on a weekday or weekend day or in the late afternoon on a weekend day, background traffic at these times after an event is substantially less than during the weekday peak commute hours. As a result, the impacts associated with stadium-generated trips are less than they otherwise would be.

The capacity of the proposed stadium is approximately half of the capacity of the existing stadium, and the number of potential parking spaces is approximately 65% less (6,205 versus 18,000), which means overall fewer vehicle trips. In addition, with construction of Street I at the southwest corner of the project site, the proposed stadium would be served by more entry/exit points than the existing stadium, which would better distribute stadium trips to the roadway network. These factors are expected to reduce current stadium volumes on streets such as Mission Gorge Road and, correspondingly, on Zion Avenue and Twain Avenue. Furthermore, as part of the proposed project, a Transportation and Parking Management Plan (TPMP) will be implemented that will include measures to minimize traffic and parking intrusion into the residential areas of the project site and affected neighboring communities.

Therefore, the proposed project would not result in significant impacts to these neighborhood streets.

02-4

The comment states that Twain Avenue is “heavily impacted before and after stadium events” due to cut-through trips. The comment provides background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Nonetheless, as noted in the prior response, the capacity of the proposed stadium is approximately half of the capacity of the existing stadium; the number of potential parking spaces is approximately 65% less than existing conditions; and a TPMP will be implemented. As a result, the proposed project

would necessarily result in fewer overall stadium vehicle trips. Further, the proposed stadium would be served by more entry/exit points, which would better distribute stadium trips to the roadway network. These two factors are expected to reduce volumes on the main roads, such as Mission Gorge Road and, consequently, reduce “cut-through” traffic on streets such as Twain Avenue. Furthermore, also as previously noted, the TPMP will include measures that will minimize traffic and parking intrusion into the residential areas of the project site and affected neighboring communities.

- 02-5** The comment states that both Mission Gorge Place and Alvarado Canon Road/Adobe Falls Road are heavily trafficked on stadium days due to cut-through trips. Please see Responses to Comments 02-3 and 02-4, which are also responsive to this comment as it applies equally to Mission Gorge Place and Alvarado Canyon Road/Adobe Falls Road.
- 02-6** The comment states that residents of Allied Gardens will be adversely affected by the proposed project. The comment expresses the opinions of the commenter, but does not raise an issue concerning the adequacy of the Draft EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
- 02-7** The comment requests a discussion of the “omission” of the five roadway segments identified in Comment 02-1 and whether the traffic analysis will be extended to include these areas. Please refer to Responses to Comments 02-1 through 02-6, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter 03

Serra Mesa Planning Group

Bryce Niceswanger, Chair

September 19, 2019

- 03-1** The comment states the Serra Mesa Planning Group has reviewed the Draft EIR for the proposed project and passed a motion to approve and send the following comments. The comment is an introduction to comments which follow.
- 03-2** The comment restates information in the Draft EIR regarding noise level increases on Broadview Avenue, north of the project site within the Serra Mesa community. Please refer to Responses to Comments 03-3 through 03-5, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-3** The comment asks about the duration of the stadium events that may cause the noise exceedance. As discussed in Section 4.12, Noise, of the Draft EIR, impacts are the result of events occurring beyond 10:00 p.m., much like events at the existing San Diego County Credit Union (SDCCU) Stadium; however, because of the location and configuration of the proposed stadium, noise may occur at levels that exceed the nighttime noise levels after 10:00 p.m.. The ultimate duration of events such as National Collegiate Athletic Association (NCAA) football and concerts is not known at this time; however, the NCAA has adopted overtime rules that limit the length of overtime periods after the third overtime. Further, concerts are typically required to be over by 11:00 p.m. In addition, as stated in the Draft EIR, amplified sound at the new Stadium would not be used after 11:00 p.m. Sunday through Thursday and 12:00 a.m. Friday and Saturday.
- 03-4** The comment asks if there are indirect impacts such as a requirement for property owners to report noise impacts if properties along Broadview Avenue are sold. The proposed project does not place a noise easement on any affected properties; and therefore, there will be no recorded instrument providing constructive notice to future owners about potential noise impacts. Landowners will make their own judgment about whether noise conditions need to be disclosed in the context of a sales transaction.
- 03-5** The comment asks why mitigation measures are not recommended for homes on Broadview Avenue, and asks what measures would minimize the noise impacts. The residences along the south side of Broadview Avenue have backyards and south-facing façades that are currently exposed to outdoor noise from existing Stadium events and operations, and would be expected have exposure to the proposed new stadium as well. For analysis purposes, and reflecting some conservatism, the modeled noise from the stadium is attributed to aggregate loud speech (or cheers) from full attendance (35,000 seats). This noise would emanate out over the top (or through openings) of the Stadium “bowl” and into the surrounding site and off-site community beyond. Typical noise mitigation measures such as barriers/sound walls along the project site boundary at grade level would thus be infeasible. Final stadium design physical features may help reduce this crowd noise to some degree, as some direct sound paths may be occluded as a result, but such design features would be resolved during final construction plans. In addition, mitigation measure MM-NOI-3 would require implementation of sound amplification controls or limits into the final design of the new stadium’s audio/visual sound system, as well as tie-ins from hosted performers to control amplified speech and music noise at the source, and thus offer some degree of expected sound-level reduction at the potentially affected noise-sensitive receiver positions.

Because the 35,000-person crowd noise represents a “worst-case” scenario, there is an opportunity for noise impacts to be reduced due to less attendance at an event. Also note, as shown on Draft EIR Table 4.12-9, the crowd noise assumes an average per-person “very loud speaking” voice level of 79 A-weighted decibels (dBA). “Raised speaking” voice magnitude, per the cited Hayne study, is considerably less (on the order of 66 dBA per person). Hence, it is anticipated that for most events, crowd noise would be relatively subdued and would allow on-site music, P/A messaging, and play-by-play broadcast over the in-house distributed speaker system to be heard. Such lower crowd noise would also likely result in contributed noise levels at the Broadview residences to be less than significant with regard to potential noise impacts.

- 03-6** The comment states that people parked in the residential communities during former San Diego Chargers football games. It is noted the capacity of the proposed stadium would be roughly 50% of the existing SDCCU Stadium formerly occupied by the Chargers. Please refer to Response to Comment 03-7 below for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-7** The comment asks about the parking impact on the Mission Village Road area on stadium event days. The number of vehicles expected to park in the neighborhood areas adjacent to Mission Village Drive is low given that the capacity of the new stadium will be 35,000 attendees, which is approximately half of the capacity of the existing SDCCU Stadium that accommodated San Diego Chargers football games. Additionally, increased use of the trolley is anticipated given the smaller venue size and reduced overall attendee volume and resulting shorter wait times at the station after events. In addition, the Stadium Transportation Demand Management (TDM) program that will be implemented as part of the proposed project will encourage attendees to use non-automobile modes, which would further reduce the overall parking demand. (See Draft EIR Section 4.15.1.1.2, PDF-TRA-2.) Finally, the proposed project includes a Transportation and Parking Management Plan (TPMP) to ensure that traffic capacity during stadium events will be maximized and potential negative effects to non-Stadium uses within the campus and roadways adjacent to the site are minimized. (See Final EIR Section 4.15.1.3.) The TPMP includes a Neighborhood Intrusion Prevention element that will implement measures for moderate to high attendance events to minimize traffic and parking intrusion into the neighboring residential areas in the project vicinity. These measures may include the closure of selected streets to through or non-resident traffic, signage, and traffic control personnel (Final EIR p. 4.15-14).
- 03-8** The comment asks about the parking impact on the Mission Village Road area on non-stadium event days. As noted in Response to Comment 03-7, CSU/SDSU does not anticipate a substantial number of vehicles parking in the area, given the minimum 0.75-mile distance from the campus office/research and development uses to the nearest parking space on Mission Village Drive, as well as the need to traverse the grade of Mission Village Drive to or from the project site. There is a similar distance between most of the residential units and the closest space on local streets north of the project site. Additionally, the Non-Stadium TDM Program to be implemented as part of the proposed project will encourage project employees and residents to use non-automobile modes, which would further reduce the overall site parking demand. (See Draft EIR Section 4.15.1.1.1.)
- 03-9** The comment asks what mitigation measures can be implemented to reduce impacts on the Mission Village area on stadium and non-stadium event days. As noted in Responses to Comments 03-7 and 03-8 above, the proposed project includes a TDM Program and TPMP that would reduce the proposed project’s impacts on the area such that significant impacts are not anticipated in the Mission Village Drive neighborhood areas.

03-10 The comment asks about the availability of a park and ride facility for the Stadium Trolley Station. As to whether a park and ride facility will be available to the general public, yes, trolley riders will be able to drive their vehicles to the site and park prior to boarding the trains. The precise number of parking spaces available to transit users has not yet been determined. As demand dictates and in coordination with the trolley operator, Metropolitan Transit System (MTS), the appropriate number of spaces will be determined and provided as necessary.

As to whether there will be a charge for parking at the trolley facility, the details of parking costs for transit users have not yet been determined. As demand dictates and in coordination with the MTS, the appropriate cost will be determined and provided as necessary. The current use of the SDCCU Stadium parking lot is very low (i.e., fewer than 50 vehicles per day), and any costs associated with parking for transit patrons is expected to have a negligible effect on transit ridership.

03-11 The comment states that a limited parking supply at the proposed project will encourage alternative transportation use. Draft EIR, Section 4.15, Transportation, addressed parking. Specifically, at page 4.15-3, the Draft EIR stated that the parking supplies for the proposed residential buildings and hotel rooms will be dedicated to those uses, while the parking for the campus office and supporting neighborhood retail uses will be shared and available for public use. The proposed parking supply would address weekday and weekend demand for the proposed residential, retail, and campus office uses, while also encouraging the use of non-automobile modes. The presence of a trolley station within an approximate 1,500-foot radius of nearly all of these uses, coupled with a robust bicycle and pedestrian network and a managed parking supply with time limits and parking fees, will help to minimize overall vehicle traffic and related parking demand.

In addition, the proposed project's "Non-Stadium" TDM Program includes a "Parking Policy and Pricing" component to discourage the use of single-occupant vehicles (SOVs), and includes parking management strategies for the new proposed campus:

Managing parking is a key element in discouraging use of SOVs as it provides flexibility for residents to choose a car-free lifestyle, especially those residing in transit priority areas with high quality transit and extensive active transportation options and connections. The proposed parking management strategies for the SDSU Mission Valley Campus include:

- **Unbundled parking** – Parking in all residential buildings will be “unbundled” from units such that residents will have to request a parking space separate from their apartment/condominium unit and pay for that parking space separately. This approach is consistent with the recently adopted City of San Diego ordinance that requires all multi-family residential parking in Parking Standards Transit Priority Areas (TPAs) to be unbundled from units.
- **Meter On-Street Parking** – All on-street spaces within the campus core will be metered and require payment of an hourly charge during typical daytime hours (e.g., between 8am and 6pm). The parking spaces on the southwest and southeast edges of the site nearest the park/recreation facilities may also be metered, but at a minimum will include time limits to ensure parking turnover and prevent extended storage of resident vehicles.

- Limit parking supply – The proposed project will provide a maximum parking supply of 1.23 spaces per dwelling unit. This rate is lower in comparison to the parking provided at similar developments in the Mission Valley region. The recently adopted City of San Diego ordinance regarding unbundled parking referenced above also allows for no parking to be provided for multi-family residential units in Parking Standards TPAs. In the event residential buildings are built with lower parking ratios that further reduce the overall parking supply, additional trip reductions and TDM benefits are expected.

(Draft EIR, Section 4.15, Transportation, p. 4.15-7.)

- 03-12** The comment asks why no park and ride facilities with shuttle service to the project site are planned for locations on Aero Drive. CSU/SDSU will provide a variety of options for campus users to travel by modes other than personal cars including transit, bike, or rideshare. (See, e.g., Draft EIR, Section 4.15, Transportation, pp. 4.15-4 through 4.15-9, Table 4.15-1, and pp. 4.15-10 through 4.15-14.) This would include the potential for off-site parking at the main campus and using the MTS Green Line to the project site. The Mission Valley campus site will include facilities for bus service should MTS operate new bus routes in the future, and the refined site plan, as explained in Thematic Responses – Project Refinements, notes that at least four bus bays would be provided in a new transit center at the trolley plaza. SDSU does not control or have access to properties on Aero Drive for use as a park and ride facility or other purposes.
- 03-13** The comment asks if park and ride facilities will be implemented to reduce traffic in the Serra Mesa neighborhood. As noted in Responses to Comments 03-7 and 03-8 above, the proposed project will include a TDM Program and a TPMP to minimize parking and traffic intrusion into the area neighborhoods.
- 03-14** The comment states that spillover parking will occur in the Serra Mesa neighborhood no matter how much or how little parking is provided. Please refer to Response to Comment 03-11 for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-15** The comment asks why there is no plan to protect parking in the Serra Mesa neighborhood. As explained in Responses to Comments 03-7 and 03-8 above, the proposed project includes a TDM Program to reduce the number of vehicle trips in the first instance, and a TPMP to address potential traffic and parking impacts as necessary. Additionally, parking impacts are not anticipated in the Serra Mesa/Mission Village Drive neighborhood areas due to the distance from the proposed campus uses on site, as well as the reduced capacity of the new stadium.
- 03-16** The comment asks why SDSU has not formulated a plan to have the City of San Diego establish a residential parking permit district for certain Serra Mesa streets. As the comment notes, the establishment of any such residential parking permit district lies with the City. Nonetheless, CSU/SDSU is committed to working with adjacent communities to prevent neighborhood parking intrusion should it occur. This will include working with the City to implement a parking permit program should a problem be identified after the new stadium is in full operation and additional uses are built and occupied on-site.
- 03-17** The comment states that a residential parking permit program for the Serra Mesa neighborhood should be implemented before a problem arises. The comment also notes examples of City communities in which

a residential parking permit district has been established. As explained in Response to Comment 03-16, the establishment of any such residential parking permit program lies with the City; however, CSU/SDSU will work with the adjacent communities and the City to prevent neighborhood parking intrusion should it occur. Implementation of a parking permit program before it is needed could result in unnecessary inconvenience to residents and visitors, as well as additional costs for participating entities.

- 03-18** The comment asks whether SDSU will take the lead and negotiate with the City to establish a residential parking permit program for Serra Mesa as part of the agreement to purchase the land. Please see Responses to Comments 03-16 and 03-17 for information responsive to this comment.
- 03-19** The comment asks if there will be a liaison for the Serra Mesa community to resolve issues such as traffic, parking, and noise when they arise. The liaison for the community to contact to resolve parking, traffic and noise-related issues is the SDSU TDM Coordinator or University Police representative (depending upon the nature of the issue). Further, SDSU attends community meetings, and anticipates having a representative attend Serra Mesa meetings as the proposed project is developed and implemented to hear concerns and issues raised by residents around the project site. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. This comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-20** The comment asks what criteria were used for determining the transportation analysis study area. The study area was determined by identifying the major roadways (including intersections, roadway segments, and freeway segments and ramps) that the proposed project traffic is forecast to use to approach and depart the project site. In addition, secondary roadways were included if projected to carry substantive traffic volumes. In most, but not all cases, intersections expected to serve 50 or more peak hour trips were included in the project study area. At some locations, project traffic would be added to intersections that currently operate well and are projected to operate at acceptable levels in the future even with the addition of more than 50 peak hour trips. Please see the Transportation Impact Analysis, Section 2.2, Project Study Area (Fehr & Peers, July 29, 2019; Draft EIR Appendix 15-1) for additional information responsive to this comment. It is also noted that the identification of the proposed project's significant impacts on the area roadways presented in EIR Section 4.15, Transportation, is based on automobile delay or the level of service (LOS) metric, with additional analysis provided for information purposes based on the vehicle miles traveled (VMT) metric. To the extent the following comments regard LOS methodology-related issues, in *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 2019 Cal.App. LEXIS 1274; 2019 WL 6888482, the court held a challenge to an EIR LOS analysis moot because due to recent changes in the law, CEQA no longer requires the identification of significant impacts based on an LOS metric, and the replacement VMT analysis is not required until July 1, 2020.
- 03-21** The comment describes transportation characteristics of the Serra Mesa community and is an introduction to comments to follow. Responses are provided below to the specific comments raised. This comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-22** The comment refers to specific streets in the Serra Mesa community and asks why they were not included in the existing conditions analysis. The comment also asks about the impact to these streets and the possible mitigation measures. In response, on Murray Ridge Road, Raejean Avenue, Greyling

Drive, Hammond Drive, and Mission Center Road, the amount of traffic generated by the proposed project is expected to be low (i.e., less than 15 vehicles in either the AM or PM peak hours). While CSU transportation impact analysis guidelines do not specify a minimum volume threshold for roadway study, this volume is well below the City of San Diego threshold of 50 peak hour vehicles typically requiring study of an intersection or on a roadway segment. The projected maximum volume of 15 vehicles equates to 1 additional vehicle every 4 minutes and would not require analysis of the aforementioned streets under CEQA or industry standards.

On Sandrock Road between Aero Drive and Gramercy Drive, analysis indicates that the proposed project is expected to add up to 889 daily trips to the Horizon Year 2037 No Project segment volumes. Based on analysis conducted under the City of San Diego segment analysis guidelines, the proposed project is expected to cause a segment threshold exceedance on Sandrock Road between Aero Drive and Murray Ridge Road because the Sandrock Road/Aero Drive intersection is projected to operate at LOS E. Please see Attachment O3-A to these responses to comments for the analysis results. As noted in the Draft EIR, based on CSU's traffic analysis guidelines (and significance thresholds) and the fact that intersection operations typically are the more accurate indicator of roadway conditions than segment analysis, the analysis of roadway segments, including Sandrock Road, is provided for informational purposes only. Further, the typical improvement to eliminate this exceedance would be to re-stripe or widen the roadway to provide additional capacity. The recently published Kearny Mesa Community Plan Update Draft Mobility Technical Report (July 2019), which also projects a threshold exceedance on this segment with development of the proposed Kearny Mesa community plan land uses, does not propose to widen the facility or propose any improvement projects along this segment (Chen Ryan 2019). Therefore, based on the draft report, the threshold exceedance would remain with development of the proposed community plan land uses. For further responsive information, please refer to Thematic Response TR-1 – General Increase in Traffic.

- 03-23** The comment asks about analysis of the Aero/Sandrock intersection. The Draft EIR's analysis of this intersection determined that the addition of project traffic at this location would not result in a significant impact under CEQA based on the CSU impact analysis guidelines and criteria. In the AM peak hour, operations are expected to be level of service (LOS) D under Horizon Year Plus Project conditions. In the PM peak hour, operations are expected to be LOS E under Horizon Year conditions, and the proposed project traffic would increase the average delay by 2.3 seconds. This is not a significant impact under CSU's significance thresholds. However, for information purposes, the increase in delay would result in an exceedance of the City of San Diego intersection threshold, and signal timing optimization, which the City of San Diego conducts on a regular basis, would reduce the delay to below the threshold. Please see Attachment O3-A to these Responses to Comments.
- 03-24** The comment asks about analysis of the Interstate (I-) 805 ramps at Murray Ridge. Project traffic on the I-805 ramps at Murray Ridge is expected to be low (i.e., less than 10 new vehicles on any ramp during either peak hour). The projected volumes are well below the typical threshold levels requiring further analysis under CEQA and industry standards. This volume is not unexpected given the circuitous route that would be required to access the project site using the I-805 freeway from this location in Year 2037.
- 03-25** The comment asks about analysis of alternative routes through Serra Mesa to avoid gridlock. The distribution of project traffic throughout the study area roadways presented in the Draft EIR's traffic analysis, including consideration of gridlock, was derived from the San Diego Association of

Governments (SANDAG) Series 13 traffic model, a computerized travel demand model used to identify the distribution of project trips to the area roadways based on origin and destination, travel speed, and congestion. The model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques. The SANDAG model is the primary tool used for forecasting traffic volumes on roadways and transit facilities in the City and County of San Diego. The analysis presented in the Draft EIR considered and disclosed traffic congestion issues based on the modeling data.

03-26 The comment asks about variations in street segment volumes between the Kearny Mesa Community Plan Update and the Draft EIR traffic analysis. Minor variations in volumes are due to counts being conducted on different days in 2016 for each study or from a different year (2017) in the case of the Draft EIR. The variations in total volume are within typical daily and seasonal variations. Further, it is noted that the Kearny Mesa Community Plan Update analyzed Aero Drive from Sandrock Drive to Ruffin Road as a four-lane collector with a two-way left-turn lane. The Draft EIR instead determined this segment of Aero Drive to be a four-lane major collector per the adopted Serra Mesa Community Plan Street Classification figure; the posted speed of 45 mph on this segment exceeds the City of San Diego's design criteria for a four-lane collector, and the wider lanes exceed the City of San Diego's design criteria for a four-lane collector. Accordingly, the four-lane major classification is more appropriate for the analysis of this segment.

03-27 The comment states that the Draft EIR analysis does not seem to take into account the Kearny Mesa Community Plan Update. The traffic forecasts used in the Draft EIR analysis are based on the latest information available in the SANDAG Series 13 travel demand model, a computerized travel demand model used to identify the distribution of project trips to the area roadways and which includes growth in various areas, including the Kearny Mesa and Serra Mesa community plan areas; the land uses and mobility plans included in the draft Kearny Mesa Community Plan Update were not available at the time. The SANDAG model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques, and is the primary tool used for forecasting traffic volumes in the City and County of San Diego. Once the development project cited in the comment at 8225 Aero Drive is approved and permitted, the change in land use is expected to be included in future iterations of the SANDAG travel demand model and other planning documents.

As to potential effects, without the detailed SANDAG model land use inputs, it is not possible to accurately determine how roadway segment impacts would change. Additionally, the Kearny Mesa Community Plan Update has not yet published a Draft Environmental Impact Report for public review and consideration; accordingly, such information is not available. Instead, the Draft EIR relied on the best available information at the time the Draft EIR was released for public review.

03-28 The comment states that the Draft EIR analysis does not seem to take into account the draft Kearny Mesa Community Plan Update with respect to the I-805 analysis. As noted in Response to Comment 03-27, the Draft EIR did not account for the draft Kearny Mesa Community Plan Update as it was not available at the time of this analysis. (See Response to Comment 03-27 for additional information responsive to this comment.) As to the specific segments of I-805 noted in the comment, the LOS from the SDSU Mission Valley Draft EIR indicates similar or worse operations as the Kearny Mesa Community Plan Update Mobility Technical Report. It is important to note that the freeway analysis in the Draft EIR was conducted using a volume-to-capacity methodology per California Department of Transportation (Caltrans) requirements for individual land development projects. The Kearny Mesa Community Plan

Update freeway analysis was conducted using a density-based methodology consistent with Caltrans' requirements for community plan updates. Variations in traffic volumes are expected with the different methodologies. On the segment of I-805 specified in the comment, project trips are expected to be low (i.e., less than 25 peak hour trips), well below 1% of the 9,000 hourly vehicle capacity of the segment that would cause significant impacts under CEQA. This conclusion would not change if baseline volumes were increased as a result of using the Kearny Mesa Community Plan Update forecasts.

- 03-29** The comment expresses the view that the Draft EIR does not contain graphics, charts, and/or language that a layperson can sufficiently understand. The comment does not identify which graphics, charts, and/or language are not sufficiently understandable; thus, no further response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 03-30** The comment is an introduction to comments that follow. No further response is required.
- 03-31** The comment regards the Draft EIR analysis relative to Taft Middle School. The Draft EIR analysis included a posted speed limit of 25 mph for the section of Gramercy Drive in the vicinity of Taft Middle School, consistent with the comment. Schools are not typically identified in a transportation analysis unless noticeable traffic operations or safety issues exist in their vicinity. Based on field observations of intersection and roadway operations, no apparent operational or safety issues were identified in this area during the AM and PM peak hours.
- 03-32** The comment regards the Draft EIR analysis relative to Jones Elementary School on Greyling Drive and Angier Elementary School on Hurlbut Street. The proposed project is anticipated to add fewer than 10 vehicle trips to either Greyling Drive or Hurlbut Street in the vicinity of the schools during the AM or PM peak hour. This low volume is not expected to result in significant safety impacts under CEQA or industry standards.
- As to the use of Greyling Drive to avoid gridlock on Murray Ridge Road, the Draft EIR did not identify any significant traffic impacts to streets in the western area of Serra Mesa, including on Murray Ridge Road and Greyling Drive, consistent with the low volume of traffic expected to be added to those streets. Accordingly, no mitigation is proposed or required.
- 03-33** The comment expresses the view of using Hurlbut Street to avoid gridlock and is an introduction to comments that follow. Responses are provided below to the specific comments raised.
- 03-34** The comment asks why there is no mention in the Draft EIR of the 25 mph speed zone near Taft Middle School. The Draft EIR analysis included a posted speed limit of 25 mph for the section of Gramercy Drive in the vicinity of Taft Middle School. Specific speed limits are not typically identified for every section of roadway in the text of an EIR's transportation analysis.
- 03-35** The comment asks why the Draft EIR does not include analysis of Greyling Drive and Hurlbut Street due to the 25 mph school zone speed limit. In response, speed zones do not in and of themselves require a traffic study and, therefore, analysis of these streets due solely to the speed zone is not required. Rather, consistent with CEQA's requirements, the Draft EIR's transportation analysis focused on streets and roadways where the proposed project is anticipated to add enough traffic to potentially result in a significant impact. The volume of project traffic on Greyling Drive and Hurlbut Street is estimated to be less than 10 vehicle trips during either the AM or PM peak hour. These volumes are well below the

typical threshold levels requiring further analysis under CEQA and industry standards. And, as previously noted, schools, and related school zones, are not typically identified in a transportation analysis unless noticeable traffic operations or safety issues exist in their vicinity, which is not the case as to the subject streets.

03-36 The comment asks if there is a plan to mitigate the danger to children resulting from increased traffic in the school zones on Gramercy Drive and Greyling Drive, and Hurlbut Street. As explained in Response to Comment 03-31 and related 03-35, the presence of a school zone does not automatically require a traffic study. Further, the Draft EIR did not identify any significant traffic impacts to Gramercy Drive, Greyling Drive, or Hurlbut Street, which is consistent with the low volume of traffic expected to be added to those streets and because sufficient capacity is available. Accordingly, no mitigation is proposed or required.

03-37 The comment regards access from an apartment complex on Gramercy Drive and the addition of project traffic. As shown in Draft EIR Table 4.15-30, there will be sufficient capacity available on Gramercy Drive to accommodate projected Horizon Year Plus Project volumes. The two-way center-left turn-lane on the road provides adequate refuge for vehicles leaving the referenced apartment complex such that they can complete a two-stage left-turn. Therefore, no exceedance of the City of San Diego segment threshold is anticipated. In addition, no significant impact was identified due to the addition of project traffic based on CSU criteria; accordingly, no mitigation is required.

As to the comment relating to residents backing out of their driveways, Draft EIR Table 4.15-30 shows that based on City of San Diego roadway segment capacities, there would be no threshold exceedances on those streets included in the study area. As noted in Response to Comment 03-22, the addition of project traffic to Sandrock Road between Aero Drive and Gramercy Drive would result in an exceedance of the City's roadway segment threshold under Horizon Year Plus Project Conditions, which indicates that vehicles turning into and out of driveways may experience some additional delay. However, the City identified a similar threshold exceedance as part of its recently published Kearny Mesa Community Plan Update, but did not propose any improvement projects along this segment.

03-38 The comment asks if there is a plan to mitigate for the lower quality of life for Serra Mesa residents due to the anticipated increased traffic. The Draft EIR proposes mitigation for those impacts identified by the transportation analysis as significant and attributable to the anticipated increased traffic. Please refer to Draft EIR Section 4.15.9, Mitigation Measures.

03-39 The comment asks why the proposed project does not include a zero parking space policy for future students and other residents of the proposed project. The proposed project residential buildings are being built with development partners that require a certain parking supply in order to be competitive with the area's housing market and to secure financing for development. However, the proposed parking ratio is a maximum value that will not be exceeded, and it is lower than other similar developments in Mission Valley in order to encourage transit use and reduce traffic near the site and in surrounding communities. In addition, nothing in the Draft EIR precludes future developers from using the City of San Diego's recently adopted standards for parking in Transit Priority Areas, which allow for significantly reduced parking. For further responsive information, please refer to the Final EIR, Thematic Response TR-1 –General Increases in Traffic.

Similarly, the proposed office space would be built with development partners that require a certain parking supply in order to be competitive with the area's commercial office and research and

development space market. The parking structure for the campus office space is being designed to allow a portion of the parking area to be converted to laboratory space in the event parking demand changes over time or can be managed differently.

The comment regarding other campuses is noted for the record and included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

03-40 The comment asks why SDSU is not more environmentally conscious by using extremely limited parking availability. Preliminarily, please see Response to Comment 03-39 regarding parking supply for information responsive to this comment and, more generally, the Final EIR, Thematic Response TR-1 – General Increase in Traffic. With respect to air pollution, the comment addresses general environmental issues which received extensive analysis in Section 4.2, Air Quality, of the Draft EIR, as well as Appendices 4.2-1 and 4.2-2. The Draft EIR determined that air quality impacts were significant and unavoidable, and no feasible mitigation measures were available to reduce these impacts to below a level of significance. The CSU system, including SDSU, has a focus on sustainability goals, including in the areas of transportation, energy, social responsibility, and water. Specific to the proposed project, the project includes a TDM Program to reduce vehicle trips to and from the project site generated by both non-stadium and stadium uses. The program will serve to reduce vehicle traffic and related significant impacts to selected freeway, ramp, intersection and roadway segments to the extent feasible by reducing congestion (Draft EIR Section 4.15.1.1, Transportation Demand Management Program). Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments and Thematic Response TR-1 – General Increase in Traffic for further responsive information.

03-41 The comment asks about an approved development project in Serra Mesa and its effect on the Draft EIR traffic analysis. Baseline growth in traffic throughout the study area roadways presented in the traffic analysis was based on the SANDAG Series 13 traffic model, a computerized travel demand model used to identify the distribution of project trips to the area roadways. As previously noted, the model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques. The SANDAG model is the primary tool used for forecasting traffic volumes in the City and County of San Diego. Specific to the project referenced in the comment, the SANDAG 2035 model assumes 127 multi-family units at the Ruffin/Gramercy corner. Given that the 15,000 square feet of retail space referenced in the comment is a size considered to be local-serving, as opposed to regional-serving, the volume forecasts derived from the SANDAG model account for development of the referenced project. In addition, as part of the Draft EIR analysis, the traffic volume growth factor on many of the segments included in the study area was increased beyond usual practice volumes and, by doing so, the analysis presented in the EIR provides a more conservative traffic analysis than would otherwise be provided as less future capacity would be available to accommodate project traffic.

As to the effect of stadium redevelopment, the proposed project includes redevelopment of the existing SDCCU Stadium; and, therefore, the Draft EIR fully accounts for stadium redevelopment as part of the traffic analysis. As such, the Draft EIR Horizon Year analysis accounts for reasonably foreseeable cumulative projects, with appropriate mitigation identified for significant impacts, and no further mitigation is required.

03-42 CSU/SDSU acknowledges the comment and contact information and will contact Mr. Niceswanger with any questions.

Response to Comment Letter 04

North Park Planning Committee

Rene A. Vidales, Chair

September 20, 2019

- 04-1** The comment is an introduction to comments that follow. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required. Please refer to the following responses.
- 04-2** The comment states that the City of San Diego should grant authorization for CSU to implement the improvements identified in the Draft EIR. CSU/SDSU acknowledges the comment and is coordinating with the City of San Diego to determine which improvements are authorized. CSU/SDSU notes that, if the City of San Diego does grant authorization for the recommended mitigation measures, transportation impacts would be reduced.
- 04-3** The comment states that Level of Service (LOS) should not be the only methodology used to determine transportation impacts. CSU/SDSU agree with the comment and notes that the Draft EIR evaluated several thresholds to determine impacts to transportation. As described in Draft EIR Appendix 4.15-1, Section 14.1, LOS is valid as a project evaluation methodology for environmental documents prepared pursuant to CEQA until July 1, 2020. Moreover, in addition to an LOS analysis, the Draft EIR includes analysis of the proposed project's impacts relative to vehicle miles traveled (VMT), as suggested by the comment. The VMT analysis is presented in Draft EIR, Section 4.15.7.9, and Appendix 4.15-1, Section 14.0.
- Further, the Draft EIR includes a Parking Assessment (Draft EIR Section 4.5.7.5), Multimodal Assessment for Pedestrian Facilities, Bicycle Facilities, and Transit Facilities (Draft EIR Section 4.15.7.6), Construction Impacts (Draft EIR Section 4.15.7.7), and Emergency Access (Draft EIR Section 4.15.7.8). The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required.
- 04-4** The comment states that other methods of analysis that are consistent with the City of San Diego's Climate Action Plan, such as VMT, should be used. CSU agrees with the comment and refers to Response to Comment 04-3, above. Further, as detailed in Draft EIR Appendix 4.7-2, City of San Diego Climate Action Plan Evaluation, and summarized in Draft EIR Section 4.7, Greenhouse Gas Emissions, the proposed project would be consistent with the City of San Diego Climate Action Plan.
- 04-5** The comment states the Draft EIR shall match the Mission Valley Community Plan Update (MVCPU) for traffic mitigation and fire safety. As to traffic mitigation, the MVCPU was reviewed, and the proposed project's consistency with the MVCPU is presented in Appendix 4.15-1, and Draft EIR Sections 4.15.7.4 and 4.15.9. The Draft EIR recommends mitigation measures, which would not conflict with the MVCPU. With respect to fire safety, the Draft EIR concluded that direct impacts would be less than significant, but the proposed project may result in a cumulative contribution to impacts to fire services, similar to the MVCPU Final Program EIR. The Draft EIR determined that because cumulative projects may cause the need to construct new fire facilities, the location of which have not been determined at this time, there may be environmental effects associated with the construction of those fire facilities which cannot be known or mitigated at this time. No mitigation is available to reduce this impact to less than

significant and the impact was determined to be significant and unavoidable, similar to the MVCPU Final Program EIR; however, the proposed project would pay applicable Fire Development Impact Fees.

- 04-6** The comment recommends providing protected bike lanes along Texas Street/Qualcomm Way from Camino del Rio South to Friars Road. Per the significance criteria in the Draft EIR, the proposed project would not disrupt existing or planned bicycle facilities or conflict with bicycle plans, guidelines, policies or standards or otherwise have a significant impact supporting the proposed bike lane improvements. As such, the addition of protected bike lanes on the cited section of Texas Street/Qualcomm Way is not required as project mitigation. It should also be noted that the Mission Valley Community Plan Update recommends bike lanes along Qualcomm Way and a Project Study Report for the Qualcomm Way/Interstate 8 (I-8) interchange that should appropriately accommodate bicyclists. Installation of protected bike lanes would enhance safety for bicyclists but would also require substantive changes to the interchange design, which would need to be addressed by the Project Study Report. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 04-7** The comment recommends adding a northbound right-turn lane at Texas Street and Camino del Rio South. CSU/SDSU acknowledges the comment. As described in Draft EIR Section 4.15.9.3, the proposed mitigation at this location would fully mitigate the proposed project's impact to a less-than-significant level. Accordingly, no additional mitigation is required per CEQA.
- 04-8** The comment recommends synchronized traffic lights on Texas Street at Camino del Rio South and Texas Street at the I-8 eastbound off-ramp. CSU/SDSU acknowledges the comment. As described in Draft EIR Section 4.15.9.3, the proposed mitigation at the Camino del Rio South intersection would fully mitigate the proposed project's impact at this location. Per Draft EIR Table 4.15-29, the analysis did not identify a significant impact at the I-8 eastbound off-ramp intersection. Thus, no additional mitigation is required per CEQA.
- 04-9** The comment recommends synchronized traffic lights on Qualcomm Way at Camino del Rio North and Qualcomm Way at Camino de la Reina. CSU/SDSU acknowledges the comment. As shown in Draft EIR Table 4.15-29, the analysis did not identify a significant impact at these intersections. Thus, no additional mitigation is required per CEQA. It is also noted that these signals are already coordinated in the PM peak hour.
- 04-10** The comment is a conclusion statement that the comments are consistent with the motion made at the September 27, 2019, North Park Planning Committee meeting. See Responses to Comments IO4-1 through 04-9, above. CSU/SDSU acknowledges the comment. No further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter O5

Sierra Club San Diego
 Peter Anderson, Chairperson
 George Courser, Chairperson, Conservation Committee
 September 26, 2019

- 05-1** The comment provides information regarding support for the SDSU Mission Valley Campus Master Plan project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-2** The comment refers to 15 recommendations made by the Sierra Club during the Notice of Preparation (NOP) period in February 2019, and states that the letter on the Draft EIR addresses recommendations that in the Sierra Club's view "*must* be included in the final EIR." As such, the comment is an introduction to comments that follow. The Sierra Club is referred to Responses 05-3 through 05-88, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-3** The comment provides the Sierra Club's views on the recreational and cultural importance of the proposed project. The comment is an introduction to comments that follow, and the Sierra Club is referred to Responses 05-4 through 05-10, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-4** The comment states that "the DEIR does a good job of highlighting the recreational and cultural components" of the proposed project, and restates information included in the Draft EIR regarding project-related components. The comment also states the Sierra Club's agreement with the findings in the Draft EIR that the proposed project would reduce the park deficit in Mission Valley. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-5** The comment states that, although the Draft EIR included an extensive lighting study, the Draft EIR does not analyze the impact of the athletic fields "adjacent to the San Diego River habitat." First, the athletic fields are a minimum of 100 feet from the San Diego River and are not immediately adjacent thereto. Second, under existing conditions, the current onsite parking lot has lights; and thus lighted sports fields are not a substantial change from existing conditions. Third, there is an existing berm along the San Diego River, which would shield light from the project site, which is not proposed to be removed as part of the proposed project.

Further, the Draft EIR considered lighting and the potential effects of light in the River Park. The Sierra Club is referred to the Draft EIR, Section 4.3, Biological Resources. As described therein, in Section 4.3.4 (pp. 4.3-19 – 4.3-20), the Draft EIR considered impacts associated with lighting on the MHPA Preserve area, in conformance with the City of San Diego MHPA Adjacency Guidelines. Specifically:

"Within the River Park and Shared Parks and Open Space, several lighted sports fields and courts are proposed. ...These fields and courts would be set back a minimum of 100 feet from the San Diego River. 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. For security purposes, trails within the River Park and Shared Parks and Open Space would have nighttime lighting. Similar to the sports fields, lighting would be shielded, with directional LEDs so there would be very little light spill. The installation of the River Park and Shared Parks and Open Space will provide a natural buffer between the Stadium, commercial and residential buildings, and the San Diego River and Murphy Canyon Creek. Lighting will be directed away from the San Diego River and Murphy Canyon Creek."

In addition, the Draft EIR identified two mitigation measures to ensure impacts from lighting remained less than significant. MM-BIO-10 requires any sport or recreational fields and courts to be set back a minimum of 100 feet away from the floodway of the San Diego River. MM-BIO-11 sets forth a lighting plan and requires lighting to be directed away from sensitive areas in accordance with the Multiple Species Conservation Program's Land Use Adjacency Guidelines and applicable regulations; MM-BIO-11 also requires the lighting in the River Park and Shared Parks and Open Space be designed so there is no light spillage into the River Corridor Area.

- 05-6** The comment asks if the proposed River Park and trail system are continuously integrated into other trails and parks along the San Diego. The proposed trail system would connect to existing and planned trails adjacent to the project site. First, the proposed trail through the River Park would connect to the east and west to already improved sections of the river trail system. Second, the project proposes a trail connection to exiting trails along Murphy Canyon Creek, north of the project site. Third, the proposed trails in the River Park would connect through the river park and development to the city-wide bike lanes along Friars Road. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-7** The comment asks if there will be a gymnasium and public aquatic center that will be available to the public as well as students. The proposed project will include a building pad for a Community Recreation Center and/or Aquatic Complex, as generally depicted in the Mission Valley Community Plan Update. Construction of vertical improvements at the Community Recreation Center/Aquatic Complex is not part of the proposed project; instead, such improvements would be constructed by the City with appropriate City funding. (See EIR Section 4.14, Public Services and Recreation, pp. 4.14-27, 4.14-29.) Please refer to Response to Comment A4-76 and A4-85 regarding the Community Recreation Center and Aquatic Complex identified on the project site by the Mission Valley Community Plan Update. As described therein, the analysis in the Draft EIR anticipated these uses and the impacts thereof have been analyzed.
- 05-8** The comment requests that the lighted athletic fields be buffered from the riparian habitat to protect nocturnal species. The comment also expresses the Sierra Club's view that the proposed 100 foot setback / buffer to riparian habitat is not sufficient and requires re-examination with a focus on reducing night light in the riparian areas. Please refer to Response to Comment 05-5, above, regarding lighting near the riparian zones. Please also refer to Response to Comments A2-7 through A2-9, in the responses to the California Department of Fish and Wildlife letter for additional responsive information.
- 05-9** The comment states that the Final EIR needs to provide more information on the riparian habitat along Murphy Canyon Creek and its restoration. The comment generally addresses topics related to biological resources, which received extensive analysis in the Draft EIR, Section 4.4, Biological Resources. Murphy Canyon Creek is a narrow channel located within the eastern project boundary,

with intermittent riparian vegetation. As discussed in the Draft EIR, Section 4.3.1.1, nine vegetation communities/land covers have been mapped on the project site; vegetation/land covers have also been mapped within a 100-foot buffer surrounding the project site. The Draft EIR, Section 4.3.1.1 describes the vegetation communities and land cover types; their acreages are presented in EIR Table 4.3-1; and, EIR Figure 4.3-1 presents their spatial distributions. The Draft EIR notes that Southern Cottonwood-Willow Riparian Forest, 0.10 acres of Southern Riparian Forest, and 0.89 acres of Disturbed Wetland are present in Murphy Canyon Creek along the eastern side of the project site. (See EIR Figure 4.3-1.) As to restoration of Murphy Canyon Creek, please see Thematic Response – Murphy Canyon Creek. As described therein, and as noted in the Draft EIR, Section 2.0, Introduction, “[t]he project is not proposing any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek; therefore, while the existing creek is within the project boundary, no project element, component, improvement, or feature is contemplated within the creek.” Construction would also not necessitate or result in any alteration to Murphy Canyon Creek. (See Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-28.) The Draft EIR also found that the project would result in potentially significant short- and long-term indirect impacts to native habitat that supports wildlife movement, including Murphy Canyon Creek. (EIR Section 4.3, Biological Resources, Impact BIO-18 and Impact BIO-19.) The Draft EIR found that the potentially significant short-term indirect impacts will be reduced to less than significant through implementation of mitigation measures MM-BIO-4 and MM-BIO-5, which require temporary installation of construction fencing to delineate the limits of grading, biological monitoring, and a monitoring report. In addition, the potentially significant long-term indirect impacts will be reduced to less than significant through implementation of mitigation measures MM-BIO-7, MM-BIO-8, MM-BIO-10, and MM-BIO-11, which require signage/barriers between the River Park and Shared Parks and Open Space and San Diego River/Murphy Canyon Creek interface, restrictions on landscape planting, compliance with buffer setbacks, and a lighting plan. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-10** The comment expresses the Sierra Club’s hope that the new campus be a landmark intellectual, cultural, and recreational facility for the region. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-11** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding recycled building material from the existing stadium and parking lot. The comment is an introduction to comments that follow. The Sierra Club is referred to Responses 05-12 through 05-16, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-12** The comment restates information contained in the Draft EIR and is an introduction to comments that follow. The Sierra Club is referred to Responses 05-13 through 05-16, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-13** The comment states that the Final EIR should provide more detail on how and where recycled material will be used, and states that onsite recycling would be preferable to minimize transportation of these materials. Please refer to the Draft EIR, Project Description, subsection 2.3.4.1.2, which states: “[a]fter demolition, the materials would be sorted for reuse, recycling, and landfill disposal. Approximately 80% of the demolition debris would be diverted from landfills. Further, it is expected that approximately

40,000 cubic yards of material would be hauled from the project site. Approximately 2,500 truck trips would be required to haul away the demolition debris.” (EIR Project Description, p. 2-16.) Please also refer to the Draft EIR, Section 4.17, Utilities and Services Systems, which states:

“According to the Draft Environmental Impact Report for the Stadium Reconstruction Project prepared by the City, it is estimated that demolition of the Stadium and utility infrastructure would generate approximately 430,000 tons of construction waste (City of San Diego 2015). The volume/quantity of waste from the demolition of Candlestick Park (old San Francisco 49ers stadium) was used for guidance as it is a recent similar effort involving the demolition and new construction of a similarly sized professional football stadium. Disposal ratios were based on City waste management guidelines.”

The Final EIR is revised to include Table 4.17-3, Estimated SDCCU Stadium Demolition Waste, showing the estimated amount of material that will be recycled and re-used onsite and materials that will be directed to landfills or other facilities in San Diego. The Final EIR explains this recycled material will be crushed onsite, as analyzed throughout the Draft EIR, and that the material will be used as fill to raise the remainder of the project site above the FEMA floodplain. The table was used in the preparation of the Draft EIR and Technical Appendices 4.2-1, Air Quality Technical Report, and 4.7, Greenhouse Gas Emissions Technical Report, and the emissions associated with (1) hauling / disposing materials offsite and (2) crushing and reusing materials onsite. These totals are represented in Table 4-1e, Demolition Waste Volumes, of Appendix 4.3-1 and 4.7-1, and are factored into the haul trips and rock crushing calculations prepared in each appendix.

05-14 The comment states that more detail is needed regarding what materials can be recycled and how disposal of the unused material will occur. Please refer to Response to Comment 05-13, above and Response to Comment 0-15, below.

05-15 The comment requests the EIR address the “feasibility” constraints of recycling materials that comprise the existing stadium and parking lot. First, as the comment relates to the existing stadium, as explained in Response to Comment 05-13, the analysis in the Draft EIR considered the materials that comprise the existing stadium and determined what percentage of those materials could be recycled and which materials would be required to be disposed. Further, as part of the preparation of the Draft EIR, an Asbestos, Lead-Based Paint and Universal Waste Survey was prepared by Aurora Industrial Hygiene (Appendix 4.8-4 of the Draft EIR) to determine whether, and to what extent, certain materials are present in the existing stadium. Based on the analysis of materials at the existing Stadium, the Draft EIR, Section 4.8 Hazards and Hazardous Materials, recommends Mitigation Measure MM-HAZ-1, which requires “abatement procedures for the removal of materials containing asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items...” Second, as it relates to the parking lot, the Draft EIR analyzed the presence of hazards and hazardous materials associated with the project site and recommends mitigation measures. No hazards were identified on the existing Stadium parking lot; however, the Draft EIR recommended mitigation measures related to the potential to encounter certain hazards and hazardous materials during grading activities, which would reduce impacts to less than significant. Therefore, the Draft EIR considered the feasibility of recycling existing materials onsite as requested by the comment. No revisions are required for the Final EIR, other than adding a new table providing additional details regarding the volumes of recycled material and those items which were assumed to be disposed of offsite (see Table 4.17-3 in the Final EIR).

- 05-16** The comment asks that the EIR develop and advise what alternative safety strategies will be employed should public health concerns be raised by previously undetected asbestos, heavy metals, subsurface petroleum products, volatile organic compounds (VOCs) and contaminants of emerging concern (CECs). The comment generally addresses topics related to hazardous materials, which received extensive analysis in Draft EIR, Section 4.8, Hazards and Hazardous Materials. Identification, management, and disposal of previously unidentified hazardous materials, wastes, and tanks, should they be encountered, would be discussed in a hazardous materials contingency plan (HMCP), which would be developed prior to demolition and construction in accordance with mitigation measure MM-HAZ-3 and all applicable state and local regulations. The HMCP will put procedures in place to identify, manage, properly transport, and dispose of hazardous substances and materials identified on site as a result of environmental contamination. As set forth in MM-HAZ-3, the HMCP shall include health and safety measures, which would include periodic work breathing zone monitoring and monitoring for VOCs using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities.
- 05-17** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding the Kinder Morgan tanks north of the project site. The comment is an introduction to comments that follow, and the Sierra Club is referred to Responses 05-18 through 05-24, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-18** The comment restates information contained in the Draft EIR and is an introduction to comments that follow. The Sierra Club is referred to Responses 05-19 through 05-24, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-19** The comment restates information contained in the Draft EIR and expresses the Sierra Club's gratification that the Kinder Morgan MVT "is no longer a significant problem." The comment is an introduction to comments that follow; please refer to Responses 05-20 through 05-24, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-20** The comment expresses concern about the Kinder Morgan MVT pipeline on the eastern portion of the project site and states "there is no information regarding the impact of the pipeline to the project." In response, as stated in the Draft EIR, "[i]n 2019, Group Delta Consultants conducted a limited soil and groundwater investigation near the fuel pipeline to screen for potential soil and groundwater contamination associated with any pipeline leakage (Appendix 4.8-5). ... Based on the investigation, no evidence of a fuel pipeline leak was observed." Nonetheless, as analyzed in the Draft EIR, Section 4.8, Hazards and Hazardous Materials, "excavation and construction activities in the area near this pipeline have the potential to damage the pipeline, creating an accident condition that would release hazardous materials to the environment." Accordingly, the Draft EIR identified mitigation (**MM-HAZ-6**) in the form of consultation with Kinder Morgan Energy Partners prior to commencement of construction, demolition, and implosion activities to ensure that a plan and necessary precautions are developed and implemented to avoid damage to the pipeline.
- 05-21** The comment states that the Draft EIR reports the discovery of unknown pipelines and shows a picture of valves associated with this pipeline in EIR Appendix 4.8-2, Photograph 9. In response, Photograph

9 in EIR Appendix 4.8-2, Hazards and Hazardous Materials Technical Report, is a photograph of an air pressure relief valve observed near the southeast corner of the Stadium property. An underground petroleum pipeline marker (like the one in Photograph 7 observed near the northeast corner of the site) was not observed in the vicinity of that valve and that was the basis for identifying it as an “unknown pipeline valve.” Those types of valves are commonly associated with underground water pipelines, but the contents of the pipeline it is connected to are unknown to Geosyntec, the preparer of Appendix 4.8-2. That said, the underground Kinder Morgan pipeline is known to traverse through that general area in/near the eastern portion of the Stadium property. Please refer to the Draft EIR Section 4.8, Hazards and Hazardous Materials for additional responsive information. For example, Mitigation Measure MM-HAZ-3 would require construction and demolition activities to be completed in accordance with a Hazardous Materials Contingency Plan (HMCP), which would put procedures in place to identify, manage, properly transport, and dispose of hazardous substances and materials identified or encountered on site. Compliance with MM-HAZ-3, as well as with all applicable laws and regulations, would ensure that impacts with respect to unknown pipelines would be less than significant. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-22** The comment requests information regarding risks associated with the 10-inch active fuel pipeline. Please refer to Response to Comment 05-20, above. Please also refer to Response to Comment 011-16.
- 05-23** The comment requests information regarding risks associated with the 10-inch active fuel pipeline during construction and operation of the proposed project. As to project construction, please refer to Response to Comment 05-20, above, as well as Response to Comment 011-16. As to operation of the proposed project, as shown in Figure 3, Site Plan, of EIR Appendix 4.8-5, Limited Soil and Groundwater Investigation Along Fuel Pipeline, the pipeline is located within Murphy Canyon Creek and outside the development areas of the proposed project; and the pipeline would continue to be operated by Kinder Morgan in accordance with all applicable laws and regulations.
- 05-24** The comment requests additional investigation or information on any other pipelines and discussion of impacts and/or remediation of such pipelines. Please refer to Response to Comment 05-20, above. Please also refer to EIR Section 4.8, Hazards and Hazardous Materials, Figure 4.8-1, which depicts the project site hazards. As to pipelines, the figure shows only the MVT pipeline on the eastern boundary of the project site.
- 05-25** The comment restates a recommendation submitted by the Sierra Club during the NOP period in February 2019 regarding electrification of buildings and heat pump technology. The comment is an introduction to comments that follow, and the commenter is referred to Responses 05-26 through 05-30, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-26** The comment requests that the EIR “provide information on the extent of heat pumps and electric heating and cooling to be employed.” In response, please refer to Thematic Responses – Sustainability Commitments. As explained, the Final EIR is revised to include a project design feature that would require all project-related development to utilize electric heating, cooling and ventilation (HVAC) systems.

05-27 The comment expresses opposition to the proposed project's use of natural gas. Please refer to Thematic Response – Sustainability Commitments, which notes that the proposed project has been revised to include project design features in the Final EIR that would further limit and restrict the use of natural gas by the proposed project. For example, electric HVAC systems will be used throughout the development area (as discussed above in Response to Comment 05-26), and the use of natural gas fireplaces has been eliminated in all residential units. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-28 The comment disagrees with the Draft EIR's statement that the proposed project would "require" natural gas for heating and cooling, and states it is possible to efficiently heat and cool the proposed project with electric systems. The comment further requests that the project eliminate any use of natural gas. Please see Response 05-27, above, for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Further, please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which notes that the proposed project has been revised to include project design features in the Final EIR that would further limit and restrict the use of natural gas. The additional design commitments confirm that project-related development would utilize electric HVAC systems, and eliminate the use of natural gas fireplaces in all residential units. As explained in the referenced Thematic Response, natural gas use on the campus would be largely limited to academic-related laboratories and cooktop uses in the stadium, non-residential and residential land uses. The environmental analysis provided in the Final EIR is revised accordingly, where appropriate.

CSU/SDSU also notes that wholesale building electrification for new residential and non-residential development is being studied and evaluated by multiple state agencies, including the California Energy Commission (CEC), California Public Utilities Commission (CPUC) and California Air Resources Board (CARB). Those agencies are: (i) evaluating the feasibility of electrification pathways, with consideration of technology options, policy principles and economic ramifications; and, (ii) assessing whether non-electrification options – such as the use of renewable natural gas – also provide environmentally advantageous results. CSU/SDSU has made a policy decision not to mandate wholesale building electrification in the absence of a state directive to do so through revisions to Title 24 of the California Code of Regulations. That being said, as discussed earlier in this response, significant portions of the proposed project's built environment will benefit from electrification technologies, consistent with the recommendations of the commenter.

05-29 The comment states that the DEIR "makes erroneous and misleading statements" that compare the proposed project's energy consumption to that of the existing stadium. In response, the comparative statements were provided for information purposes, and are intended to illustrate that a new and improved stadium land use would consume energy more efficiently – when measured against a common metric – than the existing stadium land use. Efficiency metrics are of recognized usefulness in the CEQA context and when evaluating the effectiveness of sustainability commitments.

05-30 The comment requests that the Final EIR "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." Section 4.7, Greenhouse Gas Emissions, of the Draft EIR provides the requested comparison. Please see pages 4.7-46 through 4.7-48 for discussion of the project's consistency with statewide emissions

reduction targets. As the comment does not identify any specific deficiency with the analysis provided therein, no further response is required.

- 05-31** The comment restates a recommendation submitted by the Sierra Club during the NOP period in February 2019 regarding natural electrification of the proposed project and the use of heat pumps and other electric technologies for heating and cooling. The comment is an introduction to comments that follow. The commenter is referred to Responses 05-32 through 05-41, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-32** The comment re-states the commenter’s opposition to the use of natural gas, and requests the entire project be converted to electric energy. Please refer to Response to Comment 05-28, above, and the Thematic Response – Sustainability Commitments.
- 05-33** The comment opines that there is no reason for natural gas fireplaces to be included within up to 5% of project residences (as provided for in the Draft EIR), and requests elimination of any use of gas fireplaces in the Final EIR. In response, the proposed project has been revised to include a project design feature in the Final EIR that would eliminate the use of natural gas fireplaces in all project residences. Please refer to Thematic Response – Sustainability Commitments.
- 05-34** The comment continues to express opposition to the use of and need for natural gas. Please refer to Thematic Response – Sustainability Commitments, and Response to Comment 05-28 above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-35** The comment states that natural gas is a major source of GHG and is much more costly than an all-electric project. The comment opines that “no new construction should utilize [natural gas]” and requests the Final EIR be revised to “delete erroneous claims that natural gas is needed at all.” In response, please refer to Thematic Response – Sustainability Commitments, as well as Response to Comment 05-28, above. As described therein, Project Design Features have been added to the Final EIR that serve to further limit the use of natural gas within the proposed project to specified uses, and electrify certain components of building operations within the project site. The Final EIR is revised accordingly to account for the Project Design Features. As shown in the Additional Technical Memo prepared by Ramboll, the new and/or refined PDFs result in quantified and qualitative benefits, including lower GHG and criteria air pollutant emissions, and lower natural gas, gasoline and diesel consumption, as compared to the information presented in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-36** The comment restates information contained in the draft environmental documentation regarding the use of natural gas, and expresses the opinion of the commenter that the use of natural gas is outrageous and unnecessary. Please refer to Thematic Response – Sustainability Commitments, as well as Response to Comment 05-28, above. Based on the project design features included in the Final EIR, the proposed project’s annual natural gas consumption is estimated to be 31,136,501 kBtu, which is 70,876,351 kBtu less than the total reported in the Draft EIR and cited in the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-37** The comment restates information contained in the draft environmental documentation regarding the use of natural gas. The commenter requests the Final EIR be revised to “eliminate misleading comparisons” and simply report the amount of additional greenhouse gas as a result of the project. In response, the Sierra Club is referred to Table 4.7-5. Summary of Greenhouse Gas Emissions (With Project Design Features), which reports the annual quantity of GHG emissions attributable to the proposed project. As to the comparative statements, they are provided in the EIR for information purposes and context, but are not the basis for the EIR’s determination that project impacts to global climate change will be less than significant (see EIR Section 4.7). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-38** The comment requests the Draft EIR not use San Diego Gas and Electric’s (SDG&E) energy mix in any analysis for the proposed project because “the current mix of energy production...has no relevance to the future.” The comment states the region is adopting Community Choice Aggregation (CCA) and any reference to SDG&E should be deleted. The comment then requests a commitment to buying electricity from a company that will provide greater than 90% of its energy from renewable energy sources. In response, SDG&E is the current energy provider to the project site, and to consider another provider at this time would be speculative and without any substantial evidence to support any mix of energy production. In this respect, the analysis in the Draft EIR therefore is based on the best available information and accords to standard practice for the estimation of emissions and energy consumption. Further, if a CCA program is in fact implemented in the City of San Diego, emissions levels from operation of the proposed project would be reduced compared to the totals presented in the Draft EIR; therefore, the analysis is conservative under the scenario suggested by the comment. Lastly, as to the request to commit to buying electricity from a company providing greater than 90% of its energy from renewable energy sources, the comment expresses the opinions of the commenter and does not identify any basis for imposing such a requirement on the project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-39** The comment restates information from the Draft EIR regarding CSU’s sovereign immunity, but states that “state agencies are not exempt from rulings of the California courts” and requests the Final EIR propose mitigation for the reduction of GHG emissions within the County that comports with recent court rulings. In response, the court decision highlighted by the Sierra Club is related to the County of San Diego and implementation of the County’s Climate Action Plan in accordance with the County’s General Plan (see *Sierra Club et al. v. County of San Diego* [Case No. D075478]). The subject decision is not germane to the proposed project; is the subject of a pending appeal before California’s Fourth District Court of Appeal; and is based on the interpretation of a County of San Diego General Plan Goal and Policy that are not applicable to the proposed project. Further, the Draft EIR analysis determined that the proposed project would result in less than significant impacts to greenhouse gas emissions largely due to the compact, mixed campus use, transit-oriented development proposed by the project, as more fully described in Response to Comment 05-68 below. Therefore, no mitigation measures are required because no potentially significant impacts have been identified. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-40** The comment restates information from the Draft EIR regarding the use of natural gas and expresses the opinion of the commenter that the conclusion that impacts to natural gas usage are less than

significant is “completely incorrect and misleading.” The comment does not provide any evidentiary support for this disagreement beyond general opposition to the use of natural gas in new projects. The Draft EIR conducted a thorough analysis of the proposed project’s usage of natural gas and determined that such usage would not result in a significant impact. Further, as outlined in Thematic Response – Sustainability Commitments, the proposed project has been revised to include additional project design features to further reduce natural gas usage and electrify buildings. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-41** The comment states that the proposed project would “massively increase energy consumption and greenhouse gas” and requests the Final EIR be revised to conclude the project’s emission would be significant and propose mitigation in the County to offset the increase in GHG. The comment does not provide any evidentiary support for this disagreement beyond general opposition to the use of natural gas in new projects and the total amount of natural gas usage and GHG emissions. Please refer to Responses 05-32 through 05-40, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-42** The comment restates a recommendation submitted by the Sierra Club during the NOP period in February 2019 regarding use of renewable energy. The comment is an introduction to comments that follow. The commenter is referred to Responses 05-43 through 05-46, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-43** The comment restates information contained in the draft environmental documentation regarding use of renewable energy and is an introduction to comment which follow. Please refer to Responses 05-44 through 05-46, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-44** The comment asks for additional information regarding where solar panels would be installed, whether the proposed project can increase the amount of energy generated onsite, and whether solar panels will cover any parking areas to provide both shade and energy generation. Please refer to Thematic Response – Sustainability Commitments, which includes responsive information regarding where solar panels are anticipated to be located, which are largely on the residential, campus and hotel uses. With respect to covering parking areas, other than on-street/parallel parking, all parking will be in garages with campus, residential and hotel uses on-top; therefore, opportunities to install solar panels over parking is limited. As discussed in Appendix 4.7-1 of the Draft EIR, the proposed project’s solar panel parameters were derived after considering the amount of rooftop space that would be available for their installation. Based on the project parameters, and considering other HVAC and mechanical equipment that would need to be located on building rooftops, it was determined that approximately 40% of the building rooftops would be covered with solar panels. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-45** The comment requests information regarding why wind power was not considered or evaluated as a source of renewable energy for the proposed project. As noted in Responses 05-39 and 05-68, the Draft EIR analysis determined that the proposed project would result in less than significant impacts to greenhouse gas emissions due to the compact, mixed campus use, transit-oriented development

proposed by the project. Therefore, no mitigation measures are required, such as additional alternative energy sources, because no potentially significant impacts have been identified. Further, there currently are no known wind power facilities located within the urbanized Mission Valley area, and the project's proposed use of solar energy is more compatible with the existing developed areas located adjacent to the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-46** The comment notes that the Draft EIR, Section 4.17 did not present electrical and natural gas schematics and requests an explanation for how these utilities are not presented. In response, Figure 2-10A, Site Utilities – Concept Electrical Utilities, depicts the proposed electrical lines through the project site. This figure (2-10A) is revised in the Final EIR to add natural gas services. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-47** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding recycling and green practices to be used during project operation. The comment is an introduction to comments that follow. The Sierra Club is referred to Responses 05-48 through 05-50, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-48** The comment 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. The comment is an introduction to comments that follow.
- 05-49** The comment requests the Final EIR clarify if recycling bins would be included through the entire project. In response, please refer to Thematic Response – Sustainability Commitments and refer to the Final EIR, Section 4.17, Utilities and Service Systems, (page 4.17-27), which has been revised to clarify that recycling bins would be provided throughout the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-50** The comment requests information regarding maintenance and emptying of recycling bins during football games and other stadium events, including provisions for assuring recycled items are recycled according to the standards of Cal Recycle. As noted on page 4.17-27 of the Draft EIR, "Recyclable materials would be transported to a certified recycling facility by a certified recyclable materials collector at least once per week." The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-51** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding plans for the River Park. The comment is an introduction to comments that follow, and the Sierra Club is referred to Responses 05-52 through 05-55, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-52** The comment asks for rationale that 100 feet is sufficient to reduce impacts from sports and recreational fields to the San Diego River. Please refer to Responses to Comments A2-7 through A2-9, in the responses to the California Department of Fish and Wildlife letter for responsive information.

- 05-53** The comment restates the San Diego River Master Plan goal of eliminating invasive plant species and introducing native species, and states that the proposed project has no plan to meet this goal. The comment is an introduction to comments that follow. Please refer to Responses 05-54 and 05-55.
- 05-54** The comment asks what procedures the project intends to employ for the removal of exotic, nonnative species in the River Park. The entire site will be cleared where there are proposed impacts, which initially includes the River Park; therefore, all invasive plants within those areas will be removed. All landscaping within the River Park prohibits invasive plants, per mitigation measure MM-BIO-8, described in Section 4.3 of the EIR:
- Invasive Species Prohibition.** The final landscape plans shall be reviewed by the project biologist to confirm they comply with the following: (1) no invasive plant species as included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region shall be included and (2) the plant palette shall be composed of species that do not require high irrigation rates. The project biologist shall periodically check landscape products for compliance with this requirement.
- 05-55** The comment asks about the project’s plans for replacement of invasive species with native plants on an ongoing basis. All non-native plants within the limits of disturbance will be removed, as detailed in Response to Comment 05-54. Please also refer to the SDSU Mission Valley Implementation Plan for guiding principles and stormwater management features with respect to utilization of native planting palettes.
- 05-56** The comment restates a comment raised by the commenter during the NOP period in February 2019 regarding design goals for the River Park to include transforming an “urban landmark into the previously wild river and wetlands that are key components of a natural river park.” The comment refers to comments 05-52 through 05-55, above. Accordingly, please refer to Responses 05-52 through 05-55, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-57** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding plants for hydrology and flood prevention on the project. The comment is an introduction to comments that follow. The Sierra Club is referred to Responses 05-58 through 05-59, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-58** The comment restates information in the Draft EIR regarding flooding and requests plans to protect all the proposed building during flood events. In response, the Sierra Club is referred to EIR Section 4.9, Hydrology and Water Quality, which analyze impacts associated with potential flooding. Specifically, page 4.9-30 states, “No structures would be built within this floodway or within any other portion of the 100-year flood zone.” Further, “the developed portions of the proposed project, ... will be constructed on pads elevated above the floodplain depths. Therefore, all structures would be set back from the natural floodplain. As a result, the proposed project would not impede or redirect flood flows at the site. Impacts are considered less than significant.” The comment does not raise any specific issue regarding the analysis in EIR Section 4.9 and, therefore, no more specific response can be provided. Please refer to Responses to Comments A7-14 through A7-18, in the responses to the San Diego Regional Water Quality

Control Board letter for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-59** The comment requests the Final EIR specify evacuation plans that would be needed during increasingly likely storm events. In response, please refer to Response to Comment 05-58, above, which explains that buildings would be constructed out of the 100-year floodplain, as well as Response to Comment 013-9 regarding future storms. As explained therein, the Draft EIR recognized “[c]urrent climate projections suggest an increase in extreme events in the San Diego region in the future with 16% fewer rainy days and 8% more rainfall during the biggest rainstorms.” The Draft EIR also noted that “[g]lobal climate change is expected to cause a future warming trend in southern California even under moderate emissions scenarios; however, there is no clear trend in annual precipitation.” (EIR Appendix 4.9-1, Water Quality Technical Report, pp. 3–4.) Thus, the Draft EIR acknowledges the potential for increased rain events; however, it also acknowledges that there is not a reasonably expected trend in annual precipitation. As to evacuation plans, the Draft EIR found that due to the proposed change in land use from an existing stadium facility to a campus, the proposed project would have the potential to conflict with existing emergency response and evacuation plans. (Impact HAZ-9.) As such, as required by mitigation measure MM-HAZ-9, CSU/SDSU or its designee shall coordinate with the City and County to update plans pertaining to emergency response and evacuation procedures to reflect the new location and design of the new stadium and addition of other proposed project buildings and facilities. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-60** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding atmospheric rivers and increased rain quantities challenging the San Diego River to accept runoff. The comment refers to comments 05-57 through 05-59, above. Accordingly, please refer to Responses 05-57 through 05-59, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-61** The comment restates a recommendation submitted by the Sierra Club during the NOP period in February 2019 regarding the generation of GHG during construction and operation of the proposed project, generation of VMT, and ways to mitigate GHG from the project site and offsets in San Diego County. The comment is an introduction to comments that follow. The commenter is referred to Responses 05-62 through 05-72, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-62** The comment restates information contained in the Draft EIR regarding the finding of significant, unavoidable air quality impacts, and expresses the opinion that “the [Draft EIR] is alarmingly inadequate in analyzing and mitigating the substantial increased greenhouse gas generated by [the proposed] project.” The comment is an introduction to comments that follow, and does not offer any specific critique of the analysis presented in support of EIR Section 4.7’s conclusions that the proposed project would result in a less-than-significant impact to global climate change. Please refer to Responses 05-63 through 05-72, below. No further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-63** The comment restates information contained in the Draft EIR regarding greenhouse gas emissions and energy usage during construction. The comment is an introduction to comments that follow; please

refer to Response to Comment 05-64, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-64** The comment opines that the Final EIR should include “a candid statement of the significant unmitigable onsite production of greenhouse gas associated with construction and operation.” The comment further states that “[i]t is important that the DEIR honestly conclude that these are significant unmitigable impacts on greenhouse gas generation.” The comment does not provide any substantive evidence to support its assertion that the project’s construction and operational emissions would be significant and unavoidable. In contrast, Section 4.7, Greenhouse Gas Emissions, of the Draft EIR analyzed the proposed project’s potential impacts from GHG emissions and, based on substantial evidence, determined that such impacts would be less than significant. Because the comment does not identify a specific issue with that analysis, other than general disagreement with the ultimate conclusion, no more specific response can be provided or is required. Nonetheless, the Sierra Club is referred to EIR Section 4.7, which contains a multi-pronged assessment of the project’s GHG emissions, noting the project’s consistency with the City of San Diego Climate Action Plan, compatibility with SANDAG’s Sustainable Communities Strategy (SCS) for the region (as presented in the San Diego Forward plan) and related Senate Bill (SB) 375 objectives, and numerous on-site Project Design Features for the reduction of GHG emissions. Of relevance, the location, type and attributes of the proposed project are consistent with many of the State’s climate policies, which encourage development in infill, transit oriented settings. The EIR’s conclusion that project impacts would be less than significant also is consistent with the City of San Diego’s finding for its recently adopted Mission Valley Community Plan EIR (SCH No. 20170171066). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-65** The comment restates information contained in the Draft EIR regarding the types of construction-related activities that would generate GHG emissions and does not raise an issue regarding the adequacy of that analysis within the meaning of CEQA. The comment is an introduction to comments that follow. Please refer to Response to Comment 05-66, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-66** The comment expresses the opinion of the Sierra Club that “an honest assessment of the significant unmitigated production of greenhouse gas associated with demolition and construction be provided.” The comment is similar to Comment 05-64. Accordingly, the Sierra Club is referred to Response to Comment 05-64, above. The construction impacts were analyzed in compliance with best practices, including project-specific data inputted into the CalEEMod emissions estimator and the results are provided in the Draft EIR, Section 4.7. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use development projects. Default data, including emission factors, have been provided by the various California Air Districts to account for local requirements and conditions. CSU/SDSU has modeled the project’s air quality impacts using CalEEMod and incorporated the results of its modeling for public review and comment in the Draft EIR. Because the comment does not identify a specific issue with the GHG analysis, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-67 The comment restates information from the Draft EIR regarding the determination that impacts related to greenhouse gas emissions and nonrenewable energy consumption would be less than significant. The comment objects to these conclusions and claims these findings are major flaws in the Draft EIR. The comment does not provide any substantive evidence to support its assertion that impacts to greenhouse gas emissions and energy usage would be significant and unavoidable. In contrast, Section 4.5, Energy and Section 4.7, Greenhouse Gas Emissions, of the Draft EIR analyzed the potential impacts associated with construction and operation of the proposed project and, based on substantial evidence, determined that such impacts would be less than significant. Because the comment does not identify a specific issue with the energy or GHG analysis, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-68 The comment expresses the opinion of the Sierra Club that the Final EIR “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.” This type of comparison was provided in the Draft EIR circulated for public review and comment. More specifically, the Sierra Club is referred to Table 4.7-5, Summary of Greenhouse Gas Emissions (With Project Design Features),, which reports the annual GHG Emissions from the proposed project with implementation of project design features, and identifies the incremental increase in project-related emissions as compared to the existing emissions on the project site. As stated on page 4.7-29 of the Draft EIR:

While the proposed project, even with these PDFs, results in an obvious change to the existing environment by increasing existing GHG emission levels, there is no scientific or regulatory consensus regarding what particular quantity of GHG emissions is significant. Further, no agency with regulatory authority and expertise, such as CARB or the SDAPCD, has adopted numeric GHG thresholds for land use development projects for purposes of CEQA. As such, this numeric increase—on its own—does not indicate that the proposed project’s GHG emissions would significantly impact the environment.

The Draft EIR then analyzes the proposed project in the context of the regional setting of various plans which address reducing greenhouse gas emission. Based on the analysis contained in Section 4.7, the Draft EIR summarizes on page 4.7-48:

While the proposed project would represent an increase in GHG emissions when compared to the existing conditions on the site, accommodating California’s growing population base at this location and with the proposed project’s proposed design attributes is more efficient than other alternatives, such as development in a non-urbanized area without transit.... Further, as discussed above, the proposed project would not conflict with the City’s CAP, the City’s MVCPU, SANDAG’s RTP/SCS, or statewide emission reduction targets. Various factors support these determinations, such as the proposed project’s location on an infill site in Mission Valley that is served by transit; the proposed project’s implementation of a TDM Program that reduces VMT at a level that is consistent with the objectives of SB 743; and the proposed project’s exceedance of existing regulatory compliance standards for the built environment.

Based on this analysis, the Draft EIR concluded the proposed project’s impacts to greenhouse gas emissions would be less than significant.

- 05-69** The comment states that the Energy Technical Report did not provide a total amount of GHG generated by the proposed project and requests the total GHG generation by the proposed project during both construction and operation be provided. In response, the purpose of the Energy Technical Report is to report energy consumption totals for the proposed project in the recognized energy-related metrics – gallons per year for transportation fuels; kilo British thermal units per year for natural gas; and, kilowatt hours per year for electricity. The relevant technical report for purposes of GHG emissions estimation is located in EIR Appendix 4.7-1: Greenhouse Gas Emissions Technical Report. The Sierra Club also is referred to Table 4.7-5. Summary of Greenhouse Gas Emissions (With Project Design Features) which reports the annual GHG Emissions from the proposed project with implementation of project design features, including mobile source/traffic emission and amortized construction emissions (construction emissions are presented in Table 4.7-3, which shows total construction emissions would be 32,303 MT CO₂e). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-70** The comment expresses the opinion of the Sierra Club that, “the DEIR erroneously concludes that there are no significant impacts on greenhouse gas” and requests “in the final EIR ... a plan for the mitigation of greenhouse gas be provided that mitigates the considerable greenhouse gas generated by the project.” Please refer to Responses 05-39, 05-64, and 05-68 above. As described therein, the Draft EIR appropriately analyzed the potential impacts to greenhouse gas emissions associated with the proposed project and determined impacts would be less than significant, and mitigation would not be required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-71** The comment restates information contained in the Draft EIR regarding a lead agency’s authority to determine a project’s contribution to a cumulative effect, and restates the guideline in full. The comment provides an introduction to the next comment; therefore, please refer to Response to Comment 05-72 for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- 05-72** The comment requests that the EIR “comply with the entirety of CEQA Section 15183.5,” as set forth in Comment 05-71. In response, the reference to Section 15183.5 is provided in the regulatory setting subsection of EIR Section 4.7, Greenhouse Gas Emissions. Section 15183.5 is discussed as it relates to the City of San Diego’s Climate Action Plan (CAP). While the meaning of the comment is not clear, the City of San Diego developed its CAP in accordance with Section 15183.5 in order to provide eligible projects with an opportunity to streamline their analysis of GHG emissions:

“[T]he City’s CAP meets the requirements under section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects.” (See *City of San Diego Climate Action Plan Consistency Checklist: Technical Support Document*, prepared for the City of San Diego by Ascent Environmental, dated June 8, 2018, page 4, available at https://www.sandiego.gov/sites/default/files/cap_consistency_checklist_technical_support_document.pdf.)

The City adopted its CAP in 2015, and the planning document has been implemented since that time and utilized in accordance with Section 15183.5. As it pertains to the proposed project, EIR Appendix 4.7-2 contains a project-specific assessment of whether the proposed project would conflict with the

City's CAP and, in doing so, evaluates the project in accordance with the City's implementing framework for the CAP in the context of CEQA analysis. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-73 The comment restates a recommendation submitted by the commenter during the NOP period in February 2019 regarding transit and plans to reduce vehicle miles travelled (VMT). The comment is an introduction to comments that follow, and the commenter is referred to Responses to Comments 05-74 through 05-80, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-74 The comment expresses the Sierra Club's support for the proposed project's Transportation Demand Management (TDM) program, unbundled parking, metered on-street parking, and reduced parking supply. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-75 The comment states there is no mention of a dividend account parking and requests the Final EIR indicate if this will be utilized. In response, a dividend account parking program is not proposed and is not part of the analysis contained in the Draft EIR. See Response to Comment I119-17 and I119-28. The TDM Program is detailed in Section 4.15.1.1, and includes elements such as unbundled residential parking and metered and time-limited on-street parking. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to Thematic Response – Sustainability Commitments for additional information.

05-76 The comment requests information on other transit such as a transit center or bus routes in addition to the exiting trolley service. In response, please refer to Response to Comment Letters A5 (MTS) and A6 (SANDAG) regarding future transit service to the project site. Transit service is not under the purview or authority of CSU/SDSU; therefore, the proposed project cannot dictate future transit routes; however, the proposed project design would accommodate a transit center at the southern terminus of Street D, at the foot of the existing MTS Stadium Trolley Station. CSU/SDSU has met with MTS regarding the extension of transit service to the project site and is committed to continuing to coordinate with regional transit agencies to provide for such future service. Importantly, the analysis in the Draft EIR did not anticipate or rely upon any such transit service, therefore, should future transit lines be extended to the proposed project, impacts related to traffic would be reduced. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

05-77 The comment restates information from the Draft EIR regarding the number of parking spaces and questions the total number of spaces. The comment concludes that providing so much parking "will result in massive car travel to and from the site and hug[e] number of related vehicle miles traveled." First, to clarify the maximum number of parking spaces would be less than the comment suggests. As shown in Table 4.15-39, Proposed Parking Supply, the maximum parking spaces would be 13,192. Of this amount, 1,140 spaces would only be available during major events, at the Tailgate Park. Therefore, on a daily basis, the total parking spaces would be a maximum of 12,052.

As to the comment regarding the total VMT, Section 4.15.7.9, Vehicle Miles Traveled (VMT), provides an analysis of the proposed project's impacts to VMT for informational purposes. Please also refer to Section 4.15.7.5, Parking Assessment, for additional information. As stated therein, the overall parking

supply, combined with anticipated parking costs for shared spaces, is intended to provide appropriate supply for the proposed uses but also to encourage the use of non-auto modes to access the site and minimize overall vehicle trip generation. In general, the limited availability of free parking would help to encourage the use of other modes of travel and reduce overall parking demand. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 05-78** The comment requests an accounting of parking spaces. Please refer to Response to Comment 05-77 above, as well as Figure 2.11-E, Parking Plan. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-79** The comment requests reconsidering the number of parking spaces “that will preclude the use of transit for some [sic] many people.” Please refer to Response to Comment 05-77 above, as well as Subsection 4.15.7.5 of the EIR Transportation Section, for responsive information about the proposed project’s parking strategy approach. The comment expresses opinions of the commentator and does not raise a specific issue regarding the parking assessment and, therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-80** The comment requests that the EIR analyze the proposed project’s VMT and provide a mitigation plan for the pollution and greenhouse gas that results from the increased VMT. Regarding the requested VMT analysis, please refer to Section 4.15.7.9 of the Draft EIR and Response to Comment 05-77, above. With respect to mitigation, the Draft EIR concluded that air quality (pollution) impacts would be significant and unavoidable, even with implementation of the recommended mitigation measures. There are no additional, feasible mitigation measures available to reduce air quality (pollution) impacts from VMT beyond the Project Design Features (including TDM strategies) already incorporated into the proposed project, as well as the project’s infill location that is proximate to numerous multi-modal transportation options. Regarding GHG emissions, the Draft EIR determined such impacts were less than significant and no mitigation is required, as explained in Response to Comments 05-39 and 05-68, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-81** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding “Buy Clean” laws, and states that the Sierra Club is “pleased” that CSU/SDSU will comply with the laws. The comment is an introduction to comments that follow. The commenter is referred to Responses 05-82 through 05-83, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-82** The comment restates information contained in the Draft EIR about the Buy Clean California Act, and does not raise an environmental issue within the meaning of CEQA. The comment is an introduction to comments that follow. The commenter is referred to Response to Comment 05-83. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-83** The comment requests the Final EIR specify when the “Buy Clean” provisions set forth in the Buy Clean California Act (AB 262, 2017) would be applicable and inapplicable. In response, the comment

does not raise an environmental issue regarding the adequacy of the EIR; rather, the comment addresses contracting and procurement requirements that would apply in the event of project approval as project land uses are developed. Nonetheless, and for informational purposes, the purpose of the Buy Clean California Act is to incorporate product manufacturing emissions information – as expressed in the form of a global warming potential rating – into procurement decisions made by state agencies. As for CSU, the Act expressly applies to contracts for public work projects that the CSU Board of Trustees issue pursuant to the California State University Contract Law. The Act took effect on July 1, 2019, and applies to four construction materials: (1) structural steel, (2) carbon steel rebar, (3) flat glass, and (4) mineral wool board insulation. The California Department of General Services is responsible for developing information to help administer the Act, via the setting of maximum acceptable global warming potential rating limits for each materials type that are published in the State Contracting Manual.

- 05-84** The comment restates a comment raised by the Sierra Club during the NOP period in February 2019 regarding affordable housing. The comment is an introduction to comments that follow. The commenter is referred to Responses 05-85 through 05-87, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-85** The comment restates information contained in the Draft EIR regarding the provision of affordable housing in the project site, and does not raise an environmental issue within the meaning of CEQA. CSU/SDSU wishes to clarify that the requirement to provide affordable housing per the City of San Diego's Inclusionary Housing Ordinance is 10% of the overall units, not 15% as noted in the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-86** The comment requests that the Final EIR indicate who will be eligible for affordable housing and who will make that decision. The comment raises economic, social or political issues related to affordable housing that do not appear to relate to any physical effect on the environment. The sale and development of the project site will require affordable housing in conformance with the City's housing impact fees/affordable housing requirements; the specific eligibility and implementation details are currently being developed as part of the Purchase and Sale Agreement with the City. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-87** The comment asks what mechanism will be used for pricing affordable homes and what assurances are there that affordable housing will remain affordable rather than increased by resellers or flippers. Please refer to Response to Comment 05-86, above, for information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 05-88** The comment is a conclusion statement referencing previous comments. Please refer to Responses to Comments 05-1 through 05-87, above.

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Response to Comment Letter 06

Navajo Community Planners Inc.
David Smith, Chair and Matt Adams, Vice Chair
October 1, 2019

06-1 The comment is an introduction to comments that follow. No further response is required.

06-2 The comment provides background information regarding the Grantville Focus Plan Amendment to the Navajo Community Plan (2015). The comment states that 10 acres has been allotted to develop “park equivalency” acreage for the Navajo Community Plan area and that the Navajo Community Plan calls for the construction of a 25,000 square-foot recreation facility, of which 5,000 square feet would be allocated to Navajo. Please refer to the Draft EIR Section 4.14, Public Services and Recreation, pp. 4.14-17, 4.14-26 through 4.14-30, and 4.14-33 (cumulative park/recreation effects), for a discussion of the proposed project’s park and recreation amenities in relation to the Mission Valley Community Plan and Public Facilities Financing Plan *and* the Navajo Community Plan and Navajo Public Facilities Financing Plan.

Specifically, Draft EIR Section 4.14, Public Services, provides that the proposed project would introduce new residents on the project site, which would increase demand for park and recreation facilities. Draft EIR Table 4.14-11 identifies the projected park demand associated with the proposed project, using information from the City and the Mission Valley Community Plan Update Final Program EIR. Based on that information, the proposed project would add approximately 8,510 residents to the project site, which would result in the increased demand of 23.8 useable acres of park area. The proposed project would include over 80 acres of parks, recreation facilities, and open space, including construction of additional parks and recreation facilities to accommodate the increase in the project’s projected population. This total would exceed the City’s General Plan population-based 23.8-acre park requirement (see Draft EIR Table 4.14-12).

This park, recreation and open space acreage would also include the 34-acre San Diego River Park contemplated by San Diego Municipal Code Section 22.0908, as planned and envisioned by past community planning efforts (see Draft EIR, p. 4.14-26). This includes 10-acres of Community Park as identified in the Navajo Public Facilities Financing Plan as facility P-26, Qualcomm Major Park – Development (See Navajo PFFP, pg. 73). This area would include flexible use turf event/clay areas, play structures, basketball courts, passive open space, and multi-use recreation field(s). Specific details of park facilities are being determined through a CSU/SDSU comprehensive and inclusive planning process in consultation with the community. In conformance with San Diego Municipal Code Section 22.908, the 34-acre River Park also would be constructed within 7 years of the execution of the Purchase and Sale Agreement between the City and CSU/SDSU (see Draft EIR, p. 4.14-28).

Additional features would include a dog park; a hike and bike trail located throughout the parks and recreation portions of the River Park; a 2-mile hike and bike loop connecting to the proposed hike and bike trail at multiple points encircling the project site; and a rough graded building pad for a Community Recreation Center and/or Aquatic Center, as generally depicted in both the Mission Valley Public Facilities Financing Plan (Fiscal Year 2013) and the Navajo Community Plan (2015).

Other park and recreation areas within the project site include multi-use recreation fields and a tailgate park, which would include an open turf area on approximately 7 acres in the northwest portion of the project site. Additional park and recreation areas include courtyards and greenspace located throughout campus/academic/research building areas serving as traditional “quad” features between buildings, raised planters, bike racks, pedestal paver systems, moveable tables and chairs, shade structures, and outdoor assembly space with seating and shared plaza space — complemented by bike lanes and paths within campus/academic/research areas.

For further responsive information regarding the proposed project’s park and recreation facilities, please see Draft EIR Table 4.14-12.

In addition to the proposed project’s extensive park and recreation facilities, including the set aside of a rough graded building pad for a future community recreation center (with utilities stubbed to the pad) for the proposed construction of the Community Recreation Center and/or Aquatic Complex, the proposed project would provide for the community park contemplated by both the Mission Valley Community Plan and the Navajo Community Plan as part of the 34-acre River Park. Further, as discussed in the Draft EIR, page 4.14-33, the proposed project would contribute additional parkland in an amount greater than the programmed amount of funding and improvements contemplated by the Mission Valley Community Plan Update. Additionally, the proposed project’s park and recreation facilities would help correct the existing park deficiency in the Mission Valley and Navajo communities (see Draft EIR, p. 4.14-33). The proposed project’s park and recreation facilities also would serve both the Mission Valley and Navajo communities, as stated in the Draft EIR, page 4.14-28:

It is expected that the proposed River Park would serve the Mission Valley Community Plan area and the Navajo Community Plan area, located east of the site. The Mission Valley PFFP [Public Facilities Financing Plan] identifies Project P-3, Mission Valley Community Park Design and Construction, as an approximately 20-acre community park in a location to be determined, with facilities including athletic fields, picnic areas, children’s plan areas, and nature trails.... The provision of the River Park would fulfill this project in the Mission Valley PFFP. Similarly, as discussed in the Navajo Community Plan, the Navajo Community is anticipated to benefit from 10 acres of the River Park [A]s such, there is sufficient acreage to serve the cumulative demand from both the Mission Valley and Navajo communities.

Finally, in terms of public outreach, CSU/SDSU has engaged in extensive public outreach, such as outreach to the Mission Valley and Navajo communities, as well as the Allied Gardens/Grantville Community Council. SDSU has also created a River Park Advisory Group (RPAG) which has met several times to provide direction the design of the River Park. The scope and extent of the public outreach is summarized at the following SDSU website location (<https://missionvalley.sdsu.edu/community-engagement.html>), which is incorporated by reference and available for public review.

06-3 For responsive information, please refer to Response to Comment 06-2, above.

06-4 The comment refers to the 2015 Navajo Community Plan for further reference and identifies the allocation of future park and recreation facilities. Please see Response to Comment 06-2, above, for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 06-5** The comment restates comments set forth in Comment Letter 02 from Allied Gardens/Grantville Community Council. Please refer to Responses to Comment Letter 02, specifically, comments 02-1 through 02-7.
- 06-6** The comment states that Grantville’s traffic impacts have not been properly mitigated. The comment addresses general subject areas of concern (i.e., traffic mitigation), which received extensive analysis in the Draft EIR and are addressed more specifically in the following responses. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 06-7** The comment is an introduction to the comments that follow. Please see Responses to Comments 06-8 through 06-10, below.
- 06-8** The comment asks that the EIR address the planned mitigation efforts at the Camino del Rio North and Fairmount Avenue intersection, which is a California Department of Transportation (Caltrans)-controlled facility. Mitigation for this intersection is described in detail in the Draft EIR as mitigation measure MM-TRA-12. This mitigation measure notes that the required improvement at the intersection would be to restripe the eastbound approach to provide a second eastbound right-turn lane as an approximately 150-foot pocket lane and increase the traffic signal cycle length from 130 to 150 seconds (Draft EIR, page 4.15-158). The measure further explains that a road widening to add lanes is recommended in the current Navajo Community Plan (Public Facilities Financing Plan Project T-12C); however, that improvement is considered infeasible due to physical limitations beneath the adjacent bridges serving the Interstate (I-) 8 mainline, I-8 ramp, and trolley (Draft EIR, page 4.15-158). Moreover, Project T-12C is a \$152 million dollar reconstruction of the entire interchange, an improvement far in excess of the relative impact of the proposed project and one that is currently wholly unfunded and unprogrammed. Similarly, the Mission Valley Community Plan Update also determined that roadway widening at this intersection is infeasible due to limited right-of-way (Draft EIR, page 4.15-158).

More broadly, the proposed project recommends various means of reducing vehicle trips, each of which is addressed below.

For example, the proposed project would be located in the immediate vicinity of the San Diego Trolley Green Line, which, along with Metropolitan Transit Service (MTS) bus routes, would provide the proposed project’s residents and visitors with public transit access throughout the greater San Diego metropolitan area (Draft EIR section 4.15.3.4).

As to walking and biking, the proposed project would include a network of bicycle lanes on key north-south streets, and connections to existing off-site facilities (e.g., Murphy Canyon Trail), which includes a total of nearly one lane-mile of on-street bike lanes within the project site (Draft EIR, p. 4.15-6). The site plan also would include a network of multi-use trails through the River Park, dedicated lanes throughout the office plaza area, and a campus loop multi-use path that encircles the project site. Multi-use trails and paths comprise a total of nearly 2 miles within the project site (Draft EIR, p. 4.15-6). All streets within the project site would include either sidewalks on both sides of the street or a multi-use path on one side of the street with enhanced pedestrian crossings (Draft EIR, p. 4.15-6). Additionally, to further facilitate walking, nearly all on-site intersections would include curb extensions and bulbouts, several on-site roadways would include raised crosswalks, and two roundabouts will help to manage travel speeds and enhance pedestrian safety (Draft EIR, p. 4.15-6). In addition, residential units would

include secure bicycle parking and short-term and long-term bicycle use spaces for nonresidential uses. Changing facilities to support bicycling and walking as commute modes for employees also would be provided (Draft EIR, p. 4.15-6).

As to van pools, CSU/SDSU will establish, as part of the TDM Program, a pre-tax payroll deduction program for faculty and staff purchase of participation in various alternative transportation modes, including vanpooling, as well as MTS transit passes and on-demand rideshare services, provided SDSU meets the state/CSU required minimum participation level (Draft EIR, p. 4.15-8).

As to mobility hubs, the proposed “Non-Stadium” TDM Program provides for shuttles, shared bikes and scooters, and accessible walkways (Draft EIR Section 4.15.1.1). As to shuttles, the TDM Program includes a TDM Coordinator, who would provide rideshare support, which includes making connections with the San Diego Association of Governments (SANDAG) iCommute program for carpool, vanpool, and rideshare programs that are specific to the proposed project’s residents and employees (Draft EIR, p. 4.15-8). Additionally, shuttle service would be provided to and from the hotel to be located on site. This shuttle service would be available to hotel guests and will service the airport and various other tourist locations (Draft EIR, p. 4.15-8). The proposed project site plan also would provide areas for the temporary storage of e-bikes available for rental, and identify specific locations for bike drop off, which would facilitate the use of e-bikes within the project site; private vendors currently supply electric bicycles for short-term rental in the vicinity of the proposed project.

As to a transit center, the project site would include a bus transit center with four loading/layover bays immediately adjacent to the Stadium Green Line Trolley Station to accommodate future MTS service. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate the bus facility adjacent to the Green Line Trolley Station. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations.

To ensure TDM Program strategies are implemented and effective, a Campus TDM Program Coordinator will be identified to monitor the program (Draft EIR, pp. 4.15-7 to 4.15-8). The TDM Program Coordinator would be responsible for developing, marketing, implementing, and evaluating TDM programs, thereby making the program more robust, consistent, and effective, and providing residents, employees, and visitors with a designated point of contact (Draft EIR, pp. 4.15-7 to 4.15-8). The TDM Program Coordinator’s tasks would include conducting transportation/mobility options orientation for new employees and residents; assisting with rideshare matching for employees commuting to the proposed project and residents commuting from their homes; providing information on transit, bicycling, and walking to and from the project site; acting as a source of information regarding the TDM Program; coordinating TDM Program monitoring such as administering surveys and coordinating data collection; promoting available websites providing transportation options for residents, employees, customers and guests; creating and distributing information packets regarding non-automobile modes of transportation; promoting a transportation options app for use on mobile devices (i.e., a tech enabled mobility app); and assisting employees and residents in accessing existing or establishing future TDM strategies, such as transit discount or vanpool programs through existing programs such as MTS Ecopass or SANDAG’s iCommute (Draft EIR, pp. 4.15-7 to 4.15-8).

As noted, rideshare support will be provided as part of the TDM Program. This support would include making connections with the SANDAG iCommute program for carpool, vanpool, and rideshare programs

that are specific to the proposed project's residents and employees (Draft EIR, p. 4.15-8). In addition, the TDM Program would include electric bike-share accommodations, K-12 school pool, hotel shuttle service, and transit pass strategies that include maintaining the existing transit pass program for students currently in place at the main campus (discounted MTS passes), and a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services, and providing reduced cost transit passes for faculty and staff (Draft EIR, p. 4.15-8). Additionally, employers with a minimum of 20 employees would be required to provide up to 5% of their employees with a 100% MTS transit pass subsidy (Draft EIR, p. 4.15-8).

Further, CSU/SDSU recognizes its responsibility under CEQA that the EIR "describe feasible measures which could minimize significant adverse impacts" (CEQA Guidelines Section 15126.4 (a)). To that end, where the project's transportation engineer (Fehr & Peers) was able to identify capacity enhancing road improvements to Caltrans facilities that would reduce the proposed project's significant impacts, the EIR identifies such improvements. See EIR Section 4.15.9.3, mitigation measures MM-TRA-1, MM-TRA-5, MM-TRA-6, MM-TRA-12, and MM-TRA-17, describing the necessary improvements. As to freeway segments, CSU/SDSU will assist Caltrans in its efforts to obtain the necessary approvals. However, because CSU cannot guarantee that Caltrans will be able to obtain the other funds necessary to prepare the recommended Study pursuant to a funding plan or program, the mitigation is considered infeasible.

As reported in the Draft EIR, page 4.15-160, the mitigation of freeway impacts would involve widening of the freeway facility to provide additional mainline or auxiliary lane capacity to reduce the projected vehicle to capacity (V/C) ratio. However, widening mainline freeway segments is beyond the scope of a single development project due to numerous factors, including the potential complexities of modifying adjacent interchanges, acquiring right-of-way, proximity of existing building structures and roadways, and construction costs that are out-of-proportion to a single project (CEQA Guidelines Section 15126.4(a)(4)(B).) In addition, Caltrans has no adopted fee-based infrastructure mitigation program for purposes of obtaining a fair-share contribution from all new development in an area or region that may affect state highways.

SANDAG, as the regional planning agency in San Diego County, has completed various studies regarding improvements along all the major freeways within the study area. In particular, SANDAG, in collaboration with Caltrans, the City of San Diego, MTS, and other key stakeholders, is developing a multimodal corridor study for the section of I-8 located within the City of San Diego. The Preliminary Draft Report for the I-8 Corridor Study (August 2016) considers future improvements, as well as other feasible concepts, describes existing conditions, identifies future deficiencies, develops multimodal alternatives and measures, performs technical analysis, and proposes an implementation strategy. The study addresses various topics, including right-of-way constraints, transit services, freeway interchanges, select local streets and intersections, bike and pedestrian access (active transportation), TDM, Transportation Systems Management, and other strategies to encourage the use of alternative travel modes.

Additionally, Caltrans recently completed an I-805 Transportation Concept Report that addresses congestion and operations along the entire length of the corridor. A combination of strategies is planned and incorporated in the Regional Transportation Plan (RTP), including high capacity transit projects, managed lanes, active transportation projects, auxiliary lanes, and ramp metering. Many of the concepts addressed in the I-8 and I-805 studies can be applied to other freeways, including I-15.

Caltrans is also considering implementing managed lane strategies within the I-15 corridor in the future to address congestion and enhance mobility.

In furtherance of these studies, the EIR discusses mitigation measures relative to Caltrans facilities and demonstrates CSU's recognition of its responsibility to feasibly mitigate its fair share of significant project impacts to these facilities. CSU/SDSU will assist Caltrans in its efforts to obtain the necessary approvals and prepare a project Study Report–project Development Support–project Initiation Document (Study) to evaluate alternatives to increase capacity, improve mobility, and relieve congestion on impacted segments or adjacent interchanges. Alternatives to consider include enhanced acceleration/deceleration lanes and interconnecting ramp meters.

CSU/SDSU also notes that it will work with the City of San Diego to provide the funding necessary to construct the Fenton Parkway Bridge extension. While construction of the bridge and the related redistribution of project traffic would result in an overall increase in the number of significant impacts, specific to Caltrans facilities, the bridge would result in improved operations at the I-15 Southbound Ramps/Friars Road intersection (Draft EIR pp. 4.15-218 to 4.15-219). As to freeway segments, as discussed at Draft EIR page 4.15-221, the Fenton Parkway Bridge would change the way some vehicles circulate around the project site and, correspondingly, which interchanges would be used to access origins and destinations. This redistribution of traffic would result in some traffic otherwise projected to travel on I-8 east of I-15 shifting to Montezuma Road. Similarly, some traffic projected to travel on I-15 south of Friars Road would shift to the Camino del Rio South interchange. As a result, on the I-8 freeway segments between I-15 and College Avenue, and on the I-15 auxiliary lanes at Friars Road, operations would improve with the Fenton Parkway Bridge in place (Draft EIR p. 4.15-221).

In addition, the proposed project would implement an extensive TDM Program and other project trip reduction features that reduce project vehicle trips and, hence, the number of vehicle trips on the state highways. (See, e.g., Draft EIR Section 4.15.1.2.) Further, as a project with an array of complementary land uses located in a Transit Priority Area with a high-capacity transit station centrally located on site, the proposed project will minimize the number of trips and corresponding VMT within the region, including on the state highway system, as compared to other development projects located beyond the reach of a transit station.

Accordingly, the Draft EIR includes appropriate mitigation relative to the state highways, would provide public benefits that reduce traffic congestion on state highways, and includes project features that would reduce project impacts to Caltrans facilities to the extent feasible.

06-9

The comment asks that the EIR address the planned mitigation efforts at the San Diego Mission Road/Twain Avenue and Fairmount Avenue intersection. Mitigation for this intersection is described in detail in the Draft EIR as mitigation measure MM-TRA-8, which requires that CSU/SDSU pay its fair-share to re-stripe San Diego Mission Road to add a separate eastbound left-turn lane (Draft EIR, p. 4.15-157). This measure would provide a separate westbound left-turn lane consistent with the Navajo PFFP project. The City of San Diego has indicated it would agree to authorize the improvements to enable CSU/SDSU to implement the mitigation. Additionally, SDSU has agreed to fully fund the entirety of the improvement. The mitigation would fully mitigate the proposed project's intersection impact to a less-than-significant level. Accordingly, no additional mitigation is required per CEQA.

06-10 The comment asks that the EIR address the planned mitigation efforts for the Alvarado Canyon Road Re-alignment. The proposed project would result in a significant impact at the Fairmount Avenue/Camino del Rio North-I-8 westbound off-ramp-Alvarado Canyon Road intersection, and mitigation measure MM-TRA-12 addresses the proposed project's impacts at that location and would reduce those impacts to the extent feasible. The realignment of Alvarado Canyon Road, which is referenced by the comment, would shift some traffic from the Fairmount Avenue/Camino del Rio North-I-8 Westbound Off-ramp-Alvarado Canyon Road intersection to the Fairmount Avenue/Mission Gorge intersection and reduce weaving movements on the westbound approach to the Fairmount Avenue/Camino del Rio North-Alvarado Canyon Road intersection. However, some of the shifted traffic would still travel through the Fairmount Avenue/Camino del Rio North-I-8 westbound off-ramp intersection but using different turning movements. While the realignment would provide certain traffic operations benefits in the general area, a preliminary evaluation of the effect of the realignment suggests that the requested improvement would reduce impacts, but not mitigate the proposed project's impacts to a less-than-significant level.

As explained in Response to Comment 06-8, the improvement recommended for the Fairmount Avenue/Camino del Rio North-Alvarado Canyon Road intersection is to restripe the eastbound approach to provide a second eastbound right-turn lane as an approximately 150-foot pocket lane and increase the traffic signal cycle length from 130 to 150 seconds (Draft EIR, page 4.15-158). As a Caltrans facility, CSU/SDSU will assist Caltrans in its efforts to obtain the necessary approvals for the recommended re-striping improvement but since it does not have jurisdiction over the subject road and related traffic signal and, therefore, cannot guarantee that Caltrans will approve of and implement the recommended improvements although it can and should, the mitigation is considered infeasible. Nonetheless, the proposed project has included an array of multimodal measures and features to reduce the proposed project's vehicle trips for the benefit of the project area and region. Please see Response to Comment 06-8 for responsive information.

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Response to Comment Letter 07

Normal Heights Community Planning Group

Adam Deutsch

October 2, 2019

- 07-1** The comment states the project site is poorly connected to the surrounding environs and “requires a number of fixes to simply be functional” if dense development is anticipated. The comment is in an introduction to comments which follow. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- 07-2** The comment states that while every effort should be made to enhance non-motorized mobility options, the use of automobiles is ubiquitous and must be considered. The comment is in an introduction to comments which follow. It is noted the proposed project includes Transportation Demand Management (TDM) Programs to reduce reliance on the automobile and reduce vehicle miles traveled (VMT) by approximately 14.4%. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 07-3** The comment states the project site needs, and could accommodate, direct freeway/arterial access at the northeast, northwest, and southwest corners, and suggests alternative circulation patterns be prepared and evaluated. Draft EIR Section 4.15, Transportation, discusses the proposed site access, internal vehicle circulation, and project roadway improvements, which have been designed to maximize safety and operations to the maximum extent feasible. (See, specifically, Draft EIR Section 4.15.5.4.) In addition, Draft EIR Chapter 2, Project Description, describes the existing and proposed access, circulation, and parking at the project site. (See, specifically, Draft EIR Section 2.3.4.7.) As noted therein, the existing San Diego County Credit Union (SDCCU) Stadium site has regional access to four major freeways: Interstate (I-) 15 is adjacent to the east; I-8 is approximately 0.25 miles to the south; I-805 is less than 1 mile to the west; and State Route 163, accessed via Friars Road, is approximately 2.4 miles to the west. On-site circulation improvements would consist of the construction of a network of streets and non-vehicular improvements, as shown on Draft EIR Figure 2-11A in Chapter 2. The proposed project does provide access to the project site at all four corners: (1) at the northwest and north central to Friars Road, a prime arterial; (2) at the southeast to Fenton Parkway, which is a four-lane arterial in the City of San Diego Mission Valley Community Plan Update; (3) at the northeast at San Diego Mission Road, a four-lane arterial; and (4) at the southeast a connection to Camino del Rio North via Rancho Mission Road and Ward Road. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 07-4** The comment states that the intersection of I-8 and Fairmount Avenue experiences gridlock and is hostile to non-motorized movement options, and suggests it needs a thorough re-design. The comment addresses general subject areas, (i.e., transportation), which received extensive analysis in Section 4.15 of the Draft EIR. As discussed therein, near the project study area, I-8 has on- and off-ramps at Fairmount Avenue. This intersection is analyzed as Intersection 36 in the Draft EIR’s transportation analysis. The transportation analysis shows that the proposed project will not result in a significant impact at this intersection. Further, as described in the Draft EIR, Section 4.15.5.1, the proposed project would divert trips already traveling on roads near the project site and patronize the neighborhood supporting the land uses (e.g., retail, restaurant, recreation), thereby reducing overall

traffic trips. In addition, the proposed project's complementary land uses would "capture" or "internalize" trips due to the mix of complementary land uses on site; and such capture/internalization would reduce the overall number of vehicle trips to the project site compared to the trips generated by various uses in an isolated setting (see Draft EIR Section 4.15.5.1). Moreover, as an alternative means of travel, trips would be reduced by multimodal facilities such as the on-site trolley station (e.g., Green Line Trolley and station), and the network of bicycle and walking paths proposed as part of the project (see Draft EIR Section 4.15.5.1).

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

07-5

The comment states that to greatly improve accessibility, there needs to be a bridge across the San Diego River, preferably at Fenton Parkway, to assist in traffic distribution by connecting the site directly to Camino Del Rio North and South. The comment also states there is no other sensible way to get to the project site from the south with any method of mobility, and that this location also allows for a connection to the mesa above, and the neighborhoods with park deficiencies access to the San Diego River Park. Please refer to Response to Comment A4-6 for responsive information regarding the Fenton Parkway Bridge. To elaborate, as part of the Purchase and Sale Agreement, CSU/SDSU will provide substantial funding necessary to construct the Fenton Parkway Bridge extension (see Response to Comment A4-6) as part of a separate, City-direction Capital Improvement Project which will undergo separate CEQA review based on more detailed design. The proposed project's Draft EIR provided informational analysis regarding whether the inclusion of Fenton Parkway Bridge would reduce or avoid impacts that result from the proposed project. As determined by that informational analysis, while construction of the Fenton Parkway Bridge and the related re-distribution of project traffic would result in an overall increase in the number of significant impacts, specific to Caltrans facilities, the bridge would result in improved operations at the I-15 southbound ramps/Friars Road intersection (Draft EIR pp. 4.15-218 to 4.15-219). As to freeway segments, as discussed at Draft EIR page 4.15-221, the Fenton Parkway Bridge would change the way some vehicles circulate around the project site and, correspondingly, which interchanges would be used to access origins and destinations. This redistribution of traffic would result in some traffic otherwise projected to travel on I-8 east of I-15 shifting to Montezuma Road. Similarly, some traffic projected to travel on I-15 south of Friars Road would shift to the Camino del Rio South interchange. As a result, on the I-8 freeway segments between I-15 and College Avenue, and on the I-15 auxiliary lanes at Friars Road, operations would improve with the Fenton Parkway Bridge in place (Draft EIR p. 4.15-221).

In addition, the proposed project would implement extensive TDM Programs and other project trip reduction features that reduce project vehicle trips and, hence, the number of vehicle trips on the state highways. (See, e.g., Draft EIR Section 4.15.1.2.) Further, as a project with an array of complementary land uses located in a Transit Priority Area with a high-capacity transit station centrally located on site, the proposed project will minimize the number of trips and corresponding vehicle miles traveled within the region, including on the state highway system, as compared to other development projects located beyond the reach of a transit station. The remaining comment does not raise an issue regarding the adequacy of the Draft EIR analysis. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

07-6 The comment states the neighborhoods on the mesa south of the project site have limited access to the project site and suggests a non-motorized link to connect in Normal Heights as mitigation for a neighborhood that is park-deficient. The proposed connection is not part of the proposed project; however, the proposed project includes connections to off-site bicycle and pedestrian facilities such as the Murphy Canyon Creek trail, as well as connections to the southeast on Rancho Mission Road, and to the southwest at Fenton Parkway. Further, as discussed in Thematic Response PD-2 – Purchase and Sale Agreement, CSU/SDSU CSU has agreed to advance funding of the environmental review and permitting for the Fenton Parkway Bridge as a separate, City-initiated project. If the City obtains all required permits, then CSU has agreed to construct the Fenton Parkway Bridge prior to occupancy of more than 65% of equivalent dwelling units for the proposed project as a benefit to the community, and not as part of the proposed project.

As discussed in EIR Section 4.14, Public Services and Recreation, the proposed project would include over 80 acres of parks, recreation, and open space areas. This total would exceed the City's General Plan population-based park requirement of 23.8 acres by approximately 60 acres (Draft EIR Section 4.14, p. 4.14-28). Implementation of the proposed project would reduce the overall park shortfall in the Mission Valley Community Plan Area and help correct a pre-existing park deficiency. Because parks impacts would be less than significant, no mitigation is required. The comment does not raise an issue regarding the adequacy of the Draft EIR's analysis. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

07-7 The comment suggests that the Metropolitan Transit System (MTS) Purple Line (along I-15) “needs to be expedited and connected to the Green Line” to improve access to Mission Valley and connect populations on the mesa. As noted in the Draft EIR, the MTS Purple Line is not part of the proposed project. However, it is expected to be extended through the project site in the future. The proposed project accommodates this possible future alignment. The proposed project also maintains a potential future alignment along the eastern edge of the project site, parallel to I-15 and the Final EIR adds an additional alignment on the western side of the site along Street A. Please refer to Draft EIR Chapter 2, Project Description, page 2-23, and Draft EIR Figure 2-11E, Mobility and Transit. CSU/SDSU acknowledges the preference for SDSU's proposed Purple Line alignment along I-15. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

07-8 The comment states that the I-15 bikeway needs to be sensibly connected to the project site and the Grantville neighborhood by “overcoming the freeway and river barriers.” CSU/SDSU notes that the project proposes over 4 miles of on-site bike lanes and multi-use pathways, which connect to existing and planned off-site bike lanes and pathways surrounding the project site. The Draft EIR, Section 4.15, Transportation, describes the “neighborhood site enhancement” strategies that support the ability of project residents, employees, customers, and visitors to be able to walk, bike/scooter, or access transit within the project site without having to drive or own a car (see Draft EIR Section 4.15.1.1.1). In addition, the proposed project includes “parking policies/pricing” to discourage single occupancy vehicle uses, especially for those residing within the transit-oriented project site (see Draft EIR subsection 4.15.1.1.1). Further, “commute trip reduction” strategies would provide residents with travel options other than the use of private automobiles for trips to destinations in and out of the project area (see Draft EIR Section 4.15.1.1.1). The remaining comment does not raise an issue regarding the adequacy of the Draft EIR's analysis. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter 08

Mission Valley Community Planning Group

Kaye Durant, Vice Chair

October 3, 2019

- 08-1** The comment is an introduction to comments that follow. The comments states two comment letters are provided, one from Jonathon Frankel and Kaye Durant and the other from Michele Addington. Responses to the Michele Addington comments are provide as Responses to Comment Letter I19. Responses to the Jonathon Frankel and Kaye Durant comments follow as Responses to Comments 08-2 through 08-16.
- 08-2** The comment states that Tier 4 construction equipment should be used exclusively during site preparation and grading activities related to the proposed project. In response, the use of Tier 4 equipment is required by mitigation measure MM-AQ-1 where feasible, as more specifically provided on p. 4.2-33 of the Draft EIR: “Where feasible, off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards.” MM-AQ-1 relatedly provides that in no instance shall off-road diesel-powered construction equipment greater than 50 horsepower not meet the Tier 3 emission standards. As such, the “Floor” set by MM-AQ-1 is in compliance with the Tier 3 emission standards. That being said, the Tier 4 emission standards must be met wherever it is feasible to do so. The MM-AQ-1 framework was established due to the potential unavailability of Tier 4 equipment in the San Diego region, specifically as to larger categories of construction equipment (e.g., scrapers).
- 08-3** The comment identifies information from the Draft EIR regarding the proposed project’s human health risk impacts from construction related activity, which were identified as significant and unavoidable in the Draft EIR. The comment recommends that the proposed project construction schedule be extended or the number of pieces of heavy construction equipment be reduced in order to lessen such impacts. As illustrated in Table 4.2-6 (Unmitigated Maximum Daily Construction Emissions Compared to Threshold) of the Draft EIR (p. 4.2-22), the proposed project’s construction-related emissions are estimated to be at their highest during the first three years (2020, 2021, and 2022) of construction activity, with year 2022 being the peak year of emissions..
- The construction schedule and equipment mix were developed by the proposed project’s construction contractor based on project-specific information related to project objective #5. As discussed on page 2.0-4 of the Draft EIR, that project objective is to “[c]reate a new, 35,000-capacity multipurpose Stadium ... in time for the opening of the SDSU 2022 football season.” The 2022 timeline is important as the new stadium must be built in order for the university to tear down the existing stadium which unlocks the site for construction of the full project. The stadium and the River Park also must achieve a deadline set in SDMC 22.0908 which can’t be met without the existing stadium being removed. Therefore, reducing the number of pieces of equipment or extending the schedule would conflict with the project objective to complete the proposed stadium prior to the start of the 2022 football season, and is not considered a feasible mitigation option for that reason.
- 08-4** The comment recommends that the EIR analyze the potential to include additional photovoltaic (PV) capacity to reduce operational emissions. Due to the proposed project’s design, including structured garage parking, the amount of available space for solar displays is limited to building rooftops. The Draft EIR analyzed a baseline capacity for solar PV for the proposed project based on building typology

and anticipated available roof-space (which was determined to be approximately 38% of the total rooftop area, after accounting for other mechanical and ventilation equipment that will need to be loaded onto building rooftops). (See, e.g., Draft EIR Appendix 4.7-1, Table 5-1, GHG Reductions from Solar PV.) In response to this comment (and other similar comments), the Final EIR is revised to include a Project Design Feature (PDF) that would require the installation of additional PV displays on the stadium land use, as feasible based on final design; for additional information, please see Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. It also is noted that the referenced Thematic Response also contains other PDF refinements that would reduce operational emissions, particularly those associated with natural gas consumption.

08-5 The comment restates the conclusions of the Draft EIR that (1) operational emissions of criteria air pollutants exceed adopted local standards, and (2) there are no additional feasible mitigation measure to reduce operational air quality impacts. The comment serves as an introduction to the following comment. Please see Response to Comment 08-6, below.

08-6 The comment recommends that the proposed project include a “cap” on the number of parking spaces in order to reduce automobile trips to the project site and thereby reduce operational emissions. CSU/SDSU notes that the proposed project includes a Transportation Demand Management (TDM) Program that (1) requires decoupling parking in the residential buildings and (2) provides for reduced parking in compliance with the City of San Diego’s parking regulations in Transit Priority Areas. (See Draft EIR Appendix 4.15-1.) As such, a parking maximum of 1.23 spaces per residential unit would apply for the residential buildings. Furthermore, the proposed project is significantly reducing the parking available for stadium/event uses from 17,000 spaces to approximately 6,000 spaces, which is shared with the campus uses. Additionally, campus parking is being designed with the potential for it to be converted into usable lab space in the future. . Please also refer to Section 4.15.7.5, Parking Assessment, for additional information. As stated therein, the overall parking supply, combined with anticipated parking costs for shared spaces, is intended to provide appropriate supply for the proposed uses, but also to encourage the use of non-auto modes to access the site and minimize overall vehicle trip generation. In general, the limited availability of free parking would help to encourage the use of other modes of travel and reduce overall parking demand.

08-7 The comment states the proposed project should include additional TDM strategies, to further reduce car trips, and suggests the use of transit subsidies or other financial incentives for SDSU employees. The TDM Program set forth in the Draft EIR as PDF-TRA-1 includes the use of transit pass strategies.

Specific to such strategies, page 4.15-8 of the Draft EIR explains these strategies include the following:

Transit Pass Strategies – At the Mission Valley campus, CSU will maintain the existing transit pass program for students in place at the College Area campus (passes are discounted by the Metropolitan Transit System (MTS) and subsidized by CSU/SDSU), and enable purchases by credit card. In addition, CSU/SDSU will establish a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services (e.g., uberPOOL and Lyft Line), provided SDSU meets the state/CSU required minimum participation level. Relatedly, CSU/SDSU will provide reduced cost transit passes for faculty and staff, provided SDSU meets the MTS required minimum participation level. The cost reduction will be between 10% and 25%, depending on participation level. Additionally, employers with

a minimum of 20 employees will be required to provide up to 5 percent of their employees with a 100 percent MTS transit pass subsidy.

Table 4.15-1 of the Draft EIR calculates the TDM Program effectiveness and concludes the overall TDM Program would reduce trips by 14.41% based on guidance from the California Air Pollution Control Officers Association (CAPCOA). As noted on page 4.15-9, “The campus employer Transit Pass Program is estimated to result in an additional reduction of 0.29%, which is not accounted for in any of the operational analyses or the Combined Total Reduction, and thereby results in an actual Combined Total Reduction of 14.70%.” Further, the Final EIR has been revised to include additional off-site bicycle facilities to connect the project site to the main campus as explained in Thematic Response PD-1 – Project Refinements. In closing, CSU/SDSU finds that the proposed project’s TDM Program is consistent with the recommendations made in the comment.

- 08-8** The comment states the Mission Valley Community Planning Group has no comments on aesthetics because “the aesthetics will be better once the parking lot is gone and the new buildings are not significantly higher than the current stadium”. CSU/SDSU appreciates the comment and it is included in the record for consideration by decision makers. The comment does not raise any issues regarding the adequacy of the environmental analysis provided in the Draft EIR; therefore, no further response is required or provided.
- 08-9** The comment notes that the proposed project would result in 200 fewer housing units on the project site than is provided for in the Mission Valley Community Plan Update. The comment confirms information contained in the Draft EIR, specifically Section 4.10, Land Use and Planning and Section 4.13, Population and Housing, and does not raise an issue regarding the adequacy of the environmental analysis provided in the Draft EIR. CSU/SDSU acknowledges the comment for inclusion in the record.
- 08-10** The comment states an alternative stadium design with closed ends on the north and south would be preferable for noise reduction during events. CSU/SDSU notes that the proposed project includes mitigation measure MM-NOI-2, which requires “electronic controls or limits into the final design of the new Stadium’s audio/visual sound system, as well as tie-ins from hosted performers to control amplified speech and music noise at the source.” The mitigation addresses noise reduction during stadium events without the need for a redesign at the stadium itself. Further, it is noted that the proposed stadium capacity would be half of the capacity of the existing stadium.
- 08-11** The comment states most noise impacts are the result of construction; however, noise from traffic increases on Friars Road will be constant. Please refer to Draft EIR Section 4.12, Noise, pages 4.12-14 through 4.12-16, for an analysis of off-site traffic noise associated with proposed project operations. As stated in the Draft EIR, the additional traffic volume along the adjacent roads would not substantially increase the existing noise level in the project vicinity, and the traffic noise level is considered less than significant.
- 08-12** The comment states the proposed project may include demolition of the existing San Diego County Credit Union (SDCCU) Stadium by blasting, which may be preferable to the long-term noise of deconstruction. The Draft EIR evaluates demolition issues in the Draft EIR’s project description, air quality, and noise sections. Relative to air quality, the Draft EIR analysis presented a worst-case scenario of implosion. As stated on Page 4.2-23:

This [air quality] analysis currently assumes that implosion would be used for SDCCU Stadium demolition. If implosion is not used to demolish the SDCCU Stadium, the maximum daily unmitigated and mitigated construction emissions are expected to be lower than those presented in Table 4.2-6. However, the significance findings would be similar to that presented above for construction with implosion.

Similarly, Section 4.12, Noise, explains the following (Page 4.12-15):

While not anticipated as part of the proposed project, due to the presence of the existing SDCCU Stadium structure and the project construction schedule, implosion of the existing Stadium or portions thereof may be determined to be the most efficient and preferred method for demolition to implement the proposed project. At the current stage of the proposed project design, a blasting study has not been completed, and no specific blasting timelines, or blast parameters are available. However, in order to address and evaluate this potential scenario, the following is based on the potential (based upon other implosion events) that one large implosion may occur.

Blasting typically involves drilling a series of boreholes, placing explosives (“charge”) in each hole, then topping the charge with fill material to help confine the blast. These multiple holes are typically arranged so as to yield optimal fracturing of the structure and thus allow gravity to subsequently collapse or “implode” the structure in as safe and controlled manner as possible after detonation. Post-detonation material can then be further broken down to manageable size and hauled away with conventional construction equipment and vehicles. By limiting the amount of charge in each hole, and detonating each charge successively with a time delay, the blasting contractor can limit the total energy released at any single time, which in turn reduces the airborne noise L_{max} and groundborne vibration energy associated with each individual detonated charge.

By way of example, using mathematical expressions provided by the Blasting and Explosives Quick Reference Guide (Dyno Nobel 2010), up to an 8-kilogram (17.6 pounds) charge per detonation would result in 85 dBA L_{max} at a distance of 1,200 feet. Due to the impulsive nature of the blast, the sound lasts no more than a second, which means the hourly Leq for a single detonation would be less than 50 dBA Leq. Hence, many detonations could occur in succession as part of a single “implosion” event per a well-designed blasting plan and still result in potential compliance with the City’s noise standards. Until such blasting details are known, this assessment shall assume that blasting noise is **potentially significant**. (Impact NOI-5)

Further, Page 4.12-24 of the Draft EIR states:

When explosive charges detonate, almost all of the available energy from the explosion is used in breaking and displacing the mass. However, a small portion of the energy is released in the form of vibration waves that radiate away from the charge location. The strength, or amplitude, of the waves reduces as the distance from the charge increases. The rate of amplitude decay can be estimated with a reasonable degree of consistency, which allows regulatory agencies to control blasting operations by means of relationships between distance and explosive quantity.

Using the previous example of an 8-kilogram charge weight studied for potential noise emission, mathematical expressions (Dyno Nobel 2010) suggest that for a “heavily confined” charge, the PPV from its detonation would be 0.082 ips at a distance of 1,200 feet—the apparent closest distance to a residential receptor. While the predicted vibration level for this hypothetical per-charge scenario is below a threshold of 0.5 ips PPV for a single-event source (as opposed to the aforementioned 0.2 ips PPV guidance limit for continuous vibration sources received by the same residential-type structure), the detailed parameters for the SDCCU Stadium demolition plan are not known at this time. Therefore, it is not possible to conduct a meaningful vibration analysis of proposed blasting events. Until such information is available, and for purposes of this analysis, vibration impacts from such a structure implosion are considered **potentially significant (Impact NOI-8)**.

- 08-13** The comment states that mitigation for impacts to tribal artifacts is addressed by a requirement for on-site monitoring. The comment restates information contained in the Draft EIR. No response is required.
- 08-14** The comment states the “only significant impact is the loss of a possible Historic Resource” in the existing SDCCU Stadium, which is “one of the last ‘cookie cutter’ stadium in the US.” As discussed in Draft EIR Section 4.4, Cultural Resources, implementation of the proposed project would result in substantial adverse change in the significance of a historical resource during both construction and operation (Impact CUL-1 and Impact CUL-2, respectively). Implementation of mitigation measures MM-CUL-1 through MM-CUL-3 during construction, and MM-CUL-2 and MM-CUL-3 during operation, are recommended to reduce the level of impact to historical resources. These mitigation measures would require documentation, interpretive displays, and salvage of architectural materials. These mitigation measures would help reduce impacts to such resources; however, the demolition of SDCCU Stadium and construction and operation of proposed facilities would remain significant and unavoidable. CSU/SDSU appreciates the perspective in the comment for inclusion in the record.
- 08-15** The comment expresses concern regarding the loss of the project site as a staging area during an evacuation relating to wildfire and that the “mitigation” is far from Mission Valley. The Draft EIR acknowledges that the SDCCU Stadium parking lot has been used for disaster response staging during firestorm events over the last two decades, and that the proposed project would eliminate the large expanse of parking lot area that has previously been used for such purposes (Draft EIR, Section 4.18, Wildfire, p. 4.18-16). However, the Draft EIR also provides that elimination of the large expanse of parking lot on the project site does not result in a significant impact because there are other large expanses of publicly owned parking lots located throughout the region (Draft EIR, Section 4.18, Wildfire, p. 4.18-16). In addition, the project site’s tailgate park and parking structures could still be used in the event of emergencies.
- 08-16** The comment states the Mission Valley Community Planning Group feels strongly that CSU/SDSU must make a fair share commitment to the infrastructure in Mission Valley and that once CSU/SDSU owns the project site, it is out of the City’s Development Impact Fee (DIF) structure that pays for regional infrastructure.
- CSU/SDSU notes that the Draft EIR specifically addresses issues relating to fair share contributions in the context of mitigation associated with identified transportation impacts, and the applicability of the City of San Diego’s development impact fee requirements, parkland dedication requirements, and housing impact fees/affordable housing requirements.

Regarding applicability of the City's development impact fee requirements as referenced in the comment, the Draft EIR acknowledges that the proposed project is subject to compliance with City of San Diego Municipal Code (SDMC) Section 22.0908, including subdivision (l) thereof, which provides as follows: "[s]uch sale and ultimate development shall require development within the Existing Stadium Site to comply with the City's development impact fee requirements, parkland dedication requirements, and housing impact fees/affordable housing requirements (Draft EIR, Section 4.10, Land Use and Planning, p. 4.10-8.; and Section 4.14 Public Services, p. 4.14-11). Further, Draft EIR, Section 4.10, Land Use and Planning, confirms the proposed project will be consistent with the requirements of SDMC Section 22.0908, including the development impact fee requirements (Draft EIR, Section 4.10, Land Use and Planning, p. 4.10-22).

The Draft EIR also provides that the proposed project would include more than 80 acres of park, recreational, and open space uses, including a River Park, walking paths and trails, and associated open space for the shared use of the campus and community (Draft EIR, Project Description, pp. 2-17 through 2-19). As addressed in the Draft EIR, the parks, recreation and open space areas included in the proposed project exceeds the City of San Diego's General Plan population-based park requirement by approximately 62 acres.

The Draft EIR also provides that the proposed project would result in traffic impacts, which would require mitigation in the form of off-site traffic related roadway and intersection improvements (Draft EIR, Project Description, p. 2-23; and Section 4.15, Transportation and Access, mitigation measures MM-TA-1 through MM-TRA-18). The proposed project's off-site traffic-related mitigation improvements include construction of, or fair share payment contributions to, several roads, intersections, and other facilities (Draft EIR, Project Description, p. 2-23; and Section 4.15, Transportation and Access, including technical traffic impact analysis appended to the Draft EIR).

Response to Comment Letter 09

Citizens Coordinate for Century 3 (C-3)

Cary Lowe, PhD, AICP

October 3, 2019

- 09-1** The comment is an introduction to comments that follow.
- 09-2** The comment is an introduction to comments that follow.
- 09-3** The comment states that the Draft EIR does not adequately describe the terms of the pending Purchase and Sale Agreement between the City of San Diego and CSU/SDSU nor does it adequately discuss whether the agreement terms will affect either the scope of the project or the potentially significant environmental impacts. As discussed in Section 2.3.2, Purchase and Sale Agreement, the City and CSU/SDSU are currently discussing the terms of the Purchase and Sale Agreement, and one of the intended uses of this EIR is to provide the CEQA compliance needed for the Purchase and Sale Agreement. CSU/SDSU, as the lead agency, has prepared the Draft EIR in accordance with CEQA, and has evaluated all potential environmental impacts associated with the project. Mitigation measures have been applied where feasible in order to reduce potential impacts and alternatives to the proposed project have been analyzed accordingly. Please also refer to Thematic Response – Purchase and Sale Agreement (TR-PD-2) for further responsive information.
- 09-4** The comment states that the Draft EIR’s failure to adequately describe the pending Purchase and Sale Agreement makes it questionable whether the EIR can be used by the City in connection with the approval of the agreement. As discussed in Section 2.3.2, Purchase and Sale Agreement, one of the intended uses of this EIR is to provide the CEQA compliance needed for the Purchase and Sale Agreement. Please also refer to Response to Comment 09-3, above.
- 09-5** The comment states that the Draft EIR does not provide adequate information on the actual, as opposed to possible, physical elements of the project, and states that the information presented is merely conceptual and thus does not provide a sound basis for a meaningful environmental analysis. CSU/SDSU does not concur with the statement. Please refer to the Draft EIR, Chapter 2, Project Description, including Figure 2-8, Proposed Campus Master Plan. The Draft EIR’s project description contains extensive detail concerning the proposed project and its characteristics. The comment also does not provide any specific criticisms regarding the level of specificity desired by the comment. Thus, CSU/SDSU cannot provide any further responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-6** The comment states that Draft EIR Table 2-4, Existing and Proposed Event Characteristics, omits future NFL games. The comment also states that future NFL games might require expansion of the proposed Stadium, which would then require a supplemental CEQA analysis, but should be identified and discussed here. As stated in Draft EIR Section 2.3.4.1.1, the EIR does not analyze the future potential of expanding the proposed Stadium to accommodate a future professional franchise because such expansion is not a part of the proposed project and such expansion is not reasonably foreseeable. There are currently no plans or proposals for the return of an NFL or other professional franchise to San Diego. Additionally, such expansion capacity and timing are not known and cannot reasonably be anticipated or evaluated without performing hypothetical scenarios without regard to an actual project,

development proposal, or time frame for implementing any such project or proposal. The Draft EIR discusses these issues, and states that should plans or circumstances change, the lead agency would be required to address the potential significant environmental impacts associated with an expanded Stadium at a later time, consistent with CEQA and the CEQA Guidelines (Draft EIR Chapter 2, Project Description, p. 2-11). Please also refer to the Draft EIR project alternatives analysis, which considered but rejected a potential NFL Stadium Alternative in Section 6.3.2, Alternatives Considered But Rejected. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-7 The comment states that the Draft EIR does not identify permits required for construction of the River Park, including compliance with the Multiple Species Conservation Program (MSCP) and the City's Climate Action Plan (CAP). In response, the Draft EIR lists the requested project approvals, including CSU Board of Trustees approvals required to implement the proposed project and a non-exclusive list of project permits or approvals that may be required by other public agencies other than the CSU Board of Trustees. Draft EIR Table 1-3, Summary of Planning Documents, identifies applicable, adopted regulatory and planning documents. Draft EIR Table 1-3 includes the MSCP and CAP in its list of City of San Diego Planning Documents. As to the MSCP, while noting that SDSU is not subject to the MSCP and need not comply with its provisions, the Draft EIR analyzed the proposed project's conformance with the City's MSCP Subarea Plan, and found that no impacts to the MSCP would occur (Draft EIR, Section 4.3, Biological Resources, pp. 4.3-31 through 4.3-34). As to the City's CAP, the Draft EIR also evaluated the proposed project's conformance with the City's CAP, and found that the proposed project would be consistent with the CAP (Draft EIR, Section 4.7, Greenhouse Gas Emissions; Draft EIR Appendix 4.7-2, City of San Diego CAP Evaluation Memo). Please also refer to Response to Comment 09-24, below. The comment does not raise a specific issue regarding the analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-8 The comment states that the River Park project component is all or mostly on land remaining in City ownership and will be subject to City regulations. The comment also states that the Draft EIR fails to address long-term maintenance of the River Park. As stated in the Draft EIR, the City will retain ownership of the approximately 34-acre River Park, which CSU would revitalize and restore as part of CSU's purchase of the property comprising the project site (Draft EIR Project Description, Section 2.1.2, Overview, footnote 1). Pursuant to the Purchase and Sale Agreement, SDSU would design, construct, and maintain the 34-acre River Park. Because the River Park will be constructed as part of the CSU's development of the Project, it is not anticipated that CSU will require any approvals from the City to construct the River Park. The City and CSU are expected to enter into a maintenance agreement with respect to the River Park, but maintenance is not expected to have any potentially significant environmental impacts and therefore is beyond the scope of the EIR.

09-9 The comment states that the Draft EIR incorrectly describes SDSU's obligation to comply with the terms of the Measure G Initiative, stating that the EIR should state an obligation to comply with the precise terms of the initiative and not its "framework." In response, the Draft EIR discusses Measure G, which has been codified in San Diego Municipal Code (SDMC) Section 22.0908; please refer to Draft EIR Chapter 1, Introduction and Existing Environmental Setting, Section 1.6, San Diego Municipal Code Section 22.0908. Section 1.6.3 discusses the applicability of SDMC Section 22.0908 to the proposed project. As discussed therein, the City and CSU are currently negotiating the Purchase and Sale Agreement, which will include terms consistent with those codified in SDMC Section 22.0908. The Draft

EIR states that CSU will agree to purchase the project site pursuant to the “framework” of the SDMC because not all terms of the Purchase and Sale Agreement between the City and CSU are finalized yet. The framework, however, is sufficiently definite to provide for meaningful environmental review. In addition, please refer to Draft EIR Section 4.10, Land Use and Planning, specifically, Table 4.10-3, which analyzes the proposed project’s conformance with SDMC Section 22.0908 (i.e., the Initiative). Lastly, please refer to Thematic Response PD-2 - Purchase and Sale Agreement for further responsive information. The comment does not identify a specific term of the municipal code with which the proposed project does not comply; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-10** The comment states that the Draft EIR fails to address cumulative housing impacts or to identify feasible mitigation measures. Please refer to Section 4.13.4.3, Cumulative Impact Analysis, in Draft EIR Section 4.13, Population and Housing. As discussed therein, the Mission Valley Community Plan Update (MVCPU) accounts for the proposed project and other cumulative projects in the MVCPU’s updated population and housing projections. Nonetheless, because SANDAG has not yet updated its regional projections to account for the recently adopted Mission Valley Community Plan Update (MVCPU), the cumulative impact that was identified in the Draft EIR remains significant and unavoidable in the Final EIR.
- 09-11** The comment states that the Draft EIR fails to address cumulative circulation impacts or to identify feasible mitigation measures. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. Please refer to Draft EIR Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-12** The comment states the Draft EIR contains conflicting information about Murphy Canyon as a wildlife corridor. The comment, however, does not describe the alleged inconsistency, so it is difficult for SDSU to provide a specific response. Nevertheless, in an effort to clarify the issue, first, SDSU would refer to Section 4.3.1.7 of the Draft EIR titled, Habitat Connectivity and Wildlife Corridors, for a discussion of impacts on Murphy Canyon Creek. Second, the Final EIR is revised as follows (revisions shown in ~~strikeout~~ and underline: “Due to the nearby urban areas, highways, and existing stadium, wildlife are not expected to ~~use~~ utilize the developed portions of the project site as a wildlife corridor...” In addition, the following sentence is added to Section 4.3.1.7 of the Final EIR: “Other urban-adapted mammals, such as coyotes, bobcats, opossums, raccoons, and rabbits could use both the San Diego River and Murphy Canyon Creek for movement through the area.” Please refer to Thematic Response - Murphy Canyon Creek (TR-BIO-1) for further responsive information.
- 09-13** The comment expresses disagreement with the Draft EIR’s conclusion that project-related light and noise impacts will have less-than-significant impacts on wildlife in the Murphy Canyon Creek corridor. The comment, however, does not explain the basis of the position or provide evidence of error with respect to the conclusion drawn in the Draft EIR. Please see Response to Comment 09-12, above, for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Nonetheless, while the mitigation measures provided in the Draft EIR would reduce noise and lighting impacts to less than significant, the Final EIR is revised on page 4.3-21 as follows (revisions shown in ~~strikeout~~ and underline):

With lighting design and shielding devices internal to the luminaire, there ~~should~~ will be ~~no~~ very little light spillage into the River Corridor Area, and lighting ~~should~~ will be directed away from sensitive areas to ensure compliance with the MSCP's Land Use Adjacency Guidelines.... Similar to the sports fields, lighting would be shielded, with directional LEDs so there ~~would~~ will be very little light spill.

Further, mitigation measure MM-BIO-9 is revised in the Final EIR as follows:

Pre-construction surveys shall be conducted for any work between February 1 and September 15. Between 3 and 7 days P~~-~~prior to start of construction activities, a qualified biologist with experience in identifying least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*) shall conduct a pre-construction survey for the least Bell's vireo (~~*Vireo bellii pusillus*~~) and, if needed, southwestern willow flycatcher (~~*Empidonax traillii extimus*~~) to document presence/absence and the extent of ~~occupied~~ habitat being occupied by the species. The pre-construction survey area for these species shall encompass all suitable habitats within the impact area, as well as suitable habitat within a 300-foot buffer of the construction activities. If active nests for any of these species are detected, a qualified biological monitor shall monitor the nest(s) for any signs of disturbance. Any signs of disturbance to the bird shall be documented, and trigger noise reduction techniques if applicable. ~~On-site~~ On-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels (dBA) hourly equivalent noise level or the ambient noise level, whichever is higher, (or the existing ambient noise level if already above 60 dBA during the breeding season) at the nest location. Noise reduction techniques shall be implemented and may include constructing a sound barrier or shifting construction work further from the nest.

- 09-14** The comment expresses opinions that the Draft EIR's biological surveys in Murphy Canyon Creek were insufficient, but does not state why those surveys were insufficient. Note that the proposed project is not expected to disturb or otherwise affect Murphy Canyon Creek; nor is Murphy Canyon Creek part of the City of San Diego Multi-Habitat Planning Area (MHPA). Please refer to Responses to Comments 015-19 and 015-20 for information regarding biological surveys. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-15** The comment states the Draft EIR contains inconsistencies regarding the amount of light spillage into wildlife areas. Please refer to Response to Comment 09-13, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-16** The comment states that the Draft EIR ignores the City-owned part of the project site being subject to the MSCP. The comment addresses MSCP conformance, which received extensive analysis in Section 4.3, Biological Resources, of the Draft EIR. As described therein, the proposed project considered the MHPA Adjacent Guidelines in the design of the River Park, including a 100-foot riparian buffer which the California Department of Fish and Wildlife, one of the MSCP implementing agencies, concurred

with. Please also refer to Response to Comment 09-7. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-17** The comment states that the Draft EIR does not adequately address the existing Stadium’s historical significance, including recognition by the national American Institute of Architects. CSU/SDSU does not concur with the comment and refers to Section 4.4 of the Draft EIR, which determined the existing San Diego County Credit Union (SDCCU) Stadium is an historic resource and that impacts thereto would be significant and unavoidable. The comment does not raise an issue with the adequacy of the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-18** The comment states that the project layout “does not comply with the model” to achieve Leadership in Energy and Environmental Design (LEED-ND) credit for solar, characterizing the north–south orientation of the site as “not ... optimal.” In response, the project design includes achievement of the LEED-ND designation (Draft EIR, p. 4.5-3). The LEED rating system is a points-based system, which allows for projects to advance sustainability principles through a menu of options, one of which is the use of renewable energy. In this instance, the project is designed to install solar photovoltaic (PV) panels that are expected to generate a quantity of electricity that is equivalent to approximately 15% of the project’s total electricity demand (Draft EIR, p. 4.5-2). Whether these PV panels will qualify for LEED-ND points cannot be feasibly determined at this stage of the project design process. However, as provided in the project’s Draft EIR, the project design includes enforceable commitments to: (i) achieve LEED-ND designation and (ii) install on-site PV panels.
- 09-19** The comment states that the Draft EIR does not adequately discuss water reuse measures, and does not include specific plans for achievement of LEED-based water efficiency points. As for the subject of LEED-based water efficiency points, as provided in Response to Comment 09-18 above, it is not feasible to identify the specific suite of LEED points that will be utilized to achieve the project design commitment at this phase in the project design process. That being said, the Draft EIR discusses the types of water efficiency features that may be incorporated to maximize water efficiency under the LEED system (Draft EIR, p. 4.17-25) and includes an express commitment to achieving the LEED designation (Draft EIR, p. 4.5-3).
- 09-20** The comment states the Draft EIR does not address anticipated changes in energy code over the course of the project’s life, including requirements related to solar energy. In response, CSU/SDSU agree the Draft EIR does not incorporate future updates to the California Building Code because these triennial updates are not currently the adopted code. However, the proposed project would be required to comply with all applicable state-laws, including updates to the California Building Code. These have the likely effect of further improving energy efficiency and reducing greenhouse gas (GHG) emissions; however, to be conservative, the proposed project was modeling assuming the current, 2016 building code was in effect for the entire construction and duration/operation of the project. As stated in Section 4.5, Energy of the Draft EIR:

The analysis is conservative because further beneficial changes to California’s regulatory framework, serving to reduce energy consumption and enhance energy efficiency, are reasonably anticipated with the passage of time. For example, California revises its building energy standards (as set forth in Title 24 of the California Code of Regulations) on a periodic basis. More specifically, California’s building codes are published in their

entirety every 3 years. Intervening Code Adoption Cycles produce supplement pages half-way (18 months) into each triennial period. The next Title 24 code to be published is the 2019 Code; the corresponding building energy standards were adopted in May 2018 and will take effect in January 2020. Each subsequent building code has required more energy efficiency than the previous codes. Accordingly, because this analysis is based on current codes (i.e., the 2016 Code), it necessarily will result in an overestimate of energy usage in buildings.

09-21 The comment states the proposed project does not comply with Executive Order B-18-12 for Zero Net Energy. In response, the referenced Executive Order was issued by then Governor Brown in 2012, and included an order 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 be Zero Net Energy.” Since the issuance of Executive Order B-18-12 in 2012, neither the California Legislature through the enactment of statutes nor the operative state agencies (i.e., the California Energy Commission and California Public Utilities Commission) through the enactment of regulations have established definitive definitions, standards or trajectories for the deployment of Zero Net Energy facilities. Instead, the metric has evolved with the passage of time, with the current focus being on Zero Carbon (see the California Energy Commission’s 2018 Integrated Energy Policy Report Update, available at https://ww2.energy.ca.gov/2018_energy_policy/). The shift in the referenced metric reflects the continued evolution of California’s climate policy, which is seeking carbon neutrality by 2045. Given the change in metric, the proposed project’s design focuses on reducing the pre- and post-development carbon footprint, in this instance through the incorporation of various “beyond code” design efficiencies.

09-22 The comment states the proposed project does not comply with the SDSU CAP (SDSU 2017). In response, as stated on page 4.7-20 of the Draft EIR:

It is noted that SDSU also has a CAP, which was prepared by the university’s Climate Action Planning Council and describes the university’s commitment to achieving specified GHG reductions. 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. 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 is carried forward to the proposed project.

(See also Draft EIR Section 4.10, Land Use and Planning, p. 4.10-3, pp. 4.10-14 through 4.10-15.) Accordingly, the Draft EIR did consider the SDSU CAP and determined it was not applicable to the proposed project.

09-23 The comment states the Draft EIR did not address higher energy requirements for stadium demolition and new stadium construction compared with renovating the existing stadium. In response, please see Section 6.4.1, Stadium Re-Use Alternative, of the Draft EIR. As analyzed on page 6-22 of the Draft EIR:

Because the Stadium Re-Use Alternative would forgo demolition of the existing SDCCU Stadium and construction of a new Stadium, this alternative would reduce energy use associated with stadium demolition and construction activities. However, because the

existing SDCCU Stadium is larger and would be less energy-efficient than the proposed Stadium, this alternative could result in greater energy impacts associated with the Stadium use than the proposed project.

Accordingly, the Draft EIR did address higher energy requirements for stadium demolition and new Stadium construction compared with renovating the existing stadium. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-24** The comment states the Draft EIR fails to address compliance with the City of San Diego CAP. In response, please refer to Draft EIR Section 4.7.4, Greenhouse Gas Emissions, and specifically pages 4.7-29 through 4.7-34, which analyze the proposed projects conformance with the City's CAP. As discussed in Section 4.7.4, under Step 1 of the City's CAP implementation framework, the proposed project would serve to beneficially increase density within a Transit Priority Area on a site that is served by numerous multi-modal options. Additionally, under Step 2 of the City's CAP implementation framework, the project would implement all applicable strategies and checklist items identified by the City for the reduction of GHG emissions. Finally, under Step 3 of the City's CAP implementation framework, the project would affirmatively advance and implement each of the six sustainability concepts identified by the City for projects located within Transit Priority Areas. (See also Draft EIR Appendix 4.7-2, which contains a 44-page memorandum that discusses and demonstrates the project's consistency with the City's CAP.) The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-25** The comment states the GHG reduction targets in the City's CAP are insufficient for climate stabilization, and the analysis in the Draft EIR and proposed mitigation do not meet that standard. Please refer to Response to Comment 09-24, above, for information regarding the proposed project's consistency with the CAP. Additionally, CSU/SDSU notes that the City's CAP was adopted in December 2015 without legal challenge, and charts the City's course for attainment of jurisdiction-specific reduction targets for 2020 and 2035. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-26** The comment states the Draft EIR fails to address GHG emissions associated with Stadium demolition and trucking away debris. Please refer to Draft EIR page 4.7-26, which discloses that "[c]onstruction of the project would generate 114,680 total hauling trips during the grading and demolition phases" and "[c]onstruction generates on road vehicle GHG emissions from ... trucks for soil and material hauling." Further, Draft EIR Table 4.7-3 provides a summary of construction emissions calculations, which are described on page 4.7-27.

Table 4.7-3. Summary of Construction Emissions (Without Project Design Features)

Construction Source	MT CO _{2e} Emissions ¹
Off-Road Equipment	23,997
On-Road Vehicles	8,306
Total	32,303
30-year Amortized²	1,077

Notes: MT CO_{2e} = metric tons carbon dioxide equivalent.

- ¹ Emissions calculated using CalEEMod. See Tables 4.7-1a and 4.7-1b for detailed emissions inventories
- ² One-time emissions from construction were amortized over a 30-year period.

(See also Draft EIR Table 4.7-2 on page 4.7-27, which identifies the quantity of GHG emissions from hauling trips that are anticipated to occur during the first three calendar years of the construction schedule.)

The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-27** The comment states that the proposed project and the Draft EIR are isolated from the goals and underlying principles of the MVCPU. The comment addresses general subject areas, consistency with the MVCPU, which received extensive analysis in the Draft EIR. Draft EIR Chapter 1, Introduction and Existing Environmental Setting, discusses the MVCPU in Subsection 1.7.1, San Diego General Plan, Community Plan, and Climate Action Plan. As described in Draft EIR Section 4.10, Land Use and Planning, the MVCPU designates the project site as a site that will be redeveloped through a Campus Master Plan, which will include detailed information on the land uses, mobility system, and recreation facilities. Further, as depicted in Table 4.13-7 (reproduced below), the MVCPU assumed land uses for the existing SDCCU Stadium site (i.e., the project site), and the proposed project's land uses fall within the envelope identified in the MVCPU.

Table 4.13-7. Mission Valley Community Plan Update EIR versus Proposed Project

Project Component	Unit Count or Square Feet		Difference	% Increase/ (Decrease)
	<i>Mission Valley CPU</i>	<i>Proposed Project</i>		
Residential	4,800 units	4,600 units	(200) units	(4.17%)
Office	2,000,000 square feet	1,565,000 square feet	(435,000) square feet	(21.8%)
Retail/Hotel	300,000 square feet	310,415* square feet	10,415 square feet	3.5%
Parks and Recreation	43 acres	86.1 acres	43.1 acres	100%
Stadium	40,000	35,000 capacity	(5,000 seats)	(12.5%)
Residential Population	8,880	8,510	(170)	(1.9%)

As shown in Table 4.13-7, the proposed project also includes greater amount of parkland than the MVCPU, including 10-acres identified to serve the Navajo/Grantville Community Plan Area, and which would serve to reduce cumulative impacts to parks and recreation as explained in Section 4.14 of the Draft EIR. In addition, Section 4.15.7.4 of the Transportation section discusses the MVCPU, including MVCPU roadway improvements, proposed bicycle facility improvements, proposed pedestrian facility improvements, and proposed transit facility improvements. Lastly, the MVCPU does not propose or identify any other access points or traffic improvements to the project site which are not part of the proposed project. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-28** The comment states that because the proposed project and the Draft EIR are isolated from the goals and underlying principles of the MVCPU, the proposed mitigation measures do not adequately address needs of the area that this project, along with all other projects, is expected to contribute to resolving. Please refer to Response to Comment 09-27, above, for responsive information. The comment does not identify which specific needs of the area the proposed project is expected to contribute to resolving, and thus no further response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-29** The comment states that the proposed project is not based on an actual land use plan but only a conceptual plan, and that as a result, traffic and other impacts cannot be analyzed with the required level of specificity or certainty. CSU/SDSU do not concur that the proposed project is not an actual land use plan. As stated on page 2-2 of the Draft EIR, “CSU as lead agency would consider approval of the SDSU Mission Valley Campus Master Plan, which is the physical master plan to guide the future development of CSU facilities, based on academic goals and projected student enrollment levels, for an established time horizon.” Figure 2-8 depicts the Campus Master Plan, which is the state-recognized plan for the future development of the SDSU Mission Valley Campus. Beyond the state-recognized Campus Master Plan, the site plans in Chapter 2 of the Draft EIR show the location of proposed parks, circulation, campus-office buildings, campus-residential buildings, campus-hospitality buildings and campus stadium, and the environmental analysis contained within the Draft EIR is based on those specific proposed uses and their locations/configurations. Please also refer to Response to Comment 09-5.
- 09-30** The comment states the Draft EIR fails to explain why future Stadium expansion is not reasonably foreseeable “when it has been part of the planning discussion all along.” In response, the commenter is referred to page 6-8 of the Draft EIR, which states:
- It is noted, consistent with SDMC Section 22.0908, that the proposed project’s stadium footprint (including the concourse area) and adjacent park area have already been designed to accommodate a future expansion should an NFL team decide to relocate to San Diego, which would accomplish the primary goal of this alternative. Therefore, this alternative would meet CEQA’s feasibility requirements, but, as explained below, the alternative would cause greater environmental impacts when compared to the proposed project.
- Moreover, this alternative has been rejected as infeasible because at the time of the writing of this EIR, no NFL team is considering relocation to San Diego, nor does CSU/SDSU have the ability to compel any such move. Further, the financing for a larger stadium has not been identified. As identified above, the NFL Stadium Alternative would increase environmental impacts as compared to the proposed project. Further, as stated, there is no plan, proposal, nor any probable future plans or proposals for an NFL franchise to relocate to San Diego, particularly in the time frame required for a fully operational stadium (i.e., 2022 collegiate football season). Accordingly, the NFL Stadium Alternative has been rejected as infeasible.
- Accordingly, the Draft EIR did address the potential for a future Stadium expansion. Please also refer to Response to Comment 09-6, above. The comment does not address the adequacy of the analysis in the Draft EIR, therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-31 The comment states that the Draft EIR 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 mean income. Please refer to Response to Comment 09-10, above, for responsive information. CSU/SDSU wish to clarify that the Draft EIR identified a cumulative impact with respect to growth inducement in the Mission Valley area because the additional residential units in the Mission Valley area proposed by the MVCPU allow for more growth in the area than the San Diego Association of Governments (SANDAG) growth projections. As of the time of the Draft EIR, the MVCPU was not yet adopted. Since the Draft EIR, the City adopted the MVCPU. As such, the proposed project and other cumulative projects are accounted for in the MVCPU's updated population and housing projections. Nonetheless, the while MVCPU and Final EIR has been adopted, SANDAG has not yet updated the regional projections to account for the increase in planned growth. Thus, to be conservative, the SANDAG 2013 projections are the most recently adopted projections and were used to evaluate cumulative growth in the Mission Valley area.

However, to the extent SANDAG updates regional projects based on the MVCPU as adopted, the proposed project and other cumulative projects considered would be accounted for in the updated population and housing projections and this cumulative impact would be reduced to a less than significant level. In addition, the cumulative impact identified in the Draft EIR was a result of the cumulative number of housing units in the Mission Valley area not being included in any adopted plan, and did not relate to the provision of housing at certain income levels. The comment addresses general subject areas that received extensive analysis in the Draft EIR. Please refer to Section 4.13, Population and Housing. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-32 The comment states that the Draft EIR fails to make clear how the project's park requirements will be met, relative to or in addition to the River Park. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. Please refer to Draft EIR Section 4.14.4.5, Parks and Recreation, which states the proposed project will provide more park land than required under the City's 2.8 acres/1,000 population standard. As shown in Draft EIR Table 4.24-11, the proposed project's addition of 8,510 residents to the project site would result in the increased demand of 23.8 useable acres of park area. The proposed project would include approximately 83 acres of parks, recreational facilities and open space, which would include the 34-acre City-owned River Park contemplated by SDMC Section 22.0908 (Draft EIR Section 4.14, Public Services and Recreation, p. 4.14-26). The 83 acres of parks, recreational facilities, and open space would exceed the City's General Plan population-based park requirement of 23.8 acres by approximately 60 acres (Draft EIR Section 4.14, Public Services and Recreation, p. 4.14-28). The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The Draft EIR also states that the MVCPU anticipated the project site would provide approximately 38.1 acres of active park and 4.9 acres of open space; thus, the proposed project would provide approximately 40 acres of parks, recreation, and open space in excess of the projected amounts in the MVCPU. Accordingly, the proposed project would contribute an amount greater than the programmed amount of funding and improvements, and would help correct an existing park deficiency in the Mission Valley and Navajo Communities (Draft EIR Section 4.4, Public Services and Recreation, p. 4.13-33). The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-33** The comment states that the Draft EIR analyzes traffic impacts “in isolation, apart from existing traffic levels in the surrounding community and from other projects anticipated in the foreseeable future.” CSU/SDSU does not agree with the comment and directs the commenter to Draft EIR Section 4.15.2, Methodology, which describes how the traffic analysis was prepared. Importantly, in Section 4.15.2.9, Cumulative Projects, the Draft EIR states:

Baseline traffic forecasts for project buildout year 2037 were developed using projections from the SANDAG Series 13 Year 2035 travel demand model, which is regarded as the best available long-range planning tool for traffic volume forecasting in the San Diego region. The SANDAG model reflects the forecasted population and employment numbers from land uses based on the adopted General Plans of all 18 cities within the county, and the County of San Diego for the unincorporated areas.

Daily traffic volumes generated from the model for Year 2035 were compared to the volumes from the model for Year 2012 to determine an average annual growth rate along each roadway and freeway segment. Calculated growth rates ranged from -0.3% to 2.4%. The existing volumes on all facilities were increased to Year 2037 conditions using either the calculated growth rate or 1.0%, whichever was greater, to provide a conservative analysis of future traffic operations.

Thus, the Draft EIR did analyze the proposed project in the context of surrounding and projected traffic volumes. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-34** The comment states the Draft EIR fails to address traffic between the project site and the main SDSU campus, or to discuss plans for transportation improvements beyond the trolley. With respect to analyzing traffic between the project site and SDSU campus, the traffic analysis presented in the Draft EIR analyzed all road facilities at which the proposed project potentially would result in a significant impact, including as applicable those serving the existing SDSU campus (Draft EIR subsection 4.15.2.1). Traffic generated by the project site was distributed to the various roadways within the study area using the SANDAG Series 13 Year 2035 model, a computerized travel demand model used to identify the distribution of project trips to the area roadways (Draft EIR, Section 4.15.5.2; please also see Section 4.15.5.1.1, Campus Effect on Trip Generation). The model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques. The SANDAG model is the primary tool used for forecasting traffic volumes in the City and County of San Diego.

As to transportation improvements beyond the trolley, the proposed project includes substantial road improvements to be constructed as part of the project. (See Draft EIR Section 4.15.5.4, Site Access, Internal Vehicle Circulation, and Project Roadway Improvements.) Additionally, transportation improvements were identified for all significantly impacted locations, and the Draft EIR proposes mitigation measures where feasible, including on roadways providing access to the existing campus. (See Draft EIR Section 4.15.9, Mitigation.) Please refer to Draft EIR Section 4.15.2, Methodology, and Response to Comment 09-33, for additional information responsive to this comment.

- 09-35** The comment states the Draft EIR fails to address coordination between agencies, e.g., Metropolitan Transit System (MTS) and SANDAG, for expansion and coordination of transit services. CSU/SDSU disagrees with the comment and notes, preliminarily, that transportation planning and the provision of

transit services are under the discretion of other agencies, and are provided based on demand and transit agency system resources. Moreover, SDSU has met with and anticipates continuing to meet with both MTS and SANDAG, and has plans for a transit center at the terminus of Street D, which will include stops and layover spaces for at least four buses. SDSU further desires that bus service be extended to the project site where bus service is not currently provided. Accordingly, SDSU has refined the site plan to anticipate a transit station with at least 4 bus bays at the end of Street D, near the existing MTS Green Line Stadium Trolley Station; however, these may be further refined based on additional coordination with MTS and SANDAG. Any additional transit service would further reduce vehicle trips to and from the project site and thus, would reduce traffic impacts. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-36** The comment restates information contained in the Draft EIR regarding mitigation measures that rely on funding and implementation actions by the state Legislature and the City of San Diego over which CSU/SDSU has no control. In response, CSU/SDSU notes that the Draft EIR identified significant impacts to road facilities under the jurisdiction and control of either the City of San Diego or California Department of Transportation (i.e., facilities beyond the control of CSU/SDSU to unilaterally implement improvements). Accordingly, the mitigation measures identified in the Draft EIR to address these impacts acknowledge this jurisdictional fact and appropriately conclude that because CSU/SDSU does not have jurisdiction and control over these facilities, mitigation is infeasible and the impacts are significant and unavoidable (Draft EIR Section 4.15.9, Mitigation Measures). However, as also noted in Section 4.15.10, Level of Significance After Mitigation, if the City grants CSU/SDSU the necessary authorization to implement the recommended improvements, such impacts would be reduced to less than significant.
- 09-37** The comment states the Draft EIR does not address fair share traffic mitigation requirements. CSU/SDSU disagrees with the comment and notes that the Draft EIR identifies improvements for all significantly impacted locations, and proposes mitigation measures where feasible. (See Draft EIR Section 4.15.9, Mitigation Measures.) As explained in Response to Comment 09-36, upon appropriate authorization from the City, CSU/SDSU will implement the recommended mitigation. As to those impacts for which CSU/SDSU is responsible for a fair-share payment, consistent with CEQA's requirements, such payment will be made assuming an appropriate plan or program is in place that would provide the necessary remainder funding and ensure the improvements would in fact be implemented. The project's share of future growth for selected improvements is presented in Table 4.15-44 and helps to inform the calculation of fair share mitigation requirements.
- 09-38** The comment states the Draft EIR does not address the Fenton Parkway Bridge as a possible project element. The comment is correct that the Fenton Parkway Bridge is not an element of the project. However, the Draft EIR does address the bridge under multiple analysis scenarios presented in the Draft EIR. Please see Response to Comment A4-6 to the City of San Diego letter for further information responsive to this comment.
- 09-39** The comment states the Draft EIR does not identify traffic-calming features within the proposed project. CSU/SDSU disagrees with the comment and refers the commenter to the Transportation Demand Management (TDM) Program, to be implemented as part of the project, which specifically calls for traffic calming, noting "Nearly all on-site intersections will include curb extensions and bulb-outs, several on-site roadways will include raised crosswalks, and two roundabouts will help to manage travel speeds and enhance pedestrian safety" (Draft EIR Section 4.15.11, page 4.15-6).

Please also refer to Figure 2-1, Concept Design – Site Plan. Other traffic-calming features include on-street parking, bike lanes, planted medians and landscaped parkways, and sidewalks (Draft EIR, page 4.15-6, Neighborhood Site Enhancements).

- 09-40** The comment states the Draft EIR is not clear whether streets will be constructed to City standards. CSU/SDSU refer the commenter to Draft EIR page 4.15-149, which states, “In the case of streets, *all roadways have been designed or planned based on City of San Diego standard*” (emphasis added).
- 09-41** The comment states the Draft EIR “ignores previous recommendations for added bus service to the site, reorientation of major streets, and other circulation improvements.” CSU/SDSU refer the commenter to Response to Comment 09-35 regarding the provision of transit services, including bus service. As to the reorientation of major streets and circulation improvements, the proposed project includes substantial circulation improvements to the proposed site. See, for example, Draft EIR Section 4.15.5.4, Site Access, Internal Vehicle Circulation, and Project Roadway Improvements; Figures 4.15-10A and 4-15-10B, Project Road Improvements; and Figure 4.15-11, Internal Network.
- 09-42** The comment states the Draft EIR does not analyze the location of the Purple Line trolley through a portion of site. CSU/SDSU disagrees with the comment and notes that the Draft EIR in fact analyzes multiple potential locations. For specific information responsive to this comment, please refer to Responses to Comments A6-5, A6-6, and At-7 to the SANDAG letter, and Responses to Comments A5-2, A5-3, A5-4, and A5-5 to the Metropolitan Transit System (MTS) letter.
- 09-43** The comment states the Draft EIR does not sufficiently discuss overflow parking impacts on the surrounding area resulting from Stadium events. CSU/SDSU disagrees with the comment and refers the commenter to Draft EIR Section 4.15.7.2, which addresses Stadium Parking Supply and Demand. The analysis determined that additional off-site parking likely will need to be provided for higher attendance Stadium or special events but acknowledges that parking impacts for some events will be significant and unavoidable. However, to address the potential impacts, a comprehensive Transportation and Parking Management Plan (TPMP) TDM Program are included as Project Design Features to minimize potential parking demand impacts. (See Draft EIR Sections 4.15.1.1.2, Stadium TDM Program, and 4.15.1.3, Transportation and Parking Management Plan.) Furthermore, and specific to the comment, the TPMP includes a Neighborhood Intrusion Prevention component that would include measures to minimize traffic and parking intrusion into the residential neighborhoods in the project vicinity. These measures include closure of selected streets to through- or non-resident traffic.
- 09-44** The comment states that the Draft EIR “lacks adequate discussion of connections to adjacent/nearby existing uses.” CSU/SDSU refers the commenter to Draft EIR Section 4.15.5.4, Site Access, Internal Vehicle Circulation and Project Roadway Improvements, which describes proposed road improvements and connections to City streets at Street I (connection to Fenton Parkway), Stadium Way, Mission Village, San Diego Mission, Rancho Mission Road and a new intersection at Friars Road between Stadium Way and Mission Village. Non-vehicular connections include pedestrian/trail improvements through the River Park, bicycle connection to the Murphy Canyon Creek bike trail, and various on-street and sidewalk connections along off-site road connections. Please also see Draft EIR Figures 4.15-10A and 4-15-10B, Project Road Improvements; and Figure 4.15-11, Internal Network, for additional information relating to the proposed project’s connections to adjacent/nearby existing uses.

- 09-45** The comment states that the Draft EIR does not “adequately discuss active transportation modes” and fails to provide for them as project elements or mitigation measures. CSU/SDSU does not agree with the comment and directs the commenter to Draft EIR Section 4.15.3.2, Existing and Planned Bicycle Circulation; Section 4.15.3.3, Existing Pedestrian Circulation; and Section 4.15.7.6, Multi-Modal Assessment, which analyzes the proposed project’s impacts relative to pedestrian and bicycle facilities and determines the proposed project would have a less-than-significant impact to these modes of transportation. As to providing active transportation modes as project elements or mitigation measures, because the proposed project would not result in significant impacts related to these facilities, mitigation is not required. However, the proposed project does include substantial improvements relative to bicycle and pedestrian facilities. Please see Response to Comment 09-44 for information responsive to this comment.
- 09-46** The comment states the proposed project “fails to integrate circulation improvements with those called for in the Mission Valley Community Plan (MVCP Update).” CSU/SDSU disagrees with the comment. Preliminarily, the Draft EIR includes analysis of the proposed project transportation characteristics relative to the MVCP, specifically addressing Roadway Improvements, Bicycle Facility Improvements, and Pedestrian Facility Improvements (Draft EIR Section 4.15.7.4, Mission Valley Community Plan Update). As noted in Response to Comment 09-27, the underlying land uses in the MVCP and proposed project are similar; therefore, the analysis in the MVCP included the proposed project traffic. The MVCP did not identify circulation improvements in the immediate vicinity of the project site so as not to conflict with the analysis of the redevelopment of the SDCCU Stadium site. Additionally, Draft EIR Section 4.15-1 analyzed the potential environmental effects to transportation caused by the proposed project, recommending mitigation measures to reduce identified impacts to the extent feasible. These measures are identified in Section 4.15.9, Mitigation Measures, which includes analysis where applicable of potential road improvement consistency with the MVCP. See, for example, mitigation measure MM-TRA-2.
- 09-47** The comment states the Draft EIR fails to consider reconfiguration of circulation improvements in the project vicinity as a way of mitigating traffic impacts. CSU/SDSU disagrees with the comment. Preliminarily, site access, including vehicle circulation and related project roadway improvements are addressed in Draft EIR Section 4.15.5.4. Additionally, in each instance in which a significant impact is identified, the Draft EIR includes recommended road improvements, which include the reconfiguration of circulation improvement where applicable, to reduce the identified impact. See Draft EIR subsection 4.15.9, Mitigation Measures.
- 09-48** The comment states the Draft EIR fails to consider transit connections as mitigation measures for traffic impacts. Please see Response to Comment 09-35 for information responsive to the comment.
- 09-49** The comment states the Draft EIR fails to address alternatives if provision of parking near the trolley station does not induce significant increase in trolley ridership. Draft EIR Section 4.15.5.1 addresses traffic generation, that is the number of vehicle trips estimated to be generated by the proposed project. As noted at pages 4.15-45 to 4.15-46, the number of external trips that would be made by transit, as well as by walking and biking, was calculated by the MXD model, which was developed by Fehr & Peers and the U.S. Environmental Protection Agency. The estimates of trip reductions due to the proximity of high-quality transit (i.e., the trolley) are based on substantiated studies of similar developments including sites in San Diego. Similarly, the increase in transit and active transportation use resulting from anticipated traffic reductions from implementation of the TDM Program was estimated using

context-sensitive and state of the practice data. (See Draft EIR Section 4.15.1.1, Non-Stadium TDM 4 and Stadium TDM 1.) These studies include sites that provide some parking near transit stations, and the provision of parking by itself is not expected to hinder transit use given the multitude of factors that influence travel choice. Lastly, the parking supply for the residential uses will be unbundled from the units and will be based on a maximum ratio, such that individual buildings may be built with lower per-unit parking ratios.

- 09-50** The comment states the Draft EIR fails to consider “dividend account parking” or other methods of inducing less reliance on motor vehicle use as mitigation measures for traffic impacts. CSU/SDSU disagrees with the comment and refers the commenter to the TDM Program which includes policies intended to reduce reliance on single-occupancy vehicles. These strategies include residential strategies such as unbundled parking in residential buildings, reduced parking ratios/maximum parking limits, neighborhood site enhancements including bike lanes and pedestrian walkways and trails, and commute trip reduction strategies such as subsidized transit passes and a TDM Coordinator (Draft EIR Section 4.15.1.1, Proposed Transportation Demand Management Program).
- 09-51** The comment states the Draft EIR fails to address circulation needs of mobility-challenged travelers. CSU/SDSU disagrees with the comment as all facilities, buildings, and streets within the campus, as well as all non-automobile connections to adjacent properties will be designed to Americans with Disability Act (ADA) standards to accommodate mobility-challenged travelers. Additionally, the proposed project will construct new pedestrian and bicycle connections to link surrounding areas (i.e., Grantville to Fenton Marketplace) that will facilitate the use of wheelchairs and related transport vehicles.
- 09-52** The comment states that certain images are not clear online or reproducible. CSU/SDSU is not aware of unclear or unreproducible images in the Draft EIR and will rectify any such instances as needed. The comment does not raise a specific issue with the adequacy of the analysis in the Draft EIR; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-53** The comment states that the conclusion of SDSU being exempt from local school fees conflicts with the terms in the Initiative. The comment is unclear because the Draft EIR does not conclude that SDSU is exempt from local school fees. The Draft EIR discusses Senate Bill (SB) 50, which relates to school fees, in Section 4.14, Public Services and Recreation, p. 4.14-10. The Draft EIR finds that the proposed project’s direct impacts to schools would be less than significant (Draft EIR Section 4.14, p. 4.14-10). In addition, the Draft EIR finds that the proposed project would contribute to a cumulatively considerable impact to schools (Draft EIR Section 4.14, p. 4.14-32). This finding is based on the MVCPU Final Program EIR, which concluded that, even with the collection of fees from future development to fund school facilities, if needed, impacts to schools from the implementation of the MVCPU would be significant and unavoidable because the construction and operation of any future facility is not known at this time. The specific locations or plans for future schools are not yet determined; therefore, project-specific impacts of new or expanded school facilities are not known at this time (Draft EIR Section 4.14, p. 4.14-32). Thus, consistent with the MVCPU Final Program EIR, the Draft EIR for the proposed project determined no mitigation measures are available at this time to mitigate this cumulative schools impact. As to the comment that the proposed project conflicts with the terms of the Initiative, which is codified in SDMC Section 22.0908, the Draft EIR includes a consistency analysis of SDMC Section 22.0908 (Draft EIR Section 4.10, Land Use and Planning, Table 4.10-2). The consistency analysis determined the proposed project is consistent with the terms of SDMC Section 22.0908. The comment

does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-54 The comment states that the Draft EIR fails to address hauling and landfill impacts of demolition and removal of the existing stadium. The comment restates information presented in Comment 09-26 regarding the Draft EIR's consideration of hauling trips associated with Stadium demolition. Please refer to Response to Comment 09-26, above. The comment also refers to the effects of Stadium demolition on solid waste impacts, referring to the need to dispose of such waste at landfills. In response, the Draft EIR, Section 4.17, Utilities and Service Systems, anticipated Stadium demolition and the associated approximately 430,000 tons of construction waste generated by demolition that would not be re-used on-site and therefore would be directed to local landfills. The Draft EIR determined this was a potentially significant impact (UTL-2) and recommended mitigation (MM-UTL-2) to reduce this impact to less than significant. Please also refer to Responses to Comments 05-11 through 05-16 for additional responsive information.

09-55 The comment states the Draft EIR does not address the need for the project to provide employment opportunities which pay well enough to allow workers to afford housing costs within close proximity to the project site, stating that this would reduce vehicular traffic and thereby reduce GHG generation. The economic characteristics of the proposed project are described in Draft EIR Chapter 2, Project Description, Section 2.4, Economic Characteristics. The discussion is based on Draft EIR Appendix 4.13-1, an economic report prepared for CSU/SDSU by Ernst & Young, which estimated the proposed project's potential economic and tax impacts. The findings include (a) construction, which could take up to 15 years, would support almost 29,000 one-year jobs; and (b) once construction is complete, the proposed development would directly support a maximum annual total of approximately 7,809 jobs on site; indirectly result in 4,314 jobs; induce approximately 5,117 jobs for a total of approximately 17,241 jobs (Draft EIR Chapter 2 Project Description, p. 2-29). In estimating the proposed project's economic impacts, the economic report relied on the average annual wages for each of the types of employment generated by the proposed project. In addition, as noted in Response to Comment 09-09, the City and CSU/SDSU are currently negotiating a Purchase and Sale Agreement, which will include conditions codified in SDMC Section 22.0908. SDMC Section 22.0908, subdivision (w) states:

(w) Such sale shall require SDSU or its designee to pay prevailing wages for construction of the Joint Use Stadium and other public improvements, provided that the construction occurs on state-owned property or involves the use of state funding. To the extent possible under state law, all building and construction work shall be performed by contractors and subcontractors licensed by the State of California, who shall make good faith efforts to ensure that their workforce construction hours are performed by residents of San Diego County. With respect to the new Joint Use Stadium, SDSU will use good faith efforts to retain qualified employees who currently work at the Existing Stadium.

Please refer to Draft EIR Appendix 4.7-2, CAP Consistency Memo, and Section 4.13, Population and Housing, which discuss the proximity and number of jobs within the project site. Further, the Draft EIR analyzed the proposed project's effects on vehicle miles traveled in Section 4.15, Transportation. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Finally, the comment raises economic considerations which do not relate to the physical impact to the environment are not within the purview of CEQA.

09-56 The comment states the Draft EIR fails to consider highly plausible alternatives such as a higher-density development. CEQA requires EIR Alternatives that would reduce significant environmental impacts. Increasing the density of the proposed project would not reduce any of the identified impacts because it would not reduce air quality emissions, impacts to the existing SDCCU Stadium, noise from construction and Stadium events, and population and housing; rather, such an alternative may exacerbate several of these impacts. Therefore, such an alternative is not required and in fact does not meet the threshold to be considered under CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-57 The comment states the Draft EIR failed to consider alternatives including construction of the Stadium at a different location (e.g., Balboa Stadium), construction of a larger stadium, and 100% park use of the site. CSU/SDSU disagrees with the comment; all three of the referenced alternatives were considered in the Draft EIR.

As to an alternative for construction of the Stadium at a different location, the construction of an off-site Stadium is the basis of Section 6.4.5, Alternate Stadium Location Alternative, which entails construction of the proposed Stadium on the SDSU main campus in the College Area. The Draft EIR also considered but rejected the alternatives considered by the City of San Diego in its 2015 Stadium Reconstruction EIR, SCH No. 2015061061. The City's 2015 EIR for the reuse of the project site considered but rejected as infeasible two alternative site locations, namely, a downtown stadium (just east of Petco Park) and a downtown stadium associated with an expanded convention center. (See EIR, Chapter 6, Alternatives, p. 6-7.)

As to an alternative for construction of a larger stadium, in Section 6.3.2.3, the Draft EIR considered but rejected an "NFL Stadium Alternative," which assumed a minimum of a 50,000-capacity Stadium on the project site (as opposed to the 35,000-capacity Stadium contemplated by the proposed project). The Draft EIR found that this alternative would cause greater environmental impacts when compared to the proposed project; moreover, the Draft EIR rejected this alternative as infeasible because no NFL team is considering relocation to San Diego, nor does CSU/SDSU have the ability to compel any such move (Draft EIR, Chapter 6, p. 6-8). Please also refer to Response to Comment 09-29, above.

As to an alternative for 100% park use of the site, in Section 6.3.2.4, the Draft EIR considered but rejected an "All Park Alternative." Under this alternative, the existing SDCCU Stadium would be demolished and the project site would be graded to accommodate various parks, recreation, and open space uses. This alternative was considered but rejected because it would "not meet most of the project objectives, and because there is no reasonably foreseeable means to finance such a project, it was considered but rejected from further analysis" (Draft EIR, Chapter 6, p. 6-10).

The comment does not raise any specific issues regarding the Draft EIR alternatives analysis and, thus, no further response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

09-58 The comment states that the Draft EIR improperly dismisses the Stadium Re-Use Alternative without adequate explanation, and ignores historical/cultural bases for retaining and reconstructing it. CSU/SDSU does not agree this alternative was improperly dismissed; as set forth in Draft EIR Section 6.4.2, the Stadium Re-Use Alternative was selected for analysis as a project alternative. The Draft EIR determined that this alternative would not achieve five of the project objections (Draft EIR Chapter 6, p. 6-25). In addition, please refer to pages 6-25 and 6-26 of the Draft EIR Alternatives analysis, which state:

The Stadium Re-Use Alternative ... would conflict with SDMC Section 22.0908, because it would not develop the new Stadium or demolish, dismantle, and remove the existing SDCCU Stadium. ... it would also require substantial renovation costs that are expected to at least equal the cost of constructing a new stadium/venue and the existing seating configuration limits desired sightlines necessary to achieve a multi-purpose stadium and premium seating (i.e., seats and boxes/suites are set back too far from the field). This Alternative would also incur significant maintenance costs for the aging stadium. Furthermore, this alternative would not achieve all of the project objectives or to the same degree as the proposed project, and would only reduce impacts to historic resources (CUL-1 through CUL-3).

The comment does not raise a specific issue with the adequacy of the analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 09-59** The comment expresses the opinion of the commenter that the Stadium Re-Use 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. CSU/SDSU does not agree and refers the commenter to Table 6-1 of the Draft EIR and Section 6.5, Environmentally Superior Alternative, which identify the Stadium and River Park Alternative as the CEQA Environmentally Superior Alternative. Compared to the Stadium Re-Use Alternative, the Stadium and Park Alternative would reduce impacts to aesthetics, air quality, energy, geology and soils, greenhouse gas emissions, hazards, hydrology and water quality, population and housing, public services, transportation, utilities, and wildfire. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 09-60** The comment expresses the opinion of the commenter that the No Project Alternative is not the environmentally superior alternative, because it retains the large parking area on historic wetlands. CSU/SDSU does not agree and notes that the Existing Condition is the parking lot; thus, the comment that the No Project Alternative is not environmentally superior because the parking lot overlies historic wetlands is not applicable. Please refer to Draft EIR Section 6.5, Environmentally Superior Alternative, including Table 6-1, Comparison of Proposed Project's Significant Impacts to Alternatives, for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- 09-61** The comment is a conclusion statement referencing previous comments. No further response is required.

Response to Comment Letter O10

San Diego Environment + Design Council

Ms. Vicki Estrada, FASLA, APA

October 3, 2019

- O10-1** The comment is an introduction to comments that follow. No further response is required.
- O10-2** The comment provides factual background information about the organization and does not raise an environmental issue over the adequacy of the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- O10-3** The comment states that the Draft EIR was discussed at the organization's October 2, 2019, meeting at which the organization decided not to provide comments "since a real project (with detail) has not actually been put forward." CSU/SDSU does not concur with the statement about a "real project" and "project-specific" details. Please refer to the Draft EIR, Chapter 2, Project Description, including Figure 2-8, Proposed Campus Master Plan. The Draft EIR's project description contains extensive detail concerning the proposed project and its characteristics. The comment also does not provide any specific criticisms regarding the level of specificity desired by the comment. Thus, CSU/SDSU cannot provide any further responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- O10-4** The comment states that the organization has reviewed and generally agrees with the comments provided by Citizens Coordinate for Century 3 (C-3). The comment also states that it will not comment on the project since there really are no project specifics. Please refer to Response to Comment Letter O9 for responses to the C-3 comment letter. As to the comment that there are no "project specifics," please refer to Response to Comment O10-3, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- O10-5** The comment states the organization is interested in the project and will continue to be involved. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- O10-6** The comment introduces an Op-Ed by Mike Stepner and Mary Lydon published in the Voice of San Diego and states the organization is in agreement with the article. Please refer to Response to Comment O10-7, below. The comment expresses an opinion and does not raise an environmental issue over the adequacy of the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- O10-7** The comment is an Op-Ed by Mike Stepner and Mary Lydon published in the Voice of San Diego, which suggests that the Draft EIR was possibly released too early, does not contain sufficient details about the project design, connectivity to the surrounding community, affordable housing, and achievement of the City's Climate Action Plan, and suggests four principles for the continued planning of the project site.

The comment addresses general subject areas including the City's Climate Action Plan, project design and connection to Mission Valley, and affordable housing, all of which received extensive analysis in

Chapter 2, Project Description; Section 4.7, Greenhouse Gas Emissions; Section 4.10, Land Use and Planning; Section 4.13, Population and Housing; and Section 4.15, Transportation, of the Draft EIR. Regarding project details, please refer to Response to Comment O10-3, above. The comment does not raise any specific issue regarding that analysis or identify what project details are considered lacking for adequate public review. Therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

O10-8 The comment is a conclusion statement with contact information. No further response is required.

Response to Comment Letter O11

Green Love Sustainability Commission
Associated Students, San Diego State University
October 3, 2019

- O11-1** The comment provides factual information about SDSU's Associated Students Green Love Sustainability Commission and Advisory Committee. The comment serves as an introduction to comments that follow. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- O11-2** The comment begins by expressing support for the Draft EIR's inclusion of sustainability as a project objective, and restates information from the Draft EIR regarding its determination that the SDSU Climate Action Plan (CAP) is not applicable to the proposed project. (Please see Draft EIR, Section 4.7, Greenhouse Gas Emissions, pages 4.7-20; and Section 4.10, Land Use and Planning, pages 4.10-14 through 4.10-15.) In summary, the SDSU CAP is for the existing College Area SDSU main campus; it describes the university's commitment to achieving specified greenhouse gas (GHG) reductions in various emission sectors; and it was developed for and focused on issues specific to the already built-out existing SDSU main campus located in the College Area of the City of San Diego. As stated in Draft EIR, Section 4.10, Land Use Planning, although the existing SDSU CAP does not apply to the proposed project because of the different geographic area and built-environment setting, CSU/SDSU has committed to implementing numerous sustainability features as part of the SDSU Mission Valley Campus Master Plan. For further responsive information, please see the Final EIR Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments; the Mission Valley Campus Master Plan Guidelines/Implementation Plan (<http://missionvalley.sdsu.edu/implementation-plan.html>); and the Final EIR Mitigation Monitoring and Reporting Plan. In addition, these documents memorializing the CSU/SDSU commitment to sustainability on the proposed Mission Village Campus Master Plan site, the proposed campus, if approved, would develop campus residential and nonresidential land uses in an urban infill setting served by multimodal transportation options (trolley, bus) and further enhance other multimodal options by designing the proposed project site to encourage pedestrian- and bicycle-oriented connectivity.

The comment recommends that SDSU “solidify[] a method” that will ensure its leadership on sustainability issues is “carried forward” to the proposed project. In response, the means by which the commitment to sustainability will be carried forward to the proposed project are summarized in the Final EIR.

First, as explained, the proposed project is served by regional transit (i.e., the Metropolitan Transit System [MTS] Green Line Trolley and future Purple Line extension) within a mix of campus uses including residential and employment uses consistent with regional plans to reduce GHG emissions. Further, as explained in Thematic Response PD-1 – Project Refinements, the proposed project has been refined to include a transit center at the trolley plaza which would provide for at least four bus bays to accommodate future high-frequency bus service. As discussed in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR:

While the proposed project would represent an increase in GHG emissions when compared to the existing conditions on the site, accommodating California's growing

population base at this location and with the proposed project's proposed design attributes is more efficient than other alternatives, such as development in a non-urbanized area without transit.... Further, the proposed project would not conflict with the City's CAP, the City's MVCPU [Mission Valley Community Plan Update], SANDAG's RTP/SCS [San Diego Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy], or statewide emission reduction targets. Various factors support these determinations, such as the proposed project's location on an infill site in Mission Valley that is served by transit; the proposed project's implementation of a TDM [Transportation Demand Management] Program that reduces VMT [vehicle miles traveled] at a level that is consistent with the objectives of SB [Senate Bill] 743; and the proposed project's exceedance of existing regulatory compliance standards for the built environment.

Second, the Draft EIR included a suite of Project Design Features (PDFs) to reduce GHG emissions. With implementation of these measures, impacts to GHG were determined to be less than significant. Further, in responses to comments on the Draft EIR, additional PDFs have been added to the proposed project to limit natural gas usage, electrify buildings, increase recycling, and increase solar photovoltaic energy generation. Importantly, one of the new PDFs requires SDSU to include "Sustainability" as part of the scoring system for each new building in the SDSU Mission Valley campus. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for additional responsive information. As shown in the Additional Technical Memorandum prepared by Ramboll, the new and/or refined PDFs result in quantified and qualitative benefits, including lower GHG and criteria air pollutant emissions, and lower natural gas, gasoline, and diesel consumption, as compared to the information presented in the Draft EIR.

011-3 The comment provides information on the CSU 2014 Sustainability Policy and additional background information on the SDSU CAP. The comment asks how SDSU's leadership will secure leadership and stewardship for the proposed project if the SDSU CAP does not apply. Please refer to Response to Comment 011-2, above. Further, the Draft EIR determined the proposed project would result in less-than-significant impacts to both energy and GHG emissions. Accordingly, the inclusion of additional PDFs detailed in Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments reinforces SDSU's commitment to sustainability by adding additional requirements to reduce GHG emissions and nonrenewable energy usage.

011-4 The comment recommends that the proposed project "clearly adhere" to the SDSU CAP *or* create a specific CAP for the Mission Valley campus in consultation with campus sustainability professionals. Please refer to Responses to Comments 011-2, above. Additionally, as discussed in the Draft EIR (e.g., page 4.7-20), "The SDSU Mission Valley Campus Guidelines/Implementation Plan have been prepared to ensure that SDSU's leadership on sustainability and stewardship issues [are] carried forward to the proposed project." The Guidelines, which were released for public review concurrently with the Draft EIR, are available at the SDSU Mission Valley website (<http://missionvalley.sdsu.edu/implementation-plan.html>). As such, CSU/SDSU is proceeding with preparation of a campus-specific planning framework, which is one of two options recommended by the comment. Notably, the Draft EIR's analysis also provides much of the same information that is typically provided in a CAP: it estimates existing and projected emissions for the proposed project; it identifies strategies for the reduction of GHG emissions; it sets forth criteria for implementing the referenced GHG reduction strategies; and it considers whether the project-related GHG emissions would impair achievement of the state's policies for the reduction

of GHG emissions. Further, the Final EIR includes a mitigation monitoring and reporting program to ensure enforcement of the mitigation commitment is made in the Final EIR.

- 011-5** The comment states the Draft EIR provides for mitigation but does not include a comprehensive building design plan or environmental sustainability plan; the comment further states the mitigation measures meet “basic compliance measures *relating* to the environment — rather than achieving true sustainable design” (emphasis in original). In response, the Draft EIR was developed to accord to CSU/SDSU’s responsibilities under CEQA; as such, the analysis focuses on identifying the significance of the proposed project’s impacts both with and without mitigation using metrics and methodologies routinely utilized by CEQA practitioners. In conjunction with the environmental impact evaluation, the Draft EIR considered and identified a wholistic suite of sustainability strategies that are compatible with the proposed project’s purpose and parameters, and cover the major pillars of sustainability planning, including innovation in the built environment and transportation efficiencies. (See, e.g., Draft EIR, pages 4.7-23 through 4.7-25 [description of PDFs with quantified and unquantified GHG reduction benefits].) For example, the Draft EIR identified a commitment to achieve Leadership in Energy and Environmental Design (LEED; Version 4.0) designations at a Silver or better certification level for each building located on the Mission Valley campus, as well as a LEED Neighborhood Development designation for sitewide design.

In addition, the proposed project, with implementation of its PDFs, was found to be consistent with strategies set forth in the City of San Diego’s Mission Valley Community Plan and Climate Action Plan. (See, e.g., Draft EIR Table 4.7-7, Local Plan-Level Consistency Analysis.) The strategies in the referenced plans were developed to ensure that new development advances important sustainability principles.

The Final EIR is revised to incorporate additional PDFs, as explained in Final EIR Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, related to increased emphasis on sustainability in the vertical environment, additional electrification of buildings, limiting natural gas use, and eliminating residential hearths. As shown in the Additional Technical Memorandum prepared by Ramboll, the new and/or refined PDFs result in quantified and qualitative benefits, including lower GHG and criteria air pollutant emissions, and lower natural gas, gasoline, and diesel consumption, as compared to the information presented in the Draft EIR. As such, achieving “sustainable design” has been and will continue to be an important part of the planning process for the proposed project.

- 011-6** The comment states that SDSU is a leader in innovation and sustainability, and recommends that the proposed project achieve LEED Gold certification, in lieu of the LEED Silver certification level set forth in the Draft EIR. Please refer to Final EIR Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information regarding LEED. As discussed therein, LEED Gold certification would not necessarily provide any additional emissions reduction benefits because many LEED credits are not specific to criteria air pollutant- or GHG-reducing strategies. Nonetheless, the Final EIR now includes a PDF that ensures “Sustainability” is a component of the scoring criteria used during the Request for Proposals process, and favorably weighs a builder’s proposal to implement strategies above and beyond those needed to achieve LEED Silver Version 4 certification or better. Further, CSU/SDSU note that based on recent experience with new buildings on the main campus including the Aztec Student Union and Engineering and Interdisciplinary Sciences buildings, the campus expects the proposed project to exceed the LEED Silver certification minimum, and achieve something greater in many of the new buildings within the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 011-7** The comment provides information about the Associated Students' commitment to LEED Gold certification and achievement of LEED Double Platinum certification at the Aztec Student Union, and notes that CSU's 2014 Sustainability Policy requires LEED Silver certification as a minimum. Please refer to Final EIR Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments and Response to Comment 011-5 for responsive information regarding LEED Gold. CSU/SDSU also notes that the proposed project's LEED-specific PDF is consistent with the framework established by CSU's 2014 Sustainability Policy. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 011-8** The comment restates information contained in the Draft EIR related to the proposed project's commitment to achieving LEED Silver Version 4.0 rating "or its equivalent." The comment questions whether the inclusion of a LEED "equivalent" program implies the absence of an official certification from the U.S. Green Building Council (USGBC) and a "less sustainable building – both economically and environmentally." First, the use of "equivalency" in the proposed project's LEED-specific PDF is consistent with the parameters of CSU's 2014 Sustainability Policy, which states: "The CSU shall design and build all new buildings and major renovations to meet or exceed the minimum requirements *equivalent to* LEED 'Silver'" (emphasis added). Second, whether or not USGBC certification is officially issued under LEED does not affect the environmental integrity of the PDF, which requires a showing that the project-related building would "achieve" the LEED standards required for a Silver or better certification level.
- 011-9** The comment recommends that the proposed project be 100% LEED Neighborhood Development Gold certified. Please refer to Responses to Comments 011-2, 011-3, and 011-8, above, for responsive information. Further, it is noted that buildout of the proposed project is anticipated to take approximately 15 years, which would provide for regulatory standards to be increased, including energy conservation and other sustainable design and best practices.
- 011-10** The comment restates the proposed project's anticipated on-site solar generation (which would meet roughly 15% of total electricity demand) and compares that to the CSU 2014 Sustainability Policy, which states that: "[t]he CSU will endeavor to exceed the ... Renewable Portfolio Standard (RPS) sooner than the established goal of procuring 33 percent of its electricity needs from renewable sources by 2020." The comment suggests that the proposed project is not fully complying with the 2014 Sustainability Policy in this regard. In response, CSU/SDSU note that the 15% on-site solar energy generation would be supplemented by energy most likely provided through San Diego Gas & Electric (SDG&E). As noted in the Draft EIR, Section 4.5, Energy, SDG&E currently provides approximately 45% of its energy from renewable sources (Draft EIR, page 4.5-4); therefore, the proposed project would procure more than 33% of its energy needs from renewable resources, consistent with CSU's 2014 Sustainability Policy.
- 011-11** The comment refers to Section 4.5 of the Draft EIR and restates information regarding the proposed project's use of natural gas. The comment also restates language from CSU's 2014 Sustainability Policy regarding moving away from fossil fuels, and expresses concern that the proposed project will "create a capacity and need for fossil fuel use, instead of reducing it." Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, for responsive information, which describes additional PDFs that have been added to the Final EIR to limit use of natural gas in the proposed project and provide for electrification of the project buildings. For example, the use of natural gas fireplaces has been eliminated from *all* project residences, and the proposed project will utilize electric heating and cooling for all non-stadium buildings. As such, natural gas usage is primarily limited to cooktops

(at the stadium and in project restaurants and residences) and campus laboratory facilities. CSU/SDSU has also committed to sizing all electrical utilities and conduit to enable the electrification of all uses in the future. These refinements to the project's design features are consistent with the comment. As shown in the Additional Technical Memorandum, prepared by Ramboll, the new and/or refined PDFs result in quantified and qualitative benefits, including lower GHG and criteria air pollutant emissions, and lower natural gas, gasoline, and diesel consumption, as compared to the information presented in the Draft EIR.

- 011-12** The comment provides background information regarding natural gas consumption resulting in GHG emissions and recommends electrification of the proposed project. Please refer to Responses to Comments 011-3 and 011-11, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 011-13** The comment states that the project site may be able to source power from San Diego's Community Choice Aggregation (CCA) program, and questions if the proposed project "would ensure complete electrification of the site and remove natural gas infrastructure from all buildings possible." Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which describes additional PDFs that have been added to the Final EIR to limit use of natural gas in the proposed project and provide for future electrification of the proposed project's buildings. Additionally, please refer to Response to Comment 05-38 for information regarding San Diego's CCA program.
- 011-14** The comment expresses concerns regarding safety at a new campus away from the main campus, and serves as an introduction to comments which follow. Please refer to Responses to Comments 011-15 through 011-17, below, for responsive information.
- 011-15** The comment identifies hazardous vapor as a specific safety risk, and questions the lack of mitigation to address hazardous vapors at the project site. The comment asks "how will the SDSU community be protected from toxic air in the learning and recreation environments on site." The comment is referred to Section 4.8, Hazards and Hazardous Materials, of the Draft EIR. Based on the findings of previous environmental investigations, as discussed in Draft EIR Section 4.8.1.4, there is a potential that soil vapor is present on the project site. Because operation of the proposed project would introduce residential housing and public use spaces onto the project site, the presence of this soil vapor contamination would create a potential release of hazardous materials into the environment, specifically indoor air (Impact HAZ-6) (Draft EIR Section 4.8, p. 4.8-20). As a result, construction and operation of the new buildings would include vapor mitigation measures in accordance with mitigation measure MM-HAZ-7, which is repeated below.

MM-HAZ-7 Vapor Mitigation. Prior to commencement of vertical construction of each residential, educational, and commercial building at the project site, San Diego State University or its designee shall conduct a soil vapor investigation within the proposed building footprint. If soil vapor is detected within the footprint of a proposed building or enclosed structure, vapor mitigation measures shall be implemented in accordance with the Department of Toxic Substances Control Vapor Intrusion Mitigation Advisory for all such future buildings and enclosed structures. The construction contractor shall develop vapor mitigation measures that adequately mitigate potential vapor intrusion in buildings and enclosed

structures on the project site. Typical vapor mitigation systems comprise of a sub-slab geomembrane or vapor barrier installed throughout the entire footprint of the building. Sub-slab ventilation piping is installed below the geomembrane layer for capturing VOCs in the soil gas and discharging them above the building roof through vent stacks. Optional blowers can be connected to the vent piping at the roofline for conversion of a passive venting system into an active system, if necessary. Operation of the project shall maintain functionality of these features as required to continue protection from vapor intrusion.

The Draft EIR also assessed the potential soil vapor hazards during project demolition and construction activities. As stated on page 4.8-19 of the Draft EIR Hazards section, in the event that these contaminated media are disturbed during construction, a significant hazard to the public or environment could occur should these materials be released (Impact HAZ-3). To avoid accident and upset conditions by disturbance and release of contaminated media, including soil vapor, a Hazardous Materials Contingency Plan (HMCP) would be completed and followed in accordance with mitigation measure MM-HAZ-3, which is repeated below

MM-HAZ-3 Hazardous Materials Contingency Plan. Prior to commencement of any demolition or construction activities, a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil, **soil vapor**, and groundwater from releases on or near the project site, as well as the potential for existing hazardous materials on site (e.g., drums and tanks). The HMCP shall include training procedures for identification of contamination. The HMCP shall describe procedures for assessment, characterization, management, and disposal of hazardous constituents, materials, and wastes, and notification and decommissioning procedures for tanks, in accordance with all applicable state and local regulations. Contaminated soils and/or groundwater shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities. California State University/San Diego State University or its designee shall implement the HMCP during construction activities for the proposed project. The HMCP shall be submitted to the County of San Diego Department of Environmental Health for review.

(Emphasis added.)

Accordingly, the Draft EIR analyzed the impacts associated with potential soil vapor on the project site; included mitigation to address vapor hazards; and determined that with implementation of the recommended mitigation, impacts would be reduced to less than significant.

011-16 The comment restates information about an existing fuel pipeline along the eastern boundary of the project site and the proposed mitigation regarding coordination with Kinder Morgan Energy Partners

(KMEP), the owner of the pipeline. The comment states that based on the scale and duration of construction activity for the proposed project, the pipeline is at particular risk of damage or, even if it is not damaged, there is a risk the pipeline may leak. As background, KMEP operates a 10-inch steel, high-pressure fuel pipeline that runs along the eastern property boundary of the proposed project. (The location of the pipeline is depicted in the Draft EIR Appendix 4.8-4, Figure 2, and Appendix 4.8-5, Figure 3.) The pipeline varies between 3 and 8 feet below ground surface (bgs) along the eastern boundary of the site and deepens to 16 feet bgs to cross under the Murphy Canyon Creek (Draft EIR Appendix 4.8-5, Limited Soil and Groundwater Investigation Along Fuel Pipeline). CSU/SDSU note the pipeline has been in existence for decades and is designed, operated, and inspected consistent with applicable requirements. As explained in the Draft EIR (page 4.8-4):

In 2019, Group Delta Consultants conducted a limited soil and groundwater investigation near the fuel pipeline to screen for potential soil and groundwater contamination associated with any pipeline leakage (Appendix 4.8-5). No field evidence of VOC-impacted soil was observed during the investigation. Although some low residual total petroleum hydrocarbons (THP) concentrations were detected in the soil and groundwater samples, none of the concentrations exceeded applicable screening levels. No VOCs were detected in soil or groundwater samples except for acetone in one soil sample at a low concentration significantly below the RSL. Based on the investigation, no evidence of a fuel pipeline leak was observed.

The Draft EIR determined that construction may have the potential to impact the pipeline; therefore, the Draft EIR includes mitigation measure MM-HAZ-6, Safety of Fuel Pipeline, to reduce potential construction-related impacts to the fuel line. Pursuant to MM-HAZ-6, prior to commencement of construction, demolition, or implosion activities, CSU/SDSU and KMEP will determine appropriate setbacks, safety measures, and procedures that will be put in place to avoid conflict with the preexisting fuel pipeline in accordance with all applicable state and local regulations. Further, it is noted that the comment regarding the potential for an accident even if the pipeline isn't damaged, does not related to an environmental impact for which mitigation is required.

- 011-17** The comment states “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.” The comment asks, “what are the specific mitigation measures in the case of a spill to protect” the proposed project residents, students, employees, and guests. The Draft EIR includes mitigation measure MM-HAZ-9, which requires CSU/SDSU or its designee to coordinate with the City and County to update plans pertaining to emergency response and evacuation procedures to reflect the new location and design of the new stadium and addition of other proposed project buildings and facilities. The mitigation measure states:

MM-HAZ-9 Emergency Response and Evacuation Planning. Plans and policies pertaining to emergency response and evacuation procedures shall be updated to reflect the location and design of the new stadium, new buildings, and other proposed project features. San Diego State University or its designee shall submit plans to the City of San Diego Fire-Rescue Department Fire Prevention Bureau and Unified San Diego County Emergency Services Organization for review. Plans shall include, but not be limited to, maps of evacuation routes for both pedestrians and vehicle

traffic; locations of hospitals, fire stations, and police stations; locations of fire extinguishers; and designation of responsible personnel and agencies. To the extent feasible, California State University/San Diego State University or its designee shall consult the U.S. Department of Homeland Security's Evacuation Planning Guide for Stadiums and implement measures recommended therein, as necessary.

As to the comment's characterization of "frequent" oil spills, the historical spills surrounding the proposed project site, including at the KMEP Mission Valley Terminal, are summarized in Draft EIR Section 4.8, Hazards and Hazardous Materials, and associated appendices. CSU/SDSU notes that KMEP is regulated under separate permits and regulations, and is reviewed regularly to ensure compliance. In addition, nearby residential developments to the west and east of the KMEP Mission Valley Terminal facility have co-existed with the facility since the early 1960s. Under the active regulatory oversight of multiple federal, state, and local agencies, it is anticipated that the Mission Valley Terminal facility will continue to operate safely and in compliance with environmental regulations.

011-18 The comment states the project site is within 500 feet of a major freeway, which would subject "future residents to indefinite hours of traffic pollution exposure." The comment provides information about minority populations being disproportionately exposed to air pollution from vehicles. The comment recommends the Mission Valley campus leverage sustainability to promote SDSU's values of diversity, equity and inclusion.

It is noted that freeway emissions are an existing condition, and that the proposed project would only add a small fraction of the total trips on interstates I-15 and I-8. Nonetheless, with respect to the potential exposure of potential residents to pollution from freeway traffic, the Draft EIR included a Health Risk Assessment (HRA) to address impacts associated with freeway proximity (Appendix 4.2-2, Freeway Health Risk Assessment). The results of the Freeway HRA are analyzed in Section 4.2, Air Quality, of the Draft EIR. As stated therein, the results of the analysis show:

- The cancer and non-cancer health impacts of the [diesel particulate matter (DPM)] emissions from project-related vehicles traveling on the modeled sections of the I-15 and I-8 freeways are below the [San Diego Air Pollution Control District (SDAPCD)] public health risk notification requirements, and
- The cancer and non-cancer health impacts of the DPM emissions from vehicles traveling on the modeled sections of the I-15 and I-8 freeways on residential and nonresidential receptors located on the project site, including those within 500 feet of the freeways, are below the SDAPCD public health risk notification requirements.

Thus, impacts to sensitive receptors are **less than significant**.

Regarding minority populations' disproportionate exposure to freeway pollution and SDSU's values of diversity, equity and inclusion, the comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Nonetheless, CSU/SDSU are committed to complying with and implementing all fair housing practices regarding diversity and inclusion, including providing 10% of the residential units on site as affordable housing.

- 011-19** The comment restates information from the Draft EIR regarding the proposed project's compliance with the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) through 2017, but notes that the proposed project would not be built out until 2037. The comment states that by the time the proposed project is constructed, traffic air pollution is expected to increase and could expose surrounding residents to significant levels of harmful chemicals. Please refer to Response to Comment 011-18, above, regarding the Freeway Health Risk Assessment (see Draft EIR Appendix 4.2-2) performed for the proposed project. The ambient air quality monitoring stations throughout San Diego County measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and NAAQS; thus, the reported ambient concentrations of pollutants from 2015 through 2017 are the most recent data available. Of note, the NAAQS and CAAQS apply to criteria air pollutants while the Freeway HRA evaluates health risk impacts from exposure to toxic air contaminants emitted from vehicles traveling on the I-15 and I-8. Further, as detailed in Section 4.1.4, Exposure Assumptions, of Appendix 4.2-2, Freeway HRA, "[t]he total exposure duration analyzed for residents and other sensitive receptors is 30 years, in accordance with the OEHHA [Office of Environmental Health Hazard Assessment] Guidance Manual's default assumptions, and begins in the third trimester to accommodate the increased susceptibility of exposures in early life." Accordingly, based on a 30-year exposure duration, the HRA did factor future buildout of the proposed project as the comment suggests. No further response is required.
- 011-20** The comment provides background information on traffic pollution impacts, including asthma and impaired lung function. The comment states that the American Lung Association notes that teenagers and children are more vulnerable to traffic pollution. Please refer to Responses to Comments 011-18 and 011-19, above for responsive information regarding the modeled exposure duration assumptions starting at third trimester and carrying out for 30 years, as well as the results, which determined that health risk impacts to on-site residents from toxic air contaminants emitted by vehicles traveling on proximate freeways would be less than significant.
- 011-21** The comment recommends that the proposed project use "the highest quality of air filtration, using buildings and infrastructure, to keep site-users as healthy as possible." Please refer to Responses to Comments 011-18 and 011-190, above for responsive information regarding the modeled exposure duration assumptions starting at third trimester and carrying out for 30 years, as well as the results which determined impacts would be less than significant. As impacts were determined to be less than significant, no mitigation is required by CEQA.
- 011-22** The comment states it is in the best interest of project developers and future facility users to take proactive measures to alleviate future health impacts and, therefore, requests the proposed project incorporate built and natural solutions like LEED Gold-Certified buildings, carbon sinks, and natural barriers to reduce health risks. The Draft EIR considered potential health risks from freeway proximity in Section 4.2, Air Quality, and determined such impacts were less than significant and would not require mitigation as explained in Response to Comment 011-18, above. That being said, the proposed project would include landscaped barriers between development on the project site and I-8 and I-15 in the form of the River Park and other vegetative buffers. Further, as described in Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, SDSU is committed to adding "Sustainability" as part of any scorecard for assessing proposals to develop buildings within the project site.
- 011-23** The comment asks how the proposed project will ensure safe air for users over a long period of time. Please refer to Responses to Comments 011-18 and 011-19, above for responsive information

regarding the modeled exposure duration assumptions starting at third trimester and carrying out for 30 years, as well as the results which determined health risk impacts from freeway proximity would be less than significant.

- 011-24** The comment provides factual background information about transit, summarizes information from the Draft EIR Project Objectives, and serves as an introduction to comments which follow. Please refer to Responses to Comments 011-25 through 011-29, below.
- 011-25** The comment states the Draft EIR does not propose sufficient mitigation to create the “transit-oriented” reality the Project Objectives describe. Specifically, the comment notes that the “existing transit pass program for students” is “only...a 10-15% reduced priced fare on semester-long transit passes,” which the comments states “does not give students or faculty an accessible or equitable option when choosing to commute by transit over car.” First, CSU/SDSU wishes to clarify that, per the TDM Program Transit Pass Strategies, “[t]he cost reduction will be between 10% and 25%, depending on participation level. Additionally, employers with a minimum of 20 employees will be required to provide up to 5 percent of their employees with a 100 percent MTS transit pass subsidy” (Draft EIR Section 4.15, Transportation, p. 4.15-8). Second, as shown in Table 4.15-1 of the Draft EIR (reproduced in Response to Comment 011-26, below), no trip reduction credit was assumed for the transit pass program due to the difficulty in quantifying how many students and/or employees would utilize the program. Accordingly, the Draft EIR analyzed a “worst case” assumption that no students, faculty/staff or employees would utilize the transit pass program; however, as analyzed in Section 4.15.17.9, the VMT generated by the proposed project, with application of the proposed project’s TDM Program, would be below the applicable threshold.
- 011-26** The comment states that having a transit line bisect the project “is insufficient in designating the campus as “transit-oriented” and requests “the specific Transportation Demand Management (TDM) measures to reduce Vehicle Miles Traveled (VMT).” In response, the commenter is directed to Section 4.15, Transportation of the Draft EIR, specifically Section 4.15.1.1 on pages 4.15-4 through 4.15-12. As described in that section, the proposed project includes a TDM Program consisting of both stadium and non-stadium strategies to reduce single-occupancy vehicle trips and VMT. These measures are reiterated in Appendix 4.7-2, CAP Consistency Memorandum, wherein the proposed project is demonstrated to comply with the City of San Diego’s CAP due to its location within a Transit Priority Area and measures under the TDM Program. Table 4.15-1 is reproduced below to demonstrate the measures which would reduce VMT in accordance with California Air Pollution Control Officers (CAPCOA) standards.

Table 4.15-1. Proposed Non-Stadium Transportation Demand Management (TDM) Trip Reductions

CAPCOA Category	TDM Measure	Individual Reduction	Combined Reduction ⁴
Neighborhood Site Enhancements	Improve Site Design including: New bicycle facilities Dedicated Land for Bicycle/Multi-use Trails Bicycle Parking Increased Intersection Density	11.08%	
	Traffic Calming	0.25%	

Table 4.15-1. Proposed Non-Stadium Transportation Demand Management (TDM) Trip Reductions

CAPCOA Category	TDM Measure	Individual Reduction	Combined Reduction ¹
	Car Share	0.37%	
	Pedestrian Network	2.00%	
			5.00%
Parking Policy/ Pricing	Unbundle Parking	0.95%	
	Meter On-Street Parking	3.15%	
			4.07%
Commute Trip Reduction	TDM Marketing with Transportation Coordinator including: Shower and Locker Facilities	2.21%	
	Carpool Matching/Guaranteed Ride Home	2.80%	
	Bicycle Share	0.50%	
	School Pool (K-12)	0.70%	
	Hotel Shuttle Service	0.04%	
			6.09%
Combined Total Reduction			14.41%*

¹ To account for inherent duplication and redundancies that occur when individual TDM strategies are implemented in unison, appropriate adjustments to the calculations are necessary to account for this occurrence. Accordingly, the Combined Reduction is not calculated by simply summing the Individual Reductions. Similarly, the Combined Total Reduction is not calculated by summing the individual Combined Reductions. For additional information, please see TIA Appendix G.

As analyzed in Section 4.15.17.9 of the Draft EIR, the VMT generated by the proposed project, with application of the proposed project's TDM Program, would be below the applicable threshold.

011-27 The comment states that the Draft EIR's transportation plan is isolated from the goals and principles in the Mission Valley Community Plan Update (MVCPU) — “particularly, goals for improving current traffic, recreation, housing, and other conditions in the area.” As it relates to traffic, as explained in Response to Comment 011-26, the proposed project includes a TDM Program to reduce VMT and activate an underutilized trolley station by planning a dense, transit-oriented development project within 0.25 miles of a major transit stop. The Draft EIR, Section 4.15.7.4 discusses the MVCPU, including MVCPU roadway improvements, bicycle facility improvements, pedestrian facility improvements, and transit facility improvements. None of the mitigation measures or access/frontage improvements proposed or recommended for the proposed project would conflict with the MVCPU circulation network. Further, the MVPCU does not include or identify any other access points or traffic improvements to the project site that are not part of the proposed project.

In addition, the land uses included in the proposed project are similar to those anticipated under the MVCPU, as shown in Table 4.13-7 of the Draft EIR. As described in Draft EIR Section 4.10, Land Use and Planning, the MVCPU designates the project site as a site that will be redeveloped through a Campus Master Plan, which will include detailed information on the land uses, mobility system, and recreation facilities. (See also Draft EIR Chapter 1, Introduction and Existing Environmental Setting, Section 1.7.1, San Diego General Plan, Community Plan, and Climate Action Plan.) As depicted in Draft EIR Table 4.13-7, the MVCPU assumed land uses for the existing San Diego County Credit Union

(SDCCU) Stadium site (i.e., the project site), and the proposed project's land uses fall within the envelope identified in the MVCPU. In fact, the proposed project would provide only 200 fewer residential units (4% less than the MVCPU), and only the proposed campus office use is more than 12.5% different than the assumed land uses/density/intensity in the MVCPU.

With respect to recreation, the proposed project includes over 80 acres of parks, recreational facilities and open space. The MVCPU anticipated the project site would provide approximately 38.1 acres of active park and 4.9 acres of open space; thus, the proposed project would provide approximately 41 acres of parks, recreation, and open space in excess of the projected amounts in the MVCPU. Accordingly, the proposed project would contribute an amount greater than the programmed amount of funding and improvements, and would help correct an existing park deficiency in the Mission Valley and Navajo Communities (Draft EIR Section 4.4, Public Services and Recreation, p. 4.13-33).

011-28 The comment states that the Draft EIR focuses on off-site traffic mitigation measures but does not provide any mitigation measures for "sustainable transportation." The comment does not define "sustainable transportation." However, based on the comment's introduction regarding the Draft EIR's focus on "off-site traffic mitigation measures," CSU/SDSU interpret the comment to request additional, on-site measures to reduce traffic impact and improve transit. CSU/SDSU refer the reader to the TDM Program in Section 4.15.1.1 of the Draft EIR. As described, the TDM Program is a PDF designed to reduce single-occupancy vehicle trips and VMT, thereby acting as a sustainable transportation measure. Please also refer to Response to Comment 011-26, above.

011-29 The comment restates information contained in the Draft EIR regarding enhancing use of the MTS Green Line Stadium Trolley Station, minimizing vehicular traffic use, and accommodating the planned Purple Line on the project site, but states "there are no current mitigation measures to expand incentives to use MTS." First, with respect to enhancing use of the existing trolley station, as explained in Appendix 4.7-2, CAP Consistency Memorandum:

[T]he proposed project would accommodate a village development by providing 4,600 residential units arranged in a mixed-use configuration with up to 95,000 square feet of ground floor commercial/retail uses; up to 1,565,000 square feet of employment-producing office, academic, innovation, and research and development space; up to 400 hotel rooms; and 84.5 acres of parks, recreation, and open space, as well as a 35,000-capacity multi-purpose Stadium within 0.5 miles of existing light rail trolley service. As a result, the estimated proposed project employment growth would be 7,809 estimated annual jobs. An approximate population of 8,510 represents the estimate of new residents as a result of the proposed project's residential component.

Thus, construction of the proposed project would generate a new population of potential transit users. Second, the proposed project would activate the existing, underutilized trolley station to make the station more attractive to potential transit riders, compared to the existing oversized parking lot, and would be a daily attraction/destination rather than only during large events at the existing Stadium.

Regarding new incentives, please refer to Response to Comment 011-25, above.

011-30 The comment states that "San Diego has the sixth most air in the state and needs to be a focus." Based on a review of the footnote citation included in the comment, the comment is referring to the American

Lung Association's "State of the Air" 2019 report, which discusses the San Diego region's standing with respect to ozone pollution. CSU/SDSU interpret the comment to suggest that the subject of air quality needs to be a focus of the proposed project's environmental analysis. In response, the subject of air quality received extensive analysis in Section 4.2, Air Quality, of the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided.

- 011-31** The comment provides background information on water procurement in the San Diego region, the City's Pure Water program, and suggests that new developments in San Diego should utilize existing technology to minimize the amount of potable water used. CSU/SDSU refer the commenter to Appendix 4.17-5, Water Use Estimation Memo, and page 4.17-19 of the Draft EIR, which compare the estimated water usage of the proposed project to other factors. As described therein, the proposed project would use approximately 693,343 gallons per day (gpd), which is a reduction of approximately 901,847 gpd compared to the City of San Diego Water Department's Facility Design Guidelines, or approximately 56.5% less. This reduction would be achieved through a combination of indoor and outdoor conservation measures, best available technologies, and compliance with recently adopted water conservation laws and regulations. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. Nonetheless, the comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project
- 011-32** The comment states there are water purchase agreements for developments to install water treatment and reuses systems. The comment recommends SDSU water sustainability experts to participate in coordinating and incorporating water use minimization, rain capture, and greywater treatment into Requests for Proposals (RFPs) for future project developers/builders. CSU/SDSU agree that future RFPs should include sustainability measures such as water conservation; and the Final EIR is revised to include a PDF requiring that CSU/SDSU include "Sustainability" as a component of the scoring criteria and weigh each builder/developer's commitment to implementing strategies above and beyond California Building Code Title 24, CalGreen, and LEED Silver (Version 4.0) as at least 10% of the overall scoring. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 011-33** The comment provides examples of other projects which have implemented Net Zero Water infrastructure. While not stated by the comment, CSU/SDSU interprets the comment to suggest additional reduction in water usage should be implemented. As explained in Response To Comment 011-31, above, the Draft EIR determined that the proposed project would reduce daily water usage by approximately 901,847 gpd compared to the City of San Diego Water Department's Facility Design Guidelines, or approximately 56.5%. Accordingly, the Draft EIR determined that impacts to water supply would be less than significant. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is provided.
- 011-34** The comment recommends that the proposed project include purple piping or pre-piping, for the planned City of San Diego Pure Water program. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which notes that the Final EIR is revised to include a project design feature to require the proposed project to install "purple pipe" in the main roadways for future connection to a City-constructed reclaimed water system; however, such reductions are not quantifiable at this time. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

011-35 The comment asks if water sustainability experts will help plan and develop sustainable water systems at the project site. As explained in Response to Comment 011-31, above, the Draft EIR determined that the proposed project would reduce daily water usage by approximately 901,847 gpd compared to the City of San Diego Water Department's Facility Design Guidelines, or approximately 56.5%. Accordingly, the Draft EIR determined that impacts to water supply would be less than significant. The comment addresses a general topic—water supply systems—which received extensive analysis in Section 4.17, Utilities and Services Systems, of the Draft EIR. Further, as explained in Thematic Responses – Sustainability Commitments, the Final EIR is revised to include a Project Design Feature to require installation of “purple pipe” or otherwise provide for a connection to the City's future Pure Water System. Lastly, and as also explained in in Thematic Responses – Sustainability Commitments, a Project Design Feature has been added which would provide that scoring for each RFP for developer(s)/builders emphasize sustainability, which may include proposals from developer(s)/builders to further reduce water usage. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided.

011-36 The comment states that the amount of waste is a necessary consideration for sustainable development and that the site must consider local landfills. The comment states that the Miramar Landfill is projected to reach capacity by 2030, before the proposed project completion date, and that switching to another landfill would be a “short term solution to a prevalent and long-term issue.”

As to the capacity of Miramar Landfill, CSU/SDSU concurs that this landfill, which is the closest landfill to the proposed project, is projected to reach capacity and close by the end of 2030. As reported Draft EIR Section 4.17, Utilities and Service Systems, additional active solid waste landfills within San Diego County include Borrego Springs Landfill, Otay Landfill, Sycamore Landfill, San Onofre Landfill, and Las Pulgas Landfill. Of these, the two closest facilities are Sycamore Landfill and Otay Landfill. Sycamore Landfill is located approximately 12 miles from the site, with a remaining capacity of approximately 114 million cubic yards (cy) as of 2016. The Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day and has a maximum permitted capacity of 148 million cy with a projected closing date of December 31, 2042. Otay Landfill is located approximately 18 miles from the project site, with a remaining capacity of approximately 21 million cy as of 2016. This landfill is permitted to receive a maximum of 6,700 tons per day with a maximum permitted capacity of 61 million cy. The projected closing date is February 28, 2030. The Draft EIR notes that when Miramar Landfill closes, Allied Waste Services Inc., which would serve the proposed project's solid waste needs, would be responsible for disposing the proposed project's solid waste at a landfill in the region with sufficient permitted capacity. The current estimates of remaining capacity suggest sufficient permitted capacity exists to serve the proposed project's solid waste generation of 2,342 annual tons (Draft EIR Section 4.17, Utilities and Service Systems, p. 4.17-27).

As also stated in Draft EIR Section 4.17, SDSU typically diverts over 50% of its yearly on-campus generated solid waste to a licensed recycling facility. Solid waste generated from operation of the proposed project would be subject to the existing on-campus solid waste diversion program, which historically has been successful at diverting at least 50% of on-campus generated solid waste from a landfill to an appropriate recycling facility. Maintaining the existing diversion rate would ensure compliance with Assembly Bill 75, which requires all large state facilities to divert at least 50% of solid waste from landfills. The proposed project would include recycling bins in the housing and campus innovation buildings. Recyclable materials would be transported to a certified recycling facility by a certified recyclable materials collector at least once per week. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability

Commitments, which notes that the Final EIR is revised to include a project design feature to require composting as an additional solid waste management strategy.

- 011-37** The comment provides factual background information on anaerobic decomposition of organic matter and release of methane, a GHG emissions. The comment notes that EDCO is partnering with the City of San Diego for composting services with an anaerobic digestion facility in 2020 and asks if the SDSU Mission Valley campus would contract with this facility. CSU/SDSU is committed to composting and would consider contracting with such an anaerobic digestion facility when available; SDSU would work with the local trash provider to improve recycling practices on the Mission Valley Campus. In addition, as discussed in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, to ensure implementation of CSU/SDSU’s commitment to composting, a new PDF has been included in the Final EIR, as follows:

PDF Composting CSU/SDU shall utilize pre-consumer organic food composting for the proposed Stadium and University-constructed buildings, and shall encourage the incorporation of composting facilities in the residential units developed through the P3 Process. CSU/SDSU also shall utilize post-consumer organic food composting for the proposed Stadium and University-constructed buildings when feasible (e.g., when the University’s solid waste provider operates a facility that is permitted to accept post-consumer compost).

- 011-38** The comment states that certain materials require large quantities of energy and resources to produce, and states that “procurement of recycled content products should be a necessary principle to include in negotiations with potential building tenants”. The comment also recommends a high landfill diversion rate at the SDSU Mission Valley campus. CSU/SDSU agree that sustainability is an important component to consider for future building tenants and notes that a project design feature has been added to the Final EIR to require that sustainability be a component of future scorecards during RFPs for future developer selections. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. Please also refer to Response to Comment 011-36 for additional responsive information regarding waste diversion.
- 011-39** The comment provides background information on solid waste reduction/diversion targets in the City of San Diego and state-wide, as well as diversion strategies at other college campuses in California. The comment questions if SDSU will “hire a full-time Waste Reduction Coordinator” for the proposed project and recommends “a high landfill diversion rate at the SDSU Mission Valley campus.” Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which, as discussed in Response to Comment 011-38, includes PDF related to recycling in the proposed project. Further, the Final EIR is revised to clarify that recycling bins would be provided through the project site to encourage recycling. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is provided.
- 011-40** The comment is a conclusion referencing previous comments. No further response is required; however, please see prior responses herein for relevant information regarding the proposed project’s environmental sustainability, including energy use and building design. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 011-41** The comment is a closing call to collaborate with Associated Students and its Sustainability Commission. The SDSU project team has consulted with the Associated Students during the project development process, including meetings during the public review period and again on December 4, 2019 to provide an update on the changes made to the proposed project in response to comments received from Associated Students. A summary of those changes are included in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments.

Response to Comment Letter 012

San Diego River Park Foundation

Mr. Rob Hutsel

October 3, 2019

012-1 The comment is an introduction to comments that follow. No response is required.

012-2 The comment restates information in the Draft EIR regarding CSU/SDSU's participation in the City's Multi-Habitat Planning Area (MHPA)/Multiple Species Conservation Program (MSCP) and seeks clarification on whether components of the proposed project that will remain in the City's ownership, namely the River Park, will be required to comply with the adjacency requirements of the MSCP.

As noted in the comment, SDSU is not a permittee under the City's MSCP Subarea Plan and so is not required to comply with this plan. However, because part of the River Park will remain in the City's ownership and because SDSU intends for the proposed project to be as consistent with regional planning programs as possible, Section 4.3.4 provides a consistency analysis with the City's MSCP Subarea Plan. Starting on page 4.3-31, the Draft EIR analyzes the proposed project's consistency with each provision of the MSCP Subarea Plan and land use adjacency guidelines. Through that analysis, the Draft EIR concludes that the proposed project is consistent with the City's MSCP Subarea Plan, Land Use Considerations and Land Use Adjacency Guidelines.

012-3 The comment seeks clarification on whether the proposed project would comply with the City's Biological Guidelines and specifically the Environmentally Sensitive Lands Ordinance. The comment states this Ordinance mandates certain buffers from wetlands that may affect project design.

As stated on page 4.3-13 of the Draft EIR, the biological resource analyses contained in the Draft EIR and Biological Resources Technical Report contain the types of assessments and level of detail that the City would need in order to use the Final EIR for any action leading to the approval of the Purchase and Sale Agreement.

Specifically, when preparing the Draft EIR, SDSU consulted the following City regulations as they relate to biological resources:

- City of San Diego Municipal Code
- City of San Diego Land Development Code
- City of San Diego Biology Guidelines (last amended on February 1, 2018)
 - Section I, Definitions, B. Wetland Buffers
 - Section II, Development Regulations (as they pertain to Environmentally Sensitive Lands Regulations, Wetlands and Listed Species Habitat, Impacts to Wetlands and Buffer Limits Outside of the Coastal Overlay Zone)

Because the proposed project is located outside of the Coastal Zone, Section II, Development Regulations, A., Environmentally Sensitive Lands Regulations, 1. Wetlands and Listed Species Habitat, b, Impacts to Wetlands and Buffer Limits Outside of the Coastal Overlay Zone, is the most relevant guidance regarding wetland buffers. This section of the code states that:

Under the ESL, impacts to wetlands should be avoided. Unavoidable impacts should be minimized to the maximum extent practicable. Whether or not an impact is unavoidable will be determined on a case-by case basis. Examples of unavoidable impacts include those necessary to allow reasonable use of a parcel entirely constrained by wetlands, roads where the only access to the developable portion of the site results in impacts to wetlands, and essential public facilities (essential roads, sewer, water lines, etc.) where no feasible alternative exists. Unavoidable impacts will need to be mitigated in accordance with Section III.B.1.a of these Guidelines. A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland. Section 320.4(b)(2) of the U.S. Army Corps of Engineers General Regulatory Policies (33CFR 320- 330) list criteria for consideration when evaluating wetland functions and values. These include wildlife habitat (spawning, nesting, rearing, and foraging), food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters.

The Draft EIR, Section 4.3, Biological Resources, pages 4.3-23 through 4.3-26, evaluates the proposed project's impact on wetlands/waters of the United States. Consistent with the evaluation, the proposed project would have permanent but minor impacts (0.35 acres) on wetlands/Water of the United States associated with an unnamed tributary to the San Diego River near the Fenton Parkway terminus. These impacts would occur as a result of connecting the proposed project's stormwater drainage/treatment system to the San Diego River and construction of the Fenton Parkway connection onto the project site. The Draft EIR, at pages 4.3-36 through 4.3-41, recommends appropriate mitigation measures that would reduce these impacts to less-than-significant levels: MM-BIO-2 (habitat mitigation), MM-BIO-4 (temporary installation of fencing), MM-BIO-5 (construction monitoring and reporting), MM-BIO-6 (air quality standards), MM-BIO-7 (signage and barriers), MM-BIO-8 (invasive species prohibition), and MM-BIO-13 (wetland mitigation/federal and state agency permits). The proposed project also would have very minor (0.15 acres) temporary wetland impacts associated with connecting the proposed sewer and stormwater drainage systems to the existing systems located within the north berm of that portion of the San Diego River owned and maintained by the City. All habitat affected during these construction efforts will be fully restored with appropriate native/aquatic resources and be planned in accordance with City requirements as well as those of the permitting regulatory agencies.

According to the City's Guidelines, wetland impacts are permissible only under three circumstances: (i) when the impact is part of an essential public project, (ii) when the impact is necessary to make the proposed project economically viable, and (iii) when the impact occurs as part of a biologically superior option. In addition, even impacts falling within one of these three categories require a deviation from the wetland regulations.

The wetland impacts necessary to construct the Fenton Parkway Connection is unavoidable because the wetland is created by a storm drain outlet at the existing terminus of Fenton Parkway. No connection can be made from the south without extending or relocating the storm drain and making the physical connection to the current roadway. This connection supports essential public infrastructure (a roadway included on the 2019 Mission Valley Community Plan Update), and thus qualifies as permissible under category (i). Impacts to the wetlands caused by connection of the proposed project to the existing sewer system and stormwater system would constitute the biological superior option—category (iii)—because the proposed connection would ensure all drainage coming from the existing San Diego County Credit Union (SDCCU) Stadium property is appropriately treated and discharged in a planned area/manner.

By contrast, under existing conditions, stormwater is allowed to flow across the existing parking lot, where it collects contaminants, and then into the San Diego River. Thus, the proposed connection would benefit the existing functions and values of the adjacent wetlands by ensuring that the stormwater entering the wetlands has been treated.

Connecting the proposed project's wastewater to an existing sewer pipeline (currently located in the north berm of the San Diego River) would create the fewest and least severe environmental impacts while still supporting the redevelopment of the SDCCU Stadium property (as envisioned by the 2019 Mission Valley Community Plan Update). By contrast, constructing a new sewer pipeline or connection further downstream in or along the San Diego River would result in a greater impact footprint in sensitive areas associated with and adjacent to the San Diego River. It should be noted that the wildlife agencies will be consulted through the Endangered Species Act take permit process (for impacts to least Bell's vireo) and Clean Water Act permitting process, which is also spelled out in the City's Biology Guidelines.

Other City of San Diego planning guidelines and the San Diego River Park Master Plan describes the need for a 100-foot buffer between active development and uses, on one hand, and the San Diego River and other watercourses (e.g., Murphy Canyon Creek) on the other. The proposed project would remove the existing parking lot, which currently constitutes the 100-foot buffer adjacent to the San Diego River and Murphy Canyon Creek and would restore these areas to a more natural setting, thereby allowing natural percolation and treatment of stormwater and providing a more appropriate buffer to these sensitive watercourses. For the above reasons, the proposed project would be consistent with the wetland buffer requirements as outlined in the City's Biology Guidelines and specifically the Environmentally Sensitive Lands Ordinance.

012-4

The comment asks if amplified music is anticipated along the San Diego River, and whether any mitigation is included to limit sound levels that might impact MSCP-designated lands. In response, no amplified music is anticipated along the San Diego River. All active park uses are located at least 100 feet from the San Diego River. An amphitheater area is proposed south of the campus area, north of the Metropolitan Transit System (MTS) Trolley Green Line, which is over 500 feet from the San Diego River. Further, there is an existing berm along the northern edge of the San Diego River, which would act to buffer noise from impacted wildlife within the MHPA. Lastly, the Draft EIR considered indirect impacts, including noise, in Section 4.3, Biological Resources. As stated in the Final EIR Section 4.3.6, Mitigation Measures, the following biological mitigation measures MM-BIO-9 and MM-BIO-10 are recommended to address potential indirect noise impacts:

MM-BIO-9 NOISE: Pre-construction surveys shall be conducted for any work between February 1 and September 15. Between 3 and 7 days Prior to start of construction activities, a qualified biologist with experience in identifying least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*) shall conduct a pre-construction survey for the least Bell's vireo (~~*Vireo bellii pusillus*~~) and, if needed, southwestern willow flycatcher (~~*Empidonax traillii extimus*~~) to document presence/absence and the extent of occupied habitat being occupied by the species. The pre-construction survey area for these species shall encompass all suitable habitats within the impact area, as well as suitable habitat within a 300-foot buffer of the construction activities. If active nests for any of these species are detected, a qualified biological monitor shall monitor the nest(s) for

any signs of disturbance. Any signs of disturbance to the bird shall be documented, and trigger noise reduction techniques if applicable. On-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels (dBA) hourly equivalent noise level or the ambient noise level, whichever is higher, (or the existing ambient noise level if already above 60 dBA during the breeding season) at the nest location. Noise reduction techniques shall be implemented and may include constructing a sound barrier or shifting construction work further from the nest.

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 and Murphy Canyon Creek to reduce noise and lighting impacts.

- 012-5** The comment recommends noise monitoring along the San Diego River until it can be determined that noise levels do not exceed background noise levels. Please refer to Response to Comment 012-4, above. The comment is noted for the record and included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

Response to Comment Letter 013

Promise Posterity Organization

Austin Gent

October 3, 2019

- 013-1** The comment introduces comments to follow regarding reasonably foreseeable environmental effects of the proposed project, including on biological and human systems. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-2** The comment expresses opinions that the Draft EIR should not be approved in its current state. See Responses to Comments 013-3 through 013-30, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-3** The comment states that “the biological resources that will inevitably face anthropogenic molestation” from the proposed project include sensitive habitats and state/federally listed endangered and threatened species located directly on or adjacent to the project site. CSU/SDSU agrees that the proposed project may affect special-status species and their habitats. These impacts were addressed in Section 4.3, Biological Resources, of the Draft EIR. The comment then expresses opinions that the Draft EIR does not consider and analyze offsite biological resources located offsite and downstream of the project site. The comment introduces comments to follow that are more specific. For this reason, the commenter is referred to Responses 0-13-18 and following. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-4** The comment states that the proposed project would have short and long-term impacts to human systems, “regardless of how we may classify such impacts” due to the construction and operation of the proposed project. The comment notes examples of these include hazards due to flooding, contamination leakages, and circumstances in light of climate change (flooding). The comment introduces comments to follow that are more specific. For this reason, the commenter is referred to Responses to Comments 013-7 through 013-11. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-5** The comment states the reasonably foreseeable effects of the proposed project are due to the “incapacities of the proposed location” of the project site. The comment serves as an introduction to comments which follow. Please refer to Responses to Comments 013-6 through 013-11, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-6** The comment states the project site is bordered by the San Diego River and Murphy Canyon Creek, and is located 5 miles upstream from the mouth of the San Diego River, which provides important habitat for special-status species listed under the federal and California Endangered Species Acts. The comment provides background information and does not raise an environmental issue related to the adequacy or content of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 013-7** The comment restates information from the Draft EIR regarding the project site's location within the 100-year and 500-year Federal Emergency Management Agency (FEMA) floodplain and provides background information about Murphy Canyon Creek and the San Diego River watershed, but does not raise an environmental issue over the adequacy or content of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-8** The comment states the project site is located in an area of "extreme flood hazard." The comment restates information contained in the Draft EIR; the subject received extensive analysis in EIR Section 4.9, Hydrology and Water Quality. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. For further responsive information, please see Thematic Response BIO-1 – Murphy Canyon Creek.
- 013-9** The comment states that with the effects of climate change leading to more precipitation, the magnitude for flood hazard of the project area will only worsen. The Draft EIR recognized this in Section 4.9, Hydrology and Water Quality, stating, "[c]urrent climate projections suggest an increase in extreme events in the San Diego region in the future with 16% fewer rainy days and 8% more rainfall during the biggest rainstorms (San Diego Foundation 2014; Appendix 4.9-1)." However, the Draft EIR also noted that "[g]lobal climate change is expected to cause a future warming trend in southern California even under moderate emissions scenarios; however, there is no clear trend in annual precipitation." (Draft EIR, page 4.9-2) Thus, the Draft EIR acknowledges the potential for increased rain events; however, it also acknowledges that there is not a reasonably expected trend in annual precipitation and therefore, could not rely upon any conclusive substantial evidence to increase rainfall in future year hydraulic analyses. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-10** The comment states that based on the project site's proximity to the Kinder Morgan Mission Valley Terminal, the proposed project may be reasonably foreseen to pose a fire hazard. The comment addresses the general subject area of fire hazards, which received extensive analysis in Section 4.8, Hazards and Hazardous Materials, and Section 4.18, Wildfire, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-11** The comment states that based on the project site's proximity to the Kinder Morgan Mission Valley Terminal, the proposed project "poses as a reasonably foreseeable health threat to the individuals carrying out construction." The comment addresses the general subject area of hazards, which received extensive analysis in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR. Draft EIR Section 4.8.6 recommends mitigation measures to reduce potentially significant impacts during construction of the proposed project. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 013-12** The comment states that the above referenced “incapacities” of the project site are “partially, or totally, ignored” and are required to be disclosed, considered and mitigated. CSU/SDSU does not concur with the comment and refer the commenter to Responses to Comments 013-6 through 013-11, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-13** The comment states that the Draft EIR “ought to do a more thorough job at establishing the extant flood hazard conditions of the existing environment.” Please refer to Responses to Comments 013-7 through 013-9, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. See also Thematic Response BIO-1 – Murphy Canyon Creek, for further responsive information.
- 013-14** The comment provides background information on CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-15** The comment expresses the opinion of the commenter that “approval of the project ... would effectively mean an approval to have members of the SDSU community (attempt to) live and learn in an area of extreme historical flooding.” Please refer to Responses to Comments 013-7 through 013-9, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-16** The comment repeats a similar comment as 013-9, above, regarding climate change and future flood hazards. Please refer to Responses to Comments 013-8 and 013-9, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-17** The comment is a summary referencing previous comments. Please refer to Responses to Comments 013-6 through 013-6, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-18** The comment states that the Draft EIR fails to disclose and mitigate off-site or indirect impacts of the proposed project. CSU/SDSU do not concur with the comment.

First, the off-site, impacted area is approximately 5 miles from the project site. Second, the claim that the proposed project would have a negative impact is not supported by any substantial evidence other than the fact that the project site is upstream of the San Diego River mouth. As noted in Comment 013-7, “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).” Accordingly, the project site would “compromise” less than .07% (seven hundredths of one percent) of the watershed area.

Nonetheless, Section 4.3.4 of the Draft EIR analyzes indirect impacts to vegetation communities, jurisdictional resources, plant, and wildlife species. The impacts in Section 4.3.4 address a variety of indirect impacts that could result in both on-site and off-site (downstream) impacts, such as changes in hydrology. Page 4.3-17 of the Draft EIR states (emphasis added):

Construction could result in hydrologic and water-quality-related impacts adjacent to and **downstream** of the limits of grading. Hydrologic alterations include changes in flow rates and patterns in drainages and dewatering, which may affect adjacent and **downstream (off-site)** aquatic, wetland, and riparian vegetation communities. Water-quality impacts include chemical-compound pollution (fuel, oil, lubricants, paints, release agents, and other construction materials), erosion, and excessive sedimentation. Direct impacts, as described previously, can also remove native vegetation and increase runoff from roads and other paved surfaces, resulting in increased erosion and transport of surface matter into adjacent vegetation communities. Altered erosion, increased surface flows, and underground seepage can allow for the establishment of non-native plants. Changed hydrologic conditions can also alter seed bank characteristics and modify habitat for ground-dwelling fauna that may disperse seed.

Page 4.3-18 of the Draft EIR describes long-term indirect impacts, and specifically analyzes impacts from hydrology as follows (emphasis added):

The San Diego River serves as a natural outlet for stormwater runoff from the project site. Accordingly, the proposed project's grading plan and storm drain system would collect and retain runoff and direct drainage to retention basins in compliance with Municipal Separate Storm Sewer System (MS4) requirements. This will improve the current runoff conditions, which convey surface runoff from the Stadium parking lot into the outfall structures without basins to filter sediment and pollutants. **Long-term indirect impacts to the San Diego River associated with altered hydrology are expected to improve** as a result of the proposed project. Accordingly, the water, and associated runoff, used during landscaping activities will be retained and treated within the project site....

In short, Section 4.3.4 of the Draft EIR analyzes additional potential short-term and long-term indirect impacts to vegetation communities, jurisdictional resources, plants, wildlife, and wildlife movement. Each of these describe potential indirect impacts to the San Diego River; and any indirect impacts to the San Diego River could affect areas downstream, which are the focus of Comments 013-18 through 013-29.

Further, Section 4.9.4 of the Draft EIR analyzes impacts to water quality from construction of the proposed project. Pages 4.9-18 through 4.9-20 describe the specific best management practices (BMPs) that would be implemented during demolition, grading, and construction of the proposed project that would minimize degradation of surface water quality and thus, any downstream water quality.

As described in Section 4.9.4, "[t]he proposed project would result in a substantial increase in turf/landscape areas, with a decrease in impervious surfaces from approximately 90% to 57% of the project site." This would result in greater opportunity for groundwater recharge, resulting in beneficial impacts. The EIR recognizes that "[w]hile this increase in vegetation would provide substantial benefits with respect to decreased runoff and increased filtration of incidental contaminant concentrations, contaminants that may be present in runoff include nitrogen and phosphorous from fertilizers applied to landscaping and turf." To address potential water quality impacts from contaminants, biofiltration BMPs, consisting of partial retention and lined bioretention facilities, are included in the proposed

project's design. These BMPs achieve water quality treatment by filtering captured stormwater through vegetation and layers of treatment media and drainage rock prior to controlled releases through an underdrain and surface outlet structure (Draft EIR pg. 4.9-22). The drainage design of the proposed project would include routing on-site runoff from the Drainage Management Areas (DMAs) via the proposed storm drains designed to convey the peak flow rates toward the proposed River Park, where low flow structures would divert runoff for the small and more frequently occurring storms through these permanent pollutant control stormwater BMPs for water quality purposes, then would discharge runoff through each of the three existing storm drain outfalls along the San Diego River (Draft EIR Figure 4.9-7, Proposed Drainage). The proposed project structural LID BMPs would also incorporate full trash capture (Draft EIR Appendices 4.9-1 and 4.9-4). Based on the quantitative (i.e., modeled) and qualitative water quality analysis, in combination with incorporation of proposed LID design, source control BMPs, and structural BMPs, as described above, water quality impacts during project operations would be less than significant.

Invasive plants are prohibited from any landscaping on site (see mitigation measure MM-BIO-8), and all existing non-native plants within the limits of disturbance will be removed during construction activities when the site is cleared. Therefore, there will be a decrease in the potential for non-native, invasive species to establish downstream as a result of the proposed project.

Additional mitigation measures are required, which reduce potential indirect impacts, such as MM-BIO-5, which requires biological monitoring, in part to ensure that the proposed project is implementing stormwater pollution prevention plan BMPs: dust control, silt fencing, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and weather-proof, prohibition of pets on the construction site, etc.

In conclusion, the Draft EIR provides a full analysis of both on-site and off-site indirect impacts, including potential effects to the San Diego River and its downstream reach. The proposed project has been designed in compliance with all applicable permit requirements to reduce or eliminate potential downstream effects from water quality-related impacts and no mitigation is required to avoid or reduce impacts to water quality.

013-19 The comment states that the Draft EIR limits discussion of impacts to on-site and adjacent to the site. See Response to Comment 013-18, above.

013-20 The comment states that the Draft EIR fails to fully disclose off-site impacts to biological resources, including but not limited to specifically endangered and/or threatened birds.

CSU/SDSU do not concur with the comment and refer the commenter to Draft EIR Section 4.3, Biological Resources, including pages 4.3-14 through 4.3-22. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

013-21 The comment states that the Draft EIR does not fully disclose off-site impacts to biological resources—specifically sensitive aquatic plant and/or fish species. CSU/SDSU does not concur with the comment.

The Draft EIR discloses the proposed project's anticipated impacts to San Diego marsh-elder (*Iva hayesiana*), the only sensitive plant species observed on site. As described in Response to Comment 013-18, the Draft EIR includes an analysis of project impacts to vegetation communities and wildlife species downstream of the project site.

- 013-22** The comment provides factual background information about salt-marsh habitat west of the project site and does not raise an environmental issue with the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-23** This comment is an exhibit showing salt-marsh habitat west of the project site. The comment provides factual background information and does not raise an environmental issue with the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-24** This comment is an exhibit showing eelgrass habitat west of the project site. The comment provides factual background information and does not raise an environmental issue with the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-25** The comment states that the Draft EIR ignores species that occur off site. In response, CSU/SDSU notes that California least tern (*Sternula antillarum browni*), light-footed Ridgway's rail (*Rallus obsoletus levipes*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), and western snowy plover (*Charadrius alexandrinus nivosus*), among other special-status species, are all analyzed in Appendix D2 of Draft EIR Appendix 4.3-1. While none of these species has the potential to occur on site or in the surrounding habitats, the Draft EIR notes that these species will likely benefit from the proposed project's BMPs and mitigation measures, as these are designed to reduce impervious surface runoff and associated contaminant discharge into the San Diego River. Thus, the proposed project will result in an overall improvement of water quality in the river. For this reason, the proposed project would not result in downstream effects to these species or habitat for these species. Refer to Response to Comment 013-18 for more information.
- 013-26** The comment states that the Draft EIR fails to address indirect impacts to species that occur west of the project site. Please refer to Responses to Comments 013-18 and 013-25, above, for responsive information.
- 013-27** The comment states that the Draft EIR fails to address indirect impacts on fish species. Please refer to Responses to Comments 013-18 and 013-25, above, for responsive information.
- 013-28** The comment provides background information about special-status species within off-site habitat and does not raise an environmental issue with the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-29** The comment is a summary statement of comments regarding off-site biological resources. Please refer to Responses to Comments 013-18 through 013-28, above. The comment expresses general opposition to the proposed project, but does not raise any new issue concerning the adequacy of the Draft EIR. For that

reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 013-30** The comment provides factual background information about the commenter's organization. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 013-31** The comment is a conclusion statement. No further response is required.

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Response to Comment Letter 014

San Diego Green Building Council

Commenter

October 3, 2019

- 014-1** The comment provides background information on the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- 014-2** The comment applauds CSU/SDSU's "efforts of looking to incorporate many green building strategies into the development plan and the overall site and buildings." The comment serves as an introduction to comments that follow. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- 014-3** Referencing Draft EIR Figure 1-5, the comment states that the building and street layout does not "fit" Leadership in Energy and Environmental Design–Neighborhood Development (LEED-ND) credit for solar due to the proposed project layout's north/south orientation. The comment relatedly encourages CSU/SDSU to re-orient the street blocks in an east/west orientation, rather than the north/south orientation shown in Draft EIR Figure 2.1-1, to potentially increase building energy efficiencies by over 15%. As noted in the Draft EIR, the proposed project would achieve LEED Version 4 at a Silver or better certification level, as well as a LEED-ND designation for sitewide design. LEED certification is based on standards that encourage the development of energy-efficient and sustainable buildings. The layout of the proposed project's development areas has been designed to maximize the unique infill opportunity presented at this Mission Valley location. This includes benefits from the existing Metropolitan Transit System (MTS) Trolley Green Line that runs through the proposed project, as well as the planned Purple Line transit line and trolley station. The Draft EIR determined that impacts related to Energy (Section 4.5) and operations greenhouse gas (GHG) emissions (Section 4.7) would be less than significant, and no mitigation is recommended.
- Please also refer to Response to Comment 09-18 for additional information responsive to this comment. As discussed therein, and irrespective of LEED-ND credit eligibility, the proposed project is designed to install solar photovoltaic (PV) panels that are expected to generate a quantity of electricity that is equivalent to approximately 15% of the proposed project's total electricity demand (Draft EIR, p. 4.5-2). Whether these PV panels will qualify for LEED-ND points cannot be feasibly determined at this stage of the project design process. However, as provided in the Final EIR, the project design includes enforceable commitments to: (i) achieve LEED-ND designation; and (ii) install on-site PV panels. It is further noted that solar orientation is not a requirement to achieve LEED compliance.
- 014-4** The comment restates information contained in the Draft EIR and encourages CSU/SDSU, as part of the site plan design, to investigate water capture and re-use to reduce water demand. The comment states that captured and treated water can be used for cooling systems, landscape irrigation, and other non-potable uses. In response, CSU/SDSU note that the Draft EIR determined that impacts to water service would be less than significant; thus, no mitigation is proposed to reduce water usage. Further, because outdoor water use makes up for the largest percentage of water use in San Diego, interior re-use is limited and thus not included as a requirement of the proposed project at this time. However, CSU/SDSU note that should future buildings develop with such systems, water demand would be

further reduced from those totals disclosed in the Draft EIR. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, regarding a new Project Design Feature regarding installation of “purple pipes” for future connection to a reclaimed water system should the City of San Diego develop such a system. Regarding re-use of captured water for irrigation purposes, CSU/SDSU notes the proposed project has been designed to outlet into the San Diego River and that the water quality treatment in bioretention basins has not been designed to treat to levels that would typically allow for either re-use on-site or to treat pollutants typically associated with indoor water usage to then outlet to a sensitive biological area. Further, due to potential for vectors, the bioretention basins are designed to discharge treated water within 72 hours; which limits opportunities to re-use any treated, captured runoff. Therefore, the proposed project would not re-use water for irrigation to avoid potentially loading polluted water into the San Diego River. Lastly, the proposed project would have a beneficial effect to water quality by converted a large, impervious area (i.e., the parking lot and existing Stadium) into 80_acres of parks and open space, and treating all runoff from the project site prior to discharge into the San Diego River.

014-5 The comment states that, due to the prolonged nature of the anticipated project build out, CSU/SDSU should evaluate the effects of Zero Net Energy (ZNE) building requirements on the project design. In response, CSU/SDSU would comply with any required ZNE requirements as they apply to the proposed project over the duration of project buildout. However, at this time, neither the California Legislature through the enactment of statutes nor the operative state agencies (i.e., the California Energy Commission [CEC] and California Public Utilities Commission [CPUC]) through the enactment of regulations have established definitive definitions, standards or trajectories for the deployment of ZNE buildings. Because the exact timing of those requirements and construction are not known with certainty at this time, the energy modeling was based on best available information, including existing building code requirements. Any future requirements would further reduce energy usage by the proposed project. As such, the Draft EIR’s finding of less-than-significant energy impacts is conservative because anticipated building code updates will allow for further improvements in efficiency to be realized.

014-6 The comment provides information regarding code-based requirements for “EV ready infrastructure” – i.e., infrastructure that facilitates the subsequent installation of EV chargers. The comment requests the proposed project comply with the standards that will go into effect beginning January 1, 2020. CSU/SDSU agrees with the comment, and the Final EIR is revised to reflect the 2019 California Building Code’s (CBC) requirements for EV ready infrastructure. Please refer to page 4.2-21 of the Final EIR. CSU/SDSU also notes that, over the course of project buildout, project-related development will comply with the CBC requirements in effect at time of CSU building permit application and design, as the CBC is updated approximately every 3 years.

014-7 The comment restates information contained in the Draft EIR regarding the proposed project’s LEED certification design features, and recommends that CSU/SDSU continue to be seen as a local sustainability leader by including LEED Gold or higher, Zero Net Energy and International Living Future Institute’s Living Building Challenge commitments. In response, the design commitments contained in the Draft EIR ensure that the proposed project’s buildings would achieve “beyond code” sustainability and efficiency targets, and result in less-than-significant energy impacts. Further, those design commitments establish a “floor” for project-related development; additional sustainability and efficiency enhancements will be evaluated and considered during the building-specific design phase,

consistent with SDSU's approach to development at its existing campus. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information.

- 014-8** The comment restates information contained in the Draft EIR regarding the application of local land use plans, policies, and regulations to the proposed project, and serves as an introduction to comments that follow below. No further response is required.
- 014-9** The comment states that the proposed project should comply with Executive Orders (EOs). The comment specifically notes the Draft EIR does not include a discussion of EO B-18-12, which sets goals for ZNE for state buildings beginning design after 2025 as well as interim goals for buildings beginning after 2020. The comment encourages SDSU to “evaluate this Executive Order in their construction of future buildings and strive for Zero Net Energy.” Please refer to Response to Comment 09-21 for information responsive to this comment. As discussed therein, since the issuance of EO B-18-12 in 2012 by then Governor Brown, neither the California Legislature through the enactment of statutes nor the operative state agencies (i.e., the CEC and CPUC) through the enactment of regulations have established definitive definitions, standards, or trajectories for the deployment of ZNE facilities. Instead, the metric has evolved with the passage of time, with the current focus being on Zero Carbon (see the CEC's 2018 Integrated Energy Policy Report Update, available at https://ww2.energy.ca.gov/2018_energypolicy/). The shift in the referenced metric reflects the continued evolution of California's climate policy, which is seeking carbon neutrality by 2045 via a subsequent Executive Order (EO B-55-18). Given the change in metric, the proposed project's design focuses on reducing the pre- and post-development carbon footprint, in this instance through the incorporation of various “beyond code” design efficiencies. Nonetheless, as provided above in a prior response, CSU/SDSU would comply with any required ZNE requirements as they apply to the proposed project over the duration of project buildout.
- 014-10** The comment notes that the proposed project's LEED commitment is inconsistently described throughout the EIR and seeks clarification on whether the proposed project would achieve equivalency to LEED or certification under LEED directly through the U.S. Green Building Council. For clarification, the proposed project is required through the Project Design Features to achieve LEED Version 4.0 Silver or equivalent in LEED BD+C for new construction, as well as a LEED-ND designation for site-wide design. The proposed project does not require certification, nor does the analysis contained in the Draft EIR rely on or take credit for any such certification. However, it is noted that the Final EIR is revised to include Project Design Feature specific to the Stadium land use to achieve LEED Gold Version 4.0 certification. Therefore, the comment does not relate to the adequacy of the analysis contained in the Draft EIR, and no further responses is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 014-11** The comment restates information contained in the Draft EIR regarding the SDSU Climate Action Plan (CAP), which addresses issues specific to the already built out SDSU main campus and is not an applicable document for purposes of the proposed project's establishment of a new SDSU Mission Valley campus. The comment requests the Final EIR include a “Carbon Commitment” to apply to all “operational” carbon regardless of campus. CSU/SDSU are committed to complying with applicable state mandates for carbon neutrality for buildings constructed and operated by SDSU on the project site. The comment expresses the opinion of the commenter but does not raise an issue, and does not question the Draft EIR's determination that the proposed project's impacts to global climate change would be less than significant. Please refer to Thematic Responses GHG-1 – SDSU Mission Valley's

Sustainability Commitments, for additional responsive information regarding additional Project Design Features incorporated into the Final EIR to reduce operational GHG emissions. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

014-12 The comment is a conclusion statement referencing previous comments. No further response is required.

Response to Comment Letter 015

San Diego Audubon Society

James Peugh

October 2, 2019

- 015-1** The comment provides background information regarding the San Diego Audubon Society. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 015-2** The comment introduces comments that follow about the commenter's concerns with the Draft EIR. Please see Responses to Comments 015-3 through 015-102, below.
- 015-3** The comment introduces comments that follow about Murphy Canyon Creek. Please see Responses to Comments 015-4 through 015-21, below.
- 015-4** The comment restates selected excerpts from Draft EIR Section 4.3, Biological Resources. The comment states that the language in the Draft EIR is contradictory regarding wildlife using the project site as a wildlife corridor. CSU/SDSU notes that the comment conflates the project site and Murphy Canyon Creek. As described in Thematic Response BIO-1 – Murphy Canyon Creek, CSU/SDSU wishes to clarify that the proposed project would not result in any significant impacts to Murphy Canyon Creek and thus would not alter Murphy Canyon Creek's current condition. See also Thematic Response PD-1 – Project Refinements. Rather, the proposed project has been designed to specifically avoid impacts to sensitive habitat, including Murphy Canyon Creek, and would provide for a park use and roadway adjacent to Murphy Canyon Creek, rather than residential, office, or Stadium campus development. To clarify the conclusion on page 4.3-26, the Final EIR is revised as follows (changes shown in ~~strikeout~~ and underline): "However, none of the developed portions of the project site ~~is~~ are considered a wildlife corridor. There are no impacts to Murphy Canyon Creek and the temporary impact to the San Diego River is very small and would be revegetated and restored following the sewer connection. Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and would not be considered a significant impact."
- The overwhelming majority of the project site is the existing San Diego County Credit Union (SDCCU) Stadium and parking lot, which do not provide any habitat value. The analysis in the Draft EIR covers the entire project site, and while Murphy Canyon Creek is included within the project site boundaries, permanent, direct impacts to Murphy Canyon creek are not anticipated as a result of the proposed project. The Final EIR is revised to clarify the statement as follows: "Due to the nearby urban areas, highways, and existing stadium, wildlife are not expected to utilize the developed portions of the project site as a wildlife corridor..." However, because the majority of the project site does not include Murphy Canyon Creek or its adjacent habitat, and because Murphy Canyon Creek would not be directly and permanently impacted by the proposed project, it would not be appropriate to revise the overall general project site description to focus solely on Murphy Canyon Creek.
- 015-5** The comment states the Final EIR should be revised to state the proposed project would compromise Murphy Canyon Creek as a wildlife corridor. As stated in Response to Comment 015-4, above, the proposed project would not change anything about Murphy Canyon Creek. The adjacent parking lot areas would be redeveloped to a park area which would accommodate periodic urban-adapted wildlife

use much better than the existing lit, paved parking lot associated with the existing SDCCU Stadium. For these reasons, the proposed project would not compromise the value of the north-south Murphy Canyon wildlife corridor.

- 015-6** The comment states the EIR should use the term Murphy Canyon Wildlife Corridor rather than Murphy Canyon Creek because the area “contains the creek and adjacent wildlife habitat” for numerous wildlife species” The comment states that a diverse range of wildlife including larger animals travel along this area to the San Diego River. CSU/SDSU would point out that the term “Murphy Canyon Creek,” as used in the Draft EIR, refers to the wetted portion of the creek as well as the riparian habitat along its banks. Further, as pointed out, the Draft EIR concludes that wildlife move through the area and references coyotes, bobcats, opossums, raccoons, and rabbits as non-aquatic species that can utilize the creek. All the species listed are urban-adapted animals, as they are commonly seen in both urban and rural environments. The Final EIR is revised to add the following sentence to this section: “Other urban-adapted mammals, such as coyotes, bobcats, opossums, raccoons, and rabbits, could use both the San Diego River and Murphy Canyon Creek for movement through the area.”
- 015-7** The comment states the Murphy Canyon wildlife corridor is in the project site and that it is “hard to reconcile a reality where you are in the Wildlife Corridor/Project Site, then take 2 steps northeast and be in the Wildlife Corridor/Not the Project Site.” Refer to Response to Comment 015-4, above. The project site includes Murphy Canyon Creek; however, it is important to note that the project would not significantly impact Murphy Canyon Creek or alter the exiting condition of Murphy Canyon Creek. Further, the proposed project is revised in the Final EIR to further reduce adjacent, indirect impacts to Murphy Canyon Creek by eliminating the former “Street H” along the eastern boundary of the exiting parking lot, immediately west of Murphy Canyon Creek. The elimination of this roadway would provide for an additional buffer by widening the “East Park” portion of the River Park, which would enhance wildlife movement through Murphy Canyon Creek. It is noted that the easternmost boundary of the project abuts the western edge of the California Department of Transportation (Caltrans) right-of-way. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek, and Thematic Response PD-1 – Project Refinements for additional responsive information.
- 015-8** The comment refers to forthcoming comments. The comment introduces comments which follow. No further response is required.
- 015-9** The comment questions if the Final EIR will be updated to refer to the Murphy Canyon wildlife corridor and “correct the references to the Creek that should include the Corridor.” Please refer to Responses to Comments 015-4 and 015-7, above.
- 015-10** The comment questions if the Final EIR will be revised to reflect that Murphy Canyon wildlife corridor is in the project boundary. Please refer to Responses to Comments 015-4 and 015-7, above.
- 015-11** The comment questions if the Final EIR will be revised to describe the range of wildlife that travel to and from canyons to the San Diego River through the project site. Please refer to Response to Comment 015-6, above.
- 015-12** The comment refers to Comment 015-7, above, and states that a more complete study of the Murphy Canyon wildlife corridor would support the following statements. The comment serves as an introduction to comments that follow. Please refer to Responses to Comments 015-14 through 015-21, below.

- 015-13** The comment restates information contained in the Draft EIR regarding how wildlife is impacted as a result of the proposed project. The comment is an introduction to comments that follow. Please refer to Responses to Comments 015-14 through 015-21, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 015-14** The comment states there is a “dichotomy” in the Draft EIR because it states that no wildlife are using the project site, but also describes wildlife using habitat on the project site. Please refer to Response to Comment 015-4, above, which explains that the majority of the project site is developed, and that the Draft EIR, when discussing the project site’s overall potential to act as a wildlife corridor, describes the limitations of the developed Stadium site (including the Stadium and parking lot) to act as a wildlife corridor. However, as acknowledged by the commenter, the Draft EIR recognizes that both Murphy Canyon Creek and the San Diego River provide habitat for wildlife and wildlife movement.
- 015-15** The comment states that migrating birds fly into buildings not designed to prevent such bird strikes and states new technology and research have identified ways to minimize and avoid bird strikes. The comment states the proposed project should commit SDSU to use these technologies and to partner with organizations and designers with expertise. CSU/SDSU notes the Draft EIR identified bird strikes as a potentially significant impact of the proposed project, and recommended mitigation to reduce this impact to less than significant. Please refer to mitigation measure MM-BIO-15 (Glare Reduction), which provides different options for SDSU to use in order to prevent bird strikes on buildings and structures. Further, the proposed project has been revised to provide two additional residential buildings pads and convert the former H2 hotel pad to a residential building, which would provide for the ability to achieve the proposed density without high-rise residential buildings. This would reduce the number of high-rise (20+ story) residential towers, which would further reduce the potential for such impacts to occur. Please refer to Thematic Response PD-1 – Project Refinements for additional information.
- 015-16** The comment reiterates that the Draft EIR identifies wildlife using the north/south Murphy Canyon wildlife corridor and states that more comprehensive studies will result in a conclusion that Murphy Canyon Creek is an important wildlife corridor. Please refer to Response to Comment 015-4, which explains the difference between the general “project site,” which is 95% developed with the existing SDCCU Stadium and parking lot, and Murphy Canyon Creek, which comprises approximately 2.8 acres on the eastern edge of the project site. Wildlife movement that may be occurring in the Murphy Canyon Creek corridor will not be adversely affected because (1) the project would not result in any direct impacts to the creek area, and (2) the project would replace the lighted, paved parking lot with a park, thereby providing a better buffer between the creek and urban development such as that proposed in the central and western portion of the site.
- 015-17** The comment restates the Draft EIR’s conclusion that “the proposed project would not have a substantially adverse effect on wildlife movement and impacts would not be considered significant,” and suggests the finding be revised to recognize that Murphy Canyon Creek is a wildlife corridor, that impacts to Murphy Canyon Creek should be minimized during construction and operation of the proposed project, and that the proposed project should improve Murphy Canyon wildlife corridor as part of the proposed project. The Draft EIR recognizes that wildlife use the existing Murphy Canyon Creek, as noted in several comments above. However, as described in Response to Comment 015-4, above, and Thematic Response BIO-1 – Murphy Canyon Creek, the proposed project would not result in any significant impacts to Murphy Canyon Creek, and Murphy Canyon Creek would not be altered from its exiting condition.

Further, Section 4.3.4 of the Draft EIR provides a descriptive list of potential indirect biological impacts. In addition, mitigation measures MM-BIO-4 and MM-BIO-5 require temporary installation of construction fencing to delineate the limits of grading, biological monitoring, and a monitoring report; and MM-BIO-9 requires noise monitoring for least Bell's vireo, southwestern willow flycatcher, and/or coastal California gnatcatcher if present within 300 feet of the impact areas. MM-BIO-7, MM-BIO-8, MM-BIO-10, and MM-BIO-11 require signage/barriers between the River Park and Shared Parks and Open Space and San Diego River/Murphy Canyon Creek interface, restrictions on landscape planting, compliance with buffer setbacks, and a lighting plan. These mitigation measures were designed to reduce indirect impacts to areas where wildlife are present, such as Murphy Canyon Creek.

Finally, with respect to the suggestion that the proposed project improve the Murphy Canyon wildlife corridor, SDSU does not concur this is necessary. There is no identified impact—and thus no nexus under CEQA—that would require any such improvements to Murphy Canyon Creek. Note also that the Draft EIR considered two alternatives, which would have provided for expansion of Murphy Canyon Creek: the All Park Alternative, which was considered and rejected (please refer to Responses to Comments 015-96 through 015-97, below) as well as the “Single Channel Murphy Canyon Creek” Alternative.

- 015-18** The comment asks if the corrections referenced in Comment 015-17 would be made in the Final EIR. Please refer to Response to Comment 015-17, above.
- 015-19** The comment asks if the Final EIR will recognize the Murphy Canyon wildlife corridor. Please refer to Response to Comment 015-4, above.
- 015-20** The comment asks if the Final EIR would include a more comprehensive biological survey of the Murphy Canyon wildlife corridor and provide additional mitigation. There will not be a more comprehensive wildlife movement study performed on Murphy Canyon Creek. Please refer to Responses to Comments 015-4 and 015-6, above.
- 015-21** The comment asks if CSU/SDSU will implement best available technologies to minimize and avoid bird strikes. Please refer to Response to Comment 015-15, above, regarding recommended mitigation to avoid and reduce such impacts.
- 015-22** The comment restates information contained in the Draft EIR regarding mitigation measure MM-BIO-2. The comment expresses the opinion that any mitigation should be performed on site and recommends “restoration of degraded habitat along Murphy Canyon Creek in the Murphy Canyon Wildlife Corridor.” MM-BIO-2 provides for three options for mitigating impacts, including on-site improvements, off-site improvements to property under SDSU control, and purchase of credits at an approved mitigation bank in San Diego County. Under CEQA, off-site mitigation may be appropriate to reduce impacts to less than significant, and mitigation banks including biological mitigation banks, have been implemented and upheld under case law. CSU/SDSU note that the impacts in question are limited to less than 0.2 acres, and mitigation would include creation and enhancement in consultation with the appropriate federal and state regulatory agencies (i.e., U.S. Army Corps of Engineers [ACOE], California Department of Fish and Wildlife [CDFW], and the San Diego Regional Water Quality Control Board [SDRWQCB]).

CSU/SDSU is currently pursuing all options to provide at least 1:1 mitigation ratio on site, including revisions to the River Park design to accommodate such mitigation on site.

- 015-23** The comment states that least Bell's vireo habitat mitigation can be created by on-site preservation as listed in the mitigation measure. As explained in Response to Comment 015-22, above, on-site mitigation is one feasible option to reduce impacts to least Bell's vireo habitat to less than significant.
- 015-24** The comment restates information from MM-BIO-3 and restates the opinion that mitigation should occur on site. Please refer to Response to Comment 015-22, above.
- 015-25** The comment restates information in the Draft EIR related to impacts BIO-2, BIO-3, and BIO-4, and restates the commenter's opinion that mitigation should occur on site. Please refer to Response to Comment 015-22, above.
- 015-26** The comment asks if "there be a priority to address significant impacts" on site to reduce impacts to less than significant. Please refer to Response to Comment 015-22, above.
- 015-27** The comment restates impact BIO-6 to migratory birds and suggests that the mitigation measure to address this impact, MM-BIO-3 (Bird Surveys), is too broad and places too much of a burden on the project biologist. The comment recommends that the mitigation measure "be handled in consultation with a qualified ornithologist with experience in the species identified in the project site." The Biological Resources section and mitigation measures of the EIR were written by a qualified biologist who is extremely familiar with the wildlife species present in the San Diego region. The requirements outlined in the mitigation measure have been used on projects throughout the City of San Diego, the County of San Diego, and the other local jurisdictions and were developed under the direction of Ornithologist, Dr. Anita Hayworth. SDSU would implement all measures necessary to avoid impacts to birds protected under the Migratory Bird Treaty Act.
- 015-28** The comment restates the requirement of mitigation measure MM-BIO-3. The comment is an introduction to comments that follow. Please refer to Response to Comment 015-27, above, and Responses to Comments 015-29 through 015-36, below.
- 015-29** The comment suggests that mitigation measure MM-BIO-3 should be revised to clarify the type of materials that will be used to mark occupied nests. While MM-BIO-3 already includes language suggested by the commenter, such as "construction personnel shall be instructed on the sensitivity of nest areas" and the "project biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas," the mitigation measure is revised in the Final EIR. Please refer to Section 4.3.6, Mitigation Measures, of the Final EIR for the revised mitigation measure.
- 015-30** The comment states the Draft EIR "should list the species expected to be nesting on site and the appropriate buffer required for constructions activities to take place." The Draft EIR identifies species with the potential to occur on site; please refer to Appendices D1 and D2 in the Biological Resources Technical Report (Draft EIR Appendix 4.3-1). With respect to the appropriate buffer, the Draft EIR recommends that buffers for construction setbacks from special-status species be followed (300 feet [passerine] and 500 feet [raptor] buffers are followed). However, topography, construction activity, schedule, vegetation, nest location and species reactivity can all factor into the size of these buffers. Buffer modifications are conducted under the direction of a qualified ornithologist with experience in the San Diego region.

- 015-31** The comment states the project site is too large, and the mitigation measure too optimistic for one biologist to adequately perform the assigned tasks. Please refer to Responses to Comments 015-27 through 015-29, above. Further, while the project site may be large, as stated in previous responses, over 95% of the project site is currently developed as parking lot and an existing Stadium. A very small portion is comprised of habitat for sensitive biological resources. Further, the proposed project would be phased such that initial grading and potential indirect (and limited direct) impacts are generally occurring from the southwest to the northeast in a sequential order, which would enable a single biologist, or multiple biologists if necessary, to appropriately implement MM-BIO-3.
- 015-32** The comment asks SDSU to identify the source of the protocol for the biological surveys of nesting sites 72 hours prior to construction. Three days is a generally accepted timeframe for determining the occupied status of suitable habitat. This duration is associated with the time for a bird to identify a nest location, find the appropriate next-building materials, and construct a typical nest. Based on the experience of the project's biologists and ornithologist (all of whom are familiar with the project site and vicinity), this is an acceptable timeframe for such surveys to be conducted prior to construction activities. Further, biological monitors will be on site during construction activities to note any nesting birds that may become disturbed as a result of construction activity. CSU/SDSU notes also that CDFW did not object to this mitigation requirement.
- 015-33** The comment asks if the protocol can be detailed so experts can vet for its effectiveness at identifying nesting sites. Please refer to Response to Comment 015-32, above.
- 015-34** The comment asks if certain species build a nesting site in less than the 72-hour window of the survey. As stated in Response to Comment 015-32, this 72-hour timeframe is based on the experience of the project's biologists and ornithologist (all of which are familiar with the project site and vicinity), and it is a widely accepted timeframe for such pre-construction surveys.
- 015-35** The comment asks why the project biologist is being given discretion and whether the biologist should have to follow the protocols established in the Draft EIR. Mitigation measure MM-BIO-3 has been revised to further clarify the parameters by which the biologist will evaluate impacts to nesting birds and the process they will follow to establish appropriate buffers.
- 015-36** The comment asks if the project biologist assisted in writing the mitigation measure. In response, Dudek prepared the biological resources evaluation (Draft EIR Appendix 4.3-1), including conducting all the surveys, and also prepared the Draft EIR. Dudek biologists Anita Hayworth, PhD, and Callie Amoaku have many years' experience working with wildlife species throughout San Diego County, including in the San Diego River Corridor area. Both have extensive experience working with the U.S. Fish and Wildlife Service (USFWS) and CDFW in determining appropriate survey methods (including those for avian species), impact evaluation techniques, adequate mitigation measures, and construction implementation guidance. All biological resource analyses and mitigation measures were developed by Dr. Hayworth and Ms. Amoaku.
- 015-37** The comment restates information contained in the Draft EIR regarding Impact BIO-7 and mitigation measure MM-BIO-5 concerning short-term indirect impacts to special-status plants and sensitive natural communities. The comment is an introduction to comments that follow. Please refer to Responses to Comments 015-38 through 015-43, below.

015-38 The comment suggests mitigation measure MM-BIO-5, and other locations in the Final EIR, should be revised to provide for more than one “project biologist” to perform the required tasks. In response, MM-BIO-5 is revised in the Final EIR to acknowledge that multiple biological monitors may be required to perform the duties (changes shown in ~~strikeout~~ and underline):

To prevent inadvertent disturbance to areas outside the limits of grading for each phase, all grading of native habitat shall be monitored by one or more biologists as circumstances dictate. The biologist(s) shall be contracted to perform biological monitoring during all clearing and grubbing activities.

The project biologist(s) also shall perform the following duties:

- a. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing and grubbing to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).
- b. During clearing and grubbing, the project biologist shall conduct~~Conduct~~ meetings with the contractor and other key construction personnel each morning prior to construction activities in order to go over the proposed activities for the day, and for the monitor(s) to describe~~ing~~ the importance of restricting work to designated areas and of minimizing harm to or harassment of wildlife prior to clearing and grubbing.

015-39 The comment restates information regarding the responsibilities of the project biologist under mitigation measure MM-BIO-5. The comment is an introduction to comments that follow. Please refer to Response to Comment 015-38, above, and Responses to Comments 015-40 through 015-43, below.

015-40 The comment asks if construction teams and other contracted work would be able to receive instructions from the project/site biologist and effectively understand with limited or no biological training. In response, practice indicates that the combination of pre-construction meetings (where a biologist outlines the species present, mitigation measures, and communication protocol; and explains why it is important to follow avoidance and minimization measures) and consultation, along with bio-fencing and on-site monitoring by biologists, are effective at reducing and avoiding impacts. In many cases, biological monitoring will occur to document any potential disturbance in nesting and if that may occur, additional measures are implemented to further avoid or reduce disturbance.

015-41 The comment asks how training can be improved so that working crews understand the mitigation measures, why they are in place, and what they are protecting. Please refer to Response to Comment 015-40, above.

015-42 The comment asks if there are scheduled meetings between project/site biologist, contractor, and construction crews to coordinate the day’s activities and implementation of any mitigation measures. Please refer to Response to Comment 015-40, above.

015-43 The comment cites Comments 015-37 through 015-42, above, as support for more detailed strategies and checklists in this Final EIR, as well as requiring a full biological team to implement. Please refer to Responses to Comments 015-37 through 015-42, above.

- 015-44** The comment restates information contained in the Draft EIR regarding Impact BIO-8 and mitigation measure MM-BIO-7 concerning long-term indirect impacts to special-status plants and sensitive natural communities. The comment serves as an introduction to comments that follow. Please refer to Responses to Comments 015-45 through 015-47, below.
- 015-45** The comment states that signage and visual barriers alone do not reduce the potential indirect impacts to a less-than-significant level because people ignore signs and climb fences. SDSU does not concur with this comment. The signage will be used as part of the educational component suggested by the commenter to explain the importance of the protected areas. The barriers will likely include split-rail fencing, boulders or similar, which are designed to allow permeability for wildlife. Any fencing required to absolutely prevent humans from entering would preclude most wildlife from moving into or out of the River Park and likely not be effective in preventing human intrusion in the River (as evident by the existing 6 to 8-foot-tall chain-link fence that currently separates the SDCCU Stadium parking lot and the river, which is ineffective and detracts from the aesthetic value of the setting); therefore, it is unrealistic to assume that no human presence would occur in the River corridor. Further, recreational resource, public safety, and SDSU education stakeholders have requested the opportunity for access to the San Diego River to allow for scientific learning; allow for public health and safety access; and to allow members of the public the opportunity to access, interact with, learn from and appreciate the natural environment present in the River corridor. Specific designs for fencing and barriers are being coordinated with the River Park Advisory Group, which consists of a diverse group of stakeholders. This design refinement process will ensure that the ultimate design will attempt to strike a balance between the various stakeholders' desires for access (or lack thereof).
- 015-46** The comment states that, in addition to fencing and signage, mitigation measure MM-BIO-7 should include an educational component to discourage intrusion into sensitive habitat. In response, SDSU agrees and is committed to exploring education opportunities that the River Park will provide. More specifically, CSU/SDSU has been working with the River Park Advisory Group to prioritize the final design of the park, including educational opportunities and delivery methods.
- 015-47** As to mitigation measure MM-BIO-8, the comment suggests that a qualified botanist should review final landscape plans and to periodically check landscape product for compliance. The comment is noted, and the mitigation measure is revised in the Final EIR to add review by a qualified botanist.
- 015-48** The comment restates information contained in the Draft EIR regarding Impact BIO-9 and mitigation measure MM-BIO-9 concerning indirect noise impacts. The comment introduces comments that follow. Please refer to Responses to Comments 015-49 through 015-55, below, for responsive information to specific comments.
- 015-49** The comment asks for the timetable on the prior-to-construction activities. Mitigation measure MM-BIO-9 is revised in the Final EIR to include information suggested by the commenter. The Final EIR is revised as follows (changes shown in ~~strikeout~~ and underline):

Pre-construction surveys shall be conducted for any work between February 1 and September 15. Between 3 and 7 days ~~P~~-prior to start of construction activities, a qualified biologist with experience in identifying least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*) shall conduct a pre-construction survey for the least Bell's vireo (~~*Vireo bellii pusillus*~~) and, if needed,

southwestern willow flycatcher (~~*Empidonax traillii extimus*~~) to document presence/absence and the extent of ~~occupied~~ habitat being occupied by the species. The pre-construction survey area for these species shall encompass all suitable habitats within the impact area, as well as suitable habitat within a ~~3500-foot~~ 500-foot buffer of the construction activities. If active nests for any of these species are detected, a qualified biological monitor shall monitor the nest(s) for any signs of disturbance. Any signs of disturbance to the bird shall be documented, and trigger noise reduction techniques if applicable. ~~On-site~~ On-site noise reduction techniques shall be implemented to ensure that construction noise levels do not exceed 60 A-weighted decibels (dBA) hourly equivalent noise level or the ambient noise level, whichever is higher. ~~(or the existing ambient noise level if already above 60 dBA during the breeding season)~~ at the nest location. Noise reduction techniques shall be implemented and may include constructing a sound barrier or shifting construction work further from the nest.

- 015-50** The comment asks if the protocol for nesting bird surveys can be detailed in the Final EIR so experts can vet for effectiveness of success in identifying occupied habitat. Please refer to Response to Comment 015-49 for responsive revisions to mitigation measure MM-BIO-9.
- 015-51** The comment asks why the Draft EIR does not include a pre-report survey of wildlife habitat of the 300-foot buffer so a pre-construction survey will be more successful. Please refer to Response to Comment 015-49 for responsive revisions to mitigation measure MM-BIO-9.
- 015-52** The comment restates information contained in the Draft EIR regarding mitigation measure MM-BIO-9 concerning indirect noise impacts. Please refer to Responses to Comments 015-49 through 015-55 for responsive information to specific comments.
- 015-53** The comment asks if the Final EIR can detail on-site noise reduction techniques so they can be vetted for effectiveness as mitigation. Please refer to Response to Comment 015-49 for responsive revisions to MM-BIO-9.
- 015-54** The comment asks for the source of the 60 dBA noise threshold. Caltrans describes the use of 60 A-weighted decibel (dBA) as a noise level for traffic that would begin to raise concerns about the potential masking of communication sounds between birds, but the report goes on to further explain that the use of a single noise level threshold may be unnecessarily restrictive (Caltrans 2016). Using a specific dBA threshold may not be appropriate to determine noise impacts on birds; however, data shows that birds can tolerate certain levels of noise below 110 dBA without having permanent hearing damage or permanent threshold shifts (hearing loss), and continuous noise levels below 93 dBA are unlikely to cause temporary threshold shifts in birds (Caltrans 2016). At further distances from the noise (beyond the 93 dBA), Caltrans' model shows that there is little to no additional masking of communication signals. Therefore, the mitigation measure states, "construction noise levels do not exceed 60 A-weighted decibels (dBA) hourly equivalent noise level (or the existing ambient noise level if already above 60 dBA during the breeding season) at the nest location," which allows for variances if existing ambient noise levels are higher than 60 dBA.
- 015-55** The comment requests that the Biological Resources Technical Report identify the noise threshold for all special-status species expected to be in or near the project site. Thresholds for disturbance vary depending on the habitat in question, the type of noise, and the species; therefore, it would not be possible to state a single noise threshold for all special-status species expected to be in or near the project

site. However, generally, as noted in Response to Comment 015-24, special-status avian species exhibit evidence of disturbance when noise levels exceed 60 dBA, which is identified in Caltrans 2016.

- 015-56** The comment restates information contained in the Draft EIR regarding long-term noise impacts. As a preliminary matter, the habitat areas in question currently exceed the 60 dBA threshold; therefore, the analysis is based on an increase beyond the existing condition. Please refer to Response to Comment 015-54, above, and Responses to Comments 015-57 through 015-61, below, for responsive information to specific comments related to noise impacts on sensitive wildlife species.
- 015-57** The comment asks how there can be no expected impacts if this threshold is already exceeded. Appendix 4.3-1 describes the existing measured noise levels within the San Diego River south of the project and near the riparian vegetation adjacent to Fenton Parkway as ranging from 59 dBA hourly equivalent noise level (L_{eq-h}) to 64 dBA L_{eq} . (see EIR Appendix 4.12-1). These levels are generally higher than the 60 dBA L_{eq} threshold typically used for analyzing impacts to special-status species, like least Bell's vireo. Despite the noise levels generally exceeding the 60 dBA L_{eq} , least Bell's vireo (among a variety of other birds) is known to nest at, or near, these locations. During construction, the noise levels at a distance of 475 feet from the riparian area in the southwest corner (near noise monitoring location ST7) is estimated at 71 dBA L_{eq} . Noise levels at a distance of 200 feet from the San Diego River south of the project (near noise monitoring locations ST6, STR1, and STR2) is approximately 79 dBA L_{eq} (Dudek 2019a). The information provided in the Caltrans' model (described in detail in Response to Comment 015-54 above) states that birds can tolerate certain levels of noise below 110 dBA without having permanent hearing damage or permanent threshold shifts (hearing loss), and continuous noise levels below 93 dBA are unlikely to cause temporary threshold shifts in birds (Caltrans 2016). Therefore, the project's additional noise is not expected to result in behavioral shifts in birds at these locations. To ensure this does not happen, the project will implement mitigation measure MM-BIO-9, which is presented in Response to Comment 015-49, above. This measure includes monitoring the nest site if noise levels exceed the existing ambient noise levels; and if the nesting birds exhibit signs of disturbance, noise reduction techniques shall be implemented and may include constructing a sound barrier or shifting construction work further from the nest.
- 015-58** The comment asks why 60 dBA is the threshold used for all special-status species. The Draft EIR primarily focuses on the noise threshold for birds, such as least Bell's vireo. The 60 dBA threshold for birds is addressed in Response to Comment 015-54, above.
- 015-59** The comment asks what the threshold is for species not determined to be special-status but expected to use wildlife habitat near the project site. Per CEQA, the Final EIR addresses the effects of a project 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." Therefore, the Final EIR does not analyze noise thresholds for all common wildlife species found in the region. The Final EIR does, however, address noise impacts and monitoring for all birds protected under the Migratory Bird Treaty Act (see Impact BIO-18 on page 4.3-28, and mitigation measure MM-BIO-9 on page 4.3-38 of the Draft EIR).
- 015-60** The comment suggests the Final EIR should also include an analysis and mitigation measures for wildlife using the Murphy Canyon wildlife corridor. As stated in the Final EIR, there are no direct impacts to Murphy Canyon Creek (see pages 4.3-16 and 4.3-26 of the Final EIR). Murphy Canyon Creek is described in the existing conditions, and included in the impacts analysis for indirect impacts from proposed adjacent land

uses, such as special-status plants (p. 4.3-18), special-status wildlife species (pp. 4.3-20 through 4.3-22), jurisdictional resources (page 4.3-25), wildlife movement (pp 4.3-27 through 4.3-30), and habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) (pp. 4.3-31 through 4.3-33). Additionally, mitigation measures to reduce potential indirect impacts to Murphy Canyon Creek are provided as mitigation measures MM-BIO-3 (nesting bird surveys and buffers), MM-BIO-4 (temporary installation of fencing), MM-BIO-5 (construction monitoring and reporting), MM-BIO-6 (air quality standards), MM-BIO-7 (signage and barriers), MM-BIO-8 (invasive species prohibition), MM-BIO-9 (noise), MM-BIO-10 (indirect edge effects), and MM-BIO-11 (lighting plan).

- 015-61** The comment requests clarification regarding whether construction-related noise “could” or “will” occur from equipment used during vegetation clearing. The Final EIR is revised to state “Construction-related noise ~~could~~ will occur from equipment used during vegetation clearing.” Please refer to Responses to Comments 015-48 through 015-55 for responsive information related to indirect noise impacts.
- 015-62** The comment restates information contained in the Draft EIR regarding long-term indirect impacts to special status wildlife species and mitigation measure MM-BIO-10 regarding setbacks of active fields from the San Diego River. The comment asks if there is a study that the Draft EIR can refer to that details 100 feet as being the effective distance to reduce light and noise impacts. Mitigation measure BIO-10 requires a 100-foot buffer from the San Diego River and Murphy Canyon Creek, which is consistent with the City’s Multi-Habitat Planning Area (MHPA) adjacency guidelines. Section 4.3 analyzes the indirect impacts based on the City’s Adjacency Guidelines for the MHPA.
- 015-63** The comment states that mitigation measure MM-BIO-10 fails to include a buffer zone for Murphy Canyon Creek. The comment requests that recreation facilities be set back to prevent light and noise impacts on Murphy Canyon Creek. Murphy Canyon Creek is not designated as MHPA and is not subject to the same adjacency guidelines. However, the proposed project is revised in the Final EIR to reflect comments received on the Draft EIR. Importantly, the road previously proposed along Murphy Canyon Creek will no longer be located immediately adjacent to Murphy Canyon Creek, so potential conflicts with wildlife, lighting, noise, and other potential impacts from vehicle movement along the creek will be eliminated. Under the proposed plan, a buffer of approximately 140 to 740 feet would be established between Murphy Canyon Creek and the proposed active recreational (park) and residential land uses, which is in excess of the 100-foot buffer that is required in the City’s Subarea Plan (which was established in concert with the USFWS and CDFW during preparation of the City’s Subarea Plan in the 1990s). In addition, mitigation measure MM-BIO-10 is revised in the Final EIR to require the 100-foot buffer to also apply to Murphy Canyon Creek.
- 015-64** The comment asks if the proposed project could implement a native plant barrier along Murphy Canyon Creek to absorb residual light and noise to further lessen such impacts along this corridor.” The landscape character of the River Park will be predominantly native, especially along the southern and eastern edges of the park that are adjacent to the San Diego River, and Murphy Canyon Creek. Natives plants that may be used include mulefat (*Baccharis salicifolia*), toyon (*Heteromeles arbutifolia*), California sycamore (*Platanus racemosa*), and coast live oak (*Quercus agrifolia*). The native planting will transition to a blend of native and Mediterranean plantings as the park abuts the campus and residential areas. At the most northern and western edges of the park, along the development edges, a more edible theme within the landscape will be incorporated. Please refer to Response to Comment 015-63.

- 015-65** The comment states that providing such a setback would be beneficial to nocturnal wildlife who could be impacted by edge effects. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to Responses to Comments 015-63 and 015-64, above.
- 015-66** The comment states that two sentences in Draft EIR Section 4.3, Biological Resources, show that there is not a conclusion if there will be light spillage from the project site into wildlife habitat. The Final EIR is revised to be consistent with previous descriptions on light spill (changes shown in ~~strikeout~~ and underline): “With lighting design and shielding devices internal to the luminaire, there ~~should~~will be very little~~no~~ light spillage into the River Corridor Area, and lighting ~~should~~will be directed away from sensitive areas to ensure compliance with the MSCP’s [Multiple Species Conservation Program’s] Land Use Adjacency Guidelines.” The following is also revised in the Final EIR: “Similar to the sports fields, lighting would be shielded, with directional LEDs so there ~~would~~will be very little light spill.”
- 015-67** The comment states Draft EIR Section 4.3 explains there will be LEDs, but does not include any diagrams, photos, or descriptions of light post height, light post location, or project layout location. The commenter is referred to Section 4.1, Aesthetics, which states, “sports fields, parks, lighting associated with hiking and biking trails and walkways would be introduced to the project site. On trails and walkways located closest to the San Diego River, lights with directional LEDs would be installed. Shields and if needed, other appropriate design features, would be incorporated into the design of trail and walkway lighting to minimize potential light spillover beyond the project site” See also Response to Comment 015-66, above, regarding light spillage into habitat.
- 015-68** The comment expresses concern about potential light impacts to Murphy Canyon Creek. Please refer to Responses to Comments 015-66 and 015-67, above.
- 015-69** The comment states that the Draft EIR shows a very limited, properly executed, survey protocols performed in Murphy Canyon Creek for least Bell’s vireo and southern willow flycatcher. Contrary to the comment, all suitable habitat for least Bell’s vireo, southwestern willow flycatcher, and coastal California gnatcatcher was surveyed. The surveys were conducted in accordance with published protocol by surveyors with long-term experience and/or holding federal permits to conduct the surveys. Further, prior to conducting protocol surveys, a notification letter was sent to the USFWS outlining the survey areas and survey methods. This allows the USFWS to comment on the surveys prior to starting them.
- The focused surveys encompassed the anticipated area of disturbance, plus a 100-foot buffer along those portions of Murphy Canyon Creek that are within the project site. However, any portions of Murphy Canyon Creek outside of this study area were not surveyed because there are no impacts to Murphy Canyon Creek; therefore, the project does not result in any significant impacts outside the project boundary, and a 100-foot buffer from the proposed impact area is acceptable to evaluate potential indirect impacts to an area. Those portions of Murphy Canyon Creek beyond the 100-foot buffer would not be indirectly affected by the proposed project. It is important to note that least Bell’s vireo have a very distinct call and can often be heard from a distance of the surveyor and if least Bell’s vireo were heard in Murphy Canyon Creek it would have been recorded, even outside of the survey area.
- 015-70** The comment states that Murphy Canyon Creek and the San Diego River are a connected ecosystem unit and ignoring this will result in incomplete and underreported data in the biological survey. Please

refer to Response to Comment 015-69. This area was not ignored as the comment suggests; it was surveyed in accordance with protocols.

015-71 The comment restates information contained in the Draft EIR regarding biological surveys and states there is no explanation for the incomplete surveys of Murphy Canyon Creek. Please refer to Response to Comment 015-69. The surveys of Murphy Canyon Creek were conducted in accordance with protocols and thus were not incomplete.

015-72 The comment states there were no meetings with CDFW for their expertise. The comment states the Biological Technical Report includes no detail regarding the records that biologists consulted to confirm the accuracy of current conditions. The comment also criticizes the report for not including definitions of “off-site area” and “critical habitat.”

The literature used to assess the potential for special-status species to occur on or near the project site is described in detail in Section 2.1 of the Biological Resources Technical Report (Draft EIR Appendix 4.3-1); each species is further analyzed in Appendices C1, C2, D1, and D2 to the Biological Resources Technical Report.

Off-site areas are described on page 4.3-1 of the Draft EIR and shown on Figure 4.15-15: “There are off-site improvement areas, including a road expansion in the northwest corner of Friars Road and the Stadium and one sewer connection within the San Diego River. The other off-site improvements are confined to existing urban/developed areas.” The segment of Murphy Canyon Creek that is along the eastern edge of the project is indeed part of the project site although no modifications, improvements or impacts to this drainage or its surrounding native or non-native habitat is proposed. Please see Thematic Response BIO-1 – Murphy Canyon Creek, and Thematic Response PD-1 – Project Refinements for additional responsive information.

Critical habitat is a term defined by USFWS and is not defined under regional conservation plans.

015-73 The comment asks whether the Biological Technical Report considers Murphy Canyon Creek part of the project’s on-site area. As described in Response to Comment 015-4, and in Thematic Response BIO-1 – Murphy Canyon Creek, Murphy Canyon Creek is located on the project site but the proposed project would not result in any significant impacts to Murphy Canyon Creek. Thus, Murphy Canyon Creek would not be altered from its existing condition. Rather, the proposed project has been designed to specifically avoid impacts to sensitive habitat, including Murphy Canyon Creek, and would provide for largely passive park use adjacent to Murphy Canyon Creek, rather than residential, office, or Stadium campus development. Importantly, the road previously proposed along Murphy Canyon Creek will no longer be located immediately adjacent to Murphy Canyon Creek. Under the refined plan in the Final EIR, a buffer of approximately 140 to 740 feet would be established between Murphy Canyon Creek and the proposed active recreational (park) and residential land uses.

015-74 The comment asks if there is a map to show critical habitat areas. As noted in Response to Comment 015-72, and stated on page 26 of Appendix 4.3-1, off-site areas are described on page 4.3-1 of the Draft EIR and shown on Figure 4.15-15. There is no map that depicts USFWS-designated critical habitat because, as stated in Draft EIR Sections 4.3.1.4 and 4.3.1.5, there is no critical habitat on site. The closest critical habitat is for spreading navarretia (*Navarretia fossalis*; federally threatened, California Rare Plant Rank 1B.1), San Diego fairy shrimp (*Branchinecta sandiegensis*; federally

endangered) and least Bell's vireo (*vireo bellii pusillus*; federally endangered, state endangered), all of which is located approximately 5 miles from the project site.

- 015-75** The comment asks if Murphy Canyon is considered critical habitat under the definition of other regional conservation plans. As stated above, "critical habitat" is a term used in the federal Endangered Species Act (ESA) and is not a term that is used in regional conservation plans, unless those plans are expressly incorporating the ESA definition. Murphy Canyon Creek is not designated critical habitat for any species listed under the ESA. Note also that the proposed project would not directly or permanently affect Murphy Canyon Creek. Therefore, no mitigation is recommended or required for Murphy Canyon Creek. It is noted also that Murphy Canyon Creek is not part of another regional conservation plan.
- 015-76** The comment correctly notes that yellow warblers were identified in Murphy Canyon Creek. The comment introduces comments that follow. Refer to Responses to Comments 015-77 through 015-82, below.
- 015-77** The comment restates information in the Biological Resources Technical Report regarding yellow warbler. As stated in the Draft EIR, there are no significant impacts to Murphy Canyon Creek or its associated habitat. Further, the disturbed habitat noted in the comment is an existing condition, and not an impact of the proposed project. However, the Draft EIR acknowledges that there could be indirect impacts to nesting birds during the nesting season and includes mitigation measures to prevent inadvertent impacts from noise, and other potential impacts to nesting birds (see mitigation measures MM-BIO-3, MM-BIO4, MM-BIO-5, MM-BIO-7, MM-BIO-9, MM-BIO-10, and MM-BIO-11).
- 015-78** The comment provides background information about a survey in Murphy Canyon Creek, conducted in September 2019, which identified coastal California gnatcatcher. The comment then restates information from the Biological Resources Technical Report (Appendix 4.3-1), which determined coastal California gnatcatcher was not expected to nest on the project site. The comment suggests this is evidence of incomplete surveys in Murphy Canyon Creek. Focused coastal California gnatcatcher surveys were conducted according to the currently accepted protocol of USFWS Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol (USFWS 1997). The protocol states that "surveys shall be completed by permitted biologists if proposed projects are located within the historic range of this species and contain sage scrub plant communities including, but not limited to, Venturan coastal sage scrub, Diegan coastal sage scrub, Riversidean sage scrub, maritime succulent scrub, and/or alluvial fan sage scrub vegetation; chaparral and native/non-native grasslands when intermixed or ecotonal with sage scrub vegetation; and riparian vegetation when ecotonal to sage scrub vegetation." The surveys for coastal California gnatcatcher were completed in the only sage scrub plant communities within the project site (Diegan coastal sage scrub: Baccharis-dominated and Diegan coastal sage scrub), as well as between the berm and San Diego River ecotone, where a small amount of sage scrub occurs. Therefore, the surveys were completed in accordance to the currently accepted protocol.

SDSU acknowledges that coastal California gnatcatcher can occur outside of the project site and in a variety of habitat types during dispersal months (e.g., September), but observations of this species north of the project site do not "contrast to what is documented in the DEIR" since the focused surveys conducted within the project site were negative, as documented in the Draft EIR and the focused survey report. Further, within the project site, there is no sage scrub vegetation adjacent to Murphy Canyon Creek that would warrant conducting focused surveys in Murphy Canyon Creek. However, it is likely that if

coastal California gnatcatchers were nesting within Murphy Canyon Creek, they would have been detected over the nine surveys conducted within Murphy Canyon Creek for other species since they are vocal.

All surveys were conducted by utilizing generally accepted methods and protocols (when applicable). The Biological Resources Technical Report (Appendix 4.3-1) and Section 4.3, Biological Resources, of the Draft EIR include all elements required in a City of San Diego Biological Resources Technical Report. No further biological resource analyses or reports are required.

Nonetheless, as detailed in mitigation measures MM-BIO-3, MM-BIO4, MM-BIO-5, MM-BIO-7, MM-BIO-9, MM-BIO-10, and MM-BIO-11, the Draft EIR acknowledges that there could be indirect impacts to nesting birds during the nesting season and includes mitigation measures to prevent inadvertent impacts from noise, etc., to nesting birds. See Response to Comment 015-77, above.

- 015-79** The comment states that there is a high probability of edge effects to further degrade this disturbed habitat and suggests the determination of no impacts does not recognize the fragile state of Murphy Canyon Creek. Please refer to Response to Comment 015-77, above.
- 015-80** The comment states the finding of no impact to yellow warbler should be revisited and mitigation to protect and improve the disturbed habitat should be implemented. Please refer to Response to Comment 015-77, above.
- 015-81** The comment asks if the determination of no impact to Murphy Canyon Creek and yellow warbler habitat will be revised in the Final EIR. Please refer to Response to Comment 015-77, above.
- 015-82** The comment asks if Murphy Canyon Creek will have a more comprehensive biological survey performed to identify special-status species. Please refer to Responses to Comments 015-69 and 015-78, above.
- 015-83** The comment restates information contained in the Biological Resources Technical Report regarding wildlife corridors. The comment introduces comments that follow. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek as well as Responses to Comments 015-4, 015-10, and 015-84 through 87, below.
- 015-84** The comment states that tracking surveys have shown that wildlife using Murphy Canyon Creek travel “from the tributary canyons north and northeast of the project site through Murphy Canyon Wildlife Corridor (MCWC) to the San Diego River Watershed.” CSU/SDSU note the comment and agree that a portion of the project site, Murphy Canyon Creek, is used by wildlife. This is reported in Appendix 4.3-1 as noted by the commenter. However, the project would not impact Murphy Canyon Creek as explained in Thematic Response BIO-1 – Murphy Canyon Creek. The Draft EIR concludes that because there are no impacts to Murphy Canyon Creek or the San Diego River, no impacts would occur to any wildlife movement around the project site. Further, the proposed project has been refined to remove the former Street H adjacent to Murphy Canyon Creek and provide a wider buffer to the existing drainage, which would enhance the opportunity for urban-adapted wildlife to move through the corridors and adjacent park areas. See also Response to Comment 015-73, above.
- 015-85** The comment restates the Draft EIR’s conclusion regarding impacts to wildlife movement. The comment states the conclusion of no significant impact to wildlife corridors in the Draft EIR is incorrect because the report inaccurately concludes there is no wildlife corridor. See Responses to Comments

O15-4 through O15-7, above, and Thematic Response BIO-1 – Murphy Canyon Creek, which outline that the project would not result in any change to the structure and vegetation present in Murphy Canyon Creek.

O15-86 The comment restates information from the Draft EIR regarding construction of the proposed project deterring wildlife from using constrained habitat near the project site. The comment states that the Draft EIR is inconsistent in describing the project site as either a wildlife corridor or not, including Murphy Canyon Creek. Please refer to Response to Comment O15-4, above.

O15-87 The comment questions if the Final EIR will address the inconsistent statements regarding the site as a wildlife corridor and address impacts to yellow warbler and other wildlife with proper mitigation measures. The comment is a concluding comment addressing topics addressed in Responses to Comments O15-76 through O15-86. Please refer to the above responses.

O15-88 The comment restates information contained in the Biological Resources Technical Report and Draft EIR regarding the Multi-Habitat Planning Area (MHPA) and City of San Diego Multiple Species Conservation Program (MSCP). The comment is an introduction to comments that follow. Please refer to Responses to Comments O15-89 through O15-92, below, regarding the project's relationship to the MSCP and City of San Diego Subarea Plan.

O15-89 The comment states the Draft EIR concludes SDSU is not subject to the City of San Diego MSCP or other local biological resource protection ordinances. The comment expresses the opinion that it's "quite cynical and troubling that [SDSU] is proposing they are not party to habitat conservation plans or ordinances because they are not a signatory." The comment continues:

"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."

While the Draft EIR and Biological Resources Technical Report accurately state that SDSU is not a signatory of the MSCP, both the Draft EIR and Biological Resources Technical Report analyze the project for consistency with the plan. While the project site is large, it is critical to recognize that it is a previously developed site. Moreover, the project would not result in impact to all areas (e.g., Murphy Canyon Creek would be avoided). The project's total permanent, direct impacts to native habitat communities such as those protected by the MSCP total 0.4 acres of impacts, consisting largely of southern cottonwood-willow riparian. These impacts would be mitigated through compliance with wetlands permitting requirements as dictated by CDFW, ACOE and RWQCB. The overwhelming majority of impacts would be to urban/developed areas, which account for a total of approximately 167.3-acres as documented in Table 4.3-4.

An additional 0.36-acres of temporary impacts to native vegetation communities would be restored to pre-development conditions. The temporary impacts are associated with the sewer connection within the San Diego River; these temporary impacts are minor and likely overestimate the actual work area needed to tie into the sewer connection. To be conservative, a 27-foot by 60-foot work area was

estimated; however, the actual work will be conducted from the top of the berm and be done to minimize any disturbance within the San Diego River and Stadium Mitigation Site. It is important to note that improvements to existing City-owned/maintained infrastructure, assuming they are conducted in as minimally impactful a manner as possible, is a covered activity in the City of San Diego's MSCP Subarea Plan. Establishment of a connection to the City's existing sewer infrastructure in this single location is the most efficient way to service the increases in flows projected from the proposed project. Further, this extremely minor, temporary impact is the only impact within the MHPA. All other temporary or permanent impacts are located outside of the MHPA.

Further, during project planning, SDSU utilized the MSCP Adjacency Guidelines, including those that apply to lighting, noise, invasive plants, toxics, drainage, barriers, brush management and grading/land development, to evaluate impacts and develop mitigation measures. Section 4.3.6 of the Final EIR includes numerous best management practices, and avoidance and minimization measures in order to ensure there are no indirect impacts to the San Diego River/MHPA or Murphy Canyon Creek. Section 4.3.6 includes measures related to compensating for indirect impacts likely to occur as a result of the project. These indirect impact mitigation measures include fencing/signage (MM-BIO-7), invasive species prohibition (MM-BIO-8), noise (MM-BIO-9), indirect edge effects/buffers (MM-BIO-10), and lighting (MM-BIO-11), which would reduce potential indirect impacts due to adjacency to the MHPA to less than significant. As explained in responses above, while the San Diego River is part of the MHPA, it is important to note that Murphy Canyon Creek is not part of the MSCP and not subject to the same provisions; however, similar design considerations were afforded in the design of the "East Park" along Murphy Canyon Creek, which has been revised as explained in the above responses and Thematic Response PD-1 – Project Refinements.

Within the River Park and Shared Parks and Open Space, several lighted sports fields and courts are proposed. These sports fields include soccer and baseball fields, as well as basketball and tennis courts. These fields and courts would be set back a minimum of 100 feet from the San Diego River and Murphy Canyon Creek. With lighting design and shielding devices internal to the luminaire, there will be very little light spillage into the River Corridor Area. For security purposes, trails within the River Park would have nighttime lighting. Similar to the sports fields, low lights with directional LEDs will be used so there is very little light spill. All artificial outdoor light fixtures within 100 feet of the MHPA would be shielded and directed away from sensitive areas. The trail closest to the river is generally 100 feet from the river. The lighting in the River Park and Shared Parks and Open Space shall be designed so there is very little light spillage into the River Corridor Area. Safety lighting required within 100 feet of the San Diego River and Murphy Canyon Creek will be directed away from sensitive areas to ensure compliance with the MSCP's Land Use Adjacency Guidelines, the San Diego River Park Master Plan, and to be in accordance with the Land Development Code Section 142.0740 (Outdoor Lighting Regulations). The installation of the River Park and Shared Parks and Open Space will provide a natural buffer between the Stadium, commercial, and residential buildings and the San Diego River and Murphy Canyon Creek. The potential indirect impacts related to preserve adjacency of the River Park have been included in the analysis in Section 4.3.4 of the Final EIR.

The MSCP does not include a "participating special entity" provision (such as many more recent regional HCPs do) or provide the option for a non-participant to utilize take available in the plan, other than through the major amendment process, which is time intensive, extremely costly, and unnecessary. However, as outlined above, SDSU has sought direction from the MSCP and City's Subarea Plan and City's biological resource evaluation guidelines in performing this impact analysis and developing appropriate mitigation,

which meets the substance of this request. As summarized in this response and described in Section 4.3 of the Final EIR and Biological Resources Technical Report, the proposed project is designed to be consistent with the MSCP, including the Land Use Adjacency Guidelines.

- 015-90** The comment restates similar information from Section 4.10, Land Use and Planning, of the Draft EIR regarding SDSU's status as non-signatory to the MSCP and compliance with the City's Biological Resource Ordinance. Please refer to Responses to Comments 015-88 and 015-89, above.
- 015-91** The comment expresses the commenter's opinion that it is "shameful" for SDSU to take the position that the City's MHPA does not apply because SDSU is not a permittee, and will negatively impact SDSU's relationship with groups that share concerns about the environment and wildlife protections. Please refer to Response to Comment 015-89, above. SDSU was not involved with the preparation of the MSCP program in the mid-1990s. SDSU is not signatory to the San Diego MSCP and is therefore not a "permittee" under this HCP.
- 015-92** The comment questions if the Final EIR will be revised to address compliance with, and adhere to, the MSCP. Please refer to Response to Comment 015-89, above.
- 015-93** The comment restates Threshold 7 and summarizes that this section of the Draft EIR discusses the San Diego Trolley Purple Line, compliance of cumulative projects with the NCCP/HCP, including the City of San Diego MSCP, and the establishment of the regional preserve. The comment concludes by restating the finding in the Biological Resources Technical Report that concludes "Due to this consistency with these regional planning tools, the project would not result in cumulative impacts to plant and wildlife resources." The comment restates information in the Draft EIR and serves as an introduction to comments that follow. Please refer to Response to Comment 015-94, below.
- 015-94** The comment states that while the conclusion and analysis contained in the Draft EIR (and summarized above) "sounds great on paper," there are opportunities and future realities that not all standards will be met. The comment suggests this section of the Biological Resources Technical Report should recognize these unknown future probabilities and a more sober and realistic conclusion that cumulative impacts to native plants and wildlife resources would result with implementation of the proposed and cumulative projects in Mission Valley.

It would be speculative to assume that future planning efforts would fall short of required mitigation obligations or not be consistent with regional habitat conservation planning programs. For this reason, the cumulative impact analysis in the Biological Resources Technical Report (Appendix 4.3-1) and Draft EIR section are appropriate as written. Further, the City tracks mitigation requirements per their MSCP, and based on the 2018 annual report, 50,917.14 acres (96.57%) of the required 52,727 acres are currently conserved or obligated for conservation within the MHPA. The City also has performed rare plant monitoring for 20 years through the San Diego Management and Monitoring Program for specific rare plants. Finally, the City performs various ongoing management activities on City-owned lands including mitigation, habitat enhancement and restoration, invasive species removal, access control, trash and debris removal, enforcement, and abatement of homeless encampments, all of which help maintain the functions and values of the regional preserve system.

Specific to Mission Valley, the Mission Valley Community Plan Update (MVCPU) EIR provided the following cumulative impact evaluation of buildout of the community on the MHPA: The proposed

MVCPU would be generally consistent with existing MHPA preserve areas as existing preserve would remain planned as open space. Minor development within MHPA, such as footings for new pedestrian bridges (see Chapter 3: Project Description, of the MVCPU) are a consistent use within the MHPA. In addition, projects that could affect the MHPA would be required to comply with MHPA Land Use Adjacency Guidelines. Therefore, implementation of the proposed MVCPU would not result in a conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan or local policy protecting biological resources. Impacts would be less than significant (MVCPU PEIR, p. 4.2-34). Finally, and in summary, because the proposed project is anticipated by, and consistent with, the MVCPU, cumulative impacts would be considered less than significant.

- 015-95** The comment asks if SDSU can work “with conservation groups and city planners to make changes to the project that will not contribute to cumulative impacts that can be properly identified.” Please refer to Response to Comment 015-94, above.
- 015-96** The comment restates information contained in the Alternatives chapter about the All Park Alternative. The comment is an introduction to comments that follow. No further response is required.
- 015-97** The comment restates why the All Park Alternative was rejected, and notes that there were no objections raised regarding improving Murphy Canyon Creek. The comment states “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.” As described in Thematic Response BIO-1 – Murphy Canyon Creek, CSU/SDSU wishes to clarify that no significant impacts to Murphy Canyon Creek would occur, and therefore, Murphy Canyon Creek would not be altered from its existing condition. While stakeholders have suggested that a restored Murphy Canyon Creek would be a desired outcome of the project, as noted in Thematic Response BIO-1 – Murphy Canyon Creek, there are several pieces of existing infrastructure that are located in the berm to the west of the creek that would make relocation infeasible. Further, trolley infrastructure is located at the confluence of Murphy Canyon Creek and the San Diego River and would need to be relocated in order to accommodate a wider Murphy Canyon Creek channel. Both of these relocation efforts are infeasible and cost prohibitive and so for this reason, SDSU is committed to enhancing Murphy Canyon Creek by improving the adjacent land uses (elimination of a roadway that currently is located immediately west of the channel and the extensive parking lot that makes up much of the stadium site today) and reducing indirect development-related edge effects. The proposed project eliminates the current hardscape/parking lot adjacent to the portion of Murphy Canyon Creek within the project site. These design features will result in an increase buffer of up to 740 feet between Murphy Canyon Creek and the nearest development. These methods are much more in line with the nexus requirements of the project and costs associated are much more reasonable.
- 015-98** The comment provides information on the San Diego River Park Master Plan and states that compliance with the San Diego River Park Master Plan “stipulates guidance for a plan to improve the MCWC in conjunction with plans for parks and recreation.” The comment suggests the proposed project “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.” Conformance with the San Diego River Park Master Plan is analyzed in Draft EIR Section 4.10, Land Use and Planning. While CSU/SDSU is a state agency and not subject to the regulations of local land use jurisdictions, the analysis in Section 4.10 determined the proposed project would comply with the River Park Master

Plan. As described in Table 4.10-3, “The proposed project includes parks, recreation, and open space along the eastern edge of the project site, adjacent to Murphy Canyon Creek. This portion of the River Park would include trail connections to the development and connections to off-site facilities.” Further, in response to comments received on the Draft EIR, the proposed project is refined in the Final EIR to realign the road proposed along Murphy Canyon Creek, resulting in a buffer of approximately 140 to 740 feet between Murphy Canyon Creek and the nearest development. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek for additional information.

- 015-99** The comment asks if SDSU will “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.” Please refer to Response to Comment 015-4 regarding protecting Murphy Canyon Creek and Response to Comment 015-98 regarding compliance with the River Park Master Plan.
- 015-100** The comment summarizes the opinion regarding how SDSU should treat Murphy Canyon Creek, including recognizing the importance Murphy Canyon Creek to the region, and working with local conservation groups to see it is protected and flourishes for years to come. CSU/SDSU note the University has been working with conservation groups including through the River Park Advisory Group. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 015-101** The comment provides a warning for what would happen if Murphy Canyon Creek becomes more degraded and can no longer function as a wildlife corridor, including the potential for habitat fragmentation, reduced genetic diversity, and less resilient wildlife populations. The comment is a call to action. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- 015-102** The comment states that a PowerPoint presentation is attached to the letter. In response, CSU/SDSU has reviewed the PowerPoint and notes that the content does not identify issues specific to the analysis in the Draft EIR. Please refer to Responses to Comment 015-4 through 015-10, above, for responsive information regarding Murphy Canyon Creek as well as the Thematic Response BIO-1 – Murphy Canyon Creek, and Thematic Response PD-1 – Project Refinements.

Response to Comment Letter 016

San Diego County Archaeological Society
James W. Royal, Chairperson, Environmental Review Committee
October 4, 2019

- 016-1** The comment is an introduction to comments that follow. No further response is required.
- 016-2** The comment notes that MM-CUL-1 calls for Historic American Buildings Survey (HABS) documentation and asks for clarification regarding the level of documentation required. The comment also notes that efforts should be made to include interior spaces not normally accessible to the public. The Secretary of the Interior no longer distinguishes different levels of documentation for HABS/Historic American Engineering Record/Historic American Landscapes projects. The wording was updated in mid-2017 to remove mention of different levels, instead stating, “The documentation ranges in scope depending largely upon the level of significance and complexity [of the building]” (Source: National Park Service. 2017. HABS Guidelines, October 8, 2019. <https://www.nps.gov/hdp/standards/habsguidelines.htm>).
- As the comment mentions, there are copious numbers of historical photos to draw from, but the goal of HABS photography is to document the stadium as it exists today. The proposed HABS photography will include both exterior and interior views and details of the stadium.
- 016-3** The comment is a conclusion statement. No further response is required.

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Response to Comment Letter I1

Mark Nelson
August 5, 2019

I1-1 The comment raises issues concerning SDSU's statutory authority to raise and expend funds, and prepare an EIR, on a site SDSU has not procured. Under CEQA Guidelines Section 15004, Time of Preparation, Subsection b, states"

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations *should be prepared as early as feasible in the planning process* to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

Subsection (2) follows"

(2) To implement the above principles, *public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance.* For example, agencies shall not:

(A) *Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities,* except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.

Accordingly, CEQA compliance is required because the proposed project would include the execution of the purchase and sale agreement of the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I1-2 The comment notes that the commenter will send an inquiry to the California Attorney General's Office under separate email. The comment does not relate to any physical effect on the environment or the adequacy of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I2

John Riedel
August 5, 2019

- I2-1** The comment is an introduction to comments that follow. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise an issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I2-2** The comment expresses opinions of the commenter regarding protecting and improving wildlife habitat surrounding the project site, including habitat along the San Diego River Watershed and the Murphy Canyon Creek corridor. The comment addresses the general subject area of wildlife habitat, which received extensive analysis in the Draft EIR, Section 4.3, Biological Resources. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required.
- Nonetheless, as described in Section 1.3.4, Murphy Canyon Creek, the project would not impact Murphy Canyon Creek. Regarding potential indirect impacts, as described in Section 4.3, Biological Resources, the project would comply with Multi-Habitat Planning Area (MHPA) Adjacency Guidelines related to potential indirect impacts to the San Diego River; however, Murphy Canyon Creek is not part of the MHPA and therefore, is not subject to the same adjacency guidelines. Please also refer to Thematic Response – Bio-1 Murphy Canyon Creek for additional information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I2-3** The comment expresses opinions of the commenter that the Murphy Canyon Creek corridor must be improved. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise an issue within the meaning of CEQA.
- Nonetheless, as described in Section 1.3.4, Murphy Canyon Creek, the project does not propose to impact Murphy Canyon Creek; the project does not propose any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek. Therefore, improving Murphy Canyon Creek is not a part of or required by the proposed project. Further, as explained in Thematic Response – Project Refinements, the proposed project has been refined to re-align Street H, which formerly paralleled Murphy Canyon Creek, to provide an additional buffer and widen the amount of contiguous open space adjacent to existing Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I2-4** The comment addresses the general subject area of anti-bird strike methods, which received extensive analysis in the Draft EIR. Refer to Draft EIR, page 4.3-27, which determined that bird strike was a potentially significant impact, and MM-BIO-15 (Draft EIR, p. 4.3-41) which requires anti-bird strike practices. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response is provided or required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I2-5** The comment expresses the general opinion of the commentator regarding the use of best current practices for smart sustainable building practices. As described in the Draft EIR, Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, the project would incorporate sustainability measures and project design features (PDFs) intended to move the proposed project “beyond code.” SDSU is also committed to obtaining Leadership in Environmental and Energy Design (LEED) Version 4 at a Silver or better certification level for the proposed project, as well as a Neighborhood Development designation for sitewide design; LEED certification is based on standards that encourage the development of energy-efficient and sustainable buildings. Please refer to Thematic Response – Sustainability Commitments for additional information. The comment does not address the adequacy of the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I2-6** The comment expresses the opinions of the commentator. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise an issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I3

Robert Garner
August 6, 2019

- I3-1** The comment is an introduction to comments that follow. Please refer to Responses to Comments I3-2 through I3-7, below. Please also note that the SDSU Mission Valley Campus project traffic impact analysis was prepared by Fehr & Peers, licensed transportation engineers with over 30 years of experience preparing traffic impact analyses of this type throughout the state of California.
- The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I3-2** The comment states that traffic data for the SDG&E Mission Control Center at 9060 Friars Road was not covered in the traffic analysis. The referenced location is a private driveway, limited-access intersection (right-in, left-in, and right-out only). During a field review of both AM and PM peak hour conditions, inbound vehicles were observed to experience minimal delays (no more than 30 seconds) under existing conditions. Of the 200 feet of available storage in the eastbound left-turn lane, only 25% or 50 feet was utilized during both peak hours. Based on these observations, the addition of traffic on Friars Road in the vicinity of the driveway that would be generated by the proposed SDSU Mission Valley Project is not expected to result in a significant impact to operations as measured by delays or queueing at this location. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I3-3** The comment states that the traffic analysis does not include data for future increased traffic to and from the SDG&E Mission Control Center due to the planned expansion of that facility. Based on information provided by the City of San Diego Development Services Department, the referenced “planned expansion” has neither been approved nor is currently under review by the City. Accordingly, based on the status of the referenced expansion, the amount of traffic that would be generated by any such expansion is speculative and thus properly not included as part of the present analysis.
- I3-4** The comment states that there is a possibility that SDG&E will re-route traffic in connection with the planned expansion of the SDG&E Mission Control Center. The transportation impacts of any possible changes to the SDG&E site and related traffic distribution patterns would be evaluated as part of a site-specific study for that SDG&E project when and if such modifications are proposed and presented to the City for review as part of a separate environmental review process. Any such impacts attributable to the as yet undefined SDG&E project would not be the result of the proposed project that is the subject of the SDSU Mission Valley Campus Draft EIR. Please also refer to Response to Comment I3-3, above.
- I3-5** Please see Responses to Comments I3-3 through I3-4 for information responsive to this comment as it applies equally to the referenced “planned substation.”
- I3-6** The comment is a summary of preceding comments. Please see Responses to Comments I3-3 through I3-5. No further response is required.
- I3-7** The comment is a map attachment to illustrate the location of the subject of the preceding comments. Please see Responses to Comments I3-2 through I3-6. No further response is required.

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Response to Comment Letter I4

Megan Flaherty

August 6, 2019

- I4-1** The comment is an introduction to comments that follow. The comment is acknowledged and appreciated. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. No further response is required.
- I4-2** The comment expresses the opinions of the commentator about prioritizing habitat protection. The comment generally addresses biological resources, which received extensive analysis in Section 4.3, Biological Resources of the Draft EIR.
- The Draft EIR analyzed the potential direct and indirect impacts to biological resources, including potential indirect impacts associated with the park uses adjacent to Murphy Canyon Creek and the San Diego River which have the potential to indirectly impact habitat. The project site is approximately 96% developed with the existing SDCCU Stadium, parking lot, and roads, and direct, permanent impacts are limited to .4 acres of native vegetation communities, and .88 acres of Disturbed Habitat (see Draft EIR, Table 4.3-4, Permanent On-Site and Off-Site Impacts to Vegetation Communities/Land Cover Types). Minor impacts are also anticipated to wetlands areas along the southern edge of the project site, along the San Diego River. Mitigation measures are recommended to reduce direct impacts through wetlands permitting requirements and revegetation and/or restoration. Potential indirect impacts would be reduced to less than significant through measures for fencing and signage, minimizing light spillage, and use of a native plant palette. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required.
- I4-3** The comment provides background information on development within the Mission Valley floodplain. The comment addresses general subject areas, including biology and hydrology, which received extensive analysis in Section 4.3, Biological Resources, and Section 4.9, Hydrology and Water Quality, of the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. No further response is required.
- I4-4** The comment expresses the opinions of the commenter that the River Park should serve wildlife as well as people, and include areas focused on habitat and wildlife movement. The comment addresses general subject areas that received extensive analysis in Section 4.3, Biological Resources of the Draft EIR. In addition, the proposed site plan has been refined in the Final EIR to re-align "Street H" from its former alignment parallel to Murphy Canyon Creek. As a result, the park and open space area along Murphy Canyon Creek is wider and a contiguous corridor along the natural Murphy Canyon Creek without a paved road; however, trail access is provided for access to utilities. Please refer to Thematic Response PD-1 – Project Refinements. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-5** The comment expresses the opinions of the commenter that the River Park should be resilient to climate change, flooding, and invasive tree pests. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, including Section 4.3, Biological Resources; Section

4.7, Greenhouse Gas Emissions; and Section 4.9, Hydrology and Water Quality, of the Draft EIR. Further, SDSU has convened a River Park Advisory Group which has helped to further refine the park plan in consideration of the various stakeholder interests, including considerations for potential increased flooding due to climate change. The comment does not address the adequacy of the analysis in the Draft EIR. No further response is provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I4-6** The comment expresses suggestions for the proposed project including the use of native plants in all landscaping to reduce invasive species, interpretative and information signage, and the creation of a “living laboratory” for SDSU students. Please refer to Response to Comment 01-6. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-7** The comment recommends consulting with the San Diego River Park Foundation regarding homelessness, invasive plants, and “other issues which would impact ecological functioning.” CSU/SDSU note that the River Park Foundation is part of the River Park Advisory Group and has been involved in the ongoing planning and refinements to the site plan for the River Park component of the proposed project. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-8** The comment provides factual background information about the Murphy Canyon Wildlife Corridor and Murphy Canyon Creek and lists types of wildlife observed by the San Diego Tracking Team on the project site. Please refer to Responses to Comments 01-5 and 01-7. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-9** The comment expresses opinions of the commenter about widening the Murphy Canyon Corridor and improving it with native plants, wildlife ramps, and other wildlife mitigation strategies. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek, and Response to Comment 01-8. SDSU also notes, as described above, the site plan has been refined to provide additional park space/buffer west of Murphy Canyon Creek by re-aligning Street H such that it no longer runs parallel to Murphy Canyon Creek. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-10** The comment refers to a PowerPoint presentation, prepared by the San Diego Audubon Society, which is included as an attachment to the comment letter. The comment and the attachment were prepared prior to the release of the Draft EIR, and therefore, do not address the adequacy of the analysis in the Draft EIR and do not raise an issue within the meaning of CEQA. As noted above, the site plan has been refined to provide additional park space/buffer west of Murphy Canyon Creek by re-aligning Street H such that it no longer runs parallel to Murphy Canyon Creek. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I4-11** The comment recommends consulting with the Lewison Lab and The Nature Conservancy. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to response to comment O1-8. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-12** The comment expresses suggestions regarding preventing bird strikes, maximizing energy efficiency, and minimizing water usage. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to Responses to Comments O1-9 and O1-10. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-13** The comment expresses suggestions for the proposed project including the use of native plants in all landscaping. Please refer to Response to Comment I4-6, above. The proposed project would incorporate native plants in the landscape palette, and a biological mitigation measure is recommended which would prohibit the use of invasive plant species. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-14** The comment addresses general subject areas regarding the City of San Diego's Climate Action Plan and reducing greenhouse gas emissions, which received extensive analysis in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR. The comment recommends several strategies, including energy and water efficiency, co-locating housing and transit, solar panels, use of non-motorized travel, and supporting green lifestyles. Appendix 4.7-2, CAP Consistency Memo, analyzes how the proposed project would comply with the City's Climate Action Plan. As described therein, the proposed project would comply with the CAP through Option B of Step 1 and through meeting the checklist requirements under Step 2 and the Transit Priority Area requirements under Step 3. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, and Response to Comment O1-10. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I4-15** The comment is a summary of the previous comments and expresses the opinions of the commentator. Please see Responses to Comments I4-1 through I4-14, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. No further response is required.
- I4-16** The comment is a conclusion statement. No further response is required.

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Response to Comment Letter I5

David Smith
August 7, 2019

I5-1 The comment requests the location of the analysis for demolition of the existing SDCCU Stadium. A description of proposed demolition activities is provided in Section 2.3.4.1.2, Demolition, of Chapter 2, Project Description, of the Draft EIR. As discussed in the Draft EIR, the proposed project would involve demolition, dismantling, implosion, and/or removal of the existing SDCCU Stadium, a phase which is expected to last approximately 9 months, from approximately January 2022 to August 2022. Because demolition of the existing SDCCU Stadium was included as a component of the proposed project, the potential impacts of such demolition activities were analyzed and considered for all environmental issue areas in the Draft EIR, in the respective technical sections in Chapter 4, Environmental Analysis. The commenter questions where this analysis is located but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.

I5-2 The comment raises concerns regarding the stability and expansiveness of soils underlying the project site as it relates to proposed buildings and structures. As discussed in Section 4.6, Geology and Soils, based on laboratory tests conducted on the project site, soils located near the cut and borrow areas are likely to have a very low to medium potential for expansion. As discussed in more detail below, the appropriate soil preparation activities would be undertaken as part of project construction. As part of this, expansive soils may be locally removed and replaced with non-expansive material. Smaller structures and surface improvements that are not supported on deep foundations would be designed to accommodate the expected settlement, and/or the earthwork would be programmed to limit long-term settlement by placing surcharge loads or implementing other measures. Although there is a low to medium potential for soil expansion, as discussed in Section 4.6 of the Draft EIR, the soils located on the project site are susceptible to liquefaction and structural failure during both project construction and operation (Impacts GEO-1 and GEO-2). Additionally, the project site is underlain by soils located on a geologic unit or soil that may become unstable and potentially result in liquefaction or collapse (Impact GEO-3).

Appendix 4.6-1 and Appendix 4.6-2 both recommend ground improvement of soils on the project site to provide a stable foundation for the proposed project's vertical components. Deep dynamic compaction, vibro-replacement, deep soil mixing, and vertical drains are viable options that could be implemented for improving soil quality on the project site. However, each of these improvement options are unique, and each portion of the project site would need to be evaluated in order to choose the most suitable method to improve the soils in a particular area for each project component. Therefore, as required by mitigation measures MM-GEO-1 and MM-GEO-2, a qualified geotechnical engineer would prepare a final geotechnical report (or reports) for the portions of the project site proposed for construction, prior to the commencement of construction of any of the proposed project's vertical components. The final geotechnical report would include recommendations on the types of methods that should be utilized to improve soil quality in the footprint of each vertical development component. Furthermore, a geotechnical consultant would perform geotechnical observation and/or laboratory testing during grading to identify areas of potential liquefaction and unstable soils, and would develop conclusions and recommendations. All soils in areas of proposed development or future fill subject to potential liquefaction and/or instability would be treated per the recommendations of the final geotechnical report and field observations. With implementation of mitigation measures MM-GEO-1 and MM-GEO-2, the proposed project would result in a less than significant impact in regards to liquefaction and

structural failure, and the potential for unstable soil to impact people, the project, or adjacent properties would be reduced to less than significant. Please refer to Section 4.6.6 for full descriptions of these mitigation measures.

- I5-3** The comment raises concern regarding the project alternatives, and specifically with the cost and time estimate of removing the current stadium and developing a new stadium. However, the issues raised surrounding the alternatives are economic, social, or political issues that do not appear to relate to any physical effect on the environment. In response to the commenter's concern about the amount of time required for demolition of the existing SDCCU Stadium, demolition, dismantling, implosion, and/or removal of the existing SDCCU Stadium is expected to last approximately 9 months, from approximately January 2022 to August 2022. No further response is required.
- I5-4** The comment raises concern with project alternatives, and specifically with the reuse of the existing SDCCU Stadium. This alternative was analyzed in Section 6.4.2, Stadium Re-Use Alternative. The comment more specifically raises concern with the estimated cost of this alternative. It was determined that this alternative would require substantial renovation costs that could at least equal the cost of constructing a new stadium/venue. This alternative would also incur significant maintenance costs for the aging stadium. However, further specifics regarding the cost estimates of this alternative compared to development of a new stadium are not related to any physical effect on the environment. Because the comment raises economic, social or political issues that do not relate to an environmental issue, no further response is required.
- I5-5** The comment raises economic, social, or political issues related to site improvement costs and land deals, which do not appear to relate to any physical effect on the environment. Please refer to Attachment I5-A and Thematic Responses – Purchase Agreement. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the Project. No further response is required.
- I5-6** The comment is a conclusion statement. No further response is required.

Qualcomm Stadium - Cost Per Seat Analysis

Description	LA Forum Historical (\$/Seat)	Stadium Cost Model - Renovaton (\$/Seat)	Qualcomm - Cost Model (\$/Seat)	Description & Notes
Demolition & Site Clearing	144	149	200	Demolition - Reduce Seats
Utility Relocation and New Services	23	24	25	Replace
Excavation and Foundation	372	387	200	Field Level Remove and Replace
Structural Frame	828	902	850	Modify Ramping - Decks - Seating
Roofing and Waterproofing	79	73	50	
Exterior Wall	308	268	250	New Image
Interior Finishes	661	683	800	New Image
FF&E	107	49	100	
Playing Field	18	24	25	Replace
Scoreboard	147	195	195	Replace
Equipment	59	73	75	
Food Service Equipment	139	171	175	
Seating	134	61	60	Repair and Reuse
Vertical Transportation	42	73	80	Replace
Plumbing	333	195	300	Remove and Replace
Fire Protection	83	49	70	Remove and Replace
HVAC	417	244	400	Remove and Replace
Electrical	1,012	439	950	Remove and Replace
Audio Visual	169	73	150	
Plaza and Site	117	122	125	New Image
Total	5,193	4,256	5,080	
Indirect Costs	831	681	1,016.00	20%
Contingency - Design - Escalation	69	213	762	15%
Design	623	511	610	
Construction Total	6,716	5,661	7,468	

Summary	LA Forum	Stadium - Renovation Cost Model	Qualcomm - Cost Model	
# of Seats	17,500	65,600	45,000	
Cost / Seat	6,716		7,468	
Total Direct Cost	117,533,124		336,042,000	
SDSU Soft Costs			84,010,500	25%
Total Project Costs			420,052,500	

Response to Comment Letter I6

Denise Davidson

August 7, 2019

I6-1 The comment is an introduction to comments that follow. Please refer to Responses to Comments I6-2 through I6-12, below. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

I6-2 The comment states that Serra Mesa will be impacted by traffic from the proposed project and questions why a traffic study was not completed for the Serra Mesa neighborhood. The Draft EIR traffic impact analysis (TIA) did consider the traffic-related impacts of the proposed project on the Serra Mesa neighborhood. Draft EIR Figure 4.15-1 (TIA Figure 1) illustrates the intersections and street segments included in the traffic analysis study area. As shown on the figure, the study area includes roads within the Serra Mesa neighborhood, including Mission Village Drive, Ruffin Road, and Gramercy Road.

I6-3 The comment asks how to request a traffic study for Serra Mesa neighborhood, including Mission Village Drive, Ruffin Road, Gramercy Road, Murray Ridge Road, Marathon Street, and Melbourne Street, prior to construction of the proposed project. As noted in the preceding response, roads within the Serra Mesa neighborhood were in fact included within the Draft EIR traffic analysis study area.

Preliminarily, the distribution of project traffic throughout the study area roadways presented in the traffic analysis was derived based on the San Diego Association of Governments (SANDAG) Series 13 traffic model, a computerized travel demand model used to identify the distribution of project trips to the area roadways. The model quantifies existing and future land uses and estimates corresponding traffic volumes based on standardized modeling techniques. The SANDAG model is the primary tool used for forecasting traffic volumes in the city and county of San Diego.

Mission Village Drive, Ruffin Road, and Gramercy Road intersections and street sections were studied in the Draft EIR, as shown on the study area locations figure (Draft EIR Figure 4.15-1 (TIA Figure 1).

With respect to Murray Ridge Road, Marathon Drive, and Melbourne Drive, as shown on Draft EIR Figures 4.15-6, Project Trip Distribution, and 4.15-8, Project Trip Assignment (TIA Figures 7 and 9, respectively), the amount of traffic generated by the proposed project is expected to be low (i.e., less than 30 vehicles in either the AM or PM peak hours). This equates to one (1) additional vehicle every two (2) minutes and is well below the threshold levels requiring further analysis and, correspondingly, well below levels that would cause significant impacts under CEQA.

I6-4 The comment asks what the timeframe is for preparing a traffic study for Serra Mesa. Analysis of the Serra Mesa neighborhood streets was prepared as part of the Draft EIR currently being circulated for public review and comment, and no further analysis is required. Please see Response to Comments I6-2 and I6-3 above for additional information responsive to this comment.

I6-5 The comment asks what type of measures are proposed for Friars Road. As identified in the Draft EIR, the proposed project would result in significant impacts to portions of Friars Road, including intersections along the segments identified by the comment, and, on that basis, the DEIR recommends mitigation to address these impacts. Mitigation measures relating to congestion along Friars Road

include MM-TRA-3 (Fenton Parkway & Friars Road signal optimization), MM-TRA-4 (Northside Drive & Friars Road, second northbound right-turn lane and optimize signals), MM-TRA-5 (I-15 Southbound Ramps & Friars Road, second mixed flow lane on this ramp), and MM-TRA-6 (I-15 Northbound Ramps & Friars Road, add a second eastbound left-turn lane). The analysis determined that these improvements were not within the control of CSU/SDSU and therefore, determined that impacts would remain significant and unavoidable.

- I6-6** The comment asks how many free public parking spaces will be available for trolley riders at the Stadium Trolley Station. The precise number of parking spaces available to transit users has not yet been determined. As demand dictates and in coordination with the Metropolitan Transit System (MTS), the trolley operator, the appropriate number of spaces will be determined and identified as part of the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.
- I6-7** The comment asks whether construction trucks and materials will be routed through the Serra Mesa neighborhood and what the impacts will be to the neighborhood. As noted in Draft EIR Section 4.15.1.2, construction-related traffic will be added to the study roadway network that may result in potential temporary impacts; the precise routes of this traffic have not yet been determined. However, to minimize these temporary impacts, CSU/SDSU, or their designee, will prepare a Construction Traffic Management Plan (CTMP) (PDF-TRA-3), in consultation with the City of San Diego, California Department of Transportation (Caltrans), and affected adjacent property owners as appropriate, prior to initiating any construction activities. The CTMP will specifically address project construction traffic and parking, and will address, among other subjects: truck haul routes, truck turning movements at the proposed project driveways, traffic control signage, accommodation of bicycle and pedestrian traffic, restriction of hauling activities to specific time periods, on-site circulation and staging areas, traffic control plans indicating temporary lane closures, and monitoring of traffic control to implement revisions, if necessary. The CTMP also will require that CSU/SDSU, or its designee, obtain all necessary encroachment and transportation permits from the City prior to construction.
- I6-8** The comment asks what noise and air pollution would be generated by the proposed project. The comment addresses general subject areas, air quality and noise, which received extensive analysis in Sections 4.2, Air Quality; and 4.12, Noise, of the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I6-9** The comment asks how a fair and equitable price for the project site will be agreed on with the City of San Diego. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to EIR Section 1, Introduction and Existing Environmental Setting, for a discussion of San Diego Municipal Code Section 22.0908, which adopts a City policy authorizing, directing, and providing the means for the sale of the project site to SDSU, provided that such sale is at such price and upon such terms and timing as the City Council deems fair and equitable and in the public interest. No further response is required because the comment does not raise an environmental issue.

- I6-10** The comment asks how CSU/SDSU will maintain the River Park. Maintenance of the River Park is subject to the terms of the Purchase and Sale Agreement between the City of San Diego and CSU/SDSU. SDSU anticipates maintaining the River Park. On-going maintenance activities include typical park maintenance such as trash collection/ recycling and landscape maintenance, which are routine and are not expected to result in impacts to the environment. Additional maintenance activities would include maintenance of the bioretention basins, which are discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR, as well as the supporting appendices.
- I6-11** The comment questions who CSU/SDSU will be working with if archeological [sic] artifacts are discovered on the project site during construction. The Draft EIR requires mitigation measure MM-CUL-4, which requires both an archaeological and Kumeyaay cultural resources monitor during all ground-disturbing activity. No as the California Native American Heritage Committee identified several potentially affected Kumeyaay tribes or bands; however, no single Kumeyaay tribe or band was identified by NAHC.
- I6-12** The comment is a conclusion statement. No further response is required.

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Response to Comment Letter I7

Maryann T. Beck

August 11, 2019

- I7-1** The comment expresses a general opinion and opposition relating to the proposed project. The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I7-2** The comment addresses the general subject of project-related traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. sssssss The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I7-3** The comment expresses general opposition to the proposed project and does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I8

Leon Mack

August 11, 2019

- I8-1** The comment expresses general opinions of the commenter and opposition relating to the subject of project-related traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response is provided or required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I9

Jennifer Reed
August 12, 2019

- I9-1** The comment provides general background information and opinion relating to the subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I9-2** The comment expresses general opposition to the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I10

Patrick Straight
August 12, 2019

- I10-1** The comment expresses general support for the proposed project, including for adding more housing to San Diego. The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided.
- I10-2** The comment addresses the general subject area of project-related traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I10-3** The comment is a conclusion statement expressing support and enthusiasm for the proposed project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I11

Sharon Pearce
August 12, 2019

- I11-1** The comment expresses opinions of the commenter and general opposition to the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I11-2** The comment addresses the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I11-3** The comment expresses opinions of the commenter regarding the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment also suggests a bridge over the San Diego River. As explained in Section 4.15 of the Draft EIR, the proposed project does not result in impacts which would trigger the construction of the Fenton Parkway extension southerly over the San Diego River. Nonetheless, the Draft EIR did consider the potential traffic impacts associated with construction of this facility.

Subsequent to the preparation of the Draft EIR, SDSU has committed to funding the construction of a two-lane at grade Fenton Parkway Bridge as part of the Purchase and Sale Agreement with the City to provide the community with a long-term solution for a north-south connection in the Mission Valley area as part of a separately, City-initiated Capital Improvement Project. No further information or detail, including the bridge design, precise location, configuration, permitting, or construction schedule, is known at this time. No agency has submitted any permitting applications to any federal or state agencies, nor initiated any environmental review for the bridge under the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA) — and both NEPA and CEQA compliance is needed for the bridge, NEPA/CEQA compliance will ensure that environmental review will occur prior to construction. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I11-4** The comment addresses project residents and guest parking on Serra Mesa neighborhood streets. Parking impacts received extensive analysis in the Draft EIR, Section 4.15, Transportation. As analyzed in Section 4.15.7.5, the Draft EIR determined that impacts to the overall parking supply would be less than significant due to "...[t]he presence of a trolley stop within an approximate 1,500 feet radius of nearly all the proposed project uses, as well as the integration of residential, employment, and supporting retail uses with a robust pedestrian and bicycle network, will provide attractive mobility options to the use of a private vehicle." The Draft EIR found that "[t]his combination of factors is expected to reduce the overall parking and traffic demand at the site consistent with the trip reductions applied to the proposed project vehicle trip generation estimates." The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- 111-5** The comment expresses general opposition to the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I12

Scott Nenn
August 13, 2019

- I12-1** The comment expresses general opposition to the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I12-2** The comment addresses the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I12-3** The comment expresses opinions of the commenter on the general subject area of traffic and traffic safety, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I12-4** The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I12-5** The comment addresses the general subject area of alternative project locations. Chapter 6, Alternatives, in the Draft EIR (page 6-12) considered an Alternative Site Location for the proposed project on the existing SDSU campus (the Existing SDSU Campus Alternative Project Location Alternative). The Draft EIR rejected this alternative “because it was determined that there was insufficient capacity on the existing SDSU campus to accommodate such development and would result in the potential for greater impacts due to the increase in residents, vehicle trips, and short-term construction-related impacts.” (See Draft EIR, page 6-12) The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I13

“Fishinity”

August 13, 2019

- I13-1** The comment addresses the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I14

Victoria E.
August 5, 2019

I14-1 The comment is an introduction to comments that follow. Please refer to Responses I14-2 through I14-9, below.

I14-2 The comment states approval of the methodology used in the Draft EIR traffic analysis relative to the internal trip reduction attributable to the mixed-use nature of the project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the project.

I14-3 The comment raises concern regarding the trip reduction calculations associated with the Transportation Demand Management (TDM) Program to be implemented as part of the project. As stated in Draft EIR Section 4.15.1.1.1, the TDM reductions were calculated based on the California Air Pollution Control Officer's Association (CAPCOA) guidelines, which include the most comprehensive set of calculations currently available for calculating TDM effectiveness. For those measures not addressed by CAPCOA standards, case studies were utilized to estimate the appropriate reduction. The resulting reductions represent a reasonable forecast for TDM efficacy. Additionally, the TDM program is a project design feature (PDF-TRA-1 and PDF-TRA-2) that will be implemented as part of the project and will be included in the Mitigation Monitoring and Reporting Program (MMRP) to be adopted by the CSU Board of Trustees concurrent with project approval. The purpose of the MMRP is to ensure implementation of the adopted mitigation measures as well as project revisions or components such as the TDM program (CEQA Guidelines, Section 15097(a)). Moreover, the TDM Program provides for a TDM Program Coordinator to ensure the TDM strategies are implemented and effective (Draft EIR, pp. 4.15-7 to 4.15-8; see also EIR Appendix 4.15-1, Traffic Impact Analysis, Section 2.1.2, pp. 9-18 [Proposed TDM Program]).

I14-4 The comment asks how the transportation analysis accounts for the future interaction between the two SDSU campuses. The San Diego Association of Governments (SANDAG) Series 13 model was used in the analysis to forecast future traffic volumes and distribution throughout the region (Draft EIR Section 4.15.5.2). The interaction between the two campuses was evaluated as part of the model, which accounts for the interaction of travel demand between the subject site and all other origins/destinations in the region, including the SDSU College Area campus. Please refer to Response to Comment 09-34 for additional responsive information.

I14-5 The comment regards the "assumptions" utilized as part of the transit analysis and is an introduction to more specific comments that follow. Please refer to Responses I9-6 through I9-9, below, for responses to the specific comments raised.

Preliminarily, as noted on page 61 of the Fehr & Peers Transportation Impact Analysis prepared as part of the Draft EIR and included as Appendix 4.15-1, transit trips were not assumed but were estimated using the Mixed-Use (MXD+) Trip Generation Model, which was developed by Fehr & Peers and the Environmental Protection Agency. The MXD+ model accounts for density, diversity, design, destination accessibility, travel proximity, and scale of development in calculating future transit projections.

I14-6 The comment regards the methodology used to conduct the trolley analysis, and states that the analysis does not consider transit load factors, only the riders getting on and off at one stop. In response to the comment, a supplemental analysis was conducted by Fehr & Peers based on consideration of transit load factors. Attachment I14-A to this response (Trolley Capacity Estimates for Horizon Year plus Project Conditions) is a table illustrating the results of the analysis, which was conducted based, in part, on data obtained from SANDAG. The table illustrates Existing Capacity (expressed as Riders per Hour), Existing Year (2018) Peak Hour Volumes, Horizon Year (2037) Peak Hour Volumes, Project Ridership, and Horizon Year (2037) plus Project Peak Hour Volumes. The information is presented under two different scenarios, one based on projected ridership for the initial market-based uses to be developed as part of the proposed project, and the other based on a campus buildout scenario, which, for purposes of the analysis, assumes double (i.e., two times) the projected market-based uses ridership.

The table shows that under existing conditions, the trains arriving and departing during the peak hours at the trolley station located on the site of the proposed project, the Stadium Station, carry passenger loads of up to 508 riders in the peak direction (see Existing Year (2018) Peak Hour Volume). As shown in the table, this number is less than 50% of the existing hourly capacity of 1,239 after accounting for variations throughout the hour.

Specific to transit load factors, as shown in Attachment I14-A, at project buildout, passenger loads under the market-based uses scenario potentially would be as high as 905 riders per hour in the peak direction and peak hour. (See Horizon Year (2037) + Project Peak Hr Volume.) As the existing capacity for that direction and time is 1,368 total riders per hour (see Existing Capacity), even assuming no increase in capacity over the intervening years, the trains would have sufficient capacity to accommodate the projected number of passengers that would be added by the proposed project.

Furthermore, by the time the proposed project transitions to a fully functioning university campus, the Regional Transportation Plan forecasts that the train frequency is expected to double from the existing capacity, thereby providing substantial additional capacity. See the relevant excerpt from the Regional Transportation Plan, Attachment I14-B to this response to comment.

Thus, based on SANDAG load data, adequate trolley capacity is expected to be available to serve the additional riders that would be generated by the proposed project. Therefore, the Metropolitan Transit System (MTS) Green Line trolley is expected to be able to accommodate the project's forecasted ridership, and accordingly the proposed project would not result in significant impacts to trolley operations. (See Response to Comment I14-8, below, for information specific to campus uses.)

I14-7 The comment regards consideration of college class schedules in conducting the transit analysis. The transit trip estimates included in the Draft EIR are based on traditional campus office and residential uses using validated and accepted analysis methods.

As noted in the Draft EIR, the campus will transition to a university over time. While specific class schedules have not been developed for the Mission Valley campus as of this time, the Mission Valley campus is expected to have a research focus and is expected to primarily serve upper division and graduate level students. Therefore, the Mission Valley campus is expected to have different travel characteristics than the existing College Area campus. Also, the proposed Mission Valley campus is expected to serve a full-time enrollment approximately 50% of the enrollment size of the existing campus. Lastly, the estimates of transit passenger volumes presented in the Draft EIR include some peaking

during the typical commute periods, which correlates to students and employees who will spend the majority of the day on the campus. Because the commute periods are expected to correlate with the AM and PM peak hours due to the campus serving upper-division and graduate-level students, in combination with the other factors explained above, transit ridership at the Mission Valley campus, and corresponding impacts, are expected to be less during other time periods unlike the existing campus.

I14-8 The comment regards transit mode share estimates based on the SDSU main campus. According to data reported by SDSU, an average of 16% of the existing campus population travels to SDSU by transit (<https://sustainable.sdsu.edu/resources/metrics-reports>).

It is difficult to estimate transit trip mode share for the planned Mission Valley campus relative to the existing campus as the proposed land uses in Mission Valley would differ to a certain extent from the existing campus, and the primary student body in Mission Valley will be comprised of graduate students with a research focus as compared to majority undergraduate students at the existing campus.

For the uses analyzed in the Draft EIR that will generate the greatest number of overall transit trips, the MXD+ model was used as it is the most reliable source for estimating the proposed project's transit mode share. (See Response to Comment I14-5 for related information responsive to this comment.) However, even if one assumes the campus transit trip generation would be double that estimated for market uses, the trolley would still be able to accommodate the project's transit ridership within even the existing trolley capacity (see Attachment I14-A, Capacity Estimates for Horizon Year plus Project Conditions and Doubled Project). While it is highly unlikely that the campus transit trip generation would be double that of market-based uses in the peak hours, this hypothetical analysis demonstrates the ample capacity available to accommodate additional trolley ridership.

Further, as noted above, by the time the proposed project transitions to a fully-functioning university campus, the frequency of available trains is expected to double, thereby resulting in substantial additional system capacity. (See Attachment I14-B to this Response to Comment.) For these reasons, it would not be good engineering practice to rely on the transit mode share from the existing campus for the analysis, nor is there reason to question the credibility of the analysis presented in the Draft EIR.

I14-9 The comment requests comparison of the existing campus transit mode share relative to the proposed project. Please see Response to Comment I14-8 for information responsive to this comment. Moreover, as noted in Response to Comment I14-7, the analysis of transit related impacts presented in the Draft EIR is based on validated methods and addresses the campus office and residential uses proposed for the site as it transitions to a university campus setting. Thus, as previously explained, the mode share and specific number of trolley riders would be different as compared to the existing university campus. The anticipated differences in the operational characteristics of each campus will be substantive enough that a direct comparison would not be applicable in this case.

As to bus service, future service to the Mission Valley campus has been identified as a possibility, but no specific plans have been identified at this time.

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Trolley Capacity Estimates for Horizon Year Plus Project Conditions

10/17/2019

Direction	Peak Hour	Existing Capacity (Riders/hr) ^a		Existing Year (2018) Peak Hour Volume (Riders/peak hr) ^b		Horizon Year (2037) Peak Hour Volume (Riders/peak hr) ^c		Project Ridership (Riders/peak hr)		Horizon Year (2037) + Project Peak Hr Volume (Riders/peak hr)		V>C?	
		INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND
Eastbound	AM	1,268	1,268	220	216	321	315	108	124	429	439	No	No
	PM	1,368	1,368	481	466	701	679	89	226	790	905	No	No
Westbound	AM	1,239	1,239	465	508	678	740	202	66	880	806	No	No
	PM	1,181	1,181	322	341	469	497	167	120	636	617	No	No

Source: Fehr & Peers, 2019

Notes:

a Capacities calculated based on detailed ridership data from the 2007 SDSU Campus Master Plan EIR

b Existing peak hour ridership calculated from Fall 2018 data provided by SANDAG and data from the 2007 SDSU Campus Master Plan EIR

c Annual growth of 2% per year assumed per the 2007 SDSU Campus Master Plan EIR

Trolley Capacity Estimates for Horizon Year Plus Project Conditions and Doubled Project Ridership

Direction	Peak Hour	Existing Capacity (Riders/hr) ^a		Existing Year (2018) Peak Hour Volume (Riders/peak hr) ^b		Horizon Year (2037) Peak Hour Volume (Riders/peak hr) ^c		Doubled Project Ridership (Riders/peak hr)		Horizon Year (2037) + Project Peak Hr Volume (Riders/peak hr)		V>C?	
		INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND	INBOUND	OUTBOUND
Eastbound	AM	1,268	1,268	220	216	321	315	216	248	537	563	No	No
	PM	1,368	1,368	481	466	701	679	178	452	879	1,131	No	No
Westbound	AM	1,239	1,239	465	508	678	740	404	132	1,082	872	No	No
	PM	1,181	1,181	322	341	469	497	334	240	803	737	No	No

Source: Fehr & Peers, 2019

Notes:

a Capacities calculated based on detailed ridership data from the 2007 SDSU Campus Master Plan EIR

b Existing peak hour ridership calculated from Fall 2018 data provided by SANDAG and data from the 2007 SDSU Campus Master Plan EIR

c Annual growth of 2% per year assumed per the 2007 SDSU Campus Master Plan EIR

Table A.5 – Phased Transit Services – Revenue Constrained Plan (Continued)

Decade	Service	Route	Description	Peak Headway (Minutes)	Off-Peak Headway (Minutes)
2030	COASTER	398	Additional Double tracking/Increased Frequency	20	60
2030	SPRINTER	399	Double tracking (Oceanside-Escondido) Increased Frequencies	10	10
2030	Trolley	561	UTC to Mira Mesa via Sorrento Mesa/Carroll Canyon (extension of route 510)	7.5	7.5
2030	Trolley	520	Orange Line - Increased Frequency (existing 15/15)	7.5	15
2030	Streetcar	553	Downtown San Diego: Little Italy to East Village	10	10
2030	SPRINTER	588	SPRINTER Express	10	15
2030	BRT	890	El Cajon to Sorrento Mesa via SR 52, Kearny Mesa	10	-
2030	Rapid	2	North Park to downtown San Diego via North Park, Golden Hill	10	10
2030	Rapid	28	Point Loma to Kearny Mesa via Old Town, Linda Vista	10	10
2030	Rapid	30	Old Town to Sorrento Mesa via Pacific Beach, La Jolla, UTC	10	10
2030	Rapid	120	Kearny Mesa to downtown via Mission Valley	10	10
2030	Rapid	473	Oceanside to UTC via Hwy 101 Coastal Communities, Carmel Valley	10	10
2030	Rapid	709	H Street Trolley to Otay Ranch/Millenia via H Street Corridor, Southwestern College	10	10
2030	Rapid	910	Coronado to downtown via Coronado Bridge	10	10
2035	Trolley	520	Orange Line - Extend to Airport Intermodal Transit Center	7.5	15
2035	Streetcar	555	30 th St to downtown San Diego via North Park/Golden Hill	10	10
2035	Trolley	560	Mid-City to downtown (Phase 1) via El Cajon and Park Blvds	7.5	7.5
2035	Trolley	563	Pacific Beach to El Cajon via Clairemont, Kearny Mesa, Mission Valley, SDSU	7.5	10
2035	BRT	653	Mid-City to Palomar Airport Road via Kearny Mesa/I-805/I-5	15	-
2035	Rapid	11	Spring Valley to SDSU via Southeastern San Diego, Downtown, Hillcrest, Mid-City	10	10
2035	Rapid	201/202	UTC Area Super Loop - Increase Frequencies	10	10
2035	Rapid	471	Downtown Escondido to East Escondido	10	10
2035	Rapid	474	Oceanside to Vista via Mission Ave/Santa Fe Road Corridor	10	10
2035	Rapid	635	Eastlake/EUC to Palomar Trolley via Main Street Corridor	10	10
2035	Rapid	636	SDSU to Spring Valley via East San Diego, Lemon Grove, Skyline	10	10
2035	Rapid	637	North Park to 32nd Street Trolley via Golden Hill	10	10

Table A.5 – Phased Transit Services – Revenue Constrained Plan (Continued)

Decade	Service	Route	Description	Peak Headway (Minutes)	Off-Peak Headway (Minutes)
2035	Rapid	638	San Ysidro to Otay Mesa via Otay, SR 905 Corridor	10	10
2035	Shuttle	448/449	San Marcos - Increase Frequencies	10	10
2035			Local Bus Routes - 10 minutes in key corridors	10	10
2040	Trolley	520	Orange Line - Increased Frequencies	7.5	7.5
2040	Trolley	522	Orange Line Express - El Cajon to downtown San Diego	10	10
2040	Trolley	530	Green Line Extend to downtown - Bayside	7.5	7.5
2040	Trolley	540	Blue Line Express - UTC to San Ysidro via downtown	10	10
2050	Trolley	560	SDSU to downtown (Phase 2) via Mid-City, El Cajon and Park Blvds	7.5	7.5
2050	Trolley	562	UTC to San Ysidro via Kearny Mesa, Mission Valley, Mid-City, Southeastern San Diego, National City/Chula Vista via Highland Ave/4th Ave	7.5	10

Response to Comment Letter I15

Nicholas A. Barber, Assistant Professor, SDSU

August 26, 2019

- I15-1** The comment provides background information about the commenter and does not raise an environmental issue regarding the Draft EIR. The comment is acknowledged and included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I15-2** The comment expresses general support for the proposed project and restates information from the Draft EIR that the project would protect nearby wildlife habitat. The comment also expresses the opinions of the commenter that the presence of wildlife habitat in the middle of a highly developed metropolitan area is unique and contributes to quality of life in the region. The comment does not raise an environmental issue regarding the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I15-3** The comment expresses the commenter's opinion that there is an opportunity to enhance the Murphy Canyon Creek corridor. The comment states that restoration of this corridor would enhance habitat and biodiversity, and encourage animal movements through the corridor rather than across roadways or through neighborhoods. The comment does not address the adequacy of the analysis in the Draft EIR and does not raise an issue within the meaning of CEQA.
- Nonetheless, as described in Response to Comment I2-2, the proposed project would not impact Murphy Canyon Creek; the project does not include any improvement, facility, construction, or staging within any portion of Murphy Canyon Creek. Therefore, opportunities to enhance Murphy Canyon Creek are not a part of or required by the proposed project. Please refer to Thematic Response – Murphy Canyon Creek for additional information.
- Further, the proposed project has been refined in the Final EIR. As described in Thematic Response – Project Refinements, the refined site plan would re-align Street H, which formerly ran parallel along Murphy Canyon Creek. The refined plan would provide a more direct connection through the River Park to Rancho Mission Road, and would provide a wider buffer adjacent to Murphy Canyon Creek.
- The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I15-4** The comment addresses the general subject area of anti-bird strike materials, which received extensive analysis in the Draft EIR. Please refer to Draft EIR, p. 4.3-27 which determined that bird strike was a potentially significant impact, and MM-BIO-15 (Draft EIR, p. 4.3-41), which requires anti-bird strike practices. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response is provided or required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I15-5** The comment is a conclusion statement. The comment is acknowledged. No further response is required.

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Response to Comment Letter I16

Patti Roscoe
August 31, 2019

- I16-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I16-2** The comment provides background information about the election and planning process prior to Measure G regarding an “open and public process.” The comment expresses opinions of the commenter and general support for the proposed project planning process. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I16-3** The comment expresses the commenter’s appreciation that the many components that were planned during the Measure G campaign are included in the proposed project, including “the construction of new parks, expanded university space and a state-of-the-art stadium.” The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I16-4** The comment is a concluding statement referencing previous comments. No further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I17

Thor Biberman

August 6, 2019

- I17-1** The comment introduces the commenter as a reporter with the San Diego Daily Transcript. The comment is an introduction to comments that follow. No further response is required.
- I17-2** The comment requests clarification on the location of the Alternative Stadium Location Alternative. As shown in Figure 6-6B, the location for the stadium under the Alternative Stadium Location Alternative is east of College Avenue, east of the Aztec Student Union, in the location of existing Parking Lots G and F. The comment does not raise any specific issue regarding the analysis in the Draft EIR; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I17-3** The commenter asks if SDSU has issued any statement on the amount of traffic the proposed project would generate. The comment generally addresses the subject of project traffic, which received extensive analysis in Section 4.15 of the Draft EIR. As calculated in Table 4.15-10, the proposed project is expected to generate approximately 45,174 net new daily weekday trips. The Draft EIR analyzed the potential impacts on 40 existing intersections, three (3) new on-site intersections, 34 roadway segments, 23 bi-directional freeway segments, four (4) freeway on-ramp meters, and eight (8) freeway off-ramps. The proposed project includes a Transportation Demand Management (TDM) Program to reduce overall vehicles miles traveled by 14.41%, and would also include a number of on-site and off-site transportation improvements to reduce impacts to intersections and provide additional connections. CSU/SDSU note that under the latest CEQA guidelines, which are still being implemented, the proposed project would not be required to provide any traffic mitigation as VMT impacts were determined to be below application thresholds (see Draft EIR at page 4.15-145 and 4.15-146. The comment does not raise any specific issue regarding the analysis in the Draft EIR; therefore, no more specific response can be provided or is required. Lastly, as part of the ongoing PSA negotiations with the City of San Diego, CSU/SDSU has committed to funding the construction of the Fenton Parkway Bridge in a two-lane, at grade configuration as part of a separate, City of San Diego-led Capital Improvement Project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I18

Bob Chambers

August 9, 2019

- I18-1** The comment inquires about speakers for the Rancho Bernardo Rotary Club November/December meetings and states that members would be interested in learning more about the proposed project. Please contact Ms. Laura Shinn. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I19

Shain Haug
August 19, 2019

- I19-1** The comment inquires about the subject matter of the three public meetings on the Draft EIR, scheduled for September 12, 2019, and September 24, 2019. The comment questions if the material covered at each of the meetings will be the same. CSU/SDSU responded to the commenter clarifying that each meeting would follow the same format and present the same information. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I20

Mike Clifton
August 22, 2019

- I20-1** The commenter requests to be notified of any meetings about the River Park or Community meetings. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I21

Cindy Moore
August 26, 2019

- I21-1** The comment asks for Figure 13 of the Traffic Impact Analysis (Appendix 4.15-1 of the Draft EIR). In response, CSU/SDSU provided the commenter with the location and a copy of the figure requested. For clarification, the referenced figure is located in Appendix 4.15-1 on page 78. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I22

Mark Nelson (2)

August 17, 2019

- I22-1** The comment asks where comments on the Notice of Preparation (NOP) can be found on the SDSU website. In response, SDSU provided the commenter with links to where the NOP comments can be found on the SDSU website. Comments on the NOP are provided in Appendix 1-1 of the EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I23

Stephen Dahms (1)

August 31, 2019

- I23-1** The comment asks how the commenter may file public commentary on the Draft EIR, whether there are any specific forms, any protocols and a page limitation. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I23-2** The comment asks how to search for specific terms in the Draft EIR and provides examples. The comment does not raise an environmental issue within the meaning of CEQA. It is noted that the Draft EIR and appendices are “searchable” PDFs using keywords. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I24

Tommy Friedrich
September 5, 2019

- I24-1** The comment states that the commenter represents a multi-family [housing] developer and asks for contact information regarding a partnership for developing the proposed project, as well as whether there will be a bid process. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I25

Paige R.

September 8, 2019

- I25-1** The commenter requests to be added to announcements for the proposed project. The comment does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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Response to Comment Letter I26

Robert Claesson
September 10, 2019

- I26-1** The commenter requests additional information about “community planning teams” for the proposed project. Information regarding the proposed project, including community engagement, is found at www.missionvalley.sdsu.edu. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I27

Thomas Graves
September 10, 2019

- I27-1** The comment states many [sports] fans are elderly and some handicapped, and requests the stadium design be configured with overhangs to provide shaded seating areas. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I28

Marilyn Jess
September 12, 2019

- I28-1** The comment is an introduction to comments that follow. No response is required.
- I28-2** The comment suggests that transportation between the proposed SDSU Mission Valley campus and the existing SDSU campus should be “seamless, and free, or very low cost.” The comment expresses the opinion of the commenter. As discussed in EIR Section 1, Introduction, the SDSU existing main campus includes an MTS Green Line Station located three trolley stops east from the Stadium Trolley station located on the proposed project site. The project also proposes a suite of Transportation Demand Management (TDM) strategies to reduce trip generation by approximately 14.4%. Please also refer to EIR Section 4.15, Transportation, for information regarding transit pass strategies that would be maintained at the Mission Valley campus. Finally, as part of the Final EIR, the proposed project has been further refined and would complete off-site bicycle lane improvements on Rancho Mission Road to complete a campus-to-campus bikeway connecting the project site to the existing campus with existing, off-site bicycle lanes. Please refer to Thematic Response PD-1 – Project Refinements. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I28-3** The comment suggests CSU/SDSU should have an increased emphasis on better advising to help people graduate quicker and connect to alumni services. The comment expresses the opinion of the commenter and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I28-4** The comment expresses the opinion of the commenter that too many students are majoring in fields that lead to jobs which don’t require a degree and lead to low wage jobs. The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I28-5** The comment suggests more internship requirements for degrees, to improve the chances of post-education employment. The comment expresses the opinion of the commenter. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I28-6** The comment suggests a business center on campus, staffed by alumni, where students can connect directly with businesses. The comment expresses the opinion of the commenter. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I28-7** The comment is a conclusion referencing previous comments. No further response is required.

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Response to Comment Letter I29

Michele Addington
September 14, 2019

- I29-1** The comment requests including trolley and bus fares in the price of tickets to Stadium events as mitigation. The Stadium Transportation Demand Management (TDM) Program, which would be implemented as part of the project, provides for discounted or free use of Metropolitan Transit System (MTS) transit services for attendees on the event date with proof of purchase of an event ticket (Draft EIR p. 4.15-10; Transportation Impact Analysis (TIA), Draft EIR Appendix 4.15-1, page 16).
- I29-2** The comment requests whether the Demolition and Implosion Plan, Hazardous Materials Contingency Plan, Decommissioning and Destruction Plan, Emergency Vehicle Access Plan, Construction Fire Prevention Plan, Defensible Space Plan, Blasting/Drilling Monitoring Plan, Vibration Monitoring Plan, and an unclear reference on page 81 will be made available to the public. The comment relates to future plans which are to be prepared as part of the mitigation for the proposed project and which would serve to reduce impacts identified in the Draft EIR. The mitigation measures will be implemented as part of the project and will be included in the Mitigation Monitoring and Reporting Program (MMRP) to be adopted by the CSU Board of Trustees concurrent with project approval. The purpose of the MMRP is to ensure implementation of the adopted mitigation measures as well as project revisions or components such as the TDM program (CEQA Guidelines, Section 15097(a)). The comment does not address the adequacy of the mitigation measures or the findings of significance based thereon, and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-3** The comment relates to how commute trips to the site will impact Friars Road, Interstate (I-) 15, and I-8. The project impacts to Friars Road, I-15, and I-8 are analyzed in Draft EIR Sections 4.15.7 through 4.15.10. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-4** The comment relates to site access via Rancho Mission Road. Final EIR Section 2.3.4.7 is revised to correct this reference to clarify that San Diego Mission Road will be extended south as a four-lane urban major road, and Rancho Mission Road will be extending east as a two-lane collector.
- I29-5** The comment relates to the planned parking supply. It is noted that overall hotel parking will be up to 485 spaces and that all hotel uses, including parking, have been consolidate on site H1. There is no discrepancy, and no further response is needed.
- I29-6** The comment relates to phasing of the demolition of the existing stadium. Phases are generally geographically defined, with Phase 1 (or Phase A per Table 2-6, Proposed Construction Phasing) occurring on the western portion of the project site and largely consisting of construction of the proposed Stadium. Phase 2 is generally the campus residential pad and River Park. Construction activities are anticipated to overlap in order to achieve the schedule; accordingly, Phase 2 would commence construction prior to the completion of Phase 1. As shown in Table 2-6, Phase 1 would be completed with the completion of Architectural Coating for the Stadium (7/31/2022); however, Phase

2 would commence site preparation on 1/1/2022. This is necessary for grading balance purposes, as well as constructing the new Stadium prior to August 2022, and providing parking for the proposed Stadium, which is to be located to the south and east of the existing Stadium.

- I29-7** The comment asks whether an implosion phase should be included. The proposed project anticipates deconstruction of the existing San Diego County Credit Union (SDCCU) Stadium, rather than an implosion; however, the Draft EIR includes analysis of a potential implosion. As stated in Section 2.3.4.1.2, Demolition:

Implosion also may be initiated through the use of explosives in one coordinated event. Implosion methods are effective in bringing down tall structures that would be difficult to demolish with typical construction equipment or too expensive to demolish from the top downward. Implosion also reduces the length of time neighboring areas would be subject to the noise and other inconvenience from a lengthy conventional demolition approach. Implosion methods use highly specialized explosives to undermine the supports of a structure so it collapses either within its own footprint or in a predetermined path. Project-specific demolition methods would be determined based on a demolition plan. Dust mitigation and monitoring would be a part of the demolition plan. Noise levels for the implosion of concrete structures have ranged from 120 to 135 decibels at the source, which last only a brief period of time (typically less than 10 seconds). The demolition plan also would include enforcement of a human safety standoff distance during an implosion.

The Draft EIR analyzes the potential for implosion in Sections 4.2, Air Quality; 4.5, Energy; 4.6, Geology and Soils; 4.7, Greenhouse Gas Emissions; 4.8, Hazards and Hazardous Materials; and 4.12, Noise. Mitigation measures are proposed to address the potential impacts of an implosion event, including MM-AQ-1, MM-HAZ-2, MM-HAZ-6, MM-NOI-4, and MM-NOI-5.

- I29-8** The comment asks about how the City General Fund Land and City Water Fund Land affect the sale of land. As discussed in EIR Section 2.3.2, Purchase and Sale Agreement, the City and CSU/SDSU are currently discussing the terms of the Purchase and Sale Agreement. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I29-9** The comment asks about the availability of a park and ride facility for the Stadium trolley stop. Trolley riders will be able to drive their vehicles to the site and park prior to boarding the trains. The precise number of parking spaces available to transit users has not yet been determined. As demand dictates and in coordination with the trolley operator MTS, the appropriate number of spaces will be determined and provided as necessary.

- I29-10** This comment repeats the question posed in comment I29-4. Please refer to Response to Comment I29-4, above. No further response is needed.

- I29-11** The comment restates information contained in the draft environmental documentation about the use of solar panels and does not raise an environmental issue within the meaning of CEQA. Please refer to

Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I29-12** The comment asks why gas fireplaces are proposed and asks if SDSU will contemplate removing natural gas use. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. As discussed therein, in response to comments received on the Draft EIR, the project design has been refined to prohibit the inclusion of natural gas fireplaces in residential units. The comment addresses the general subject area of natural gas usage, which received extensive analysis in the Draft EIR, and does not raise any specific issue regarding that analysis. Therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-13** The comment asks if SDSU will contemplate removing the use of natural gas. Please refer to Response to Comment I29-12, above, and Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-14** The comment states there is not an exhibit showing the location for existing natural gas lines. In response, Figure 2.10A is revised in the Final EIR to include locations of existing and proposed natural gas lines. The comment does not raise any specific issue regarding the analysis in the Draft EIR; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-15** The comment asks why bus service would be provided in light of the proximity to the Green Line trolley Stadium Station. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate a bus transfer center adjacent to the Green Line trolley station, with space for approximately four stop/layover spaces. A bus transfer center could provide a mobility hub to connections not currently served by the trolley, consistent with the San Diego Association of Governments’ desire to increase implementation of mobility hubs throughout the region. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations. Please refer to Thematic Response PD-1 – Project Refinements for additional information.
- I29-16** The comment relates to detonation. See Response to Comment I29-7, above. The comment does not raise any specific issue regarding the analysis in the Draft EIR; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I29-17** The comment asks how many cement trucks will use Friars Road. Truck traffic and related impacts associated with construction activities are discussed in Draft EIR Section 4.15.8.6 and the TIA, Appendix 4.15-1, Section 12.0. The analysis addresses daily and peak period construction travel, as well as the duration of each construction phase. Because the site will be developed over time based on market demand, the specific number of cement trucks using Friars Road within any given hour cannot be reasonably estimated at this time. When construction is anticipated, a Construction Traffic Management Plan will be implemented to minimize impacts to the roadway system serving the site.

- I29-18** The comment references the TDM Program but does not ask a question. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is needed.
- I29-19** The comment relates to an increase in bus service for Bus Route 14. MTS operates the bus system and adjusts route service hours and frequency based on demand and funding availability. At this time, MTS does not appear to have any plans to adjust the service on this route, which does not currently serve the project site but has two stops along Ward Road/Rancho Mission Road within 0.5 miles of the project. If MTS determines that service changes are warranted and service to the site is needed, SDSU will coordinate with MTS to accommodate the proposed changes to the greatest extent feasible.

Response to Comment Letter I30

Paul Holloway
September 16, 2019

- I30-1** The comment expresses the commenter's opinion that, after reviewing the proposed project, the commenter doesn't see how getting people out of their cars can be considered a top priority if the proposed project relies on connecting to the light rail system and bus rapid transit. The comment does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I30-2** The comment provides factual background information regarding bus services to the existing SDSU campus from north/east San Diego County, and does not raise an environmental issue specific to the proposed project's environmental analysis. CSU/SDSU has met with Metropolitan Transit System (MTS) and the San Diego Association of Governments (SANDAG) and continues to coordinate with these regional agencies regarding potential future transit services to the project site. Please refer to Thematic Response PD-1 – Project Refinements, for information regarding a potential transit station at the project site. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I30-3** The comment provides factual background information and expresses opinions of the commentator regarding extending transit services by providing a bus connection from a "freeway level" stop at I-15 and Friars Road and the MTS Stadium Trolley Station. Transit service is provided by regional planning agencies including MTS and SANDAG, and is not within the control of CSU/SDSU. The proposed project would improve the exiting MTS Stadium Trolley Station and include a potential transit center with bus bays for up to five buses. Please refer to Thematic Response PD-1 – Project Refinements, for information regarding a potential transit station at the project site. CSU/SDSU continues to coordinate with SANDAG and MTS regarding potential future transit services to the project site. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I30-4** The comment requests that the proposed project's transit plan add a transit center and a freeway level bus stop as noted in Comment I30-3. See Response to Comment I30-3, above. The comment does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I30-5** The comment provides factual background information regarding the commenter's commute on public transit and does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I30-6** The comment suggests connection to the regional transit system. The suggestion is beyond the scope of the analysis in the Draft EIR because CSU/SDSU does not have the ability to implement such changes to the regional transit system, nor does the project include such changes. The comment does not raise an environmental issue specific to the proposed project's environmental analysis. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I30-7** The comment expresses opinions of the commenter regarding a freeway-level BRT station near Friars Road and its effect on the appeal of the proposed SDSU Mission Valley campus for commuters. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I31

Joel Anderson
September 17, 2019

- I31-1** The comment states there is not a good bike path between the existing SDSU campus and the project site. The comment suggests a dedicated, safe/protected bike path to encourage average people to bike back and forth between the two locations. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I31-2** The comment states that the trolley or bus will be the most widely used public transportation between the existing SDSU campus and the project site, but that a safe bike path would encourage another transportation solution. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I32

David Smith (2)
September 17, 2019

- I32-1** The comment requests a third-party cost estimate to renovate the existing San Diego County Credit Union (SDCCU) Stadium and a comparison with the cost of the proposed stadium. Please refer to Responses to Comments I5-4 and I34-5. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-2** The comment requests a soils report be prepared. A preliminary geotechnical study was performed for the proposed project (see Appendices 4.6-1 and 4.6-2), and the Draft EIR analyzed potential impacts to soils in Section 4.6, Geology and Soils. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-3** The comment states the proposed stadium would cost \$100m more than published estimates by SDSU. The comment raises economic issues not related to an environmental effect of the project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-4** The comment states that the cost estimate provided by SDSU has not taken into consideration the cost for demolishing of the existing SDCCU Stadium or the cost and time to secure necessary permits for demolition. The comment raises economic issues not related to an environmental effect of the project. It is noted that permits are a requirement of the proposed project, per mitigation measure MM-BIO-13 - Wetland Mitigation/Federal and State Agency Permits. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-5** The comment addresses general concern regarding demolishing the existing SDCCU Stadium and hauling away “tons of concrete” from a huge structure that is “in the San Diego River.” The comment is inaccurate. As shown in Figure 2-7, Constraints Map, the existing SDCCU Stadium is not within the 100-year floodway (which defines the limits of the San Diego River). Further, the project would crush and re-use materials from the existing SDCCU Stadium on site to reduce the amount of imported fill required to raise portions of the project site out of the floodplain. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-6** The comment states that the argument to demolish the existing stadium is that it “isn’t in the right place,” and questions whether a modified site plan could accommodate a stadium restoration alternative, if restoring the stadium would cost less and cause less environmental damage. The Draft EIR does consider such an alternative in Section 6.4.2, Stadium Reuse Alternative. The Draft EIR concluded impacts from such a project would only reduce one impact of the proposed project (impacts of demolition on the historic significance of the SDCCU Stadium) and may potentially increase other impacts. Such an alternative also would not meet all of the project objectives or be consistent with San Diego Municipal Code Section 22.0908. The comment is noted for the record and is included in this

Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I32-7** The comment substantively restates Comment Letter I5. Please refer to Response to Comment Letter I5. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-8** The comment summarizes comments I32-1 through I32-7. Please see above responses to comments. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I32-9** The comment is a concluding statement. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I33

Ricky Thompson
September 18, 2019

- I33-1** The comment requests a large splash park as part of the design of the proposed project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue within the meaning of CEQA.

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Response to Comment Letter I34

David Smith (3)
September 10, 2019

- I34-1** The comment is a link to a news story about the Colorado State University stadium. The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I34-2** The comment states the news story “illustrates the ever increasing construction and financing costs of a new stadium.” The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I34-3** The comment states that the news story used 2015 as a baseline and opines that extrapolating construction costs for the proposed stadium “represents at least a \$300 million project.” The comment continues that when adding the demolition cost of the existing San Diego County Credit Union (SDCCU) Stadium, the proposed Stadium could “easily exceed \$350 million or \$400 million.” CSU/SDSU notes that the reference article is specific to a project in another state with unknown differences to the proposed project and therefore is not a true “apple to apples” comparison between projects. Construction costs, financing costs, overall project budgets and pro-formas are reasonably different between the proposed project and the Colorado State University example. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. See also Response to Comment I5-5. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I34-4** The comment asks how much it would cost to restore the existing SDCCU Stadium to its original design of 45,000 seats, and suggests the cost difference for such an alternative would be considerable. Please refer to Response to Comment I5-4. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I34-5** The comment requests a side-by-side comparison (cost of the proposed stadium versus renovating the existing SDCCU Stadium) prepared by a third party to inform the “best and most cost effective” decision. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Further, the retention of the existing stadium was considered in Chapter 6, Alternatives, specifically Section 6.4.2, Stadium Re-Use Alternative. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I35

A. Stephen Dahms (2)

September 10, 2019

- I35-1** The comment provides factual background information about the commenter and is an introduction to comments that follow. The comment does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I35-2** The comment is an introduction to comments that follow. See Responses I35-3 through I35-8. The comment does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I35-3** The comment states there are two university laboratories that conduct air and soil monitoring of *Coccidioides*, the Valley Fever (VF) pathogen. The comment expresses the commenter's opinion that SDSU has a "legal and ethical responsibility" to conduct such analyses before construction begins and as a "public service to San Diego residents." The comment addresses general subject areas, Air Quality, which received extensive analysis in Section 4.2 of the Draft EIR (see pages 4.2-31 and 4.2-32). As discussed therein, VF is not considered to be common to San Diego. The Draft EIR concludes that the proposed project would not result in a significant impact attributable to VF exposure based on its geographic location and compliance with applicable regulatory standards, which will serve to minimize the release of and exposure to fungal spores. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I35-4** The comment provides factual background information about algal blooms. The comment does not raise an environmental issue within the meaning of CEQA. It is noted that, as discussed in Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-28, project best management practices (BMPs), including source controls (such as common area landscape management and common area litter control) and Low-Impact Development structural BMPs in compliance with the Small Municipal Separate Storm Sewer System (MS4) Permit, would prevent or reduce the release of organic materials and nutrients (which might contribute to algal blooms) to receiving waters. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I35-5** The comment states that SDSU will have a responsibility to ensure pets and people do not come in contact with the San Diego River and/or Murphy Canyon Creek, and that SDSU must provide signage to keep people from the river and creek. The comment addresses issues related to adjacency impacts, which received extensive analysis in Section 4.3, Biological Resources, of the Draft EIR. Further, mitigation measure MM-BIO-7 requires:

MM-BIO-7 SIGNAGE AND BARRIERS: To prevent long-term inadvertent disturbance to sensitive vegetation and species adjacent to the project site, signage and visual barriers (e.g., berm, fence, rocks, plantings, etc.) shall be installed

along the River Park and Shared Parks and Open Space interface with the San Diego River and Murphy Canyon Creek. The signage shall state that these areas are native habitat areas, and no trespassing is allowed. Barriers shall be installed where appropriate to deter access into the river and creek.

The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I35-6 The comment provides factual background information about the commenter and algal blooms, and is an introduction to comments that follow. The comment does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I35-7 The comment states Castor Bean plant must be eliminated from the River Park and any SDSU property. It is noted that there is not any such vegetation in the project site (see Appendix 4-3, Biological Resources Technical Report, Dudek, 2019). Further, mitigation measure MM-BIO-8 requires that final landscape plans be reviewed by the project biologist and a qualified botanist to confirm there are no invasive plant species as included on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region:

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I35-8 The comment provides factual background information about Coccidioidomycosis (Valley Fever). Please refer to Response to Comment I35-3, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I36

Mark Nelson (3)
September 29, 2019

- I36-1** The comment addresses a previous EIR for another SDSU project at the existing SDSU campus and does not address the adequacy of the Mission Valley Campus Draft EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-2** The comment expresses the opinions of the commenter that there is not an adequate purpose or need for the proposed project. CSU/SDSU notes that in 2019, SDSU received over 90,000 applications and accepted fewer than 10,000 students. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-3** The comment expresses the commenter's opinion that the proposed project is a discretionary project and, therefore, should not be permitted to have a significant impact on the environment. CSU/SDSU acknowledges that the proposed project would result in significant and unavoidable impacts as analyzed and disclosed in the Draft EIR. Findings of Fact and a Statement of Overriding Considerations have been prepared as part of the Final EIR that set out the overriding benefits of the proposed project, as required by CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-4** The comment states most CSU campuses do not have stadiums and that the EIR should have considered a project where SDSU sports are disbanded. First, CSU/SDSU notes that SDSU does not currently have a football stadium on campus, which appears to be the reference in the comment. SDSU has played home football games off-campus at the existing SDCCU Stadium since the stadium opened in 1967. Second, the construction of the stadium is part of the underlying purpose and objective of the proposed project.
- CSU/SDSU disagrees with the comment that a no project alternative has not been provided. The Draft EIR did consider two such alternatives, the No Project Alternative, and the Stadium and River Park Only Alternative. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-5** The comment expresses the commenter's opinion that because Measure G was not explicit that CSU/SDSU could be exempted from complying with City ordinances, the proposed project requires a re-vote. The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. CSU/SDSU notes the Draft EIR has been prepared in accordance with CEQA, with the CSU Board of Trustees as the Lead Agency, and provided for a 60-day comment period for the public to review the analysis contained therein. All comments have been responded to, and revisions to the proposed project and Final EIR have been incorporated. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

Nonetheless,

- I36-6** The comment expresses the commenter's opinion that AQ-1 is not unavoidable and that CSU/SDSU must comply with existing air quality plans and use offsets or other actions to mitigate impacts to less than significant. The comment addresses general subject areas, conformance with applicable air quality plans, which received extensive analysis in Section 4.2 of the Draft EIR, and does not specifically address the adequacy of the analysis contained therein or provide or recommend any alternative mitigation, therefore, no more specific response can be provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-7** The comment expresses the commenter's opinion that AQ-2 is not unavoidable and that CSU/SDSU must comply with existing air quality regulations and use offsets or other actions to mitigate impacts to less than significant. The comment addresses general subject areas, air quality, which received extensive analysis in Section 4.2 of the Draft EIR, and does not specifically address the adequacy of the analysis contained therein or provide or recommend any alternative mitigation, therefore, no more specific response can be provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-8** The comment expresses the commenter's opinion that AQ-3 is not unavoidable and that CSU/SDSU must comply with existing air quality regulations and use offsets or other actions to mitigate impacts to less than significant. The comment addresses general subject areas, air quality, which received extensive analysis in Section 4.2 of the Draft EIR, and does not specifically address the adequacy of the analysis contained therein, therefore, no more specific response can be provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-9** The comment references information contained in the Draft EIR regarding the results of the construction-related health risk assessment, specifically referencing the proposed project's cancer risk impacts. To summarize, the EIR finds that, even with implementation of all feasible mitigation for the reduction of toxic air contaminants (TAC) from project-related construction equipment, construction of the proposed project would result in a maximum cancer risk impact exceeding the SDAPCD notification requirement; thus, impacts would be significant and unavoidable for this issue. Mitigation measure MM-AQ-1, which requires CSU/SDSU to use – at a minimum – a Tier 3-compliant construction fleet along with other specified construction equipment emissions minimization strategies, would reduce the unmitigated cancer risk of 53.1 in a million to a mitigated cancer risk of 28.1 in a million. However, there are no other feasible mitigation strategies to reduce the proposed project's TAC emissions during the construction period, which – when coupled with the proximity of existing, adjacent land uses in this infill setting – precludes further reduction or avoidance of the impact. The comment does not raise an issue with respect to that analysis and thus no further response can be provided. Please refer to the Draft EIR, pages 4.2-24 (unmitigated results) and 4.2-35 (mitigated results) and Appendix 4.2-1 (Section 5). See also Response to Comment I36-3, above. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I36-10** The comment expresses the commenter's opinion that the existing stadium should be reused, and that because the proposed project is discretionary, it should not destroy the historic resource. The comment addresses general subject areas, historic resources, which received extensive analysis in Section 4.4 of the Draft EIR, and does not specifically address the adequacy of the analysis contained therein, therefore, no more specific response can be provided. CSU/SDSU notes that two alternatives considered maintaining the existing stadium and refers the commenter to Section 6 of the Draft EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-11** The comment expresses the commenter's opinion that MM-CUL-1, 2 and 3 are "insufficient" and "without any CEQA precedent". CSU/SDSU notes that the Draft EIR concludes that the MM-CUL-1, 2 and 3 would not reduce the impacts to SDCCU Stadium to less than significant and that impacts to historic resources would remain significant and unavoidable. However, these measures are the recommended and required mitigation measures to reduce impacts to an historic resource to the extent feasible (i.e., short of not demolishing the stadium as anticipated by SDMC Section 22.0908). The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-12** The comment expresses the commenter's opinion that HAZ-1 (hazardous materials encountered during demolition of the existing stadium) understates the potential impact and the proposed mitigation measure MM-HAZ-1 is not sufficient. The comment does not provide any specific deficiency that MM-HAZ-1 would not mitigate for the potential impact. M-HAZ-1 requires the demolition or renovation plans incorporate abatement procedures for the removal of hazardous materials containing "asbestos, lead, polychlorinated biphenyls, hazardous material, hazardous wastes, and universal waste items, including decommissioning and removal of aboveground storage tanks and drums". Further, MM-HAZ-1 requires that all abatement work is performed in accordance with all applicable regulations, including those of the U.S. Environmental Protection Agency (which regulates disposal), Occupational Safety and Health Administration, U.S. Department of Housing and Urban Development, California Occupational Safety and Health Administration (which regulates employee exposure), and the South Coast Air Quality Management District. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-13** The comment expresses the commenter's opinion that residents will sustain permanent hearing loss as a result of impact NOI-1, and that it is not acceptable for a discretionary project to damage the health and welfare of residents. The Draft EIR does not conclude that NOI-1 would result in permanent hearing loss; rather, NOI-1 would result in occasional, temporary (i.e., during the construction period) exceedances of night-time noise thresholds. Design features and mitigation are proposed to reduce these effects; however, if the hours of construction would be between 7:00PM and 7:00AM, noise during this time would not be reduced below nighttime noise standards; thus, the impact was determined to be significant and unavoidable. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-14** The comment expresses the commenter's opinion that the proposed project must conform with existing standards and that impact NOI-2 is not acceptable. As noted in the Draft EIR, NOI-2 would result from off-site infrastructure construction which may occur in areas that are constrained and therefore, cannot

implement required setbacks or other project design features to reduce noise levels to below applicable thresholds. These impacts would be temporary (i.e., during the construction period). Design features are proposed to limit noise levels during construction; however, due to off-site constraints, it may not be feasible to reduce noise levels to below applicable standards, therefore, NOI-2 was determined to be significant and unavoidable. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

- I36-15** The comment expresses the commenter's opinion that the proposed project would result in stress, PTSD, long term hearing loss. The comment restates information contained in the draft environmental documentation regarding noise impacts to habit[at] and cumulative noise impacts to the surrounding neighborhoods, and expresses the commenter's opinion that such impacts are unacceptable for a discretionary project, and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-16** The comment expresses the commenter's opinion that the proposed project would "permanently reduce" public safety of residents and visitors and that, per the Supreme Court, CSU/SDSU is required to fully mitigate by "adding whatever needed public and emergency services are required to fully restore public safety to the baseline." The comment appears to be referencing / re-stating impact PS-CUM-1, which is a significant and unavoidable cumulative impact to fire and emergency services. As analyzed in Section 4.14, Public Services and Recreation of the Draft EIR, the proposed project would contribute to a cumulatively considerable impact to fire and emergency medical services because, consistent with the City of San Diego Mission Valley Community Plan Update Final EIR, new fire facilities may be required to serve the cumulative project area (i.e., Mission Valley) and the location of those facilities is not yet known and; therefore, may result in significant environmental effects. The MCVPU FEIR and the SDSU Mission Valley Campus Master Plan Draft EIR do not conclude that such impacts would necessarily reduce public safety, only that new facility may be required which could result in physical impacts. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-17** The comment states that Impacts TR-1 through TR-33 are in violation of SB100 and other laws requiring a reduction in GHG. The comment addresses general subject areas, GHG emissions, which received extensive analysis in Section 4.7 of the Draft EIR. As analyzed therein, the proposed project would result in a less than significant impact on GHG emissions. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I36-18** The comment states that PMx and other criteria air pollutants must be managed inside existing regulations. The comment addresses general subject areas, criteria air pollutants, which received extensive analysis in Section 4.2, Air Quality, of the Draft EIR. See also Response to Comments I36-6 through I36-8, above. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I36-19** The comment expresses the commenter's opinion that TR-1 through TR-33 must be fully mitigated or the Draft EIR is in violation of statute. CSU/SDSU notes that mitigation is proposed which would reduce impacts TR-1 through TR-33; however, as noted in the Draft EIR, much of the mitigation is not within the control of the CSU because it is within City of San Diego right-of-way and therefore cannot be reasonably assured to be implemented. Accordingly, and appropriately, the Draft EIR identified significant and unavoidable transportation impacts. Subsequent to the release of the Draft EIR, the City of San Diego has agreed to permit certain improvements identified as mitigation measures. Therefore, the Final EIR is revised to reflect that certain previously identified significant and unavoidable impacts would be mitigated to less than significant. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I36-20** The comment states that the DEIR is incomplete because the issues listed in Section ES-5 must be fully resolved; therefore, the DEIR must be recirculated. As explained in Section ES-5, "Section 15123(b)(2) of the CEQA Guidelines requires that areas of controversy known to the lead agency be stated in the EIR summary." To determine what these areas of controversy were, SDSU prepared an NOP and Initial Study and held scoping/public information meetings to obtain agency and public input on the proposed project. The items noted in Section ES-5 include those issues raised during the NOP comment period. These issues are addressed through the Draft EIR in the sections parenthetically noted in ES-5. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I36-21** The comment claims the EIR errs in the analysis of the No Project Alternative by retroactively applying the City's planning objectives, and then when correctly analyzed, the No Project Alternative is environmentally superior. CSU/SDSU notes that the No Project Alternative was identified as the Environmental Superior Alternative. As stated on page 6-48, "The Environmentally Superior Alternative is the No Project Alternative."
- In accordance with CEQA, the Draft EIR discloses that, if the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (Section 15126(e)(2)), and determined that, based on the analysis presented in Chapter 6.0, the Stadium and River Park Alternative is considered the Environmentally Superior Alternative.
- The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I36-22** The comment restates information from Table ES-3 of the Draft EIR that environmental effects are greater under any alternatives other than the No Project Alternative, and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I36-23** The comment states that SDSU does not own or control the project site; and that statute does not allow a speculative EIR on a 3rd party's site. The comment raises economic, social or political issues that do

not appear to relate to any physical effect on the environment. CSU/SDSU does not agree with the comment, nor has any such statute been provided which documents any restriction. CSU/SDSU notes that local jurisdictions prepare regular EIRs for General Plan Updates, Rezones, etc., on 3rd party property as a regular course of practice. In addition, EIRs should be prepared as early as feasible in the planning process to enable environmental considerations to influence the project program and design. The Draft EIR has been prepared in compliance with CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

Response to Comment Letter I37

Christa McIntosh
September 20, 2019

- I37-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I38

David Smith (4)
September 24, 2019

- I38-1** The comment states the commenter has been trying to prevail on SDSU to examine reusing the existing San Diego County Credit Union (SDCCU) Stadium. The comment states that a Stadium restoration would be more cost effective than building a new stadium. The Draft EIR did consider re-use of the existing SDCCU Stadium in Section 4.6.2, Stadium Re-Use Alternative, and determined this alternative would not meet the project objectives and would not comply with San Diego Municipal Code Section 22.0908. The comment raises economic issues not related to an environmental effect of the proposed project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I38-2** The comment summarizes the recent history of the project site and actions taken by SDSU prior to the release of the Draft EIR, including hiring consultants, negotiating with the City of San Diego, and announcing a development partner. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I38-3** The comment states a Draft EIR was released but that “it doesn’t contain any information on the soils.” The commenter is referred to Section 4.6, Geology and Soils, of the Draft EIR, as well as Appendices 4.6-1 and 4.6-2 for geotechnical engineering reports on the overall project site and specific analysis of the proposed stadium location. The comment does not raise any specific issue with the analysis in the Draft EIR; therefore, no further response can be provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I38-4** The comment provides additional background information on the project site and recent history about a competing proposal for use of the project site. The comment raises economic and political issues that do not relate to an environmental effect of the proposed project. CSU/SDSU note that negotiations continue with the City and refer the commenter to Thematic Response – Purchase Agreement. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I38-5** The comment starts with the commenter’s thoughts on how the project site was previously developed in the 1960s to include a costly footing plan under more flexible rules and regulations. The comment continues that while the physical nature of the Stadium site has not changed, the rules and regulations have gotten more stringent. The comment states that a challenge for SDSU is both the cost and environmental issues SDSU faces in permitting the removal of the Stadium because the project site is in a river subject to the rules of the Army Corps of Engineers. Further, the comment questions the amount of truckloads of debris exported from the project site and the impact of construction traffic which the comment claims SDSU is ignoring.

In response, the Draft EIR was prepared to analyze the environmental issues identified by the comment. With respect to the claim that the project site is in a river, CSU/SDSU refer the commenter to Figure 2-5, Constraints Map, which shows the floodway (i.e., the San Diego River) is south of the project site.

With respect to the claim that re-using debris from the Stadium as fill for the proposed project would be subject to the Army Corps of Engineers, as documented in Section 4.3, Biological Resources, only a small portion of the project site (less than 1 acre) is subject to permitting requirements of the U.S. Army Corps of Engineers due to impacts to wetlands and waters. These areas are not related to the demolition of the existing Stadium. Further, as noted in the comment, the proposed project would include on-site rock crushers to re-use the existing Stadium demolition debris on site as fill material, which would reduce hauling trips associated with exporting demolition debris. CSU/SDSU note that import and export of material is analyzed in the Draft EIR in Sections 4.2, Air Quality; Section 4.5, Energy; and Section 4.7, Greenhouse Gas Emissions. Further, Section 4.15, Transportation, includes an analysis of construction traffic. The comment does not address the adequacy of the analysis in these sections of the Draft EIR; therefore, no more precise response can be provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I38-6 The comment expresses the opinion of the commenter that SDSU should put forward the most cost-sensitive Stadium plan and focus on providing a world class campus. Regarding the commenter's suggestion that SDSU focus on a Stadium Re-Use project, please refer to Response to Comment I38-1, above. The comment raises economic and political issues that do not relate to an environmental effect of the proposed project. Please refer to Response to Comment I5-5. CSU/SDSU note that negotiations continue with the City and refer the commenter to Thematic Response – Purchase Agreement.

I38-7 The comment requests CSU/SDSU and the mayor of San Diego to create a partnership and acknowledge the complexity of the project site, open the books on soils information and the appraisal, and discuss the City bequeathing the site to SDSU. The comment calls for acknowledging infrastructure costs of the River Park and Fenton Parkway and developing a cost sharing agreement. The comment also requests to save the Stadium because it's a better deal and historic. The comment restates similar issues raised by previous comments, and the commenter is referred to the above responses. Specific to the comment regarding Fenton Parkway, CSU/SDSU note that SDSU has agreed to fund the construction of a two-lane crossing pursuant to a separate, City-initiated Capital Improvement Project. With respect to the Stadium's historic status, the comment is consistent with the analysis in Section 4.4, Cultural Resources, of the Draft EIR and does not raise an issue with the analysis contained therein. The remainder of the comment raises social, economic, or political issues that do not relate to the physical impacts of the project on the environment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I39

Mack Grant
September 24, 2019

- I39-1** The comment is an introduction to comments that follow. Please refer to Response to Comments I39-2 through I39-6 below.
- I39-2** The comment provides factual background information regarding climate change legislation in California and does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I39-3** The comment expresses disappointment regarding meeting California's GHG emission reduction targets and goals. The comment states the proposed project would include open space, multi-modal forms of transportation, and a dense, infill development with on-site renewable electric generation. The comment concludes by claiming the Draft EIR "demonstrates minimal efforts by the University to reduce the project's environmental impact," and encourages the University to consider additional recommendations.
- The comment addresses regulatory compliance with GHG-reducing policies, which received extensive analysis in Section 4.7.4 of the Draft EIR, and serves as an introduction to comments I39-4 and I39-5. Please refer to Responses to Comments I39-4 and I39-5, below. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I39-4** The comment recommends the proposed project commit to achieving LEED for Neighborhood Development Gold or Better. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for information responsive to this comment regarding additional commitments, including incorporating sustainability into scorecards for selection of future developers/builders, in the Final EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I39-5** The comment recommends the proposed project commit to building electrification for all SDSU Mission Valley buildings. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for information responsive to this comment regarding additional commitments, including electrifying buildings, in the Final EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I39-6** The comment is a conclusion statement. No further response is required.

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Response to Comment Letter I40

Robert Claesson (2)
September 25, 2019

- I40-1** The comment provides factual background information about the commenter and is an introduction to comments that follow. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- Further, it is noted preliminarily that while the commenter states throughout the comment letter that he has solutions to several of the comments raised below, no solutions are offered in the comment letter. Therefore, no further responsive information can be provided to specific ideas.
- I40-2** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I40-3** The comment is an introduction to comments that follow. See Responses to Comments I40-4 through I40-14. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-4** The comment provides factual background information about the City of San Diego and the commenter and is an introduction to comments that follow. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-5** The comment states that parking, especially for large sports events, is not adequate in the proposed project plans, and that the commenter has solutions; however, no ideas are advanced by the commenter. Parking is analyzed in Section 10, Parking Assessment, of Appendix 4.15-1, Transportation Impact Analysis, and in Section 4.15.7, Transportation, of the Draft EIR. As described therein, “The overall supply, combined with anticipated parking costs for shared spaces, *is intended to provide an appropriate supply for the proposed uses but also to encourage the use of non-auto modes to access the site and minimize overall vehicle trip generation*” (emphasis added). Specific to large events at the stadium, Section 4.15.7.2 of the Draft EIR analyzed the potential parking impacts and found that “even with a successful TDM [Transportation Demand Management] program and TPMP [transportation and parking management plan] measures in place, parking impacts for some major and all high attendance events are expected to be potentially significant (TR-31).” This impact was determined to remain significant and unavoidable. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I40-6** The comment states that more seating would be required at the new SDSU Stadium, which would provide additional opportunities, and that the commenter has a solution. The comment expresses opinions of the commenter. CSU/SDSU note that a larger stadium, as the comment suggests, would exacerbate the commenter's opinion that parking is undersupplied. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I40-7** The comment states that traffic, vehicle congestion, and related pollution are already major problems; that the proposed project will increase traffic; and that the commenter has a solution. The comment addresses a general subject area, traffic, which received extensive analysis in Section 4.15, Transportation, of the Draft EIR. First, CSU/SDU note that the proposed project is consistent with both the amount of development as the Mission Valley Community Plan Update, as well as the traffic improvements proposed therein. Mitigation measures are recommended to reduce impacts to the extent feasible and within the control of CSU/SDSU as required by CEQA. The Final EIR has been revised to note additional feasible measures that the City of San Diego has agreed to as part of the ongoing PSA discussions.
- Further, the Draft EIR includes an analysis of the proposed project's vehicle miles traveled (VMT) for informational purposes, which documents that "the 2035 project-generated VMT per service population of 25.52 is 25.7% lower than the existing baseline efficiency metric of 34.34. Thus, the project-generated VMT would be more than 15% below the existing VMT." At the cumulative level, "the long-range regional VMT per service population would decrease from 32.95 without the proposed project to 32.89 with the project."
- In addition, an evaluation was conducted comparing the project-generated VMT to the City-wide VMT per service population. See Appendix K to Appendix 4.15-1, Transportation Impact Analysis, for additional information regarding this supplemental analysis. Lastly, as stated in Response to Comment I40-5, above, the project would limit parking supply to encourage non-motorized transportation, which contributes to reducing the service population VMT noted above. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I40-8** The comment is an introduction to comments that follow. See Responses to Comments I40-9 through I40-14. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-9** The comment states that the plan for about 6,000 parking spaces in structures is a great idea, but needs to go further. The comment suggests increasing the underground parking structures and including electric vehicle charging stations and maintenance facilities. It is noted that the proposed project includes electric vehicle facilities; please refer to EIR Section 4.7, Greenhouse Gas Emissions. The comment expresses opinions of the commenter. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I40-10** The comment provides factual background information about the commenter and the ability to accommodate various stadium engineering designs. The comment does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-11** The comment expresses general opinions regarding stadium design and costs. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-12** The comment expresses general opinion about local growth and the plan for the proposed stadium, and states that the commenter can solve the stadium attendance problem with engineering design. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue within the meaning of CEQA.
- I40-13** The comment states that traffic can be addressed with several solutions in phases. The comment addresses a general subject area, traffic, which received extensive analysis in the Draft EIR, specifically Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I40-14** The comment is a conclusion statement requesting to discuss the commenter's solutions and the SDSU expansion plans and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I41

George Franck
September 25, 2019

- I41-1** The comment suggests the project selection and design should not be finalized until the costs for potentially restoring the existing stadium and the cost of removing the existing stadium are estimated and evaluated. The commenter believes this comparison would determine the Stadium Re-Use Alternative is the most cost effective project for the stadium site. Section 6.4.2 of the Draft EIR analyzed the Stadium Re-Use Alternative. Please also refer to Response to Comment I5-4. The comment does not raise any specific environmental issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I41-2** The comment states that the Draft EIR incorrectly identifies the Existing Conditions Alternative as the environmentally superior alternative, because this alternative would retain the existing parking lot. While the existing parking would remain under the Existing Conditions Alternative, which may have increased impacts to hydrology and water quality compared to the proposed project and/or other alternatives analyzed in the Draft EIR, this alternative was initially determined to be the environmentally superior alternative, as the commenter notes, because (1) it would not result in any construction impacts and (2) would not result in increased operational impacts, including traffic, air quality, greenhouse gas emissions, and noise. However, as stated in Section 6, Alternatives, of the Draft EIR, Section 15126(e)(2) of CEQA requires the EIR to also identify an environmentally superior alternative among the other alternatives, when the No Project Alternative is identified as the environmentally superior alternative. The Stadium and River Park Alternative were therefore ultimately identified as environmentally superior alternative. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I41-3** The comment expresses the opinion of the commenter that the Stadium Re-Use Alternative is the environmentally superior alternative because it would avoid impacts to historic resources and wetlands and would provide a smaller stadium (compared to the Existing Conditions) and other campus facilities and parkland. The comment expresses opinions of the commenter and restates information contained in the draft environmental documentation, but does not raise an environmental issue within the meaning of CEQA. The Environmentally Superior Alternative was determined to be the Stadium and Park Alternative as identified in Section 6.5 and Table 6-1.
- The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I41-4** The comment expresses opinions of the commenter that the Stadium Re-Use Alternative should become the project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I42

David Smith (5)
September 25, 2019

- I42-1** The comment is a link to an article about the negotiations between SDSU and FS Investors concerning a prior proposal on the project site. The article was published before the release of the Draft EIR, although the commenter notes that the development challenges raised in the article remain pertinent to the current proposal to develop the project site. As such, the comment provides background information and serves as an introduction to comments that follow, and does not raise an environmental issue within the meaning of CEQA. Please refer to Response to Comment I5-5. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I42-2** The comment summarizes the information contained in the article. The comment provides background information, and serves as an introduction to comments that follow, and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I42-3** The comment states SDSU should examine the cost of the proposed stadium, including the costs for a restoration of the existing stadium. The Draft EIR did consider re-use of the existing stadium in Section 4.6.2, Stadium Re-Use Alternative. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment also raises economic issues not related to an environmental effect of the project. Please also refer to Response to Comment I5-4. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I42-4** The comment states “scaling down the site plan” is worth consideration. The Draft EIR did consider a Reduced Density Alternative in Section 6.4.3. Please refer to Section 6.4.3, Reduced Density Alternative. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I42-5** The comment states that there is no reasonable sale price that can be justified and that the City of San Diego needs to sell SDSU the project site for \$1. The comment concludes that “fair market price is actually less than zero.” The comment expresses opinions of the commenter. Please refer to Thematic Response – Purchase Agreement. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I43

Sweet James
September 25, 2019

- I43-1** The comment thanks SDSU for providing information about the project and accepting and incorporating suggestions into the proposed project. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I43-2** The comment asks what the proposed stadium will look like, whether it will “mimic” the existing SDCCU Stadium on a smaller scale, whether it will be a more modern stadium, and whether the public will have a vote on the design. The comment addresses general subject areas, aesthetics, which received extensive analysis in the Draft EIR, specifically Section 4.1, Aesthetics. It is noted that the stadium design is currently conceptual, but is intended to accommodate 35,000 spectators and may be expanded in the future if the demand arises. Generally, seating will be featured on the east and west side of the proposed stadium, with more open end-zone areas. which would provide strong connections to the campus to the south and a proposed hotel/conference area to the north. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I44

David Smith (6)
September 27, 2019

- I44-1** The comment is a link to an online article about the future of football as an electronic sport (e-sport). The story is not about the proposed project and does not address the Draft EIR. The comment provides background information and does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I44-2** The comment recommends considering a future where football is no longer played on a field, but instead through video games (e-sports), as the article suggests. The comment provides background information and serves as an introduction to the following comment, and does not raise an environmental issue. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I44-3** The comment suggests if the article is correct, the cost of a new football stadium “may not be a good bet” and rather, a retrofit of the existing stadium would be a less expensive proposition. The comment concludes that such an alternative would require a formal cost estimate for a retrofit and that other compromises like downsizing the site plan may be required. The Draft EIR includes a Stadium Re-Use Alternative in Section 6.4.2. Please also refer to Response to Comment I5-5. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I45

Mr. Robert Garner
September 27, 2019

- I45-1** The comment is an introduction to comments that follow and references a previous correspondence that was submitted prior to the release of the Draft EIR.
- I45-2** The comment references a “watershed property” that is not within or contiguous to the project site; however, the commenter suggests the property is a source of “fix its” as may be needed to support the River Park. The comment does not raise any specific issue regarding the analysis in the Draft EIR or an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I45-3** The comment notes a portion of the property is City-owned and the commenter has not been able to communicate with the City. The comment does not raise any specific issue regarding the analysis in the Draft EIR or an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I45-4** The comment states the property could be mitigation for nearly any impact the River Park could have on the San Diego River. The comment addresses general subject areas, impacts of the River Park, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I45-5** The attachments are correspondence to the City of San Diego. The comment does not raise any specific issue regarding the analysis in the Draft EIR or an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I46

Linda Hassakis
September 30, 2019

- I46-1** The comment is an introduction to comments that follow. No further response is required.
- I46-2** The comment inquires whether the 5,000 parking spaces under the future campus/office would be subject to flooding. First, it is noted that these spaces would not be underground, rather, they would be above-ground level. However, they would be below the future campus/office area. The parking garage would be above the future 100-year floodplain elevation and would not be subject to flooding.
- I46-3** The comment asks if the future 1,114 parking spaces adjacent to the proposed stadium would destroy any habitat. The future “Tailgate Park” area would replace an area of existing paved parking, and would be a grass field area that is only used for parking during major events at the proposed stadium; otherwise, the field areas would be available for park and recreational uses. The environmental effects of these field areas, including additional traffic during major events at the proposed stadium, were analyzed throughout the Draft EIR.
- I46-4** The comment asks if there will be incentives for future students to use the trolley instead of taking cars to campus. SDSU currently subsidizes, and anticipates continuing to subsidize, student transit passes. Second, the proposed project includes a Transportation Demand Management (TDM) Program that would encourage transit by requiring business and employers to provide a minimum percentage (10%) of employees with subsidized transit passes. Accordingly, the comment has been incorporated into the design for the project through the TDM Program.
- I46-5** The comment asks if there is any movement on SDSU becoming a carbon-free campus. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for an overview of the proposed project’s sustainability commitments, including measures to reduce emissions of greenhouse gases (GHGs) and criteria air pollutants.
- I46-6** The comment is a conclusion statement referencing previous comments. No further response is required.

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Response to Comment Letter I47

Don Wood
September 30, 2019

- I47-1** The comment provides background information about the commenter and expresses opinions of the commentator about the selection of the project architect and the preliminary renderings for the proposed project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I47-2** The comment describes the commenter's perception of the renderings for the proposed project and questions why the project architect did not consider the exiting architectural style of the existing SDSU campus. The comment expresses opinions of the commenter and does not address the adequacy of the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I47-3** The comment expresses opinions of the commentator that the project design raises "a host of issues" that have not been properly addressed. The comment does not raise any specific issue regarding the analysis in the Draft EIR and, therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I47-4** The comment is a link to a VoiceofSanDiego op-ed written by Michael Stepner and Mary Lydon. CSU/SDSU have reviewed the article and note that it does not raise specific issues regarding the analysis in the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I47-5** The comment requests SDSU pay attention to the concerns raised by the OpEd. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I47-6** The comment is a closing statement which expresses appreciation for the opportunity to comment. No further response is required.

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Response to Comment Letter I48

Chuck Srock
October 1, 2019

- I48-1** The comment is an introduction to comments that follow. No further response is required.
- I48-2** The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I48-3** The comment seeks clarification on the methodology or approach to analysis used to arrive at the conclusion stated in EIR Section 4.13.4.2, page 4.13-18, that the project would not result in an impact with respect to displacement of people or housing. The referenced EIR section contains adequate information regarding the subject impact analysis, specifically that the project site is currently vacant, and, therefore, development of the proposed project would not cause the displacement of people or housing. No revisions to the EIR are required.

The impact criteria considered in the referenced Draft EIR section is based on Appendix G of the CEQA Guidelines. The impact analysis considers whether a project's direct or indirect physical improvements would displace people or housing and, as a result, force construction of new housing elsewhere, which in turn would result in an effect on the environment. The methodology is first to review existing site conditions and consider whether there is occupied housing on site that would be demolished, and if so, consider whether the associated displacement of people could lead to impacts elsewhere associated with construction of new homes. As stated in the referenced Draft EIR section, this is not the case for the project, because there is no sanctioned housing located on site that would require demolition to build the proposed development. The section acknowledges the presence of unsanctioned housing on site, via the homeless population that is known to occupy areas adjacent to the San Diego River and Murphy Canyon Creek. The Draft EIR acknowledges homeless people may be displaced to other nearby river and creek areas once the site and adjacent areas are made less desirable for unsanctioned encampments, but such displacement of homeless people would not result in construction of off-site housing.

This section also considers potential indirect displacement of people or housing, which could theoretically occur on a project that generates a demand for substantial off-site improvements, such as new roads or schools, which in turn could displace existing housing wherever those off-site improvements are built. The methodology is to first consider whether the project generates demand for substantial off-site improvements, which the Draft EIR concludes is not the case for this project. Therefore, no indirect displacement would occur.

The project includes a considerable campus residential component. Developing residential uses on the site would draw people who would otherwise live in other areas throughout San Diego if the project were not built. Drawing people to the site in such a way does not constitute an impact pursuant to CEQA.

- I48-4** The comment discusses Section 4.13 of the Draft EIR's emphasis on future housing demands and the current lack of housing stock to meet current demands, with the commenter agreeing with the concept of increased density in the region as a "logical...solution to our current housing inventory shortfall." The

comment highlights Table 4.13-4b, which presents City of San Diego data from the Mission Valley Community Plan Update on projected housing increase in the plan area between 2012 and 2050, and Table 4.13-5, which presents San Diego Association of Governments data on the region's projected population increase between those same periods. The comment goes on to express the commenter's opinion that the Draft 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."

The comment expresses an opinion of the commenter, which is noted for the record. The assertion that the EIR ignores the project's immediate impact on adjacent communities touches generally on a detailed subject that received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I48-5 The comment states that the Draft EIR did not "take into account at any point the impacts to the non-Mission Valley communities." The Draft EIR's assessment of the project's off-site impacts was not limited to Mission Valley communities, and geographic areas incorporated into the analysis of the project's direct, indirect, and cumulative impacts were appropriate for CEQA review and disclosure purposes. For instance, the traffic impact analysis considered and studied intersection in the Serra Mesa community and the Navajo/Grantville community. The comment addresses general subject areas that received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I48-6 The comment states that the EIR does not consider the existing housing shortage for current SDSU students, and that the project does not address where the students attending class at the proposed campus would reside. The comment addresses an existing condition which is not the subject to the Draft EIR. With respect to the project site, the proposed project includes 4,600 dwelling units which would be available for students, faculty and staff. The project site is located with the Mission Valley community plan area, which was recently subject to the Mission Valley Community Plan Update in which density was increased by approximately 28,000 dwelling units. CSU/SDSU also note the proposed campus would develop over a 15-year buildout period, and that the campus/office land use would be a mix of both university services and businesses, and that the full 15,000 student full-time equivalent (FTE) would occur gradually over time, along with buildout of the Mission Valley Community Plan Update area.

I48-7 The comment first presents current SDSU student enrollment and an estimate of the school's population that resides on-campus versus off-campus. The comment also reiterates information from the project's Initial Study (information that was later restated in the Draft EIR's project description) that the project would accommodate 15,000 full-time equivalent (FTE) students. This is accurate, but clarification is warranted. The figure reflects the ultimate number of students at project buildout, and would be reached over time as classrooms are added with completion of various project phases. Please also refer to Response to Comment I48-6, above.

I48-8 The comment suggests an alternative, two-step approach to analyzing whether the project would result in displacement of housing and people, implying that students at the new campus would be forced to live off campus and encroach on existing adjacent communities. The first step suggested in the comment is to determine residential statistics for the existing students who live off campus. The next suggested step is to conduct a market survey of existing residences available to students and use data obtained in the survey to estimate behavior of students attending class at the new campus that may be seeking housing off campus.

SDSU remains committed to finding appropriate solutions for its existing and future student body, including planning and constructing on-campus and off-campus residences. However, conducting surveys of current SDSU student residential patterns throughout the region, and of existing housing configurations in the vicinity of the proposed campus, is beyond the scope of the impact analysis presented in this EIR. Such an effort would focus on current residential conditions at a time when dynamic forces are changing and will continue to change the face of housing in the region in general, and particularly in Mission Valley. It would be speculative to project the results of such a survey onto future campus populations at project buildout occurring decades in the future. EIR Section 4.13, Population and Housing, appropriately considers the project-related addition of local student population in the context of projected residential growth and planned increases to housing stock in the local community.

I48-9 The comment expresses opinions regarding potential economic behavior relative to home-ownership in a community adjacent to the project site, and offers editorial commentary on housing conditions adjacent to the existing SDSU campus. The comment raises economic, social or political issues that do not appear to relate to any physical effect on the environment. CSU/SDSU note that the surrounding land uses include apartments and condominiums immediately north and northwest of the project site, regional-serving commercial/retail and office to the west, office uses to the south, multifamily to the east and northeast, and residential to the north. These land uses are governed by the City of San Diego Municipal Code, Zoning regulations and development standards, and various community plans. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I48-10 The comment expresses opinions on potential economic behavior relative to home-ownership in a community adjacent to the project site, projecting the commenter's estimates and assumptions of potential reactions to market conditions. The comment raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I48-11 The comment questions the conclusions of the Draft EIR's analysis of project-related impacts relative to displacement of people and residences and suggests additional analysis should be performed, as referenced in Comment I48-8. The conclusion referenced in this comment is addressed in Response to Comment I48-3, which emphasizes the CEQA impact analysis focuses on a project's potential to result in the need to construct additional housing off site to accommodate people displaced by the project, which would not occur on this project. Please see Responses I48-3 and I48-8, above.

- I48-12** The comment suggests the Draft EIR's analysis of the project-related impact on housing should be more thorough, and focus on the near-term impacts of adding population to the site instead of comparing the increase to regional developments anticipated decades in the future. EIR Section 4.13, Population and Housing, appropriately considers the project-related addition of local population in the context of projected residential growth and planned increases to housing stock. Project phasing, which is described in EIR Section 2.3.6, notes that campus buildings and housing are planned to be constructed in the project's final phase, between 2022 and 2037, as determined by market/economic conditions, so the comment's implication that this growth would be immediate is inaccurate. The project will be implemented within and participate as part of a dynamic environment that will see changes in housing patterns throughout the region as market forces and City planning respond to anticipated growth.

Response to Comment Letter I49

Doug Livingston

October 1, 2019

- I49-1** The comment is an introduction to comments that follow. No response is required.
- I49-2** The comment states that the project should be designed to be “inclusive of the greater communities” surrounding the site, specifically by developing the on-site parks as “regional parks” available to the public, and by offering public parking for those using the on-site parks and recreational facilities. As noted in EIR Section 2.3.4.7, the project proposes ample parking on site, as well as bicycle and pedestrian improvements meant to encourage non-automobile access to the site. Parking impacts are analyzed in Section 4.15, Transportation. The Draft EIR determined that impacts to parking during non-event times would be less than significant and that the proposed project included a sufficient amount of parking. It is CSU/SDSU’s intent to construct park facilities and access thereto that will be attractive to and used by members of the university community and local residents alike.
- I49-3** The project states that the on-site park and recreation facilities should be easily accessible (vehicular parking) to City residents. Please see Response to Comment I49-2, above. In addition, note that EIR Section 2.3.4.3 states, “The proposed project would include a River Park, walking paths and trails, and associated open space for the shared use of the campus and community.” The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I49-4** The comment states that the “programming for the park and recreation facilities should be under the jurisdiction of the City of San Diego.” The property is subject to ongoing Purchase and Sale Agreement negotiations between the City and CSU/SDSU pursuant to San Diego Municipal Code Section 22.0908. CSU/SDSU has convened a River Park Advisory Group, which has been regularly meeting since the Draft EIR was released to review and refine the scope of the River Park. The plan has been revised in response to feedback from these stakeholders. CSU/SDSU note that the 34-Acre River Park would remain under the ownership of the City of San Diego and anticipate agreements as part of the Purchase and Sale Agreement for programming, maintenance and other purposes. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement for additional information.

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Response to Comment Letter I50

Jean-Louis Coquereau

October 2, 2019

I50-1 The comment states that a pedestrian/bike link between Normal Heights and the project site is lacking, and that the successful development of Mission Valley should include links between the valley and surrounding neighborhoods. The comment expresses opinions of the commentator. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

Nonetheless, it is noted that two future connections are planned as part of the City of San Diego's Mission Valley Community Plan Update. First, a four-lane road connection via the Fenton Parkway extension from south of the San Diego River (Camino del Rio North) to the existing terminus of Fenton Parkway (at the Metropolitan Transit System Trolley Green Line Fenton Trolley Station) is planned. Second, a bicycle pathway over the San Diego River is planned at the eastern edge of the project site, which would connect to bike paths within the proposed River Park.

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Response to Comment Letter I51

Andrew Wiese
October 2, 2019

- I51-1** The comment is an introduction to comments that follow. No further response is required.
- I51-2** The comment states that the project does not go far enough in protecting and expanding the north-south wildlife corridor between Murphy Canyon Creek and the San Diego River. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek and Responses O15-4 through O15-7 for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I51-3** The comment states that the River Park should be recognized as a “wildlife corridor” and that wildlife are expected to use the project site as such. The overwhelming majority of the project site is an existing Stadium and parking lot, which do not provide any habitat value. The Final EIR is revised to clarify the statement as follows (changes showing in ~~strikeout~~ and underline): “Due to the nearby urban areas, highways, and existing stadium, wildlife are not expected to utilize the developed portions of the project site as a wildlife corridor....” However, because the majority of the project site does not include the San Diego River and Murphy Canyon Creek or its adjacent habitat, and because the San Diego River has very minor temporary impacts and Murphy Canyon Creek would not be directly and permanently impacted by the proposed project, it would not be appropriate to revise the overall general project site description to focus solely on Murphy Canyon Creek and the San Diego River. Also, the Final EIR has been revised to add the following sentence to this section: “Other urban-adapted mammals, such as coyotes, bobcats, opossums, raccoons, and rabbits could use both the San Diego River and Murphy Canyon Creek for movement through the area.” (See EIR Section 4.3, Biological Resources, Subsection 4.3.1.7, Habitat Connectivity and Wildlife Corridors.)
- I51-4** The comment states that the Draft EIR does not describe the use of the project site as a wildlife corridor based on the future project. The purpose of the Draft EIR is to describe the existing conditions of the site as well as analyze the potential impacts to biological resources. That said, the adjacent parking lot areas would be redeveloped to a park area that would accommodate periodic urban-adapted wildlife use much better than the existing site and paved parking lot associated with the existing San Diego County Credit Union (SDCCU) Stadium. There are measures in place to protect the San Diego River and Murphy Canyon Creek from human disturbance that could disrupt existing or future wildlife use of the site, such as mitigation measures MM-BIO-4 and MM-BIO-5, which require temporary installation of construction fencing (or utilization of existing fencing) to delineate the limits of grading, biological monitoring, and a monitoring report; and MM-BIO-7, MM-BIO-8, MM-BIO-10, and MM-BIO-11, which require signage/barriers between the River Park and Shared Parks and Open Space and San Diego River/Murphy Canyon Creek interface, restrictions on landscape planting, compliance with buffer setbacks, and a lighting plan.
- I51-5** The comment states the proposed project should be planned with enhancement of Murphy Canyon and the San Diego River corridor in mind as a wildlife corridor. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek. The proposed project includes parks, recreation, and open space uses along both the San Diego River and Murphy Canyon Creek compared to a lighted, parking lot under the existing condition. Further, the proposed project is revised in the Final EIR to further reduce adjacent,

indirect impacts to Murphy Canyon Creek by eliminating the former “Street H” along the eastern boundary of the existing parking lot, immediately west of Murphy Canyon Creek. The elimination of this roadway would provide for an additional buffer by widening the “East Park” portion of the River Park, which would enhance wildlife movement through Murphy Canyon Creek. Also, see Response to Comment I51-4, above, for information related to the future use of the site.

- I51-6** The comment states that the Draft EIR minimizes the discussion of adjacent open space in the City’s Multi-Habitat Planning Area (MHPA). As stated in Response to Comment I51-3, the majority of the project site is an existing SDCCU Stadium and parking lot, which do not provide any habitat value and is not located within the MHPA. The San Diego River is located within the MHPA and there is only a very minor temporary impact within the edge of the San Diego River that will be restored following the sewer connection. There are no impacts to Murphy Canyon Creek. Therefore, describing the project site relative to canyon-lands is not relevant to the existing project site or the potential impacts.
- I51-7** The comment states that the landscaping of the River Park should maximize native planting. Mitigation Measure MM-BIO-8 (Invasive Species Prohibition) prevents planting of any invasive plant species that are included on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory for the project region within all areas outside of the multi-use playing areas. Additionally, preliminary design from the landscape architects indicate that native plant material will be planted along the eastern most and southern most edges of the project to reinforce the river-like experience for park users. Along the developed edges of the park, a “natural urban” palette will be planted, which consists of some native plants mixed in with drought tolerant-Mediterranean ornamental plant material.
- I51-8** The comment states that lighting, etc. should be withdrawn from the site edges to minimize disturbance to nocturnal species. Under the proposed plan, the trail closest to the San Diego River is generally 100 feet from the river. The installation of the River Park and Shared Parks and Open Space will provide a natural buffer between the campus Stadium, commercial and residential buildings, and the San Diego River and Murphy Canyon Creek. A buffer of approximately 140 to 740 feet would be established between Murphy Canyon Creek and the proposed active recreational (park) and residential land uses, which is in excess of the 100-foot buffer that is required in the City’s Subarea Plan (which was established in concert with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife during preparation of the City’s Subarea Plan in the 1990s). Lighting will be directed away from the San Diego River and Murphy Canyon Creek.
- I51-9** The comment states that native trees contribute to seasonal habitat for birds and other species. The comment expresses opinions of the commenter. Native plants and trees will be used within the park and site, especially within the River Park as it is adjacent to existing native habitat. Key streets will also be designed as green corridors that link portions of the developed site to the River Park and the adjacent San Diego River and Murphy Canyon Creek. This will create a unique, site-specific character and aesthetic that is sensitive to its location. Further, Mitigation Measure MM-BIO-8 prevents planting of any invasive plant species that are included on the most recent version of the Cal-IPC California Invasive Plant Inventory for the project region within all areas outside of the multi-use playing area.
- I51-10** The comment states that SDSU should exercise regional leadership in the landscape design. See Response to Comment I51-7, above. The comment expresses opinions of the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I51-11** The comment states that the Draft EIR discussion of impacts to least Bell's vireo is misleading. The commenter is correct in stating that the Draft EIR describes impacts to least Bell's vireo as "potentially significant absent mitigation (Impact BIO-1)." However, contrary to the comment, the measures provided in Mitigation Measure MM-BIO-1 provide mitigation for impacts to this species. Specifically, this measure requires habitat to be replaced at a 3:1 mitigation ratio, which results in a net increase of habitat; and it requires that all measures required through the federal Section 7 Consultation or Section 10 and the state Section 2080.1 incidental take permit requirements be implemented. These measures are often more stringent than the measures provided in the Draft EIR. That said, MM-BIO-3 (Nesting Bird Survey) and MM-BIO-9 (Noise) require specific measures to avoid take of least Bell's vireo through nesting bird surveys, buffers, and monitoring for noise impacts. The comment regarding the preference for on-site mitigation is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I51-12** The comment states that the option to provide off-site mitigation at San Luis Rey should be rejected and habitat mitigation should be focused on site or in the adjoining San Diego River corridor. The comment refers to Mitigation Measure MM-BIO-13. CSU/SDSU clarifies that the recommended mitigation measure provides for options mitigating impacts to wetlands, including that mitigation "may occur as on-site creation, off-site enhancement and restoration (e.g., at the San Diego State University-owned Adobe Falls property), and/or purchase of credits at an approved mitigation bank." Use of mitigation banks is an accepted form of mitigation for wetlands impacts. The comment regarding the preference for on-site mitigation is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I51-13** The comment states that SDSU should plant native trees and not merely focus on planting to meet the City's urban forestry goals. Native plants and trees will be used within the park and site, especially within the River Park as it is adjacent to existing native habitat. Key streets will also be designed as green corridors that link portions of the developed site to the River Park and the adjacent San Diego River and Murphy Canyon Creek. This will create a unique, site-specific character and aesthetic that is sensitive to its location. Further, Mitigation Measure MM-BIO-8 prevents planting of any invasive plant species that are included on the most recent version of the Cal-IPC California Invasive Plant Inventory for the project region within all areas outside of the multi-use playing area.
- I51-14** The comment states that SDSU should avoid planting any invasive trees or plants. Mitigation Measure MM-BIO-8 (Invasive Species Prohibition) prevents planting of any invasive plant species that are included on the most recent version of the Cal-IPC California Invasive Plant Inventory for the project region within all areas outside of the multi-use playing areas. Therefore, invasive shrubs and trees will not be used within the site and River Park considering its adjacency to the San Diego River and Murphy Canyon Creek. Resources such as the Cal-IPC will be used to ensure invasive plants are not used. Further, in multiple meetings, SDSU President Adela de la Torre has also specifically commented on the exclusion of palm trees within the project.
- I51-15** The comment states that 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." The comment further states that SDSU should aim higher than current City standards, and should leverage its own resources to construct housing affordable to its own faculty and staff. The comment states the housing crisis will not be solved by number of units alone, and that SDSU should contribute to solving the regional housing problem by committing to construction of affordable

units for San Diego residents, including faculty, staff, and students, from the date of occupancy. The comment concludes that people expect more of SDSU than the minimum standards of the City. As described in the Draft EIR, page 2-19, “The proposed project would [build] the required affordable units on-site. The remainder of the residential units would be made available to provide workforce and publicly available housing within a vibrant university village setting.” The proposed project would provide workforce and publicly available housing, which would be available to faculty, staff, and students independent of the provision of on-site affordable housing. The comment raises social, economic, or political issues that are not required to be addressed under CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I52

Sara Cabak
October 2, 2019

- I52-1** The comment expresses the opinion of the commenter that the proposed project should “work towards making all the building reuse water and LEED Gold.” Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I53

Lizzie Annison
October 2, 2019

- I53-1** The comment states that the proposed project should “use recycled water throughout” and “cut car emissions by providing bus routes to and from mission valley.” Regarding recycled water, please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. Regarding transit, CSU/SDSU note that such service is not within the authority of CSU/SDSU; however, the proposed project has been designed to accommodate a future transit center, including potential bus service, at the Metropolitan Transit Station (MTS) Stadium Trolley Station. Further, the proposed project includes a Project Design Feature for a Transportation Demand Management (TDM) Program to reduce vehicle miles traveled. Lastly, the project site is located within a Transit Priority Area and includes improvements to the MTS Stadium Trolley Station to increase ridership at an underutilized trolley stop. Please refer to Thematic Response PD-1 – Project Refinements and Thematic Response TR-1 – General Increase in Traffic for additional information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I54

Brittney Salazar

October 2, 2019

- I54-1** The comment suggests that the proposed project should comply with the Multiple Species Conservation Program (MSCP) and focus on protecting the species around the area because portions of the project would be built on the river valley. Please refer to Responses 015-89 through 015-94 for responsive information regarding the proposed project's compliance with the MSCP. The comment addresses general subject areas, impacts to biological resources in the San Diego River, which received extensive analysis in Section 4.3, Biological Resources, of the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I55

Jonathan Clay
October 3, 2019

- I55-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I56

Naomi Waldron, Matthew Garcia, Natalie Penney, and Briana Blake

October 2, 2019

- I56-1** The comment is an introduction to comments that follow. No further response is required.
- I56-2** The comment requests that the project make all buildings LEED Gold certified and easily accessible through public transportation. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I56-3** The comment requests that the project work with the City of San Diego to address homelessness. Homelessness is an existing condition in the San Diego River, which is discussed in Section 4.13, Population and Housing, of the Draft EIR. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not address the EIR’s environmental analysis.

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Response to Comment Letter I57

Emma Farrell
October 2, 2019

- I57-1** The comment requests that the project implement the idea of zero waste practices, and expresses the commenter's opinions regarding compost and recycling bins, and "to-go" packaging at food establishments. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I58

Ben Moraga
October 2, 2019

- I58-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I59

Emily Bews

October 2, 2019

- I59-1** The comment provides background information on the commenter and does not raise an environmental issue. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-2** The comment is an introduction to comments that follow.
- I59-3** The comment expresses opinions of the commenter that buildings must be certified Leadership in Energy and Environmental Design (LEED) Gold or better. The Draft EIR includes a Project Design Feature, consistent with the CSU Sustainability Policy, that all buildings would be designed and built to achieve LEED Silver or equivalent rating; however, certification under LEED is not required under the CSU Sustainability Policy. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which identifies several additional Project Design Features, including a commitment to incorporate sustainability as part of the scoring of a developer/builder Request for Proposals. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-4** The comment expresses opinions of the commenter to electrify all buildings. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which identifies additional commitments to reduce natural gas usage and otherwise electrify the proposed Mission Valley campus. These features include restrictions on residential hearths, naturally ventilated parking garages, requirements for all-electric HVAC and water heating systems, and sizing conduit for future electrification of the Mission Valley campus. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-5** The comment expresses opinions of the commenter to work with the San Diego River not against it. CSU/SDSU note that the proposed project has been designed in recognition of the San Diego River, including limiting active uses along the river, grading techniques to raise the developed portions out of the floodplain, and mitigation to reduce indirect impacts along the edge of the project site. Impacts to the San Diego River are analyzed in Draft EIR Section 4.3, Biological Resources, and Section 4.9, Hydrology and Water Quality. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-6** The comment expresses opinions of the commenter to keep the river undeveloped and allow lots of green space. The site plan has been designed with this principle. As analyzed in Section 4.3, Biological Resources, impacts to the San Diego River are limited to temporary impacts to connect utility extensions to the existing trunk sewer and permanent impacts associated with roadway extensions. Further, as stated in Chapter 2, Project Description, the proposed project would include over 80 acres of open space and park area, including the 34-acre River Park. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I59-7** The comment expresses opinions of the commenter requesting composting throughout the entire campus. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which includes a commitment for composting at the proposed stadium and within the future campus/office area. CSU/SDSU note that such services are currently being developed by waste providers with the City of San Diego (EDCO) and any local efforts would be implemented as the project builds out and receives waste collection services. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-8** The comment addresses general subject areas, use of native plant species, and natural habitat remediation, which received extensive analysis in the Draft EIR. The Draft EIR, Section 4.3, Biological Resources, recommends mitigation measures that prohibit invasive species and require restoration of temporary impacts. The proposed mitigation would reduce potential indirect impacts to less-than-significant levels. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I59-9** The comment is a conclusion statement.

Response to Comment Letter I60

Jaida Hunt
October 2, 2019

- I60-1** The comment requests that the project consider helping the cause of sustainability by incorporating energy-efficient appliances and thinking about the environment during project buildout. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I61

Izabella Brattesani

October 2, 2019

- I61-1** The comment requests that the project consider incorporating energy-efficient windows and solar panels. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I62

Simran Jain
October 2, 2019

- I62-1** The comment suggests that the project should include water reuse strategies. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I63

Karinne Nevarez

October 2, 2019

- I63-1** The comment is an introduction to comments that follow. No further response is required.
- I63-2** The comment requests that the project utilize sustainable practices and greenhouse gas reduction strategies. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR, therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I63-3** The comment requests that the project follow the Multi-Species Conservation Program (MSCP). Refer to Responses to Comments 015-89 through 015-94 for responsive information. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I64

Cassidy Melton
October 2, 2019

- I64-1** The comment requests that the project develop the buildings in a sustainable way, and expresses the commenter's opinion that the project buildings should be LEED Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I65

Pia Twittmann
October 2, 2019

- I65-1** The comment requests that the project include water reuse strategies and should not use natural gas as a power source. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I65-2** The comment expresses the commenter’s desire for bus routes to/from Mission Valley. Please refer to Section 4.15, Transportation, for public transportation analysis. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I66

Paloma Acquistapace

October 2, 2019

- I66-1** The comment requests that the project take measures to include plants in the stormwater design. Please refer to the stormwater management discussion in Section 4.9, Hydrology and Water Quality, of the Draft EIR. As discussed therein, the proposed storm drain system would collect and retain runoff and direct drainage to bio-retention basins; a conceptual drawing of a bioretention basin is provided in EIR Figure 4.9-5, Conceptual Bioretention Basin. The bioretention facilities would be designed to create and increase habitat to the extent feasible while treating the proposed project stormwater runoff. Consultation would occur with the San Diego Management and Monitoring Program staff or the U.S. Geological Survey staff regarding selection of vegetation materials for the bioretention facilities to maximize habitat and biofiltration. The upper slopes of the project site would be planted with appropriate native or non-native/non-invasive, drought-tolerant vegetation; and the lower portions of the bioretention facilities would be planted with plant materials that support habitat and are suitable for inundation as part of the biofiltration process. (See EIR Section 4.9, Hydrology and Water Quality, pp. 4.9-22–4.9-23; EIR Appendix 4.9-1, Water Quality Technical Report.) The comment restates information contained in the draft environmental documentation and does not raise an environmental issue within the meaning of CEQA. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I67

Gener Abdon
October 2, 2019

- I67-1** The comment requests that the project make all buildings LEED Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I68

Naya Ravelo
October 2, 2019

- I68-1** The comment requests that the project commit to 100% electrification, a minimum LEED Gold certification for every building, and a water reuse system. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I69

Grace Markel
October 2, 2019

- I69-1** The comment requests the project to make all buildings LEED Gold and for the site to be electrified. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment will be noted. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I70

Caroline Kamin

October 2, 2019

- I70-1** The comment requests that the project 100% electrify the site and make all the buildings LEED Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I71

Audrey Carlson
October 2, 2019

- I71-1** The comment requests that the project consider sustainable transportation, solar panels, sustainable food, vegan options, refillable water fountains, and reduction of plastic in markets. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I72

Chloe Price
October 2, 2019

- I72-1** The comment requests that the project electrify the site and make all the buildings LEED Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I73

Eva Huber
October 2, 2019

- I73-1** The comment requests that the project consider sustainable transportation, solar panels, sustainable food, vegan options, refillable water fountains, and reduction of plastic in markets. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I74

Haley Ledford
October 2, 2019

- I74-1** The comment requests that the project address the Multiple Species Conservation Program (MSCP) and states that there are many species of animals in San Diego that are specific to San Diego and need to be protected and conserved. Please refer to Responses to Comments O15-89 through O15-94 for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I75

Journey Woods
October 2, 2019

- I75-1** The comment requests that the project consider sustainable transportation, solar panels, sustainable food, vegan options, refillable water fountains, and reduction of plastic in markets. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR, therefore, no further response is required. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I76

Taitum Buckley
October 2, 2019

- I76-1** The comment urges the project to make all the buildings LEED Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I77

Anna Cilley
October 2, 2019

- I77-1** The comment states that the project should be LEED Gold and include water reuse measures. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment also states that new bus routes should be added to Mission Valley. Please refer to Section 4.15, Transportation, for public transit analysis. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate a bus transfer center adjacent to the Green Line trolley station, with space for approximately four stop/layover spaces. A bus transfer center could provide a mobility hub to connections not currently served by the trolley, consistent with the San Diego Association of Governments’ desire to increase implementation of mobility hubs throughout the region. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations. Please refer to Thematic Response PD-1 – Project Refinements for additional information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I78

Scarlett Alexander

October 2, 2019

- I78-1** The comment states that the project should be LEED Gold and include water reuse measures. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment also states that new bus routes should be added to Mission Valley. Please refer to Section 4.15, Transportation, for public transit analysis. SDSU has met with MTS representatives regarding potential future bus operations at the project site. CSU/SDSU understands that no new service currently is planned, but the proposed site plan has been designed to accommodate a bus transfer center adjacent to the Green Line trolley station, with space for approximately four stop/layover spaces. A bus transfer center could provide a mobility hub to connections not currently served by the trolley, consistent with the San Diego Association of Governments’ desire to increase implementation of mobility hubs throughout the region. SDSU will continue to work with MTS to refine the design to ensure compatibility with MTS bus operations. Please refer to Thematic Response PD-1 – Project Refinements for additional information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I79

Delaney Down
October 2, 2019

- I79-1** The comment states that the project should follow the Multiple Species Conservation Program (MSCP). Please refer to Responses 015-89 through 015-94 for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I80

Candra Preovolos

October 2, 2019

- I80-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I81

Sandra Stahl
October 3, 2019

- I81-1** The comment is an introduction to comments that follow.
- I81-2** The comment provides background information about existing conditions of Gramercy Drive and Taft Middle School, and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I81-3** The comment states that the 25 mph speed limit on Gramercy Drive would “severely impact” the flow of traffic from the proposed project and slow it down. Please refer to Responses 03-31 through 03-34 to the Serra Mesa Planning Group letter, which raises the same concern. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I81-4** The comment asks if the 25 mph speed limit on Gramercy is considered in the Draft EIR. Please refer to Responses 03-31 through 03-34 to the Serra Mesa Planning Group letter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I81-5** The comment states that a similar condition will exist in the vicinity Jone Elementary School on Greyling Drive and Angier Elementary School on Hurlbut Street, and asks why these areas were not studied. Please refer to Responses 03-35 and 03-36 to the Serra Mesa Planning Group letter, which raises the same concern. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I81-6** The comment states that it is not sufficient to respond 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.” Please refer to Responses I81-4 and I82-5, above, as well as Responses 03-31 through 03-36 to the Serra Mesa Planning Group Letter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I81-7** The comment asks why the proposed project does not include an SDSU operated park and ride lot on Aero Drive with an SDSU-operated shuttle to the Mission Valley campus. A park and ride lot is outside the scope of the proposed project and San Diego Municipal Code Section 22.0908. Please also refer to Thematic Response TR-1 – General Increase in Traffic, which includes a summary of the proposed project’s Transportation Demand Management (TDM) Program to reduce vehicle trips. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I82

Glenn Marshall
October 2, 2019

- I82-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I82-2** The comment provides factual background information regarding support for the prior development of Petco Park and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I83

Peter Elia
October 2, 2019

- I83-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I84

Kory Kavanewsky

October 2, 2019

- I84-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I85

Jason Allan
October 2, 2019

- I85-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I86

Courtney Ransom

October 3, 2019

- I86-1** The comment is an introduction to comments that follow.
- I86-2** The comment provides factual background information about climate change and does not raise an issue concerning the adequacy of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I86-3** The comment provides factual background information about GHG legislation in California. The comment states that “mass shifts in society will be the clear and only option to achieve the limited amount of mitigation possible” and that with greater changes, more legislation will come, for which SDSU should plan. EIR Section 4.7, Greenhouse Gas Emissions, addresses the existing legislative setting regarding climate change and GHG emissions. The comment does not raise any specific issue with the adequacy of the analysis in the Draft EIR; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I86-4** The comment restates information contained in the Draft EIR that the proposed project includes natural gas, and states that natural gas is a greenhouse gas which should not be the default for the project. The comment expresses the opinion of the commenter that “work should be done to ensure all appliances and systems (pools, heaters, stoves, etc.) possible that can be made electric *are* made electric.” CSU/SDSU refer the commenter to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which notes that additional project design features (PDFs) have been added to the proposed project to fortify the project’s commitments to restricting natural gas usage. Specifically, the Draft EIR PDF that limited residential hearths to 5% of residential units has been refined to eliminate residential hearths entirely. In addition, CSU/SDSU has committed to all electric heating and cooling for all land uses within the proposed project. CSU/SDSU has also committed to sizing all electrical utilities and conduit to enable the electrification of all uses in the future. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I86-5** The comment restates information contained in the Draft EIR that the proposed project would be required to comply with Leadership in Energy and Environmental Design (LEED) Silver or equivalent. The comment expresses the opinion of the commenter that “all buildings should have a LEED Gold Certification minimum.” CSU/SDSU refer the commenter to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. As discussed therein, LEED Gold certification is not guaranteed to provide any additional emissions reduction benefits because not all LEED credits are specific to criteria air pollutant- or GHG-reducing strategies. Nonetheless, the Final EIR now includes a PDF that ensures “Sustainability” is a component of the scoring criteria used during the Request for Proposals process, and favorably weighs a builder’s proposal to implement strategies above and beyond those needed to achieve LEED Silver certification. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I86-6** The comment is a conclusion statement.

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Response to Comment Letter I87

Byron Klassen
October 2, 2019

- I87-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I88

Jeff Smith

October 2, 2019

- I88-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I88-2** The comment expresses general support for the proposed project and opinions of the commenter, but does not raise an issue concerning the adequacy of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I89

Daniel Schneeweiss

October 2, 2019

- I89-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I90

Alan Dulgeroff
October 2, 2019

- I90-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I91

Jim Baross
October 3, 2019

- I91-1** The comment is an introduction to comments that follow.
- I91-2** The comment restates information contained in the Draft EIR and does not raise an environmental issue. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I91-3** The comment expresses the commenter's support for the referenced pedestrian bridge over the San Diego River. CSU/SDSU notes the pedestrian bridge is not proposed as part of the project, rather, this bridge is a regional facility that is part of the City of San Diego Mission Valley Community Plan Update. However, CSU/SDSU notes that, as part of the ongoing Purchase and Sale Agreement with the City of San Diego, CSU/SDSU has agreed to fund the construction of a two-lane crossing of the San Diego River at the southern terminus of Fenton Parkway (i.e., the Fenton Parkway Bridge) through a separate, City-initiated Capital Improvement Project. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I92

Larry Emond
October 2, 2019

- I92-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I93

Jason and Jenny Tetley

October 3, 2019

- I93-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I93-2** The comment expresses general support for the proposed project and opinions of the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I94

Tom Florio
October 3, 2019

- I94-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I95

Kforde F

October 3, 2019

- I95-1** The comment expresses general opposition to the proposed project due to Mission Valley being “too crowded” and because “people don’t use mass transit,” but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. Please also refer to Thematic Response TR-1 – General Increase in Traffic. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I96

Daniel Feingold

October 3, 2019

- I96-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I97

Kenny Kirkpatrick

October 3, 2019

- I97-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I98

Chip Murphy
October 3, 2019

- I98-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I99

Ken Locati
October 3, 2019

- I99-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I100

Gener Abdon
October 3, 2019

- I100-1** The comment is an introduction to comments that follow.
- I100-2** The comment states that the Draft EIR does not specify if the project will adhere to the Multiple Species Conservation Program (MSCP). Please refer to Responses 015-89 through 015-94 for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-3** The comment states that the Draft EIR fails to provide measures for future plans on Murphy Canyon Creek. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek, which describes that Murphy Canyon Creek would not be directly impacted by the proposed project; therefore, there is no nexus requiring mitigation within Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-4** The comment expresses the commenter’s opinion that the Draft EIR fails to demonstrate sustainability leadership. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information regarding additional Project Design Features included in the Final EIR, including restrictions on natural gas usage and electrification of the Mission Valley campus, additional solar photovoltaic requirements, requirements for composting, requirements to provide for use of reclaimed water, and a requirement to include sustainability as part of the scoring of any Request for Proposals for development of the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-5** The comment states that the Draft EIR does not provide adequate mitigation measures for construction equipment in relation to cumulative net increase of any criteria pollutant. The comment also states that Section 4.12, Noise, references use of electric construction equipment instead of gasoline/diesel powered equipment. The comment suggests using electric-powered equipment to avoid exhaust fumes. Construction air quality impacts are analyzed in Section 4.2.4, Impacts Analysis, and mitigation is recommended in Section 4.2.6, Mitigation Measures, specifically MM-AQ-1. With respect to the use of electric equipment, the impact analysis was based on a “worst case” analysis, and use of any such equipment may reduce impacts. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-6** The comment states that the Draft EIR does not provide implementation measures regarding diesel construction vehicle idling requirements. Mitigation measure MM-AQ-1 requires the contractor to post legible and visible signs in English and Spanish, in designated queueing areas and at the construction site, to remind equipment operators of the 5-minute idling limit. Additionally, idling requirements would be included on permit documents prior to the beginning of construction, and are also included in the MMRP. The comment also expresses the opinion that the same idling requirements should be implemented for passenger vehicles. The mitigation measure is only for diesel construction vehicles and would not be feasible for passenger vehicles as it is not reasonable to restrict such idling; however, CSU/SDSU note the vehicle fleet is currently expanding choices for vehicles which shut off when at stop

lights. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I100-7 The comment states that the Draft EIR does not provide mitigation measures in relation to the possibility of the project having a cumulative effect on air quality resources. The comment also states that there is no discussion of indoor air quality. With respect to cumulative impacts to air quality resources, the Draft EIR determined there is the potential for cumulative impacts to air quality (see Impact AQ-5). Mitigation measure MM-AQ-2 addresses a cumulative impact to air quality. Please refer to Section 4.2.6, Mitigation Measures. Regarding indoor air quality, the Draft EIR analyzed impacts to sensitive receptors in Section 4.2.4, including a construction-related Health Risk Assessment, Carbon Monoxide Hotspot analysis, Kinder Morgan MVT Siting Assessment, Health Effects of Criteria Air Pollutants and Freeway Sitting Assessment. As analyzed in Section 4.2.4, no significant impacts were identified relative to on-site receptors that would require mitigation for indoor air quality. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I100-8 The comment addresses the effect of interstate (I-) 8 and I-15 freeways on the air quality of the project site. The comment states the project site is close to these freeway and expresses the commenter's opinion that there should be mitigation measures in place. The Draft EIR, Section 4.2.4, analyzed freeway sitting. As described on pages 4.2-30 and 4.2-31 of the Draft EIR:

The results of the analysis show that:

- The cancer and non-cancer health impacts of the DPM emissions from project-related vehicles traveling on the modeled sections of the I-15 and I-8 freeways are below the SDAPCD public health risk notification requirements, and
- The cancer and non-cancer health impacts of the DPM emissions from vehicles traveling on the modeled sections of the I-15 and I-8 freeways on residential and nonresidential receptors located on the project site, including those within 500 feet of the freeways, are below the SDAPCD public health risk notification requirements.

Thus, impacts to sensitive receptors are **less than significant**.

Further, it is noted that existing traffic on I-8 and I-15 is an existing condition, and that the proposed project would only add a small percentage of the overall traffic on these freeway facilities compared to the baseline. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I100-9 The comment states the Draft EIR "fails to acknowledge the severity of the environmental impacts that this project site will have [on] energy and does not provide mitigation measures to those impacts." The comment also expresses the commenter's opinion that "the environmental impact that this project site will have on energy is Significant and Unavoidable." The commenter is referred to Section 4.5, Energy, which describes that the proposed project would result in less-than-significant impacts on energy usage; therefore, no mitigation is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-10** The comment states that the Draft EIR is non-complacent with state law regarding reductions in greenhouse gas (GHG) emissions. The commenter is referred to Section 4.7, Greenhouse Gas Emissions, which analyzes the proposed project's impacts to greenhouse gases, including compliance with applicable state laws and regulations. As analyzed therein, the proposed project was determined to have a less-than-significant impact on GHG emissions. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-11** The comment states that the project should be certified Leadership in Energy and Environmental Design (LEED) Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-12** The comment states the draft EIR fails to "acknowledge the severity of the impacts of the Greenhouse Gas Emissions ... [and] provide mitigation measures." The commenter is referred to Section 4.7, Greenhouse Gas Emissions, which analyzes the proposed project's impacts to greenhouse gases. As analyzed therein, the proposed project was determined to have a less than significant impact on GHG emissions. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-13** The comment states the Draft EIR does not provide specific information addressing decommissioned wells. Decommissioned wells received extensive analysis in the Draft EIR Section 4.8, Hazards and Hazardous Materials, specifically on pages 4.8-2 and 4.8-19. Mitigation measures MM-HAZ-4 and MM-HAZ-5 are recommended to ensure that decommissioning wells are addressed prior to and as part of construction of the proposed project. With implementation of these measures, impacts were determined to be reduced to less than significant. The comment does not raise any specific issue with that analysis, therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-14** The comment states that the Draft EIR does not propose mitigation measures to deal with current oil spills by Kinder Morgan Energy Partners or potential future oil contamination from the pipes. Please refer to Section 4.8.6, Mitigation Measures, specifically MM-HAZ-3 requires implementation of a Hazardous Materials Contingency Plan (HMCP) that addresses potential impacts from releases on or near the project site, as well as the potential for existing hazardous materials on site. In addition, MM-HAZ-6, requires consultation with Kinder Morgan prior to commencement of construction, demolition, and implosion activities to avoid damage of the fuel pipeline. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-15** The comment expresses states that the Draft EIR does not propose mitigation measures for vapor exposure to residents outside of buildings. Please refer to Section 4.8.6, Mitigation Measures, specifically MM-HAZ-3, which requires the preparation of a Hazardous Materials Contingency Plan (HMCP) that addresses potential impacts in soil, soil vapor, and groundwater from releases on or near the project site, as well as the potential for existing hazardous materials on site (e.g., drums, tanks, and pipelines). MM-HAZ-3 also requires that "Contaminated soils and/or groundwater shall be managed and disposed of in accordance with local and state regulations. The HMCP shall include

health and safety measures, which may include but are not limited to periodic work breathing zone monitoring and monitoring for volatile organic compounds using a handheld organic vapor analyzer in the event impacted soils are encountered during excavation activities.”

Further, MM-HAZ-7 requires that, prior to vertical construction of each residential, educational, and commercial building, SDSU or its designee shall conduct a soil vapor investigation and that vapor mitigation strategies shall be implemented in accordance with the Department of Toxic Substances Control Vapor Intrusion Mitigation Advisory for all such future buildings and enclosed structures where soil vapor is detected. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-16** The comment states the Draft EIR fails to acknowledge impacts on hazards and hazardous materials. The commenter is referred to Section 4.8, Hazards and Hazardous Materials, which analyzes the proposed project’s impacts to hazards and hazardous materials. As analyzed therein, the proposed project was determined to have potentially significant impacts, and Section 4.8.6 recommends mitigation measures. With implementation of the recommended mitigation, the project would result in a less-than-significant impact on hazards and hazardous materials. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-17** The comment states the Draft EIR fails to acknowledge impacts on hydrology and water quality, and does not provide any mitigation measures. Potential impacts related to hydrology and water quality are analyzed in EIR Section 4.9, Hydrology and Water Quality. As described therein, impacts would be less than significant as a result of compliance with applicable laws and regulations and the implementation of corresponding project design features and best management practices (BMPs); therefore, no mitigation measures are required. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-18** The comment states that the Draft EIR did not acknowledge the severity of impacts on Land Use and Planning and does not provide mitigation measures. Impacts related to land use and planning are analyzed in EIR Section 4.10, Land Use and Planning, and were determined to be less than significant. Accordingly, mitigation is not necessary or required. The comment does not raise any specific issue with that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-19** The comment restates information in the Draft EIR regarding San Diego Municipal Code Section 22.0908. The comment states there is some vagueness in the Draft EIR, Section 4.10, Land Use and Planning, as to which Climate Action Plan (CAP) the proposed project would comply with. The comment mentions the City of San Diego’s CAP, the SDSU CAP for the main campus, and notes the Draft EIR states the proposed project is not subject to either. The comment asks, if the proposed project would not comply with the SDSU CAP, whether others have been consulted about planning for the proposed project, and suggests consultation with faculty and staff on campus. With respect to the CAP analysis, Appendix 4.7-2 of the Draft EIR provides an analysis regarding the proposed project’s compliance with the City of San Diego’s CAP. As described therein, while not subject to the CAP as a state agency, the

proposed project would comply with both Option A and Option B under Step 1, would implement the checklist requirements under Step 2, and would meet the transportation priority area requirements under Step 3. Please refer to the Final EIR, Section 4.7, which is revised to provide additional clarifying information with respect to the City's CAP.

- I100-20** The comment states the “Draft EIR fails to acknowledge the project impacts and provide mitigation measures” related to cumulative effects on mineral resources. As analyzed on page 4.11-5 of the Draft EIR, “the project site is not a known mineral resource that would be of value to the region and the residents of the state per the City of San Diego’s General Plan, nor is the project site delineated on a local general plan, specific plan, or other land use plan as a locally important mineral resource recovery site. Therefore, the proposed project **would not contribute to a cumulatively considerable impact** to mineral resources.” Accordingly, mitigation is not necessary or required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-21** The comment asks whether mineral resources will be recycled. As described in EIR Section 2, Project Description, the proposed project would re-use existing on-site materials to generate fill to raise the project development above the floodplain. The impacts associated with these construction activities have been analyzed throughout the EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-22** The comment states that “the Draft EIR does not provide detailed information on the incorporation of electric tools and does not provide mitigation measures of alternatives of construction tools.” PDF N-2 requires that electrical power will be used to run air compressors and similar power tools; however, these are not considered to be the main contributors to construction noise impacts; rather, large, heavy duty construction equipment such as dozers, graders, and scrapers generate high levels on construction noise (see Table 4.12-4 of the Draft EIR). Because these pieces of equipment generate higher noise levels, the Draft EIR analyzes these as noise sources under the construction noise impact analysis, and there are no known replacements to these types of heavy duty equipment that would be reasonably available and have the potential to reduce construction noise impacts. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-23** The comment states that the Draft EIR fails to acknowledge indirect impacts of population growth such as roads and does not provide mitigation measures. As stated in Section 4.13.4.1.2, Indirect Growth Inducement, the proposed project would not result in the extension or expansion of roadways in previously undeveloped or underdeveloped areas such that surrounding land uses could be encouraged to intensify. Accordingly, mitigation is not necessary or required. Further, the commenter is referred to EIR Section 5.1, Growth Inducement, which analyzes the potential growth inducing impacts of the proposed project, including the construction of roads. As analyzed therein, the proposed project would have a less-than-significant impact on growth inducement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-24** The comment states that the Draft EIR fails to provide mitigation measures for cumulative effects on housing and/or population resources. The Draft EIR determined that, “No mitigation is feasible to reduce cumulative impacts and therefore cumulative impacts related to growth inducement would be **significant and unavoidable**.” The Draft EIR explains (page 4.13-20) that:

It should be noted that the Final Mission Valley Community Plan Update EIR includes a mitigation measure, MM-AQ-1, which requires that “Within six months of the certification of the Final PEIR, the City shall provide a revised land use map for the CPU area to SANDAG to ensure that any revisions to the population and employment projections used by the SDAPCD [San Diego County Air Pollution Control District] in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed CPU” (City of San Diego 2019a). While this measure is not within the discretion of CSU, should the City implement MM-AQ-1, impacts as a result of the proposed project would be reduced to less than significant.

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-25** The comment states the Draft EIR does not provide mitigation for the proposed project’s cumulative effects on public services. The Draft EIR determined that cumulative impacts could occur to fire and emergency response services (Impact PS-1) and schools (Impact PS-2). The threshold for such impacts is whether construction of public facilities would cause an environmental impact. As explained in the Draft EIR (p. 4.14-34), because the locations of such fire and emergency services facilities and schools are not known at this time, the Draft EIR could not determine whether their construction would result in significant impacts. No mitigation is available to reduce these potential impacts. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-26** The comment restates information contained in the Draft EIR regarding the Metropolitan Transit System (MTS) Green Line Stadium Trolley Station and the planned Purple Line. The comment does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-27** The comment states the Draft EIR fails to provide on-site traffic mitigation measures. On-site improvements associated with the design and implementation of the project are not considered mitigation measures under CEQA. In response, the commenter is directed to EIR Section 4.15, Transportation, specifically Section 4.15.1.1 on pages 4.15-4 through 4.15-12. As described in that section, the proposed project includes a TDM Program consisting of both stadium and non-stadium strategies to reduce single-occupancy vehicle trips and VMT. As described, the TDM Program is a PDF designed to reduce single-occupancy vehicle trips and VMT, thereby acting as a sustainable transportation measure. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-28** The comment states the Draft EIR does not clarify if funds will be available for road expansions around the project site. CSU/SDSU assume the comment relates to Development Impact Fee (DIF) funds for regional roadway improvements such as the Fenton Parkway extension. SDSU has committed to advance the funding for construction of a two-lane, Fenton Parkway connection under a separate, city-

initiative Capital Improvement Project subject to its own environmental review; however, as noted in Section 4.15, Transportation, of the Draft EIR, this improvement is not a required mitigation measure of the proposed project. CSU/SDSU would provide additional transportation improvements as community benefits, which are not required as and are in addition to mitigation proposed in the EIR. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement for additional information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-29** The comment states that pedestrian traffic (MM-TRA-6) will be low on sidewalks near the project site and does not provide alternatives. While the comment is unclear, it restates information contained in MM-TRA-6 and suggests that additional alternatives be considered. For clarification, the reason pedestrian traffic is anticipated to be low is due to the location of the recommended improvements, over a freeway interchange, and lack of surrounding land uses that would reasonably be expected to result in substantial pedestrian traffic. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-30** The comment states the Draft EIR solely focuses on car traffic mitigation but does not provide sustainable transportation (public transit) as another mitigation measure. CSU/SDSU refer the reader to the TDM Program in Section 4.15.1.1 of the Draft EIR. As described, the TDM Program is a PDF designed to reduce single-occupancy vehicle trips and VMT, thereby acting as a sustainable transportation measure. Please refer to Responses O11-26 and O11-28 for additional information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-31** The comment states the Draft EIR Tribal Cultural Resources section fails to acknowledge the level of significance after impact importance. The commenter is referred to Section 4.16.7 of the Draft EIR, which describes that impacts to Tribal Cultural Resources would be reduced to less than significant with implementation of the identified mitigation measures. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-32** The comment states that the Draft EIR does not reference mitigation measures to the Kumeyaay people. Please refer to Section 4.4, Cultural Resources, specifically MM-CUL-4, which requires that “An archaeological monitor and a *Kumeyaay Native American monitor* shall be present full-time during all initial ground-disturbing activities” (emphasis added). The same mitigation measure has been carried forward into the Final EIR, Section 4.16, Tribal Cultural Resources, as MM-TCR-1. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-33** The comment expresses states that the Draft EIR fails to provide mitigation measures for the relocation/construction of new utilities services. Impacts related to new and relocated utilities have been analyzed throughout the Draft EIR, and mitigation is provided as required where feasible to reduce impacts associated with these improvements. No unknown or other off-site improvements would be required. As a result, the Draft EIR determined that impacts would be less than significant, and no mitigation measures are required as suggested by the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I100-34** The comment states that the Draft EIR fails to provide plans to combat sufficient water supplies. Water supply is addressed in Section 4.17.4 of the Draft EIR. As analyzed therein, “The proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources, and impacts would be less than significant.” The Draft EIR continues that “if the project’s water demand was not included in the City’s 2015 UWMP [Urban Water Management Plan] and the Mission Valley Community Plan WSA [Water Supply Assessment], then for planning purposes, the proposed project would result in significant impacts until the project’s water demands are incorporated into the required updated 2020 UWMPs of the SDCWA [San Diego County Water Authority] and the City (Impact UTL-1).” To reduce this potential impact, Mitigation Measure MM-UTL-1 states that “the San Diego County Water Authority and the City of San Diego can and should include the proposed project’s water demand in their required 2020 urban water management plan updates.” The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-35** The comment states that the Draft EIR fails to provide mitigation measures of a wastewater treatment provider. Impacts related to wastewater treatment are analyzed in EIR Section 4.17, Utilities and Service Systems. As described therein, impacts would be less than significant because the proposed project would not result in a determination by the wastewater treatment provider that may serve the proposed project that it does not have adequate capacity to serve the proposed project. As such, no mitigation measures are required as suggested by the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-36** The comment states that the Draft EIR fails to acknowledge the level of significance after mitigation of the project generating solid waste. Impacts related to solid waste are analyzed in EIR Section 4.17, Utilities and Service Systems. As described therein, the proposed project has the potential to result in the generation of significant amounts of construction waste, which could result in significant impacts (Impact UTL-2). As a result, the Draft EIR recommends MM-UTL-2, which requires CSU/SDSU, or its designee, to reuse all demolition waste to the extent feasible, and dispose of all recyclable demolition waste products at a construction waste recycling facility. Further, MM-UTL-2 requires that, following occupancy of the proposed project, CSU/SDSU, or its designee, shall maintain an active recycling program to reduce solid waste generated by the proposed project. With implementation of MM-UTL-2, impacts would be less than significant. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-37** The comment states that the Draft EIR fails to provide mitigation measures on the cumulative effect on utilities and/or service systems resources. Cumulative impacts related to utilities and service systems are analyzed in EIR Section 4.17 and were determined to be less than significant; therefore, no mitigation measures are required as suggested by the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I100-38** The comment states that the Draft EIR fails to provide mitigation measures on downstream flooding. The Draft EIR analyzes the proposed project’s potential to result in flooding on pages 4.18-18 and 19. As described therein, “Considering the project site’s terrain and proximity of hillsides, and with implementation of project grading, construction and erosion control BMPs, potential impacts associated with runoff, post-fire slope instability, or drainage changes are considered less than significant.” Accordingly, no mitigation is required as suggested by the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I101

Norm Kohls
October 3, 2019

- I101-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I101-2** The comment expresses general support for the proposed project and opinions of the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.
- I101-3** The comment expresses general support for the proposed project and opinions of the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I102

Rung-Kai Tsay
October 3, 2019

- I102-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I103

Jack Roybal
October 3, 2019

- I103-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I104

Andrew Schneeweiss

October 3, 2019

- I104-1** The comment expresses general support for the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I105

Taylor Campbell Mosley

October 3, 2019

- I105-1** The comment provides background information on the commenter and serves as an introduction to comments which follow. The comment expresses concerns about “business as usual.” Please refer to Thematic Responses GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which identifies additional commitments to address climate change and GHG emissions which would be implemented by the proposed project. Please also refer to the following Responses I105-2 through I105-9, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I105-2** The comment offers general opinions regarding the responsibility to “mitigate climate change” and quotes a section of the CEQA statute regarding the state legislature’s broad intent in the initial establishment of CEQA, namely that government agencies should “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” (California Public Resources Code Section 21001[g]). The comment then asks why, in light of this directive from the state legislature, the Draft EIR’s impact analysis “completely dismiss[es]” the existing SDSU Climate Action Plan (CAP).
- The Draft EIR presents a comprehensive review of the project’s impacts on the environment, in full compliance with CEQA and CEQA Guidelines, including the referenced section of the statute. CSU/SDSU, as a public agency, acknowledges its responsibility in considering its projects’ and facilities’ effects on climate change, and has incorporated the assessment of this project’s impacts in that regard into Section 4.7 of the Draft EIR. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for a response regarding SDSU’s commitments relative to design and operation of the project in a sustainable manner, to address climate change and GHG emissions. With respect to the comment regarding the document dismissing the existing SDSU CAP, please see Section 4.10.4.2 of the Draft EIR, which explains that the SDSU CAP is site-specific and addresses commitments to reducing emissions at the existing College Area campus; therefore, it is not appropriate to analyze the proposed project’s consistency with the existing SDSU CAP. However, the EIR analyzed the proposed project’s consistency with the City of San Diego’s CAP, and determined that the proposed project would be consistent with the City’s CAP; please refer to EIR Appendix 4.7-2 and Section 4.7.4 of the EIR. Please also refer to the Mitigation Monitoring and Reporting Program (MMRP), which includes the required Project Design Features, including those which address sustainability and climate change, to be tracked by the Lead Agency to ensure they are implemented. In effect, the MMRP becomes a site-specific CAP for the proposed project.
- I105-3** The comment asks who on the “planning team or review board” will be responsible for ensuring the project’s “environmental and social issues” relative to climate action are implemented. As noted above, the mitigation measures will be implemented as part of the project and will be included in the Mitigation Monitoring and Reporting Program (MMRP) to be adopted by the CSU Board of Trustees concurrent with project approval. The purpose of the MMRP is to ensure implementation of the adopted mitigation measures as well as project revisions or components (CEQA Guidelines, Section 15097(a)). The MMRP has been prepared to include required Project Design Features including those which address climate

change and sustainability. The MMRP would be implemented by CSU/SDSU, as the Lead Agency, and includes a monitoring component to ensure the requirements of the EIR are carried forward as the comment questions. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I105-4 The comment asks how the project team will “consider and share” the project’s “‘economic and technical factors ... to consider alternatives to proposed actions affecting the environment’ with developers and relevant ... stakeholders,” quoting the same CEQA statute section referenced in Comment I105-2, above. The quoted statute section refers to the state Legislature’s intent of requiring environmental impact analysis, as well as consideration of various factors, benefits and costs, and alternatives. As stated in Response to Comment I105-2, the Draft EIR fully complies with CEQA and the CEQA Guidelines. This includes analysis and public disclosure of project details, anticipated impacts, mitigation measures, and project alternatives. Any developer who undertakes implementation of any aspect of the project would be required to adhere to project commitments and mitigation measures identified in the Draft EIR. Further, as noted in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, CSU/SDSU would incorporate sustainability in the scoring or any future selection of developer(s)/builder(s) on the project site.

I105-5 The comment restates several statements from the Draft EIR regarding the project’s commitment to achieve Leadership in Energy and Environmental Design (LEED) (Version 4.0) designations at a Silver or better certification level, and then suggests the planned LEED Silver rating “sets the bar too low,” adding the opinion that the project should aim for a LEED Gold rating. The comment also logs some criticism of the project layout as it relates to energy conservation. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments regarding the project’s LEED certification commitment and intent to incorporate sustainable elements. Please also refer to Responses O11-6 through O11-9, as well as Responses O14-3 and O14-7, for additional responsive information.

The comment asks, “What is the benchmark for LEED certification equivalence?” CSU/SDSU require buildings be built to LEED Silver, whether or not certification is sought, and conformance therewith is determined as part of the building design and permit process for each building by CSU’s internal plan review.

The comment asks, “How will Requests For Proposals include sustainable guidelines?” This comment relates to the project’s contracting process. As noted in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, CSU/SDSU would incorporate sustainability in the scoring of any future selection of developer(s)/builder(s) on the project site. A minimum of 10% of the overall scoring will be related to how developer(s)/builder(s) exceed LEED Silver, which serves as the baseline for the proposed project.

The comment asks, “Why are the development plots configured vertically, discouraging optimal building orientation for passive solar?” Please refer to Response to Comment O9-18.

I105-6 The comment suggests that the project should not be planned to assume continued use of fossil fuels as future phases are implemented, such as avoiding installation of natural gas infrastructure and appliances, and expresses the opinion that the planned reliance on fossil fuels during construction and operation “shows a lack of innovate thinking, research, and social responsibility on behalf of SDSU.” Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which identifies additional Project Design Features that would reduce or otherwise limit and restrict the use

of natural gas within the project site. This includes use of all-electric heating, ventilation, and cooling (HVAC) systems; naturally ventilated parking garages; restrictions on residential hearths; and pre-plumbing for the future electrification of the campus.

- I105-7** The comment questions why the project incorporates natural gas infrastructure “to satisfy a small percentage of energy demand (5% of housing units).” In response, please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, which notes that the proposed project has been refined to prohibit natural gas hearths in residential units.
- I105-8** The comment asks if there are plans to incorporate and/or encourage installation of solar cells in the stadium, parking structures, and residential and commercial buildings to increase the amount of on-site renewable energy beyond 15%. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments which explains how the proposed project’s 15% renewable energy generation total was calculated based on usable areas on the campus/office and campus/residential buildings and hotel site. The Stadium, however, does not anticipate solar panels because it would not be an enclosed structure; thus, opportunities for solar energy generation are limited. SDSU will remain open to future solutions to enhance sustainability of the project, including additional solar development.
- I105-9** The comment questions why the project includes natural gas appliances in spite of the existence of alternative solutions and the assumption that the technology for these alternative solutions will continue to be enhanced as time goes on. See Responses I105-6 and I-105-7, above, and also refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. The Draft EIR describes and analyzes the impacts of the project based on current building standards and practices, and the commitment to achieve LEED Silver. This does not preclude future changes to development plans associated with future phases, which will be influenced by a combination of market forces, revised building standards, and technological improvements, such that it is possible such alternatives will be incorporated into the project.

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Response to Comment Letter I106

Matt Ongaro
October 3, 2019

- I106-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I107

Kurston McMurray

October 3, 2019

- I107-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I108

Craig Bentley
October 3, 2019

- I108-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I109

Caroline McKeown

October 3, 2019

- I109-1** The comment provides background information on the commenter and does not raise an environmental issue. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I109-2** The comment requests that the project provide a pedestrian/bike bridge over Interstate (I-) 8, connecting the proposed river park to neighborhoods to the south. Such a bridge would be a major regional undertaking that is beyond the scope of this project and ballot initiative Measure G that frames project planning. CSU/SDSU also note that, as part of the ongoing Purchase and Sale Agreement negotiations with the City of San Diego, CSU/SDSU has agreed to advance fund the future construction of a two-lane crossing of the San Diego River as part of a separate, City-initiated Capital Improvement Project. The crossing would provide a pedestrian and bicycle connection over the San Diego River. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement and EIR Section 4.15, Transportation, for additional information regarding Fenton Parkway Bridge. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I109-3** The comment states the commenter’s perception that freeway traffic generated by the project will result in significant impacts on neighboring residents to the south. The project’s traffic impacts, including impacts on freeways in the vicinity of the project site, were analyzed in Draft EIR Section 4.15, Transportation. Further, it is noted that existing traffic on I-8 and I-15 is an existing condition, and that the proposed project would only add a small percentage of the overall traffic on these freeway facilities compared to the baseline. The comment does not raise any specific issue with that analysis; therefore, no further response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I109-4** The comment suggests that establishing pedestrian access to the site from the south would “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.” Please see Response to Comment I109-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I109-5** The comment suggests it is SDSU’s “civic duty” to connect the river park to neighboring communities and requests construction of a bridge across I-8. Please see Response to Comment I109-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I110

Alex Campbell
October 3, 2019

- I110-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I111

Shandra Wright

October 3, 2019

- I111-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I112

Samantha Ferreira

October 3, 2019

- I112-1** The comment suggests that the proposed project should comply with the City of San Diego Multiple Species Conservation Program (MSCP) to support local biodiversity. Please refer to Responses 015-89 through 015-94 regarding the proposed project's conformance with the MSCP. Further, Draft EIR Section 4.3, Biological Resources, includes an assessment of the proposed project's compliance with the MSCP. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I113

Jose Reynoso
October 3, 2019

- I113-1** The comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-2** The comment expresses opinions of the commenter regarding the purchase and sale agreement between the City of San Diego and CSU/SDSU. The commenter is referred to Thematic Response PD-2 – Purchase and Sale Agreement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-3** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-4** The comment addresses the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-5** The comment addresses the general subject area of traffic, which received extensive analysis in the Draft EIR, Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-6** The comment expresses general support for the project and opinions of the commenter. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I113-7** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I114

Kurt Cecconi
October 3, 2019

- I114-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I115

Warren Family
October 3, 2019

- I115-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I116

Dave Weil
October 3, 2019

- I116-1** The comment is an introduction to comments that follow.
- I116-2** The comment states that SDSU should use the project to “showcase how an environmentally sustainable community is feasible both economically and technically.” The comment generally addresses sustainability, which received extensive analysis in Section 4.7 of the Draft EIR. In addition, since the release of the Draft EIR, CSU/SDSU has incorporated additional Project Design Features (PDFs) to increase the sustainability of the proposed project. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments regarding the project’s intent to incorporate additional sustainable elements, including reducing the use of natural gas, exceeding Leadership in Energy and Environmental Design (LEED) Silver building standards, increasing solar photovoltaic usage, and reducing potable water usage. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I116-3** This comment expresses the commenter’s opinion that the proposed project is “only striving to meet minimum requirements” relative to sustainability. The comment serves as an introduction to comments that follow. Please refer to Responses I116-5 through I116-13, below. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I116-4** The comment is an introduction to comments that follow. Please refer to Responses I116-5 through I116-13, below.
- I116-5** The comment asks what “statutory requirements are applied to the project—City, state, or CSU.” It also states that the CSU sustainability policy and goals are not mentioned in the Draft EIR.

As stated in Draft EIR Section 1.6.1, CSU is a state agency and is not subject to local ordinances, regulations, policies, and rules. Development has been planned within the framework of relevant state requirements and CSU’s policies.

However, the Draft EIR also provides assessment of the project’s consistency with various City of San Diego planning documents and policies, as described in Draft EIR Section 1.7 and Section 4.10. For instance, the Draft EIR analyzed the proposed project’s consistency with the Mission Valley Community Plan Update and determined that the proposed project included similar land uses at similar but generally slightly less intense densities. Further, as analyzed in Appendix 4.7-2, CAP Consistency Memo, the proposed project would comply with the City of San Diego Climate Action Plan (CAP) through Options A and B of Step 1, meeting the checklist requirements under Step 2, and the requirements for development within Transit Priority Areas under Step 3. With respect to sustainability, the proposed project follows applicable federal and state laws that are described in Draft EIR Section 4.7.2. CSU’s 2014 Sustainability Policy is described in Draft EIR Section 2.3.5. As stated in Draft EIR Sections 4.2.4, 4.5, and 4.7.4, project-related development will comply with the applicable principles and goals set forth in the Sustainability Policy.

- I116-6** The comment acknowledges the Draft EIR’s statement regarding the intent of SDSU to prepare a CAP specific to the new campus, but suggests that the proposed project should have also considered the

existing “campus sustainability goals, especially those regarding energy, GHG [greenhouse gas] emission, carbon neutrality, water conservation, and waste.” CSU/SDSU are committed to complying with applicable state mandates for carbon neutrality for buildings constructed and operated by SDSU on the project site. Please see Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments regarding the Project Design Features addressing sustainability elements. The PDFs have been incorporated into the project’s Mitigation Monitoring and Reporting Project (MMRP), which is required to be implemented and that includes monitoring and compliance to ensure the measures are achieved as anticipated by the analysis in the EIR. With respect to incorporating “campus sustainability goals” referenced in this comment, please see Response to Comment I116-5, above. With respect to Carbon Neutrality, the SDSU Climate Action Plan adopted an operational carbon neutrality goal of 2040 and a carbon neutrality goal of 2050. As described in the Draft EIR, the SDSU CAP is specific to the main campus. The Draft EIR determined the proposed project would comply with the City of San Diego’s Climate Action Plan (see Appendix 4.7-2, CAP Consistency Memo) and would not result in a significant impact, therefore, no mitigation including achieving carbon neutrality, was recommended.

- I116-7** The comment notes that SDSU’s CAP for the existing campus requires that all new construction achieve LEED certification, and that all state buildings over 10,000 square feet, including build-to-suit leases, will be LEED-certified. With respect to SDSU CAP requirements, please note that the existing SDSU CAP is specific to the College Area campus. Please also refer to Response to Comment I116-6, above, regarding the use of the MMRP to monitor project commitments to sustainability.

As stated in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, the approach in the Draft EIR is consistent with CSU’s 2014 Sustainability Policy, which provides that CSU “shall design and build all new buildings and major renovations to meet or exceed the minimum requirements equivalent to LEED ‘Silver.’” The existing PDF, therefore, acts as a floor (not a ceiling) to the LEED-based sustainability characterization of the project.

CSU/SDSU also note that an additional PDF has been added to the Final EIR, which requires that, as part of the Request for Proposals (RFP) process for each of the vertical development components of the proposed project (i.e., construction of the buildings), additional credit/points will be allocated for sustainability features. Because there is no restriction limiting vertical development to LEED Silver, this commitment acts as a minimum from which vertical developers may exceed to secure additional points through the RFP process. This has proven to be a successful model as recent SDSU construction projects on the existing SDSU campus have achieved LEED Platinum certification, including the Conrad Prebys Aztecs Student Union.

- I116-8** The comment suggests that the Draft EIR omits information regarding California’s Zero Net Energy (ZNE) requirements, stating that new State buildings are currently required to achieve ZNE, and that beginning in 2030, new commercial buildings will be expected to achieve ZNE.

Since the issuance of Executive Order B-18-12 in 2012, neither the California Legislature through the enactment of statutes nor the operative state agencies (i.e., the California Energy Commission and California Public Utilities Commission) through the enactment of regulations have established definitive definitions, standards, or trajectories for the deployment of ZNE facilities. Instead, the metric has evolved with the passage of time, with the current focus being on Zero Carbon (see the California Energy Commission’s 2018 Integrated Energy Policy Report Update, available at https://ww2.energy.ca.gov/2018_energypolicy/). The shift in the referenced metric reflects the continued evolution of California’s

climate policy, which is seeking carbon neutrality by 2045. Given the change in metric, the proposed project's design focuses on reducing the pre- and post-development carbon footprint, in this instance through the incorporation of various "beyond code" design efficiencies.

Energy-efficiency requirements in new construction are codified in the California Building Code (24 CCR, Parts 6 and 11). As stated in Draft EIR Tables 4.5-9 and 4.7-7, project development areas would incorporate energy efficiency measures in compliance with the version of the applicable California Building Code at the time of building permit application. The referenced table entries acknowledge that the 2019 Title 24, Part 6 standards will go into effect on January 1, 2020. The 2019 Title 24 standards do not impose ZNE requirements on residential or commercial buildings.

If the California Building Code is updated to require ZNE construction, CSU/SDSU would be required to comply with such requirements; however, because the timing of construction of the campus commercial/retail component of the proposed project is not known at this time, it was not assumed this component would meet ZNE requirements in order to present a conservative (worst-case) analysis.

I116-9 The comment suggests that SDSU should also consider achieving "WELL building certification," which the commenter implies pertains to how "buildings can impact the health of the people using them" (see <https://www.wellcertified.com/>). The comment does not address the adequacy of the Draft EIR or relate to any physical effect on the environment, so no response is required pursuant to CEQA. That being said, it is noted that Draft EIR Section 4.2, Air Quality, considered potential health effects to on-site receptors due to the proximity of specified freeways. As presented on Draft EIR pages 4.2-29 and 4.2-30, such project impacts were determined to be less than significant. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I116-10 The comment suggests the project should incorporate a "district micro-grid" to optimize consumption of renewable energy. The comment does not address to the adequacy of the EIR or relate to any physical effect on the environment, so no response is required pursuant to CEQA. That being said, please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for discussion of the project's solar energy and electric vehicle charging infrastructure. While the proposed project has not made a commitment to the creation of a district micro-grid at this time, as there are no significant energy impacts of the proposed project that would be mitigated through the implementation of a micro-grid, the usefulness of a micro-grid can be considered during the phased development of the project. (As described by the U.S. Department of Energy, a micro-grid is "a local energy grid with control capability, which means it can disconnect from the traditional grid and operate autonomously"; see <https://www.energy.gov/articles/how-microgrids-work>.) The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I116-11 The comment suggests that the EIR should acknowledge that the project-related increase in use of nonrenewable energy resources conflicts with California's "move away from natural gas and towards electrification of both electrical and thermal loads." Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments, which identifies additional PDFs to further limit or otherwise restrict usage of natural gas in the proposed project. These include restrictions on all residential hearths (compared to a 5% allowance in the Draft EIR); requirements for all-electric heating, ventilating, and cooling (HVAC) systems; electric water heaters; naturally ventilated parking garages; and sizing conduit for future electrification of the campus. Natural gas usage on the campus primarily

would be limited to campus laboratories and residential and restaurant cooktops. Please also refer to Thematic Response PD-1 – Project Refinements for a summary of the reduction in GHG emissions associated with implementation of the refined and additional PDFs.

- I116-12** The comment suggests the EIR should acknowledge California’s requirement for all commercial entities to recycle all organic waste, and offers suggestions of project features that could meet this requirement. The comment refers to California Assembly Bill 1826, signed into law in 2014 and effective in 2016, which requires each jurisdiction to implement an organic waste recycling program and requires any business that generates a specified amount of organic waste per week to arrange for recycling services for that organic waste. Please refer to Response to Comment O11-37, which notes that EDCO is partnering with the City of San Diego for composting services with an anaerobic digestion facility in 2020. CSU/SDSU is committed to composting and would consider contracting with such an anaerobic digestion facility when available, and SDSU would work with the local trash provider to improve recycling practices on the Mission Valley Campus. In addition, as discussed in Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments, to ensure implementation of CSU/SDSU’s commitment to composting, a new PDF has been included in the Final EIR, as follows:

PDF Composting CSU/SDU shall utilize pre-consumer organic food composting for the proposed Stadium and University-constructed buildings, and shall encourage the incorporation of composting facilities in the residential units developed through the P3 Process. CSU/SDSU also shall utilize post-consumer organic food composting for the proposed Stadium and University-constructed buildings when feasible (e.g., when the University’s solid waste provider operates a facility that is permitted to accept post-consumer compost).

The suggestion of project features to aid in organic waste recycling are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I116-13** This comment expresses the commenter’s opinion that the proposed project is “only at best meeting the minimum requirements” relative to sustainability and suggests certain clarifications, referenced in prior comments, be made to verify that those minimum requirements are being met. Please see individual responses above regarding requested clarification. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I116-14** The comment is a conclusion statement.

Response to Comment Letter I117

Natalie Mladenov, PhD

October 3, 2019

- I117-1** The comment summarizes existing conditions text and regulatory background text from the Draft EIR on pages 4.7-5 and 4.7-17 pertaining to current and future uncertainty in the availability of water supply. The comment also suggests the project implement a system for on-site treatment of wastewater and reuse as irrigation, which would further limit the project's demand on potable water. The project's impact relative to water demand is addressed in Draft EIR Section 4.17, Utilities and Service Systems. As discussed therein, the proposed project would result in less than significant impacts to water supply. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments regarding the project's intent to incorporate sustainable elements, including with respect to water use and a commitment to connect to reclaimed water to further reduce potable water usage either through installing purple pipe or otherwise connecting to the City's Phase 2 Pure Water Program. The comment's suggested design feature is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-2** The comment provides an accurate quote from Draft EIR Section 4.7 regarding the project's intent to comply with applicable requirements of the California Building Code and the City of San Diego's CAP Checklist, and provides a suggestion to incorporate gray-water systems for on-site reuse of certain types of wastewater. The comment's suggested design feature is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-3** The comment provides suggestions for design of on-site storm drain inlets to prevent downstream pollution of surface waters by filtering trash, particularly cigarette butts, and absorbing oil and grease. The project's storm drain inlets will be designed to meet all applicable regulations consistent with the comment. As discussed in EIR Section 4.9, Hydrology and Water Quality, the proposed project structural LID BMPs would incorporate full trash capture. The comment's suggested design feature is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-4** The comment provides suggestions for incorporating into the project "modern learning and outreach facilities" to signify SDSU as "a campus of the future." The comment's suggested design feature is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-5** The comment expresses interest among SDSU faculty of outfitting the project's stormwater best management practices with instruments allowing water sample collection and measurement of water levels. The comment's suggested design feature is included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-6** The comment suggests revisiting the design of existing on-site storm drains, responding to the discussion of existing conditions in Section 4.9.1.4 of the Draft EIR that states storm drain lines "pass through the sewer main and are cased in polyethylene to prevent comingling of sewer and stormwater flows." As discussed in EIR Section 4.9, because of this design, the outfalls cannot be modified. Nonetheless, given the existing site constraints, the Draft EIR determined that impacts to hydrology and water quality would be less than significant.

- I117-7** The comment provides additional background information on water quality in the San Diego River, noting the saline groundwater of its tributaries as the potential source of elevated total dissolved solids (TDS). Draft EIR Section 4.9.2 states the San Diego River (Lower) is listed on the Clean Water Act Section 303(d) 2014/2016 list as impaired for TDS, among other constituents. The additional background information provided in this comment included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I117-8** The comment suggests SDSU should address homelessness by dedicating “considerable resources to combat the issue of lack of housing for low income San Diegans.” SDSU acknowledges the current housing shortage and crisis of homelessness affecting the region, but discussing such wide-ranging challenges is beyond the scope of the project presented in the subject EIR.
- The comment also states that many of the local homeless population may use areas on the proposed campus, and suggests the project incorporate “appropriate sanitation,” such as providing safe, graffiti/vandalism proof toilets accessible 24 hours a day. The existing homeless population residing in the vicinity of the San Diego River, including at the project site, is acknowledged in Draft EIR Section 4.13.4.2. As stated in the same section, the project is anticipated to result in a reduction in on-site homeless use of the site due to the proposed improvements and increased activity, and displacement to other areas along the San Diego River and Murphy Canyon Creek. While some degree of homeless presence is likely to continue, SDSU feels that providing additional toilets on site for use by the transient population would be inappropriate because it would attract additional activity by this group. However, public restroom facilities are planned to be constructed at the on-site parks, providing appropriate sanitation for the proposed uses.
- I117-9** The comment suggests that the project design should prioritize “using all building structures for water harvesting, gardens, and energy capture (solar panels).” With respect to water usage, the Draft EIR determined the proposed project would use approximately 693,343 gallons per day (gpd), which is a reduction of approximately 901,847 gpd compared to the City of San Diego Water Department’s Facility Design Guidelines, or approximately 56.5% less. Impacts were determined to be less than significant with respect to water supply, and no mitigation is required. Please see Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments regarding the project’s intent to incorporate sustainable elements, including connected to “purple pipe” and additional commitments to exceeding existing green building requirements which may further reduce potable water use. The comment’s suggested design features are included in the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. The comment does not raise an issue with the content of the Draft EIR, so no further response is required.

Response to Comment Letter I118

Linda Vassier
October 3, 2019

- I118-1** The comment is an introduction to comments that follow.
- I118-2** The comment expresses the opinion that the project's plan to install solar panels on "available roof space" resulting in generation capacity of 14.9% seems "extremely low and could be approved upon." Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments regarding the project's intent to incorporate sustainable elements and the assumptions regarding usable roof space for solar panels. CSU/SDSU note this 15% requirement is a minimum, and that through implementation of additional Project Design Features, including a requirement to consider sustainability as part of the scoring for the selection of future developers/builders, additional on-site renewable energy generation may occur. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I118-3** The comment expresses the opinion that the project's proposed on-site parking is inadequate for the on-site uses, including the 35,000-capacity Stadium and hotel. As stated in Section 4.15.1, the project's parking supply is intended to "address weekday and weekend demand for the proposed residential, retail, and campus office uses, while also encouraging the use of non-automobile modes. The presence of a trolley station within an approximate 1,500-foot radius of nearly all of these uses, coupled with a robust bicycle and pedestrian network and a managed parking supply with time limits and parking fees, will help to minimize overall vehicle traffic and related parking demand." The Draft EIR ultimately determined that during major events, there may not be adequate parking (see pp. 4.15-138 through 4.15-141) and found such impacts would be significant and unavoidable. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I118-4** The comment notes that the project presented to the Serra Mesa Community Council featured a grocery store, but a grocery store is not shown on the site plan. The project is anticipated to feature a grocery store within the Campus Residential/Retail land use category shown on Figure 1-5. The presence of a grocery store in the retail uses fronting "Street D" is noted in the assumptions for the Draft EIR's traffic impact analysis, as discussed in Section 4.15.5.4. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I119

Mike Bullock
October 3, 2019

- I119-1** The comment is an introduction providing general criticism of the Draft EIR's impact analysis relative to climate change, comments that are further expounded upon later in the letter. The comment states the project would "contribute to climate destabilization, leading to human extinction." Please see responses below to individual comments.
- I119-2** The comment provides background information on the author's employment history and political involvement; commentary on the California Democratic Party's environmental advocacy platform; general statements about the climate change crisis, the contribution of emissions from light-duty vehicles to climate change, and the move toward renewable energy; and opinions on a perceived inadequacy in government planning for addressing the climate crisis. The comment also introduces later comments, indicating that comments will focus on the need to reduce vehicle miles traveled (VMT). The comment provides introductory remarks and addresses general subject areas that received extensive analysis in Draft EIR Section 4.7, Greenhouse Gas Emissions, and Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. That being said, it is noted that the project is located within a Transit Priority Area (TPA) with multiple modes of non-light-duty vehicle travel accessible to the site (see, e.g., Draft EIR Figure 2-11E, Mobility and Transit). As such, the project's locational attributes serve to reduce reliance on light-duty vehicles, consistent with the commenter's objectives. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I119-3** The comment restates text from the Draft EIR's Executive Summary paraphrasing Section 15123 of the CEQA Guidelines, which require an EIR's executive summary to "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 comment suggests that the EIR's cumulative impact analysis "must consider what would happen if all projects were done in the manner proposed in this Draft," and suggests that this scenario would destabilize the earth's climate and result in "the loss of most life forms." Next, the comment reiterates text from Section ES.3.3 of the Draft EIR, identifying the discretionary action of the CSU Board of Trustees (CSU Trustees) in certifying the EIR and approving the project, and suggests that this discretionary action places "the fate of life on the planet" in the hands of the CSU Trustees.

This comment restates CEQA's requirements of publicly disclosing a project's environmental impacts and necessary mitigation, and of the CSU Trustees' role as CEQA lead agency in certifying the EIR and considering the project for approval. The comment's statements on the project's relationship to climate change and opinions on the consequences of the CSU Trustees' project decision are noted for the record and are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Draft EIR Section 4.7 includes a comprehensive review of the project's impacts relative to greenhouse gas (GHG) emissions, including discussion of the essentially cumulative nature of climate change. Section 4.7.1 therein specifically addresses the "Potential Effects of Climate Change on Earth" and the "Potential Effects of Climate Change on the State of California," summarizing relevant information and analysis conducted by the Intergovernmental Panel on Climate Change, California Air Resources Board

(CARB) and California Climate Change Center. Note also that CARB has determined that “[c]limate change is inherently driven by cumulative impacts, and no single project alone will cause a detectable change in the global climate,” a conclusion echoed by other climate scientists and regulatory experts (CARB, 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (January 2019), p. 8, available at https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf). The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required.

I119-4

The comment questions the Draft EIR’s conclusion, summarized in Table ES-2, that the project will result in a less-than-significant impact with respect to project-level and cumulative GHG emissions “because there is not [a] plan showing how [light-duty vehicles] can conform to climate-stabilizing targets. The comment states that while the proposed project may be “better than ‘business as usual,’” there is not proof that it will reduce emissions from vehicles at a rate low enough to conform to some play to achieve climate stabilizing targets.

The impact analysis summarized in the referenced table entry is presented in greater detail in Section 4.7 of the Draft EIR, which identifies the significance thresholds that were incorporated into the analysis and served as the basis for the impact conclusion. Section 4.7 of the Draft EIR presents the results of a comprehensive analysis of the project’s GHG emissions following an industry standard approach, and included consideration of the project’s emissions due to light-duty vehicle operation. As stated in Draft EIR Section 4.7:

While the proposed project would represent an increase in GHG emissions when compared to the existing conditions on the site, accommodating California’s growing population base at this location and with the proposed project’s proposed design attributes is more efficient than other alternatives, such as development in a non-urbanized area without transit. As explained in the City’s General Plan (City of San Diego 2008):

The City of Villages strategy to direct compact growth in limited areas that are served by transit is, in itself, a conservation strategy. Compact, transit-served growth is an efficient use of urban land that reduces the need to develop outlying areas and creates an urban form where walking, bicycling, and transit are more attractive alternatives to automobile travel. Reducing dependence on automobiles reduces vehicle miles traveled which, in turn, lowers greenhouse gas emissions.

Further... the proposed project would not conflict with the City’s CAP [Climate Action Plan], the City’s draft MVCP [Mission Valley Community Plan Update], SANDAG’s RTP/SCS [San Diego Association of Governments’ Regional Transportation Plan/Sustainable Communities Strategy], or statewide emission reduction targets. Various factors support these determinations, such as the proposed project’s location on an infill site in Mission Valley that is served by transit; the proposed project’s implementation of a TDM [Transportation Demand Management] Program that reduces VMT at a level that is consistent with the objectives of SB [Senate Bill] 743; and the proposed project’s exceedance of existing regulatory compliance standards for the built environment. Therefore, the proposed project’s GHG emissions will be **less than significant**.

Of note, in January 2019, CARB published a report titled 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (CARB VMT Report), a copy of which is publicly available at https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf. In that report, CARB explained that “[t]here is no expectation or endorsement of any policy that would require the total statewide VMT to decrease such as to limit population growth, limit new housing growth, support out-migration, or slow economic growth in the State” (CARB VMT Report, p. 6). Instead, CARB stated that it expects—in its emissions forecast planning scenarios—total VMT in California to continue to grow, albeit at a slower rate (CARB VMT Report, pp. 6-8). CARB also expressed support for “projects that accommodate population and/or employment growth with lower VMT,” finding that such projects “will help the State slow growth in transportation-related GHG emissions, and will support achievement of state climate goals” (CARB VMT Report, p. 8). CARB further reported that “land use development projects located in areas that would produce rates of **total** VMT per capita that are approximately 14.3 percent lower than existing conditions ... could be, by virtue of their location and land use context, interpreted to be consistent with the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 State climate goals” (CARB VMT Report, p. 11; emphasis in original). For purposes of the project that is the subject of this comment, Draft EIR Section 4.15, Transportation, concluded that the project would result in a 25.7% decrease in VMT per service population from the baseline condition (Draft EIR Table 4.15-43, VMT analysis; see also Appendix K of the Transportation Impact Analysis, provided as Draft EIR Appendix 4.15-1). As such, the project—under the parameters of the CARB VMT Report—would be consistent with the trajectory needed to achieve attainment of California’s 2050 reduction goals and climate stabilization.

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I119-5 The comment restates text from Section 2.2 of the Draft EIR regarding the project’s provision of parking. The comment states the Draft EIR 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.” In response, parking supply is analyzed in Draft EIR Section 4.15, Transportation. As analyzed therein, the proposed project would result in less-than-significant impacts to parking, with the exception of large events at the Stadium. Further, CSU/SDSU note the parking provided is a maximum, and that each residential building may be designed and built to implement the City of San Diego’s recently adopted parking standards for TPAs, which serve to limit or restrict parking. The project also is estimated to provide a maximum parking supply of 1.23 spaces per residential unit, which is lower than the parking rates provided at similar developments in the Mission Valley region (Draft EIR, p. 4.15-7). Regarding different types of parking systems, the proposed project does not anticipate such systems in the analysis in the Draft EIR in order to present a worst-case scenario for sizing of parking structures. With respect to VMT reduction, the proposed project includes a Transportation Demand Management (TDM) Program which would reduce VMT by 14.41% based on the mix of land uses and other best management practices such as unbundling parking. Please refer to Thematic Response TR-1 – General Increase in Traffic, for a summary of the TDM Program.

I119-6 The comment criticizes one of the project’s stated objectives, regarding enhanced transit ridership. The comment suggests that the project’s objective is “jacking up transit ridership for the sake of increasing transit ridership.” The comment also suggests the best way to increase transit use is “by having car parking systems that reverse the harm of bundled-price parking or bundled-benefit parking,” which also reduces VMT.

With respect to transit ridership, the proposed project is located within a TPA and has been designed to encourage transit ridership on the Metropolitan Transit System (MTS) Trolley Green Line by locating a dense campus village with a mix of uses within walking distance of the Stadium Trolley Station. Transit ridership would reduce emissions from light-duty vehicles by eliminating passenger car trips.

With respect to bundling parking, the TDM Program described in the above response includes a requirement to unbundle parking as the comment suggests; therefore, the proposed project is implementing the strategy requested by the comment, and no further response is required.

I119-7 The comment criticizes the project's stated objective to meet the City's GHG emission reduction goals, as required by San Diego Municipal Code Section 22.0908, because the commenter's opinion is that the City's CAP is "extremely weak in its efforts to reduce VMT." In response, the City's CAP is not solely based on 100% renewable energy, rather the CAP identifies a suite of strategies aimed at reducing GHG emissions specific to each unique project. As described in Appendix 4.7-2, CAP Consistency Memo, and summarized in Draft EIR Section 4.7, the proposed project would comply with numerous TPA requirements and other CAP Checklist items that would reduce GHG emissions, including implementing a TDM Program, increasing the density/intensity of development and employment around transit, and limiting and unbundling parking in residential areas. This comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I119-8 The comment criticizes the project's stated objectives to implement a TDM Program. The comment seeks greater detail on this plan, stating "we need specific strategies defined now." The project's TDM Program is described in Section 4.15.1 of the Draft EIR and summarized in Thematic Response TR-1 – General Increase in Traffic. The TDM Program also is addressed in other pertinent sections of the Draft EIR, such as Section 4.2, Air Quality; Section 4.5, Energy; and, Section 4.7, Greenhouse Gas Emissions.

I119-9 The comment restates information from Draft EIR Section 2.3.4 regarding the proposed number of buildings, residential units, and parking spaces. The comment estimates the potential above-ground and underground parking configurations and their respective costs. The comment implies the commenter's estimated costs of building the parking confirm the project should have put more thought into "what type of car parking systems should be used." The comment raises economic issues, namely the costs of providing parking, that do not relate to the physical impact to the environment. The analysis in the Draft EIR has been prepared based on the provision of garage parking, including analyzing impacts associated with building heights (Section 4.1, Aesthetics), garage ventilation and energy usage (Sections 4.2, Air Quality; 4.5, Energy; and 4.7, Greenhouse Gas Emissions), grading (Section 4.6, Geology and Soils), potential hazardous contaminants (Section 4.8, Hazards and Hazardous Materials), hydrology (Section 4.9, Hydrology and Water Quality) and parking (Section 4.15, Transportation).

Further, as noted in previous responses, residential parking would be unbundled, and the amount of parking provided for these areas represent a maximum from which future developers/builders could reduce the amount of parking in consideration of the City of San Diego's updated parking standards for TPAs.

I119-10 The comment criticizes the project's plan to develop natural gas connections to on-site residences and businesses, noting that "Berkeley has an ordinance prohibiting future developments from having any natural gas connection" and "San Francisco will have the same ordinance soon." The comment suggests

the project should forego natural gas connections in favor of electricity, which is now possible to meet the same energy needs as natural gas given technological improvements. The comment states that having electricity serve all on-site energy needs and avoiding natural gas “is a feasible mitigation measure and since [the comment author has] hereby identified it, there is now no choice under CEQA law.”

In response, please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments. As described therein, the Project Design Feature (PDF) limiting residential hearths to 5% of residential units has been refined to eliminate residential hearths entirely. In addition, CSU/SDSU has committed to all electric heating and cooling for all land uses within the proposed project. CSU/SDSU has also committed to sizing all electrical utilities and conduit to enable the electrification of all uses in the future. Additionally, based on the project’s latest design planning, the structured parking on the project site will no longer require mechanical ventilation, but instead has been redesigned to permit natural ventilation. As a result, the project design limits opportunities for natural gas primarily to residential, Stadium- and restaurant-related cooktops, and campus laboratory facilities.

It also is noted that the City of Berkeley’s recently adopted ordinance prohibiting the use of natural gas in new development is the subject of a pending legal proceeding, in which the challengers are arguing that Berkeley’s ordinance is preempted by relevant federal and state laws. (See *California Restaurant Association v. City of Berkeley*, U.S. District Court, Northern District of California, filed November 21, 2019.) The pending court proceedings call into question the legal feasibility of the commenter’s mitigation recommendation for purposes of CEQA.

- I119-11** The comment suggests the EIR should present more details on parking, such as information on “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,” and “how much this might cost.” The comment notes “figures do show that there is a lot of land being use for parking,” but it should be quantified so the reader can understand “how parking will be operated.”

Details of project parking are shown on Figure 2-11F, described in Section 2.3.4.7, and again in Section 4.15.7.5. These details give sufficient information to understand the project and assess its impacts on the environment pursuant to CEQA. Please also refer to Response to Comment I119-9, above.

- I119-12** The comment restates information from Draft EIR Section 3.3, which presents information about the methodology of compiling a cumulative project list for consideration in an EIR, which includes past, present, and future projects producing related or cumulative impacts. The comment suggests that the methodology is inadequate in light of the climate crisis, and cumulative consideration should be broader.

The comment suggests that “the common sense definition of considering ‘cumulative impacts’ is ...: 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 [light-duty vehicles] will achieve climate stabilizing targets?”

The methodology quoted in the comment is from Section 15130 of the CEQA Guidelines, and as a result is a commonly accepted practice. The commenter’s opinion on the proper approach to cumulative analysis under CEQA is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. As explained in Draft EIR Section 4.7, “GHG impacts

are cumulative impacts; therefore, assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere. If a project exceeds the identified significance thresholds, its contribution of GHG emissions would be cumulatively considerable, resulting in a cumulatively significant impact on climate change.” The Draft EIR determined that the proposed project’s impacts to GHG emissions would be less than significant, as summarized in Response to Comment I119-4, above; therefore, the Draft EIR concluded the proposed project would not contribute to a cumulative impact to GHG emissions.

- I119-13** The comment provides editorial remarks regarding climate change and the Draft EIR authors’ word choice in the subsection of DER EIR Section 4.7.1 titled “Potential Effects of Climate Change on Earth.” The comment states, “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,” and omitting the information that climate change “will wipe us out” is “unacceptable and...violates CEQA law.” The information provided in Section 4.7.1 presents a summary of existing conditions for purpose of considering the project’s environmental impacts pursuant to CEQA, including a summary of authoritative scientific viewpoints on climate change. The comment’s stated opinions on word choice in the Draft EIR and the comment author’s position on climate change are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I119-14** The comment states that “Section 4.7.2 is useful but it does not provide the reasoning behind the values,” and the comment goes on to criticize certain information provided in Section 4.7.2 regarding climate change, as addressed in California Executive Order (EO) S-3-05. The referenced section of the Draft EIR is titled “Relevant Plans, Policies, and Ordinances,” and presents factual information on adopted laws and official plans pertaining to the Draft EIR’s GHG impact analysis, including state and local documents addressing climate change. Because the purpose of the referenced section is to summarize facts about the content of existing laws and official documents, it is not appropriate for the EIR to scrutinize the accuracy of their content or debate the potential effectiveness of their execution. The comment’s stated position regarding the adequacy of EO S-3-05 is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I119-15** The comment states that, “in ALL cases, feasible mitigation measures that will reduce GHG emissions should always be sought after and adopted.” In response, CEQA requires mitigation measures when a significant impact has been identified for the project (see CEQA Guidelines Section 15126.4). In the case of the proposed project, a significant impact pursuant to CEQA has not been identified with respect to the GHG impact analysis, based on estimated emissions and comparison to relevant thresholds. Please refer to Response to Comment I119-4, above.
- I119-16** The comment suggests there is an “unacceptable lack of detail and definition” in the presentation of the project’s Transportation Demand Management Program,” because there is “no quantification” and “no guarantee that anything will happen.” Additional detail regarding the TDM Program is provided in Draft EIR Section 4.15.1 (including Appendix K of the project’s Transportation Impact Analysis, which is provide as Draft EIR Appendix 4.15-1). Section 4.7 summarized the TDM Program analysis for purposes of supporting the analysis regarding reducing VMT and the associated reductions in greenhouse gas emissions. Further, the Final EIR is revised to include additional detail including a monitoring component for the TDM Program. Please refer to Appendix 4.15-2 TDM Implementation Plan.

- I119-17** The comment suggests incorporation of Dividend Account Parking, which is understood to be “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.” The comment also expresses an opinion that “CAPCOA [California Air Pollution Control Officers Association] is woefully inadequate” in its guidance on unbundled car parking. With respect to the request to add Dividend Account Parking, CSU/SDSU note that parking under the campus/office area, within the garages, would not be free, but would be charged similar to existing parking on the main SDSU campus. Therefore, the costs of parking have been captured for all uses throughout the proposed project, from unbundled residential parking, metered on-street parking, paid garage parking at the campus/office and Stadium uses, and paid garage parking at the hotel/hospitality use. Regarding the criticism of using CAPCOA, please refer to Response to Comment I119-16, above, which notes that a TDM Implementation Plan is included in the Final EIR that outlines the responsibilities of the TDM Coordinator to ensure objective performance metrics are being achieved.
- I119-18** The comment suggests the Draft EIR “fails to treat the option of changing pricing with specific measures with the rigor it deserves,” noting “Pricing-related measures are critical.” The remainder of the comment provides background information on pricing strategies for parking and how these strategies would ultimately reduce induced traffic and VMT. Please see Response to Comment I119-17, above, for discussion of the project’s priced parking strategies and attributes. In addition, with respect to induced traffic, the proposed project does not include building new roadways or providing roadway widening to off-site roads to add capacity to the circulation network. The Draft EIR also presented an informational analysis of the proposed project’s effects on VMT and determined that the proposed project’s VMT would be under the significance thresholds. Please refer to EIR Section 4.15, Transportation, specifically Section 4.15.7.9, which states that:
- For the project-level VMT assessment, the results of the analysis were that the 2035 project-generated VMT per service population of 25.52 is 25.7% lower than the existing baseline efficiency metric of 34.34. Thus, the project-generated VMT would be more than 15% below the existing VMT, which is the applicable threshold established in both the revised CSU TISM and OPR Technical Advisory and, therefore, the project-generated VMT would be below the applicable thresholds and within the acceptable levels established by the State.
- For the cumulative impact analysis, the long-range regional VMT per service population would decrease from 32.95 without the proposed project to 32.89 with the project. Given that the proposed project would reduce regional VMT per service population as compared to the RTP scenario (i.e., the scenario without the project), the 2035 plus project scenario would be below the applicable threshold and, thus, also within acceptable levels established by the State.
- I119-19** The comment suggests the EIR “should provide climate literacy” by incorporating elements of the California Democratic Party platform, including information on reducing automobile emissions. The comment addresses economic, political, or social issues which are not required to be analyzed under CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I119-20** The comment expresses the commenter’s opinion that “developers have a responsibility to humanity” to ensure projects reduce GHG emissions, and that EIRs must identify the “*most significant impact of all,...* the extinction of humanity,” which will occur if GHG emissions are not curbed. Draft EIR Section

4.7 presents a comprehensive review of existing conditions and the project's impacts relative to GHG emissions, meeting the requirements of CEQA. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment's stated position on climate change is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I119-21** The comment suggests that "California Climate mandates are important," but "they are unfortunately NOT climate-stabilizing," based on current climate science. The comment explains that climate stabilizing targets are different for developing and developed countries and are developed by climate scientists. The comment refers to References (attachments) 2, 3 and 4 to the comment letter. CSU/SDSU have reviewed the comment and the attachments and note they provide background information but do not address the analysis in the Draft EIR. Draft EIR Section 4.7 analyzes the proposed project's impacts to climate change/GHG emissions based on meeting mandates adopted by the State of California and applicable under CEQA. Of relevance to the commenter, when releasing its 2017 Scoping Plan, CARB announced:

Achieving the 2030 target ... will ... set the California economy on a trajectory to achieving an 80 percent reduction in greenhouse gas emissions by 2050. This is consistent with the scientific consensus of the scale of emission reductions needed to stabilize atmospheric greenhouse gas concentrations at 450 parts per million carbon dioxide equivalent, and reduce the likelihood of catastrophic climate change. (See <https://ww2.arb.ca.gov/news/california-issues-proposed-plan-achieve-groundbreaking-2030-climate-goals>.)

The 2017 Scoping Plan itself provides that the "State's 2020 and 2030 targets have not been set in isolation. They represent benchmarks, consistent with prevailing climate science, charting an appropriate trajectory forward that is in line with California's role in stabilizing global warming below dangerous thresholds" (2017 Scoping Plan, p. ES3, available at https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). As such, the expert state agency with responsibility for administering California's climate policy (CARB) has determined that the state's reduction targets and goals are in furtherance of climate stabilization.

- I119-22** The comment states the Draft EIR "never addresses the relationship between California's climate mandates and what the climate scientists are telling us are the GHG emission reductions that we must achieve," implying the EIR authors incorrectly assume "that the California climate mandates are 'good enough.'" The comment also states that the EIR must inform readers about induced VMT and take into account fleet efficiency because cars last on average 15 years and there are many internal combustion engines vehicles being sold in 2019. As a result, the comment states that "we must achieve a significant reduction in VMT." The comment requests the Draft EIR clarify that vehicles are the largest category of GHG emissions and that light-duty passenger vehicles will not achieve state climate mandates. The comment further requests that the Draft EIR clarify that light-duty vehicles will not meet the state's climate mandates or climate stabilizing targets without significantly reducing VMT.

With respect to the request to clarify that vehicles are the largest category of GHG emissions, the Draft EIR states that "transportation accounts for the highest fraction of GHG emissions" (Draft EIR, p. 4.7-2). Draft EIR Table 4.7-5, Summary of Greenhouse Gas Emissions (With Project Design Features), also illustrates the proportional contribution of traffic-related emissions to the project's GHG inventory. Therefore, the comment is adequately addressed by the Draft EIR.

Regarding VMT, please refer to Response to Comment I119-18, above, which explains that “the project-generated VMT would be below the applicable thresholds and within the acceptable levels established by the State.” Further, the comment regarding whether light-duty vehicles will achieve the state’s climate mandates or climate-stabilizing targets is beyond the scope of the Draft EIR and not required to be analyzed under CEQA for the proposed project. That being said, please see Response to Comment I119-4, above, for discussion of the CARB VMT Report.

- I119-23** The comment implies the Draft EIR needs to expand its cumulative impact analysis to consider the project in relation to “the gravity of humanity’s climate predicament.” Please see Response to Comment I119-3, above. The comment further states the Draft EIR’s cumulative GHG analysis “must also show compliance or non-compliance with achieving ‘climate-stabilizing targets.’” In response, as discussed in Draft EIR Section 4.7, climate change is an inherently global phenomena. California is a recognized global leader in addressing climate change and, as noted in the comment letter and explained in the Draft EIR, has passed numerous pieces of legislation to reduce GHG emissions statewide. These measures are implemented at the state level, but also passed down to local Metropolitan Planning Organizations and local jurisdictions. As analyzed in the Draft EIR, the proposed project would be consistent with or would not impair implementation of these plans at the local (City of San Diego’s CAP), regional (SANDAG’s The Regional Plan), and state levels. Therefore, the Draft EIR concluded the proposed project would have a less-than-significant impact to GHG emissions, and, because impacts are cumulative by nature, the proposed project would not contribute to a significant impact.
- I119-24** The comment asks rhetorically which mitigation measures should be implemented. The comment states that the state should take the lead on vehicle fleet efficiency and “road use charge” needed to reduce VMT. Regarding mitigation measures, please refer to Response to Comment I119-4, above, which summarizes the findings of Section 4.7, Greenhouse Gas Emissions, of the Draft EIR (determining impacts would be less than significant and no mitigation would be required). Regarding VMT, please refer to Response to Comment I119-18, above, which explains that “the project-generated VMT would be below the applicable thresholds and within the acceptable levels established by the State.” The comment regarding the role of the state in setting vehicle fleet efficiency and road use charge is beyond the scope of the project and its Draft EIR, and not required to be analyzed under CEQA for the proposed project. Also, CSU is an educational branch of the state and not responsible for the statewide regulation of light-duty vehicles for purposes of fleet efficiency.
- I119-25** The comment provides information on road use charge systems and suggests the project should incorporate a road-use charge system to reduce VMT. The creation of such a road use charge is beyond the scope of the project and its Draft EIR, and not required to be analyzed by the proposed project. Further, CSU/SDSU lacks the authority to unilaterally administer a road-use charge, which is contemplated in Senate Bill 1077 (2014) as a potential alternative to the gas tax system. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I119-26** The comment suggests the project should incorporate a bundled-cost parking system, such as the DAP described in Comment I119-17, above, to reduce VMT and provides background information on the bundled-cost parking concept. The comment also references litigation against the County of San Diego’s CAP. With respect to the concept of bundled-cost parking, as explained in Responses O-119-9 and O-119-17, the proposed project includes a number of TDM strategies including unbundled residential parking, metered on-street parking, and restricting residential parking. Further, the

campus/office and stadium parking would also be paid parking, not free, to capture costs of parking and discourage light-duty vehicle trips as suggested by the comment. With respect to the County of San Diego CAP, the proposed project is not subject to the County's CAP; rather, as explained in Draft EIR Section 4.7 and analyzed in Appendix 4.7-2, the proposed project would comply with the City of San Diego's CAP.

I119-27 The comment suggests the project's TDM Program should incorporate a bicycle skills training program to reduce VMT and provides an example for how such a program might work. The proposed project's TDM Program features bike facilities, and on-site and off-site bicycle network improvements that would be designed and built to meet engineering design standards to provide for safe bike routes. Please also refer to Section 4.15.7.6, Multimodal Analysis, specifically Section 4.15.7.6.2 regarding bicycle facilities. The Draft EIR determined impacts to these facilities would be less than significant. It also is noted that resources are available to San Diego residents for bicycle safety training; for example, the Bike Coalition of San Diego County offers free programming (see <https://sdbikecoalition.org/basic-road-safety-class/>).

I119-28 The comment suggests that CEQA law requires the recommended measures stated in this letter must be incorporated into the project because the letter demonstrates that they are feasible, which the comment later notes includes Dividend Account Parking. The comment also references litigation against the County of San Diego's CAP.

With respect to incorporating all feasible mitigation, see the Response to Comment I119-4 regarding the Draft EIR's determination that, based on substantial evidence presented in Section 4.7 and Appendices 4.7-1 and 4.7-2, the proposed project would have a less-than-significant impact to greenhouse gas emissions and therefore, no additional mitigation measures are required to be implemented under CEQA. With respect to the County of San Diego Climate Action Plan, the proposed project is not subject to the County's CAP; rather, as explained in Section 4.7 and analyzed in Appendix 4.7-2, the proposed project would comply with the City of San Diego's CAP. With respect to Dividend Account Parking, as explained in Responses O-119-9 and O-119-17, above, the proposed project includes a number of TDM strategies including unbundled residential parking, metered on-street parking, and restricting residential parking. Further, the campus/office and stadium parking would also be paid parking, not free, to capture costs of parking and discourage light duty vehicle trips.

I119-29 The comment presents information on historic carbon dioxide levels in the atmosphere and global temperature, introduced by editorial statements regarding climate change denial and a perceived inadequacy of governmental response to the climate crisis. The comment provides information on climate change, including a series of figures showing increases in CO₂ and associated increases in global temperatures. The comment concludes that "achieving climate-stabilizing targets is our only hope" and requests all the information provided "appear in the CARB Draft" and "all EIRs that will be done for all the RTPs." The comment does not address a specific inadequacy of the analysis contained in the Draft EIR, and appears to address EIRs prepared for RTPs and not the proposed project. Nonetheless, Section 4.7 of the Draft EIR includes discussion of existing conditions and assessment of project impacts relative to GHG emissions and its effect on climate change, including how the project would comply with the SANDAG RTP/SCS and Regional Plan, which complies with the project's CEQA obligations. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I119-30** This comment is a conclusion statement referencing previous comments regarding the need to “include all of the identified feasible mitigation measures (enforceable measures) that would reduce VMT...identified in this letter.” The Draft EIR analyzed the potential impacts of the proposed project with respect to GHG emissions in Section 4.7 and determined that, based on the substantial evidence provided throughout the analysis, the proposed project’s impacts to greenhouse gases would be less than significant. To achieve this finding, the proposed project would include a number of Project Design Features, several of which have been added in the Final EIR in Responses to Comments, which would further reduce the project’s contribution of GHG emissions. Accordingly, no mitigation was identified or required. With respect to VMT, please refer to Response to Comment I119-18, above, which summarizes that the Draft EIR, Section 4.15, includes information and analysis which demonstrates the proposed project would be “below the applicable thresholds and within the acceptable levels established by the State.”
- I119-31** The comment is a listing of attachments/references cited in the comment letter. CSU/SDSU has reviewed the references and determined they do not address the analysis in the Draft EIR. The references are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I120

Sharon Kramer
October 3, 2019

- I120-1** The comment is an introduction to comments that follow.
- I120-2** The comment expresses general concern for existing traffic in the Serra Mesa community, “as planners route more vehicles and buses to Mission Village Dr. and Murray Ridge Road.” The Draft EIR describes existing traffic conditions and analyzes the impact of project-related addition of traffic in Section 4.15, Transportation. One impact was identified at the intersection of Aero Drive and Ruffin Road. The Draft EIR recommended the following mitigation measure:
- MM-TRA-13** Intersection 41: Ruffin Road & Aero Drive (City of San Diego) – Prior to the issuance of the applicable CSU building permit for, or occupancy of, 9,780 DUEs, CSU/SDSU shall optimize the signal timing at the intersection to accommodate the change in traffic demand over the next 19 years plus the addition of project traffic. This mitigation would improve operations in the PM peak hour to 49.8 seconds of delay. However, CSU does not have jurisdiction over this City of San Diego facility and, therefore, cannot guarantee implementation of this improvement. Accordingly, the mitigation is considered infeasible.
- The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I120-3** The comment suggests “the community was not given an opportunity to be involved in planning.” As stated in Draft EIR Section 1.8.2, CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of a project and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. CSU/SDSU note that there have been ample opportunities provided for public involvement. First, CSU/SDSU held three scoping meetings during the Notice of Preparation scoping period. Second, SDSU held two public meetings during the public review period for the Draft EIR. At all five meetings, CSU/SDSU provided comment cards and a court stenographer to record comments. Further, SDSU representatives attended several meetings and made numerous presentations in the community, including meetings in Serra Mesa, prior to, during, and subsequent to the release of the Draft EIR. Finally, CSU/SDSU assembled stakeholder groups and held public meetings regarding the design of the River Park component of the project. With the Notice of Preparation and associated scoping period, and the 60-day public review period for the Draft EIR, and through the Response to Comments, CSU/SDSU has met its commitments for public involvement required by CEQA.
- I120-4** The comment requests an extension of the Draft EIR’s public review period. Please see Response to Comment I120-3, above. CSU/SDSU provided a 60-day public review comment period, greater than the standard 45-day review period, to allow for the public to review the Draft EIR in recognition of San Diego Municipal Code Section 22.0908. Accordingly, CSU/SDSU has met its public review obligations pursuant to CEQA and has elected not to extend the review process.

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Response to Comment Letter I121

Joan Holliday Brown

October 3, 2019

- I121-1** The comment expresses concern for existing traffic on Friars Road. The Draft EIR describes existing traffic conditions and analyzes the impact of project-related addition of traffic in Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. Please also refer to Thematic Response TR-1 – General Increase in Traffic, for additional information regarding the proposed project’s Transportation Demand Management (TDM) Program, which would reduce traffic by 14.41% through a combination of strategies. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I121-2** The comment asks how will the project’s residents and employees get around and suggests they “would need more access to [Interstates] 15 and 8 other than what is currently available.” On-site mobility, including roads, pedestrian, and bike access, is described and analyzed in EIR Section 4.15, Transportation. Section 4.15 also analyzes project-related impacts to the off-site circulation system, including freeway access. The Draft EIR determined that impacts to certain off-site transportation facilities would be significant. The Draft EIR recommends mitigation measures in Section 4.15.9 to reduce such impacts; however, many of the improvements are not within the control of CSU/SDSU to implement or would otherwise not reduce impacts to less than significant. Therefore, the Draft EIR determined that impacts would be significant and unavoidable. The commenter’s suggestion regarding need for additional freeway access is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I120-3** The comment expresses the opinion that is a “big mistake” to develop “this valuable city property.” With respect to the property’s value, the comment raises economic issues which are not within the scope of CEQA; however, it is noted that CSU/SDSU have presented an offer to purchase the project site consistent with recent appraisals performed jointly between CSU/SDSU and the City. Please refer to Thematic Response PD-2 – Purchase and Sale Agreement for additional information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I122

Karen Lese-Fowler

October 3, 2019

I122-1 The comment expresses concern for the project's traffic impact on "the Friars Road and Serra Mesa communities," and suggests the Draft EIR did not "address a number of significant concerns, namely traffic impacts on nearby schools and neighborhoods." The Draft EIR presents a comprehensive analysis of the project's traffic impacts on the local circulation system in Section 4.15, Transportation. This analysis follows accepted industry-standard practices and is based on a thorough review of existing and projected conditions without the project, which captures existing traffic patterns related to school pick-up and drop-off times. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I122-2 The comment states that, "It is incumbent on SDSU to be good neighbors by anticipating potential problems and taking meaningful steps to address them." SDSU is committed to serving as a good neighbor in all aspects of its operations. In the environmental impact analysis presented in the Draft EIR, SDSU has given broad consideration to all manner of potential impacts that may arise from project operation and has identified mitigation measures where significant impacts may arise, as required by CEQA. Aero Drive and the intersection of Aero Drive and Ruffin Road were included in the traffic impact analysis presented in Section 4.15 of the Draft EIR. One impact was identified at the intersection of Aero Drive and Ruffin Road. The Draft EIR recommended the following mitigation measure:

MM-TRA-13 Intersection 41: Ruffin Road & Aero Drive (City of San Diego) – Prior to the issuance of the applicable CSU building permit for, or occupancy of, 9,780 DUEs, CSU/SDSU shall optimize the signal timing at the intersection to accommodate the change in traffic demand over the next 19 years plus the addition of project traffic. This mitigation would improve operations in the PM peak hour to 49.8 seconds of delay. However, CSU does not have jurisdiction over this City of San Diego facility and, therefore, cannot guarantee implementation of this improvement. Accordingly, the mitigation is considered infeasible.

The comment suggests the project should operate a park and ride lot on Aero Drive "or other locations that might be impacted," but the comment does not elaborate on what impact such a measure would be mitigating, so a more specific response cannot be provided. As part of SDSU's focus on sustainability, the project would include a comprehensive Transportation Demand Management (TDM) Program, which is described in Section 4.15.1.1, and may include measures such as ridesharing support. As summarized in Thematic Response TR-1 – General Increase in Traffic, it is noted that the TDM Program would reduce project-related traffic by approximately 14.41%.

I122-3 The comment suggests the project should consider "closing the north exit from the stadium onto [Mission Village Drive]," and rerouting project-related traffic onto Friars Road to reduce traffic impacts in Serra Mesa. CSU/SDSU note that the suggestion would worsen traffic impacts on Friars Road and restrict access to the Serra Mesa neighborhood; therefore, it was not considered in the Draft EIR.

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Response to Comment Letter I123

Francine Bates

October 3, 2019

- I123-1** The comment provides background information on the commenter and is an introduction to comments that follow.
- I123-2** The comment provides background information on existing conditions regarding events at San Diego County Credit Union (SDCCU) Stadium that generate a large amount of traffic congestion, which is tolerable to the author “once or twice a month.” Assessment of existing traffic conditions and analysis of project-related traffic impacts were presented in Draft EIR Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment’s stated opinion on local traffic conditions is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I123-3** The comment expresses the author’s perception of “heavy daily rush hour traffic driving southbound down Mission Village Road” and of drivers not abiding by traffic laws and/or safe driving practices at Ruffin Road and Mission Village Road during these times. Assessment of existing traffic conditions and analysis of project-related traffic impacts were presented in Draft EIR Section 4.15, Transportation. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The commenter’s perception of unsafe driving practices on the local circulation system is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. It is beyond the scope of the traffic analysis presented in the Draft EIR to identify or anticipate unsafe driving practices among existing traffic.
- I123-4** The comment expresses concern that residents north of the project will be subject to heavy traffic and drivers not abiding by traffic laws and safe driving practices on a daily basis, which is “not convenient,” “not tolerable,” and could have a negative effect on property values. Analysis of project-related traffic impacts were presented in Draft EIR Section 4.15, Transportation. One impact was identified at the intersection of Aero Drive and Ruffin Road. The Draft EIR recommended the following mitigation measure:

MM-TRA-13 Intersection 41: Ruffin Road & Aero Drive (City of San Diego) – Prior to the issuance of the applicable CSU building permit for, or occupancy of, 9,780 DUEs, CSU/SDSU shall optimize the signal timing at the intersection to accommodate the change in traffic demand over the next 19 years plus the addition of project traffic. This mitigation would improve operations in the PM peak hour to 49.8 seconds of delay. However, CSU does not have jurisdiction over this City of San Diego facility and, therefore, cannot guarantee implementation of this improvement. Accordingly, the mitigation is considered infeasible.

The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The commenter’s stated opinion on anticipated traffic conditions north of the project site is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I123-5** The comment suggests the project should consider closing the north exit from the Stadium onto Mission Village Drive and rerouting project-related traffic onto Friars Road to reduce traffic impacts. As stated in Response to Comment I122-3, restricting access on Mission Village Drive would worsen impacts on Friars Road and would limit access, including emergency access and fire service from Fire Station 45, to the Serra Mesa neighborhood. Regarding other exits in/out of the proposed project, CSU/SDSU notes the proposed project provides the same access points as those identified in the Mission Valley Community Plan Update, including access to the southwest, northwest, north, northeast, and southeast.
- I123-6** The comment states the project could direct access from the Stadium to the Interstate 15 southbound on-ramp, adding, “Better entrance and exit routes are NEEDED” to reduce impacts on traffic, noise, and air quality received by the Serra Mesa neighborhood to the north. Analysis of project-related impacts relative to traffic, noise, and air quality were presented in Draft EIR Sections 4.15, 4.12, and 4.2, respectively. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The opinion that the project should reconfigure roadway access to the project site is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. CSU/SDSU note that the proposed access points to the project site are consistent with the Mission Valley Community Plan Update.
- I123-7** The comment is a conclusion statement referencing previous comments. Please also refer to Responses to Comment Letter O3 from the Serra Mesa Planning Group, which provide additional responsive information.

Response to Comment Letter I124

Rick Richards
October 3, 2019

- I124-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I125

Leslie Kinney
October 3, 2019

- I125-1** The comment requests performance of a traffic evaluation before proceeding with the project, and expresses concern for existing traffic conditions and opposition to project-related addition of traffic. Assessments of existing traffic conditions and analysis of project-related traffic impacts were presented in Draft EIR Section 4.15, Transportation. Appendix 4.15-1 analyzed the proposed project's impacts on traffic and transportation, as requested by the comment. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. Please also refer to Thematic Response TR-1 – General Increase in Traffic, for additional responsive information. The comment regarding local traffic conditions is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I126

Aria Pounaki
October 3, 2019

- I126-1** The comment is an introduction to comments that follow.
- I126-2** The comment restates Comment Letter 04. Please refer to Responses 04-2 through 04-9 for responsive information.
- I126-3** The comment expresses a desire for the project to reduce the number of parking spaces compared to what is currently proposed, which would “[push] residents to use transit and active transportation” and thereby allow SDSU to “grow in a less restrained and better planned setting.” This in turn would reduce the project’s VMT, the associated release of greenhouse gases (GHGs), and overall traffic. The Draft EIR presented analysis of project impacts with respect to traffic (including VMT) in Section 4.15 and GHG emissions in Section 4.7. CSU/SDSU note that the proposed project has been designed with a parking maximum in the residential areas, and that future reductions in parking spaces would be at the decision of developer(s)/builder(s) and could comply with the City of San Diego’s recently adopted parking allowances in Transit Priority Areas. As analyzed in EIR Section 4.7, the proposed project would have a less-than-significant impact on GHG emissions. Further, the VMT analysis determined that the proposed project would be below applicable thresholds for VMT. The comment’s opinions on the project parking plan are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I127

Marc Zsutty
October 3, 2019

- I127-1** The comment expresses general concern for project-related traffic and the perception that local residents were not given adequate notice of the project and that their concerns will not be heard by project decision-makers. Existing traffic conditions were assessed in Draft EIR Section 4.15, Transportation. Please refer to Thematic Response TR-1 – General Increase in Traffic for general responsive information regarding traffic generated by the proposed project. The comment does not raise any specific issue regarding the material presented in the Draft EIR, so no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. With respect to project noticing, CSU/SDSU has met its commitments for public involvement required by CEQA; please see Response to Comment I120-3.
- I127-2** The comment states that existing traffic north of the project site and project-related traffic “will have a ripple effect,” including on nearby freeways. Existing traffic conditions and project-related traffic impacts were assessed in Draft EIR Section 4.15, Transportation. The comment does not raise any specific issue regarding the material presented in the Draft EIR, so no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I127-3** The comment states that public transit is not sufficient to handle the transportation demand of the project. Draft EIR Section 4.15 presents an analysis of project-related traffic impacts, including impacts related to transit usage, which incorporates considerations for existing trolley and bus service to the project site. The project site is located within a Transit Priority Area and is planned as a campus with a mix of office, residential, hospitality, stadium, retail/commercial, and parks/recreation and open space uses configured around the existing Metropolitan Transit System (MTS) Green Line Stadium Trolley Station. The proposed project includes a Transportation Demand Management (TDM) Program as a Project Design Feature to reduce traffic from the proposed project. The TDM Program would reduce traffic by approximately 14.41%. Nonetheless, the Draft EIR determined there would be several impacts related to transportation facilities that could not be mitigated; thus, impacts would be significant and unavoidable. The comment does not raise any specific issue regarding the material presented in the Draft EIR, so no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I127-4** The comment provides background information on the commenter and editorial remarks on project-related traffic impacts. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I127-5** The comment states that public transit is not sufficient to handle the transportation demand of the project, and that analysis is being conducted by “people that do not live here and have not seen how much worse things have gotten in just ten years.” Draft EIR Section 4.15 presents an analysis of project-related transportation impacts, which incorporates considerations for existing trolley and bus service to the project site. See Response to Comment I127-3, above. CSU/SDSU notes the traffic analysis was prepared by professional traffic planners using industry-standard methods that capture information on existing traffic and project project-related traffic patterns. The comment does not raise any specific

issue regarding the material presented in the EIR, so no more specific response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I127-6** The comment provides information on existing parking conditions north of the project site during Stadium events, and expresses concern that this will occur “constantly” under project conditions. The comment describes an existing condition. The Draft EIR analyzed potential parking impacts related to both typical weekday conditions and event conditions. Section 4.15.7.6 determined that during Stadium events, there was the potential for significant impacts related to parking supply. The proposed project includes Project Design Features for the preparation of Transportation and Parking Management Plans (TPMP) for stadium events. However, the Draft EIR determined that mitigation was not available to reduce impacts related to parking during Stadium events to less than significant.
- I127-7** The comment expresses concern that the comments provided in the letter will not be “addressed with actions limiting development because seldom will the little guy be truly listened to.” CSU/SDSU is committed to meeting its obligation under CEQA by responding directly to all comments addressing the content of the Draft EIR, and including all comments in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I128

John Riedel
October 3, 2019

- I128-1** The comment is an introduction to comments that follow.
- I128-2** The comment indicates the author's interest in the Draft EIR's biological resources section and the significant impacts identified therein, and expresses concern for resources along Murphy Canyon Creek. The comment does not raise a specific issue regarding the material presented in the EIR, so no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I128-3** The comment restates information from Section 4.3.1.7 of the Draft EIR, and then generally references biological resources surveys that suggest additional details on biodiversity in Murphy Canyon Creek beyond that described in the Draft EIR. Specific information on the referenced surveys is not provided; however, the Final EIR is revised to add the following sentence to this section: "Other urban-adapted mammals, such as coyotes, bobcats, opossums, raccoons, and rabbits, could use both the San Diego River and Murphy Canyon Creek for movement through the area."
- The comment also describes Murphy Canyon Creek as "the only wildlife corridor in this area that connects wildlife habitat in a north-south direction," and that the project represents a "once in a lifetime opportunity" to protect habitat in the creek.
- The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. The existing parking lot areas adjacent to Murphy Canyon Creek would be redeveloped to a park area which would accommodate periodic urban-adapted wildlife use much better than the existing lit, paved parking lot associated with the existing SDCCU Stadium. Therefore, the value of the north-south Murphy Canyon wildlife corridor would be increased. Additionally, the proposed project is revised in the Final EIR to further enhance the areas adjacent to Murphy Canyon Creek by eliminating the former "Street I" along the eastern boundary of the exiting parking lot, immediately west of Murphy Canyon Creek. The elimination of this roadway would provide for an additional buffer by widening the "East Park" portion of the River Park, which would enhance wildlife movement through Murphy Canyon Creek. It is noted that the easternmost boundary of the project abuts the western edge of the California Department of Transportation (Caltrans) right-of-way. Please refer to Thematic Response BIO-1 – Murphy Canyon Creek, and Thematic Response PD-1 – Project Refinements for additional responsive information.
- I128-4** The comment suggests there is conflicting information in the Draft EIR regarding the importance of Murphy Canyon Creek as a wildlife corridor. To clarify the conclusion on page 4.3-26, the Final EIR is revised as follows (changes shown in ~~strikeout~~ and underline): "However, none of the developed portions of the project site ~~is~~ are considered a wildlife corridor. There are no impacts to Murphy Canyon Creek and the temporary impact to the San Diego River is very small and would be revegetated and restored following the sewer connection. Therefore, the proposed project would not have a substantially adverse effect on wildlife movement and impacts would not be considered significant."
- I128-5** The comment expresses the opinion that the project's buffer adjacent to Murphy Canyon Creek is not adequate to guard against edge effects on wildlife, compared to the buffer provided along the San Diego River. See Response to Comment I128-3, which includes additional information on the revisions to the project which will result in increased buffers along Murphy Canyon Creek. In addition, there are

measures in place to protect the San Diego River and Murphy Canyon Creek from human disturbance that could disrupt existing or future wildlife use of the site, such as mitigation measures MM-BIO-4 and MM-BIO-5, which require temporary installation of construction fencing (or utilization of existing fencing) to delineate the limits of grading, biological monitoring, and a monitoring report; and MM-BIO-7, MM-BIO-8, MM-BIO-10, and MM-BIO-11, which require signage/barriers between the River Park and Shared Parks and Open Space and San Diego River/Murphy Canyon Creek interface, restrictions on landscape planting, compliance with buffer setbacks, and a lighting plan.

- I128-6** The comment suggests the EIR emphasizes the San Diego River as a wildlife corridor while not providing due attention to Murphy Canyon Creek as a wildlife corridor. Please see Responses I128-3 through I128-5, above. The Draft EIR recognizes that both Murphy Canyon Creek and the San Diego River provide habitat for wildlife and wildlife movement. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I128-7** The comment emphasizes that the San Diego River and Murphy Canyon Creek are connected and part of the ecosystem, so “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.” See Response to Comment I128-3, which includes additional information on the revisions to the project which will result in increased buffers along Murphy Canyon Creek.
- I128-8** The comment expresses the opinion that Murphy Canyon Creek is a “wonderful resource that should be utilized by SDSU as an instrument for educational studies for biological, biochemistry, ecology, and other opportunities.” The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I128-9** The comment expresses the hope that “SDSU and the project planner...understand the vital and very important decisions made now will have profound impacts to the region’s wildlife.” Biological resources impacts are addressed in Section 4.3 of the Draft EIR. The comment does not raise a specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I128-10** The comment asks whether SDSU will “make a commitment to acknowledge the importance of [the] Murphy Canyon Wildlife Corridor” and “make a commitment...to protect and improve it.” Please refer to Response to Comment I128-3, above, for information on the revisions to the project which will result in increased buffers along Murphy Canyon Creek. Murphy Canyon Creek will be enhanced by providing a buffer between the creek and developed areas because the project would replace the lighted, paved parking lot with a park, thereby providing a better buffer between the creek and urban development. Please also refer to Thematic Response BIO-1 — Murphy Canyon Creek. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I128-11** The comment expresses the hope that the author can “be proud of SDSU” and the project. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I129

Brian Sipe
October 3, 2019

- I129-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I130

Eline Dahlberg
October 4, 2019

- I130-1** The comment expresses the commenter's opinion that the proposed project should make all buildings Leadership in Energy and Environmental Design (LEED) Gold. Please refer to Thematic Response GHG-1 – SDSU Mission Valley's Sustainability Commitments for responsive information regarding LEED. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I131

Nikki Clay
October 4, 2019

- I131-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I132

Jolene Shumilak

October 7, 2019

- I132-1** The comment states the commenter lives in the Serra Mesa neighborhood, north of the project site, and that the proposed project impact on traffic would be more in Serra Mesa than any other neighborhood, and expresses opposition to the proposed project. The comment addresses a general subject area, traffic, which received extensive analysis in Section 4.15, Transportation, of the Draft EIR. The comment does not raise any specific issue regarding that analysis; therefore, no more specific response can be provided or is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I133

A. Stephen Dahms

October 2, 2019

- I133-1** The comment expresses concern over the potential for algal blooms in the river park portion of the proposed project, in “waters under control of SDSU,” and cites the need to restrict access to the river for people and pets should such algal blooms occur. The Draft EIR, Section 4.3, recommends mitigation for fencing and signage to prevent intrusion into the San Diego River and Murphy Canyon Creek as requested by the comment. Please refer to Response I35-5. The comment is an introduction to comments that follow.
- I133-2** The comment provides factual background information and does not raise an environmental issue on the project or the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I133-3** The comment states that the most common cause of algal blooms is runoff of nutrient-rich water, and that River Park Advisory Group meetings have made clear that such runoff into the San Diego River would be “controlled and ameliorated.” The comment addresses water quality, which was analyzed in the Draft EIR, Section 4.9, Hydrology and Water Quality. As described therein, the proposed project would have a beneficial impact on water quality compared to the existing condition because the project site is currently approximately 90% impermeable surface (i.e., the stadium parking lot), and the proposed project would reduce the amount of impervious surface to approximately 57%. Further, the proposed project would comply with the provisions of the Phase II Small MS4 Permit for treating water quality prior to discharge into the San Diego River via existing outlet structures. This combination of reducing the impervious surface area of the project site and providing water quality treatment best management practices (BMPs) resulted in a finding that the proposed project would have a less-than-significant impact to water quality. Please refer to Response I35-4 for additional information.
- I133-4** The comment suggests that project-related runoff into Murphy Canyon Creek would not be subject to the same controls as runoff to the San Diego River, but states that it must be because Murphy Canyon Creek is under SDSU control. Runoff into Murphy Canyon Creek is an existing condition which will be matched in the post-development condition. The comment addresses general subject areas, hydrology and water quality, which received extensive analysis in the Draft EIR, Section 4.9, Hydrology and Water Quality. Please refer to Response to Comment I133-3 for additional responsive information.
- I133-5** The comment suggests that water agencies can mitigate potential algal blooms by releasing stored water and flushing waters, which is not possible with Murphy Canyon Creek. The comment does not relate to the proposed project and is not within the control of CSU/SDSU. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I133-6** The comment provides factual background information regarding microcystin exposure related to algal blooms and does not raise an environmental issue on the project or the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I133-7** The comment states that microcystin must be tested in suspected waterways, and notes materials presented to the River Park Advisory Group showing people standing in the creek where there were clear-cut algal mats. The Draft EIR, Section 4.3, recommends mitigation (MM-BIO-7) for fencing and signage to prevent intrusion into the San Diego River and Murphy Canyon Creek. The comment raises issues that do not appear to relate to the project's physical effect on the environment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I133-8** The comment provides factual background information regarding microcystin as a toxic agent and does not raise an environmental issue on the project or the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I133-9** The comment suggests that the project has "an ethical and legal obligation to assure that visitors to the River Park are not exposed" to microcystin in Murphy Canyon Creek because the waterway will be under control of SDSU. The Draft EIR, Section 4.3, recommends mitigation (MM-BIO-7) for fencing and signage to prevent intrusion into the San Diego River and Murphy Canyon Creek as requested by the comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

Response to Comment Letter I134

A. Stephen Dahms

October 2, 2019

- I134-1** The comment expresses concern over “toxin-producing native plants in the periphery of the green zone, either on city property or SDSU property,” and requests that the comments be incorporated into the EIR. The comment is an introduction to comments that follow. The comments stated in this letter are noted for the record and are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I134-2** The comment suggests that the toxic castor bean plant must be “rigorously eliminated from the River Park territory and SDSU property to avoid contact with children or pets.” Castor bean is a well-known invasive species in the San Diego region, is not anticipated to be part of the landscape plans, nor was it documented in biological surveys of the project site conducted as part of the preparation of Appendix 4.3-1, Biological Resources Technical Report. The comments stated in this letter are included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. Please refer to Response I35-7 for additional information.
- I134-3** The comment provides factual background information regarding ricin exposure and does not raise an environmental issue on the project or the Draft EIR within the meaning of CEQA. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I134-4** The comment states that the author has not reviewed the Draft EIR for inclusion of information on ricin, and expresses similar concern for other toxic plants such as jimson weed. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required pursuant to CEQA because the comment does not raise an issue with the project or the content of the Draft EIR. Please refer to Response I35-7.
- I134-5** The comment suggests the project’s native plants “be reviewed for toxic capability and if such excluded from the project.” The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required pursuant to CEQA because the comment does not raise an issue with the project or the content of the Draft EIR. Please refer to Response I35-7.

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Response to Comment Letter I135

A. Stephen Dahms

October 1, 2019

- I135-1** The comment is an introduction to comments that follow.
- I135-2** The comment references an enclosed appendix. CSU/SDSU has reviewed the information provided on valley fever and determined that the information is not a comment on the analysis contained in the Draft EIR.
- I135-3** The comment suggests that material provided in the Draft EIR is “minimal at best” and introduces subsequent comments. Note that the comment references Section 9.4.2 of the EIR, a section number that does not exist. CSU/SDSU note that the information provided in the comment is included as part of the Final EIR. Please refer to Response I35-3 for additional responsive information.
- I135-4** The comment provides factual background information regarding valley fever and does not raise an environmental issue on the project or the Draft EIR. The comment addresses a general subject area, Air Quality, which received extensive analysis in Section 4.2 of the Draft EIR (see pages 4.2-31 and 4.2-32). As discussed therein, valley fever is not considered to be common to San Diego. The Draft EIR concludes that the proposed project would not result in a significant impact attributable to valley fever exposure based on its geographic location and compliance with applicable regulatory standards, which will serve to minimize the release of and exposure to naturally occurring fungal spores.
- I135-5** The comment states that environmental factors are critical in considering potential exposure to valley fever fungus. The comment provides factual background information regarding valley fever and does not raise an environmental issue on the project or the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I135-6** The comment states that “engineering controls and environmental modification” are important to minimizing the spread of wind-driven fugitive dust and soil, acknowledging that the Draft EIR partially addresses this topic. In response, Mitigation Measure MM-AQ-1 includes a dust control plan as follows:

Dust Control Plan. Prior to the commencement of construction, a dust control plan shall be prepared to minimize dust from construction-related sources, such as windblown storage piles, off-site tracking of dust, debris loading, and truck hauling of debris. This plan shall include the following requirements:

- Watering of exposed active construction areas shall occur three times per day; after active construction activities, any unpaved areas that will remain unpaved until future phases of the project, shall be stabilized (e.g., nontoxic soil stabilizer, soil weighting agent, or alternative soil stabilizing method)
- All haul trucks transporting soil, sand, or other loose material off site shall be covered;
- All vehicle speeds on unpaved roads shall be limited to 15 mph; and
- A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond to such complaints and take corrective action, as needed, within 48 hours. The San Diego Air Pollution Control District’s phone number shall be visible to ensure compliance with applicable regulations.

The purpose of watering construction areas is to minimize the wind-blown dust over exposed areas. The project would have to comply with SDAPCD Rule 51 (Nuisance) and 55 (Fugitive Dust Control), so

the applicant would need to water areas that are actively disturbed and make sure there is a sufficient crust for areas that are inactively disturbed.

SDAPCD Rule 55 requires that no person shall engage in construction or demolition activity subject to this rule in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60 minute period.

SDAPCD Rule 55 defines “construction or demolition activity” as any on-site activity preparatory to or for the purpose of building, altering, rehabilitating, raising, tearing down, breaking into pieces, or improving property, including, but not limited to, the following activities: grading, excavation, loading, transporting, crushing, cutting, planning, shaping, or ground breaking.

The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I135-7** The comment states “air and soil monitoring and surveillance” must be performed during project construction to prevent the spread of valley fever fungus. As stated in Draft EIR Section 4.2, the project’s location in San Diego County indicates a low potential for exposure to valley fever during project excavation. Therefore, the Draft EIR concludes that this impact is less than significant and does not warrant mitigation pursuant to CEQA. However, as stated in the Draft EIR, the project would abide by San Diego County Air Pollution Control District (SDAPCD) Rule 55, which establishes fugitive dust abatement measures, including watering disturbed areas on the project site to minimize adverse air quality impacts. Please refer to Response to Comment I135-6 for additional information.
- I135-8** The comment states “medical facilities and hospitals should be alerted” to the valley fever concern, and provides additional background information and suggestions regarding Coccidioides assessment and management. Please see Response to Comment I135-7, above, regarding the Draft EIR’s conclusion that the proposed project would have a less-than-significant impact with respect to valley fever.
- I135-9** The comment states protective equipment, meaning an “N-95 respirator or higher,” must be used for workers who may have encountered the valley fever fungus. Please see Response to Comment I135-7 regarding the Draft EIR’s conclusion that the proposed project would have a less than significant impact with respect to valley fever.
- I135-10** The comment states “immunologically-compromised individuals” must be protected from exposure to valley fever fungus. Please see Response to Comment I135-7 regarding the Draft EIR’s conclusion that the proposed project would have a less-than-significant impact with respect to valley fever.
- I135-11** The comment states the health of workers and residents of neighboring communities must be a primary concern during project construction and should be advised to wear masks during certain weather conditions. Project-related air quality impacts during construction are assessed in Section 4.2 of the Draft EIR. The proposed project will incorporate Mitigation Measure MM-AQ-1 to minimize air pollutant emissions during construction, and will abide by SDAPCD Rule 55, which establishes fugitive dust abatement measures, including watering disturbed areas on the project site to minimize adverse air quality impacts. Additional notifications to neighboring residences are not warranted as mitigation because the Draft EIR did not identify a significant impact in this regard.
- I135-12** The comment states SDSU should establish an ad hoc study group to inform the university on the risks of valley fever fungus. Please see Response to Comment I135-7.

Response to Comment Letter I136

Jamie and Leslie Edmonds

August 8, 2019

- I136-1** The comment relates to including a public labyrinth in the proposed project site plans, and provides background information on labyrinths. The comment suggests project design elements unrelated to the adequacy of the Draft EIR. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I137

R B

August 19, 2019

- I137-1** The commenter requests to be included on all further email notifications regarding the project. No further response is required because the comment does not raise an environmental issue.

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Response to Comment Letter I138

Catherine Stemple (Tomovich)

October 2, 2019

I138-1 The comment repeats Comment Letter I81. Please refer to Responses I81-1 through I81-7.

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Response to Comment Letter I139

Kory Kavanewski

October 2, 2019

- I139-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I140

Dennis Reese
October 3, 2019

- I140-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I141

Jim Marshall
October 3, 2019

- I141-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I142

Eunha Hoh
October 3, 2019

- I142-1** The comment is an introduction to comments that follow.
- I142-2** The comment states that the project should increase the percentage of electric vehicle (EV) charge stations. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. As noted therein, in response to comments received on the Draft EIR, and because the CalGreen Code is updating effective January 1, 2020, the proposed project will increase the requirement for EV parking spaces, from 3% to 10% of total residential parking spaces. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I142-3** The comment notes that solar photovoltaic panels will generate approximately 14% of the energy for the proposed project and asks if solar energy production is maximized. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information, which notes the proposed project anticipated installing solar panels based on building typologies (residential, campus, and hotel) and certain design restrictions including roof-mounted heating, ventilation, and air conditioning (HVAC) equipment and other restricting factors like access and setbacks from building perimeters. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I142-4** The commenter questions whether water reuse measures will be included in the project. Please refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information, which notes the proposed project would install purple pipe for future connection to a City-wide reclaimed water system as part of the City’s Pure Water project; however, reclaimed water is not currently available to the project site. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I142-5** The commenter makes suggestions regarding sustainable building strategies. CSU/SDSU note the proposed project includes a project design feature (PDF) to achieve LEED Silver (Version 4.0) or equivalent for new construction, and would also comply with the latest (2019) California Building Code. Please also refer to Thematic Response GHG-1 – SDSU Mission Valley’s Sustainability Commitments for responsive information. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I143

Adam Wasserman

October 2, 2019

- I143-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I144

Kevin Reardon
October 3, 2019

- I144-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I145

Downie R. Beckett

October 3, 2019

- I145-1** The comment expresses general support for the proposed project, but does not raise an issue concerning the adequacy of the Draft EIR. For that reason, no further response to this comment is provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

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Response to Comment Letter I146

Various (Draft EIR Public Meeting)

September 12, 2019

- I146-1** The comment expresses the commenter's support for the proposed project's connection to "purple pipe" to future proof the project site and suggests the proposed project include smart irrigation technology and drip irrigation where possible. The comment expresses the opinions of the commenter on a topic, water supply, which was analyzed in Section 4.17, Utilities and Utility Systems, of the Draft EIR. The comment does not raise a specific issue with that analysis; therefore, no further response can be provided. Please refer to Thematic Responses GHG – 1, Sustainability Commitments for information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I146-2** The comment states there should be a policy to deal with composting and food waste, and that the proposed project should use zoned air conditioning as much as possible. Please refer to Thematic Responses GHG – 1, Sustainability Commitments for information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I146-3** The comment states that the proposed project has been designed to accommodate the 100-year floodplain and questions what happens when the rest of Mission Valley develops. Cumulative impacts to hydrology and water quality were analyzed in the Draft EIR, Section 4.9.4. As analyzed therein,
- Further, nearly all projects identified in the cumulative scenario would meet the definition of 'new development and redevelopment projects' under the San Diego County MS4 [Municipal Separate Storm Sewer System] Permit. Such projects are required to implement site design; source control; and, in some cases, treatment control BMPs [best management practices] to control the volume, rate, and water quality of stormwater runoff from the proposed project during long-term operations.
- The Draft EIR concludes that based on compliance with these requirements designed to protect beneficial uses, the cumulative water quality and hydromodification impacts would be less than significant and thus not cumulatively considerable. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I146-4** The comment provides background information on the commenter. No response is required.

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Response to Comment Letter I147

Various (Draft EIR Public Meeting Comment Cards)

September 12, 2019

I147-1 The comment requests the proposed project implement a recirculating irrigation system that re-uses water that is treated through the on-site best management practices (BMPs) and water quality treatment system for irrigation purposes. Water usage is addressed in the Draft EIR, Section 4.17, Utilities and Services Systems. As described therein, the proposed project water demand was projected to be 693,343 gpd, which would reduce water usage by approximately 902,000 gpd, or roughly 56.5%, compared to estimates based on the City Water Department's Facility Design Guidelines (Book 2; 2014). Accordingly, the Draft EIR determined "the proposed project's potable water demand would be minimal as compared to the Alvarado Treatment Plant capacity, impacts would be **less than significant.**" The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response can be provided. Further, as described in Thematic Response GHG-1 - SDSU Mission Valley's Sustainability Commitments, the Final EIR is revised to include a Project Design Feature to connect to purple pipe or otherwise connect to the City of San Diego Pure Water Program. Lastly, as also reflected in Thematic Response GHG-1 - SDSU Mission Valley's Sustainability Commitments, the Final EIR includes a PDF requiring sustainability be considered as a minimum of 10% of the scoring for any RFP submitted by developer/builder partners.

I147-2 The comment states that it is unrealistic to proceed with the proposed project without a universal transit pass for students so there are no obstacles for different socioeconomic class to get to the project site. The proposed project includes a Transportation Demand Management (TDM) Program, which would reduce vehicle trips by approximately 14.41%. As part of the TDM Program, the following measure would be included:

- **Transit Pass Strategies** – At the Mission Valley campus, CSU will maintain the existing transit pass program for students in place at the College Area campus (passes are discounted by the Metropolitan Transit System (MTS) and subsidized by CSU/SDSU), and enable purchases by credit card. In addition, CSU/SDSU will establish a pre-tax payroll deduction program for faculty and staff purchase of MTS transit passes, vanpooling, and pooled on-demand rideshare services (e.g., uberPOOL and Lyft Line), provided SDSU meets the state/CSU required minimum participation level. Relatedly, CSU/SDSU will provide reduced cost transit passes for faculty and staff, provided SDSU meets the MTS required minimum participation level. The cost reduction will be between 10% and 25%, depending on participation level. Additionally, employers with a minimum of 20 employees will be required to provide up to 5 percent of their employees with a 100 percent MTS transit pass subsidy.

While the proposed project does not anticipate increasing the transit subsidy at this time, the connection between the main campus and project site may provide opportunities for additional subsidies in the future; however, this is unknown at this time. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response can be provided.

I147-3 The comment states the existing Metropolitan Transit System (MTS) pass for students is \$150 per semester, which is an extreme hardship to many students and states that a universal transit pass would be beneficial and necessary with the completion of the proposed project. Please refer to Response to

Comment I147-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I147-4** The comment states that SDSU's Climate Action Plan (CAP) needs to be followed for transport reduction goals. The proposed project includes a Transportation Demand Management (TDM) Program, which would reduce vehicle trips by approximately 14.41%. As analyzed in the Draft EIR, while not an adopted threshold at this time, the proposed project was determined to meet thresholds for vehicle miles traveled (see Draft EIR, Section 4.15, Transportation). With respect to the main campus CAP, Section 4.7, Greenhouse Gas Emissions, notes that the CAP is not applicable to the proposed project because it is specific to the existing campus. The Draft EIR analyzed the proposed project's impacts to greenhouse gases (GHGs) and determined that with implementation of the various Project Design Features, the proposed project's impacts would be less than significant. For additional responsive information, please refer to Thematic Response GHG-1, Sustainability Commitments. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-5** The comment states that student transit passes need to be included for equitable access to campus and reduction of GHG emissions. Please refer to Response to Comment I147-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-6** The comment suggests focusing on bicycle and pedestrian flow instead of traffic and recommends working with the main campus to obtain universal transit passes. With respect to focusing on bicycle and pedestrian flow, the proposed project has been designed with a series of pedestrian and bicycle facilities throughout the project site to provide connections between the various uses, as well as the surrounding community. Over 4 miles of bicycle lanes, trails, and sidewalks are proposed. Further, as described in Thematic Responses PD-1 – Project Refinements, the Final EIR is updated to include off-site improvements to complete a campus-to-campus bike path, which would be constructed within existing right-of-way and would not result in any new impacts. Regarding the comment about universal transit passes, please refer to Response to Comment I147-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-7** The comment suggests a trolley connection between the SDSU main campus and the project site in between regular Green Line trolley service frequencies. As described in Thematic Response PD-1 – Project Refinements, the Final EIR has been updated to include off-site improvements to complete a campus-to-campus bike path, which would be constructed within existing right-of-way and would not result in any new impacts. Further, the refined site plan includes a transit center with at least four bus bays for future bus service to the project site. In addition, the site plan accommodates a future extension of the Purple Line. However, trolley service is not under the discretion of SDSU; rather, it is under the purview of MTS. SDSU has and continues to coordinate with MTS and the San Diego Association of Governments (SANDAG) regarding future transit options for the project site. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-8** The comment states that Draft EIR Section 4.10, Land Use and Planning, includes information about the MTS Purple Line Trolley running along Murphy Canyon and asks if there will “be an incorporation of that trolley line for MV?” The Draft EIR, Section 3.4, discusses the MTS Purple Line planning efforts and

notes that it is not “at the stage where a project application has been filed, or where environmental review has been commenced” and is not “under environmental review for development, approved for construction, under construction, or completed.” Further, the Draft EIR notes that, “[this] proposal [does not have] any set design or construction plans in place for study purposes; [and] as a result, there is uncertainty as to design, location, configuration, timing, and other factors.” Nonetheless, as the comment notes, the Draft EIR “describes MTS’s current plans regarding the Trolley Purple Line to-date and accommodates potential future alignments through the project site.” A third alignment has been identified based on ongoing coordination with MTS and SANDAG; please see Responses to Comment Letters A5 and A6. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I147-9** The comment states the proposed project should be carbon neutral from the start, in conjunction with the City of San Diego (City) carbon goals. CSU/SDSU is not aware of any requirement from the City of San Diego for carbon neutrality. As described in the Draft EIR, Section 4.7, Greenhouse Gas Emissions, the proposed project would comply with the City of San Diego CAP. Further, based on the analysis contained in Section 4.7, the proposed project would have a less-than-significant impact to GHG emissions; therefore, no mitigation, such as achieving carbon neutrality, is required of the proposed project. For additional responsive information, please refer to Thematic Response GHG-1, SDSU Mission Valley’s Sustainability Commitments. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-10** The comment states the proposed project should consider choosing packaged rooftop systems with modulating or variable speed componentry to save energy. Section 4.2, Air Quality, analyzed potential air quality impacts of the proposed project and did not include any requirement for treating outdoor air supply to the project site. Section 4.5, Energy, analyzed the efficient use of energy and determined that impacts would be less than significant, therefore, no mitigation is required. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-11** The comment notes several sustainability goals including zero net energy, carbon neutrality, compliance with Leadership in Energy and Environmental Design (LEED) Silver and air quality, increasing solar commitment and providing shade over play areas. Please refer to Responses I147-9 and I147-10, and Thematic Response GHG-1, SDSU Mission Valley’s Sustainability Commitments, for information responsive to this comment. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-12** The comment states the proposed project needs to ensure all transport to the project site is clean and suggests use of the trolley or natural gas vehicles only. The comment also suggests increasing the transit subsidy. With respect to clean transportation, the proposed project includes a suite of measures aimed at reducing vehicle trips as part of a comprehensive TDM Program. Please refer to Thematic Response TR-1 – General Increase in Traffic, for a summary of the TDM Program. With respect to only allowing natural gas vehicles and trolley access to the project site, this request is outside the scope of the Draft EIR. Regarding transit subsidies, please refer to Response to Comment I147-2, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-13** The comment requests buildings be LEED Platinum or zero net energy to reflect the values of the campus. Please refer to Thematic Response GHG-1, SDSU Mission Valley’s Sustainability Commitments

for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I147-14** The comment states the proposed project would use less energy if buildings were oriented to not let the most sun in. The Draft EIR, Section 4.5, analyzed energy usage of the proposed project. As analyzed therein, the proposed project would result in less-than-significant impacts to energy. For additional responsive information, please refer to Thematic Response GHG-1, SDSU Mission Valley's Sustainability Commitments. Please refer to Response to Comment O14-3 for additional responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-15** The comment states there should not be any kind of natural gas for building operations energy. Please refer to Thematic Response GHG-1, SDSU Mission Valley's Sustainability Commitments, which describes additional Project Design Features that have been incorporated into the project design that further restrict natural gas usage in favor of expanded commitments to electrical energy. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-16** The comment suggests solar panels over parking areas. The proposed project does not include major surface parking areas, rather, parking is proposed in garages. The proposed project would generate 15% of its expected energy demand through on-site solar photovoltaic panels. Further, the proposed project would include approximately 450 electric vehicle (EV) charging stations and another 450 parking spaces pre-wired for future EV charging installation. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-17** The comment states that carbon neutrality is essential for all future development to lead global climate mitigation and adaptation. Please refer to Response to Comment I147-9, above, regarding carbon neutrality. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-18** The comment states that students value water re-use and encourage purple pipes, not the City's Pure Water program. Please refer to Response to Comment I147-1, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-19** The comment states the proposed project should use reclaimed water from the project site. Please refer to Response to Comment O147-1, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-20** The comment requests a public outreach fact sheet explaining vector issues. The proposed project would comply with all requirements for water retention, including provisions that would ensure stormwater outlets from on-site treatment areas within 72 hours. In addition, as discussed in Draft EIR Section 4.9, Hydrology and Water Quality, p. 4.9-28, project best management practices (BMPs), include source controls (such as common area landscape management and common area litter control) and Low-Impact Development structural BMPs in compliance with the Small Municipal Separate Storm Sewer System (MS4) Permit. Further, Section 4.3, Biological Resources, of the Draft EIR includes mitigation measure MM-BIO-7, which requires:

MM-BIO-7SIGNAGE AND BARRIERS: To prevent long-term inadvertent disturbance to sensitive vegetation and species adjacent to the project site, signage

and visual barriers (e.g., berm, fence, rocks, plantings, etc.) shall be installed along the River Park and Shared Parks and Open Space interface with the San Diego River and Murphy Canyon Creek. The signage shall state that these areas are native habitat areas, and no trespassing is allowed. Barriers shall be installed where appropriate to deter access into the river and creek.

The comment does not address the adequacy of the analysis in the Draft EIR; therefore no further response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

- I147-21** The comment requests the proposed project use gray water based on the ample amount of showers and such onsite. Please refer to Response to Comment O147-1, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-22** The comment states the proposed project should have a clear commitment to the City of San Diego's CAP. As analyzed in Section 4.7, Greenhouse Gas Emissions, and Appendix 4.7-2, CAP Consistency Memo, the proposed project would comply with the City's CAP through Option B of Step 1 and meeting the requirements under Steps 2 and 3. Further, as noted in the Final EIR, with the adoption of the Mission Valley Community Plan Update, the proposed project would be consistent with Option A under Step 1 of the CAP and would not be subject to Step 3. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-23** The comment states there should be a sustainability lead from SDSU to help with the process. Please refer to Thematic Response GHG-1, Sustainability Commitments, regarding the added PDF requiring sustainability be considered when judging RFP submittals for developer/builder partners. The comment does not address the adequacy of the analysis in the Draft EIR; therefore no further response can be provided. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-24** The comment states that increasing water reuse would be very beneficial and suggests pre-piping for purple pipe. Please refer to Response to Comment I147-1, above. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-25** The comment states the project must be carbon neutral to meet the City's climate goals. Please refer to Responses I147-9 and I147-22, above, for responsive information. The comment is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.
- I147-26** The comment states that the proposed project should establish a post-consumer compost plan. Please refer to Thematic Response GHG-1, SDSU Mission Valley's Sustainability Commitments, for information responsive to this comment. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.
- I147-27** The comment states the project must be carbon neutral to meet the City's climate goals. Please refer to Responses to Comments I147-9, I147-15, and I147-22, above for responsive information. The

comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

I147-28 The comment states that “we must address the displacement of the homeless population that currently resides near the building site.” The Draft EIR, Section 4.13, Population and Housing, analyzed impacts to homeless populations around the project site. As described therein, the Draft EIR recognized the project site is surrounded by the San Diego River and Murphy Canyon Creek, which are areas that have “been documented to have a persistent homeless population.” However, the Draft EIR further notes that “due to the transient and nonpermanent nature of these dwellings as well as general fluctuations in the homeless population, the exact homeless population in these areas can vary at any given time,” and that “the overall issue regarding homelessness and provision of housing for this population is a separate matter from the proposed project.” Accordingly, the Draft EIR determined there would be no impact because the proposed project would not necessitate the construction of replacement housing elsewhere. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project.

I147-29 The comment states the project must be carbon neutral to meet the City’s climate goals. Please refer to Responses to Comments I147-9, I147-15, and I147-22, above for responsive information. The comment is noted for the record and is included in this Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required.

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