



Alan Freeman, Director
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San Jose State University
One Washington Square
San Jose, CA 95192-0010

Re: Draft Environmental Impact Report Comments
San Jose State University Master Plan 2001 Update
SCH No. 2001022002 June 16, 2001

Dear Mr. Freeman:

The Campus Community Association (CCA) has reviewed the Draft Environmental Impact Report (DEIR) for the San Jose State University Master Plan 2001 Update (Master Plan). As neighbors of the University, the members of CCA will be directly affected by the programs and projects discussed in the Master Plan.

After careful review, the CCA concludes that the DEIR is inadequate in many respects, and fails to meet the requirements under the California Environmental Quality Act (CEQA). The fundamental purpose of the EIR is to provide "a sufficient degree of analysis to provide decision-makers with information to make a decision which intelligently takes account of environmental consequences." (CEQA Guidelines, Section 15151).

Here, the scope of the project is misleading, and fails to provide relevant information about cumulative impacts from other projects. Most notably, the Master Plan fails to address or provide any analysis of the impacts associated with the Civic Center Redevelopment Plan, which will include the construction of a new City Hall complex spanning two city blocks immediately north of the Campus. In addition, the DEIR contains only a partial analysis of the proposed expansion of the co-generation facility and omits any analysis or discussion of possible mitigation and/or feasible alternatives. The DEIR ignores entirely the 1990 Master Plan Revision for SJSU, which also as predicted on a projected increase in student enrollment to 25,000 FTE, and contained a proposal for 2,500 new parking spaces. Finally, the DEIR makes no mention of the environmental review process associated with the 1992 closure of San Carlos Street and the associated mitigation measures which were imposed by that process.

The DEIR states that *Master Plan 2001* is a “land use plan that would allow the campus to improve and expand facilities over the next 10 years.” The proposed DEIR is described as a combined “Tier 1 EIR and a project-level EIR.” The Housing Village project and the Central Plant expansion project are to be evaluated as a project-level analysis, since the University has received specific proposals for those components of the Master Plan, but the remaining elements of the Master Plan would be evaluated as part of a Tier 1 EIR programmatic impact analysis. (Sec. 1.0, p 1-1).

The impetus for the Master Plan 2001 Update is to accommodate a projected increase to a maximum of 33,784 students, or 25,000 full-time equivalent (FTE) students, over the next ten years; a net increase of 5,500 FTE students, as well as a corresponding increase in the number of faculty. The Master Plan thus seeks to increase the amount of “academic space” from the current level of 5.0 to 6.3 million gross square feet (“mgsf”).

In addition, the Master Plan envisions the addition of 2.5 mgsf private non-campus development for potential non-campus uses, such as commercial, office, research and development. The private, non-campus uses are projected to increase the non-campus related population by an additional 7,143 persons on a daily basis. Although the ostensible reason for the Master Plan 2001 revision is to accommodate a projected enrollment increase of 5,500 full-time equivalent students, it proposes to add an additional 7,143 non-campus persons on a daily basis for non-campus uses.

To accommodate the projected increase in student enrollment, as well as to improve existing facilities, the Master Plan contains two project-specific proposals for analysis. The first involves the construction of a Housing Village which would increase the current number of beds (1,697) to a total of 5,670 with 392 dedicated for faculty and staff, an increase of over 4,000 beds. The provision of increased on-campus housing, according to the DEIR, would reduce the impact of the increased number of vehicle trips. In addition, the Master Plan calls for construction of an additional 1,700 parking spaces, of which 210 would be for faculty and staff. There appears to be an error in the DEIR. On page 2-13, the DEIR states that a total of 1,910 underground parking spaces will be added. On page 2-18, as well as elsewhere in the document, the total number of underground parking spaces is set at 1,700, which would include 210 spaces for faculty and staff. In any case, the DEIR notes that the current parking ratio of 0.38 spaces per FTE student is already one of the lowest in the CSU system, and that the proposed number of spaces is insufficient to accommodate the demand. The DEIR proposes two options: (1) build new parking structures, or (2), lower the parking ratio policy.

Based on information contained in the DEIR, the current number of available parking spaces is 7,493, of which 5,080 are located in garages on the main campus, and 2,418 are located in surface spaces, mostly in the South Campus area. The addition of 1,700 underground spaces would bring the total number of parking spaces to 9,193 spaces, more than 300 spaces short of the amount necessary to maintain even the low 0.38 space-per-student ratio. Yet, according to the DEIR, over 60 percent of SJSU and 69 percent of SJSU faculty commute as solo drivers to the Campus. Moreover, as

discussed below, the additional parking spaces proposed to be built in conjunction with the Housing Village project will most likely be inadequate to accommodate the new residents of that project alone, let alone any of the thousands of commuters seeking parking spaces on or near the Campus.

In Section 2.1, the DEIR states that the Master Plan 2001 is a comprehensive document that addresses the future physical development and land use on the campus. The report further states that the "previous SJSU Master Plan was a land use diagram [that] was amended each time a building was added, or improvements were made, but there was no comprehensive plan for campus change and growth." According to the DEIR Project Manager, Shabnam Barati of URS Corporation, this "previous" Master Plan was a diagram dated 1988, and that there was no real "plan."

However, this statement ignores the fact that in November, 1990, Woodward-Clyde Consultants, now URS Corporation, prepared and submitted a Mitigated Negative Declaration for the San Jose State University Master Plan Revision. This 1990 "Master Plan Revision" contained proposals for nine specific capital improvement projects for a total of approximately 1.6 mgsf of building area, and the construction of a 2,500 space parking garage, in order to accommodate a projected increase in student population to a maximum of 25,000 FTES by the year 2000. The proposed 1990 Master Plan revision included proposals for an administrative services building, a performing arts building, a science building, demolition and replacement of student housing, classrooms, a gymnasium, a new library, and a six-story parking garage to be located on the South Campus area.

The construction of this parking garage, initially proposed by the University, became a key consideration for mitigating the impacts of the closure of San Carlos Street, by diverting commuter vehicle traffic to the South Campus area. In its comments concerning the 1990 Master Plan proposal, the City of San Jose Planning Department stated that the proposal to utilize satellite parking and shuttle systems was an "excellent concept," but that without committed funding, it remained just a concept and "does nothing to address the present and growing parking deficiency for the campus community which, in turn, places undue pressure on the surrounding residential community." The City identified the proposed parking garage on the South Campus as a mitigation measure, but further urged the University to identify and incorporate the shuttle and other transportation demand management (TDM) measures into the Master Plan and Capital Improvement Program (CIP) "in order to ensure effective use of the garage."

In 1992, as a result of an almost two-year series of meetings of the San Jose State Environs Task Force formed to evaluate the proposed closing of San Carlos Street through the Campus, the Task Force unanimously recommended that the University follow through with its proposal to construct the South Campus parking garage. San Jose State administration, however, claimed that they could not commit to this project, inasmuch as it would require approval of the Chancellor. To date, the 2,500 space parking garage proposed in the 1990 Master Plan revision, and which was unanimously

recommended as a condition of approval for the closure of San Carlos Street, has never been funded or constructed. Now, the University proposes to add only 1,700 parking spaces to accommodate a net increase of almost 4,000 new beds, located in an area that is already severely impacted by traffic.

The 1990 Master Plan Revision called for new construction of 2,200 new beds to replace the aging dormitories and accommodate the planned expansion to 25,000 FTE students. Although CCA does not dispute that there is a need for safe and affordable housing for students and faculty, the DEIR does not address or provide any analysis as to the basis for the increased demand to accommodate the same projected increase in student population. No information is provided as to the current occupancy levels of the existing units, the availability (or lack thereof) of similarly priced units in the area. Nor is there any information or analysis to support the conclusion that a total of 5,670 beds are required. The DEIR only states that the "low end of student demand for beds is estimated to be 4,900." (DEIR, Sec. 2.4.1., page 2-14). Even at this reduced demand level, if only one out of every three students owns a vehicle on Campus, they will overwhelm the projected increase in new parking spaces (1,480) being designated for student parking. The balance of 210 parking spaces will undoubtedly be used by the occupants of the 392 beds being constructed for faculty and staff. As a consequence, the projected increase in parking spaces will not be available for the majority of students, faculty or staff that currently commute to the Campus, let alone provide any accommodation for the projected increase of 5,500 new students expected to attend the University. The absence of adequate parking will invariably result in more vehicles circling the campus and local neighborhoods. Any reduction in daily trips and accompanying pollution levels resulting from increasing the number of on-campus residential units will be more than offset by the long queues of idling vehicles awaiting precious few parking spaces. The DEIR fails entirely to evaluate the consequences of this reasonably foreseeable outcome.

CENTRAL PLANT EXPANSION PROJECT

The DEIR reports that the Master Plan 2001 will involve the addition of two, 6-megawatt natural gas fired turbines to the existing 6-megawatt turbine, for a total capacity 18 megawatts, essentially tripling the size of the existing facility. However, the analysis only evaluates the air quality output of two 6-megawatt natural gas powered turbines, not all three. (Sec. 3.6-2, page 3-79). Even on the basis of this limited analysis, the total daily emissions from the two, 6-mw turbines, in combination with the emissions from vehicular traffic, would exceed the daily significant thresholds of 80 pounds per day. In the far term analysis, emissions of CO are projected to be 1111.7 pounds per day; for NOx, 117.5 pounds per day, and for ROG, 442.2 pounds per day.

The DEIR notes that the impact is "significant but unavoidable." Not only does the DEIR fail to analyze the total output of all three (3) 6-mw turbines, it also fails to address any possible mitigation measures, such as measures to ensure appropriate

conservation measures. No alternatives, such as the installation of photovoltaic systems for the proposed housing project and other new construction, or requirements for architectural amendments to reduce energy consumption, are discussed or analyzed. Moreover, the DEIR does not provide any analysis of the basis for the need for the addition of additional capacity of the co-generation facility. In a recently published report, the combined capacity of new power generation facilities already approved were expected to result in a near-term surplus of energy. (*Silicon Valley Business Journal*, August 24, 2001).

The DEIR not only fails to evaluate the long-term need for increasing the capacity of the existing co-generation facility, but it ignores entirely any discussion of other proposed projects or their cumulative impacts. One project, a 125 megawatt facility proposed by a new company known as "Spartan Power Co." and which was highlighted in the Mayor of San Jose's State of the City address on February 1, 2001, is proposed to be located within yards of San Jose State University's South Campus area. As noted in yet another article, the construction of smaller power plants will generate twice the amount of pollution and use more natural gas than the construction of larger power plants. (*Silicon Valley Business Journal*, February 9, 2001). The DEIR further fails to acknowledge that since the time the Master Plan 2001 Update was initially submitted for environmental review, the City Council of the City of San Jose has officially reversed its position and voted to support construction of the Calpine Metcalf Energy 600 megawatt facility in south San Jose, and there have been further discussions of another project for the Alviso area.

In summary, the DEIR is inadequate as to its discussion and analysis of the potential impacts of the proposed expansion of the Central Plant facility. As set forth in the "Discussion" section under Guideline 15130, the Lead Agency is required to discuss not only approved projects under construction, but also unapproved projects currently under environmental review with related impacts (i.e., other power generation facilities), and shall include projects under review by other relevant public agencies. CEQA requires the Lead Agency to use "reasonable efforts to discover, disclose, and discuss the other related projects. As of July 10, 2001, the California Department of Energy shows both the Spartan peaker project, as well as another expected peaker project (Calpine U.S. Dataport), planned for Santa Clara County. A copy of the California Energy Commission map showing "Current, Expected and Approved Emergency Peaker Power Plant Licensing Cases" is attached. The failure of the DEIR to include any discussion of the cumulative impacts of these projects and their related impacts renders the analysis inadequate under CEQA.

THE DEIR FAILS TO ADDRESS CUMULATIVE IMPACTS OF OTHER PROJECTS

The failure of the DEIR to include any meaningful discussion of other development projects in the vicinity of the campus constitutes an abuse of discretion, and renders the DEIR inadequate for failure to consider the cumulative impacts of these projects. *San Franciscans for Reasonable Growth v. City and County of San Francisco*,

(1984) 151 Cal.App.3d 61. As noted above, CEQA requires discussion of cumulative impacts of other projects under construction, projects under environmental review with related impacts, and projects under review by other relevant public agencies

Most notably, the DEIR completely ignores one of the largest single projects currently under construction in the downtown core: the Civic Center Plaza and related development projects. In addition to a 550,000 square foot City Hall complex, current downtown projects under construction at this time or planned for near future include the Joint Library, Horace Mann School, a 1,250-space offsite employee parking garage, various apartment and condominium projects, annexes and/or renovations as well as new construction of hotels, office space, and an entirely new facility at the First United Methodist Church. The City Hall project alone will create a demand for an anticipated 1,650 parking spaces, 400 of which will be located under the new facility and 1,250 will be located in a multi-level, off-site garage just north of Santa Clara Street, in the same city block where the plans eventually call for a new symphony hall. In addition, the Redevelopment Agency has selected New York-based Palladium Company to develop a 1.6 million square foot mixed use project in the downtown area. All of these projects are located within a mile, if not a few hundred yards, of the SJSU Campus. A copy of the San Jose Redevelopment "Downtown Projects Construction Schedule 2000 – 2005" is attached.

By itself, the failure of the DEIR to discuss and analyze the cumulative impacts from these projects is grounds to conclude that the DEIR is inadequate and fails to meet the basic requirements under CEQA. Most of these projects will impact the same commuter corridors and intersections identified in the Master Plan 2001 DEIR, and will create increased parking demands that will further inhibit the ability of the residential neighborhoods to absorb the impacts. On this basis, CCA recommends that the Board direct the University to conduct an appropriate level of environmental review with a comprehensive analysis of the cumulative impacts. Without such information, the decision of the Lead Agency would be based on incomplete and inadequate information, and would be an abuse of discretion.

GENERAL COMMENTS: MIXED USE CONCEPT

Although the impetus for the Master Plan 2001 Update is the projected increase in student population, there are no projects analyzed under the DEIR which would provide additional classroom space to accommodate this increase. The Housing Village project, which will add almost 4,000 new beds, will provide on-campus housing for existing as well as new students, but does not, by itself, provide any means to carry out the University's core function of providing education. The addition of "academic space" is tied to the development of "mixed use" facilities consisting of privately funded office, retail, commercial and similar space.

During public presentations of the Master Plan, University officials stated that the reason they were seeking opportunities for partnerships with private sector users for development of mixed use facilities was that this was the only way they could obtain financing of needed academic space. They explained that they had basically “shot their wad” with the joint library project, and did not foresee the State providing them with any further funding in the near (or apparently far) term. Securing a private sector tenant for the proposed office structures would secure the financing to pay for the classroom and other academic space they needed.

These joint-use, private-public partnership developments, as noted in the DEIR, would add over 7,000 non-campus users on a daily basis – more than the increased number of students – and would generate the need for additional parking, etc. In the absence of the University’s ability to secure such partnerships or development plans, it is unclear from the DEIR how the University plans to provide the increased academic space to accommodate the increased student population. The DEIR attempts to address the “future impacts” of these developments by stating that these projects will be required to provide parking, and would be subject to further environmental review

The University’s dependence on private-public partnerships to fund needed classroom space would seem to put the cart before the horse, especially considering that the “solution” to the demand for increased academic space will, by itself, generate an even greater impact in the form of over 7,000 non-campus users. The DEIR further ignores the economic realities that the University would be directly competing with private property owners, as well as the San Jose Redevelopment Agency, to secure corporate tenants for these spaces. The DEIR attempts to justify this approach, in part, by arguing that the City of San Jose has a “jobs-housing imbalance,” with “80,000 more employed residents than jobs within its borders.” The Master Plan 2001 would provide more employment on campus in the form of more faculty and staff; increased student enrollment would create additional indirect and induced jobs through spending, and the private development space would also facilitate the creation of more jobs. (DEIR, Section 3.1.2.3., page 3-7)

The logic of the foregoing argument ignores the fact that the San Jose Redevelopment Agency has itself announced a program to add 4,000 market-rate housing units to the Downtown area in order to sustain the economic system necessary to sustain redevelopment growth and funding for the projects that it is attempting to bring to downtown. Here, we have the irony of one agency claiming there are not enough jobs for the existing local residential population, and at the same time another agency is pushing for more housing to increase the seeking to increase the local residential population. To the extent that the University is relying on the success of these private-public partnerships to finance accommodations for the anticipated increase in student population, it would seem that it fails to take into account a number of economic as well as environmental factors. On this basis, the DEIR, even at the program or tier level analysis, fails to adequately address the potential impacts.

Although the University is correct to the extent that it claims that it is exempt from City zoning and land use policies with respect to classroom and classroom-related development, such is not the case for non-classroom development. Any such projects would require City land use approval.

SPECIFIC COMMENTS: TRAFFIC IMPACT ANALYSIS

The evaluation of traffic around the University is incomplete. Key data were omitted or do not accurately measure existing conditions. South 7th street is heavily impacted by existing University traffic. South 7th runs adjacent to Lowell Elementary School and existing traffic causes negative impacts on noise and public safety at the school. The DEIR, however, did not evaluate traffic conditions on 7th street, except for the 7th St. and San Salvador St. intersection. Data from this intersection are questionable since they were collected after the close of the academic year in May 2001. These data must be collected to adequately evaluate existing and future traffic conditions in the University neighborhoods.

Some of the existing traffic data used to evaluate key intersections are three to four years old. San Jose has experienced rapid growth since these data were collected, it is uncertain that they accurately measure existing conditions. New traffic data should be collected during the academic year to evaluate existing and future traffic conditions at the following intersections:

- San Carlos St. and 11th St.
- San Salvador St. and 4th St.
- San Salvador St. and 10th St.
- San Salvador St. and 11th St.
- Reed St. and 2nd St.
- Reed St. and 3rd St.
- Reed St. and 4th St.

The one-way couplets on 10th and 11th Streets are already over utilized. High traffic volumes and excessive speed on these streets create unsafe conditions for university neighbors as well as SJSU students. The CCA and other neighborhood groups are working with the City of San Jose to get the 10th and 11th Streets returned to two-way traffic and calmed through a variety of traffic calming measures. Increases in traffic volume and speed on 10 St. and 11th St. are not welcome. The DEIR should develop plans to mitigate traffic, and not simply defer to the City's "traffic calming policies" as a mitigation measure. Mere passing reference to mitigation measures are insufficient. *Citizens for Quality Growth v. Mount Shasta* (1988) 198 Cal.App.3d 433.

SPECIFIC COMMENTS: TRAFFIC MITIGATION

In order for one agency to rely on another agency for mitigation, it must first develop a sufficient and adequate analysis of the impacts, so that the other agency,

including any Responsible Agencies, may rely on the environmental review of the Lead Agency. *Lexington Hills Association v. State of California* (1988) 200 Cal.App.3d 415 Here, the University has determined that one of the most significant traffic impacts, at the intersection of I-280 and 11th Street, can be mitigated by the widening and/or restriping of the off-ramps and on-ramps. This work would fall under the jurisdiction of the California Department of Transportation (CalTrans), and there is no indication that CalTrans agrees that this mitigation measure is feasible or would actually mitigate the impact. Compounding the problem is the fact that this same intersection has been identified in environmental review conducted in connection with the aforementioned Civic Center Plaza project by the Redevelopment Agency, and the Master Plan 2001 Update DEIR does not discuss how those impacts would be affected by the projects and programs which are the subject of this DEIR. In the absence of even this basic information, we cannot see how the Master Plan 2001 Update DEIR meets the standards under CEQA

In addition, the proposed mitigation efforts to mitigate traffic at 10th and 11th streets at I-280 are designed to enhance the flow of traffic through the neighborhoods. This will most likely move the negative impacts of traffic further into the neighborhood. Mitigation efforts should focus on reducing traffic volumes and speed through the neighborhoods, not enhancing it. The DEIR needs to fully evaluate the cumulative impacts of the proposed campus expansion including the cumulative and downstream impacts of the proposed mitigation efforts.

As part of the extensive review conducted in connection with the 1992 closure of San Carlos Street, a number of mitigation measures were imposed, including the addition of signalized intersections, and the installation of electronic reader boards that would provide real-time information regarding the availability of parking at the three Campus garages to incoming drivers. The equipment was installed, but soon failed, and for the past several years the University has failed to repair or replace these devices. As noted elsewhere, it was also understood and agreed that a key mitigation measure was the construction of a 2,500 space parking garage on South Campus, and the joint development of a 3,000 parking space project near Municipal Stadium. The consideration for these projects were that they would provide parking and draw traffic away from the heavily impacted areas immediately south of the Main Campus, thereby relieving the congestion which would result from the closing of San Carlos Street. The University claimed it lacked funding to construct the garage, and has never pursued this mitigation measure.

University should work with neighborhoods and City of San Jose to calm traffic around the University and develop alternative means to get student to the campus (bus passes, expanded shuttle bus service, south campus parking, satellite campuses, virtual classrooms, etc.). Any expansion of services in the south campus area must be done so that it does not further impact the Spartan-Keyes neighborhood. Access to the south campus should be directed away from 7th and 10th streets (and existing neighborhoods), to Tully and Senter streets.

The DEIR states that there will be numerous significant and unavoidable negative traffic impacts of the proposed university expansion. These impacts include reduced service on Interstate 280 and Highway 87 as well as multiple intersections throughout the downtown neighborhoods. The impacts are unavoidable because the current infrastructure is fully build out and cannot be expanded. If current and future infrastructure is currently at capacity, then the expansion as proposed should not occur. The University must come up with an expansion plan that will not have significant, unavoidable impacts to traffic

SPECIFIC COMMENTS: PARKING ANALYSIS

On page 1-2 of Master Plan 2001, the University lists one of the goals of plan is to "Provide adequate parking." The DEIR, however, documents how the University currently does not provide adequate parking for students, staff, and faculty and states that the University will maintain the status quo through implementation of the plan. The DEIR states that 60 percent of the students, and 69 percent of the faculty and staff, are solo-drivers. As noted elsewhere, it is highly likely that the proposed 1,700 parking spaces will be inadequate to serve the needs of the occupants of the new residential halls, and it is also noted that the University converted a large area of the 10th Street parking garage to office space, further reducing its available parking inventory. Additional and planned development in the downtown area has further reduced the availability of off-campus parking, and the new, 800-space parking garage at the corner of 4th and San Fernando Streets is being added to compensate for the demand for the newly constructed apartment complexes and the new Joint Library. At the same time, the DEIR admits that the existing parking ratio of 0.38 spaces per student is one of the lowest in the University system.

In short, the parking analysis is inadequate. The lack of available parking will only serve to force students, faculty and staff to seek parking in the neighborhoods. This situation, which was clearly observed following the closure of San Carlos Street in 1992, resulted in increased speeding and traffic in the neighborhood streets, and forced non-campus commuters to seek alternate routes through the neighborhood to avoid the congestion along the 10th and 11th Street corridors. Reliance on the parking permit system is misplaced, as enforcement is sporadic, and many students find ways to circumvent the system.

CCA feels that more work is needed to address the existing traffic and parking problems, and that any expansion of the University should be based on the capacity of the Campus and the neighborhood to absorb these impacts. Reliance on public transportation and bicycle alternatives has only a limited effect, and the DEIR itself notes that the buildout will pose a further threat to bicycle access to the Campus. Simply relying on the hope that future development of the campus will provide adequate parking does not satisfy our concerns that these issues have been adequately addressed or analyzed.

SPECIFIC COMMENTS CUMULATIVE TRAFFIC IMPACTS

At Section 4.4, page 4-2, the DEIR section purports to discuss traffic circulation and parking issues from a cumulative traffic impact, and states that “recently approved projects” were analyzed along with “project-related traffic.” The DEIR notes that based on “historical growth rates,” the projected impacts will be “significant and unavoidable.”

SPECIFIC COMMENTS. BIOLOGICAL RESOURCES

The DEIR states that the proposed Master Plan 2001 development would not have an adverse impact on special status bird or animal species because none are present on the site. Steelhead rainbow trout, a federal and state threatened species are known to be present in Coyote Creek which lies approximately 3000 ft NE of the University. Coyote Creek receives storm drain runoff from the University and surrounding neighborhoods. Increased traffic from the proposed development will increase pollutants flowing into Coyote Creek from storm drain runoff. It is likely that the highest concentration of these pollutants will occur in the fall as the steelhead trout are migrating upstream to spawn. The DEIR must evaluate the negative impacts of the proposed development on the threatened steelhead trout and present plans to mitigate these impacts

SPECIFIC COMMENTS: EVALUATION OF ALTERNATIVES

The DEIR presents two reduced-scale alternatives to the proposed Master Plan 2001 development. These alternatives vary only in the scale of the public-private partnerships that would be developed. The DEIR states that the reduced scale alternatives will not achieve one of the key objectives of Master Plan 2001, “to utilize campus lands most efficiently” (DEIR pp 5-5 and 5-7). According to the DEIR, however, one of the objectives of Master Plan 2001 is to “utilize campus land more efficiently” (DEIR p. ES-2).

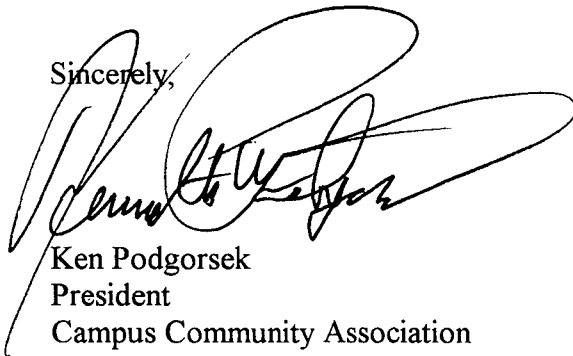
CEQA requires the DEIR to evaluate feasible alternatives. As with the failure of the DEIR to consider alternative means of meeting the energy needs, the DEIR fails to consider or evaluate any alternatives to properly accommodate a projected increase in student population. Utilizing the campus on a year-round basis is mentioned as a mitigation measure, but there is no meaningful analysis of the potential impacts of this proposal. There is no discussion or even mention of the possible use of teleconferencing or development of satellite classroom facilities which California State University could utilize to accommodate the projected increase in overall student population. Simply assuming that larger high school class sizes will automatically result in increased enrollment at SJSU is not substantiated. CCA recalls that the University previously projected reaching a capacity of 25,000 FTE students by the year 2000. (1990 Master Plan Revision).

CONCLUSION

The Campus Community Association and its members will be directly affected by the projects and programs which are the subject of the Master Plan 2001 Update DEIR. CCA feels that the Board of Trustees should acknowledge that the level of environmental review is simply inadequate, and lacks a sufficient level of discussion of analysis of potential and cumulative impacts, in order to make an intelligent decision regarding these plans. The DEIR entirely ignores the current projects under construction within a few yards of campus by the largest Redevelopment Agency in the State of California. The DEIR fails to provide an adequate discussion or analysis of the cumulative impacts or of feasible alternatives to the proposal to triple the size of the Central Plant, and fails to evaluate other similar projects currently approved or pending approval before the State Energy Commission. The DEIR further fails to provide a meaningful discussion of feasible alternatives to accommodate the projected increase in student enrollment.

The Campus Community Association has developed a long-standing working relationship with San Jose State University. Many of its officers and members are graduates, and in general the CCA has encouraged the development of improvements to the SJSU Campus over the years. However, the CCA feels that the DEIR prepared for the proposed Master Plan 2001 Update fails to provide a sufficient level of information on which the Board of Trustees and other relevant agencies could reasonably rely to make intelligent decisions regarding the proposed projects. The CCA therefore recommends that the Board of Trustees of the California State University conclude that the DEIR is inadequate for purposes of the fundamental requirements under the California Environmental Quality Act, and exercise their discretion to not certify the DEIR.

Sincerely,



Ken Podgorsek
President
Campus Community Association

DOWNTOWN PROJECTS CONSTRUCTION SCHEDULE 2000 - 2005

ESTIMATED SCHEDULES

| Year | 2000 | | | | 2001 | | | | 2002 | | | | 2003 | | | | 2004 | | | | 2005 | | | | | | | | | | | | | | | |
|--------------------------------|--|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|---|---|---|---|
| | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | | | | | | | | | | | | |
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| JOINT LIBRARY | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| CIVIC CENTER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CIVIC CENTER OFF-SITE GAR.* | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4TH & SAN FERNANDO GAR. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 101 SAN FERNANDO APT. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| THE PLAZA CONDOMINIUMS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MISSION VILLAS CONDOMINIUMS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FAIRMONT ANNEX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MONTGOMERY HOTEL | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MARRIOTT HOTEL | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CENTURY CENTER APT. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| JOSE THEATRE SEISMIC | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BLOCK 2 TOWER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OPUS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 488 ALMADEN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FOX CALIFORNIA THEATRE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PLAZA AT ALMADEN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ADOBE EXPANSION | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COURTYARD BY MARRIOTT* | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRP FLOOD CONTROL - PH. 3C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRP FLOOD CONTROL - PH. 3B | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GRP FLOOD CONTROL - PH. 3A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MIXED USE PROJECT | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FIRST UNITED METHODIST CHURCH* | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | J <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> <th>J</th> <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> <th>J</th> <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D |
| Quarter | J <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> <th>J</th> <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> <th>J</th> <th>F</th> <th>M</th> <th>A</th> <th>M</th> <th>J</th> <th>J</th> <th>A</th> <th>S</th> <th>O</th> <th>N</th> <th>D</th> | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D |
| Year | 2000 | 2000 | 2000 | 2000 | 2001 | 2001 | 2001 | 2001 | 2002 | 2002 | 2002 | 2002 | 2003 | 2003 | 2003 | 2003 | 2004 | 2004 | 2004 | 2004 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | 2005 | | | | |

Phase I - Demolition/Excavation Phase II - Construction

Revised on 3/30/2001

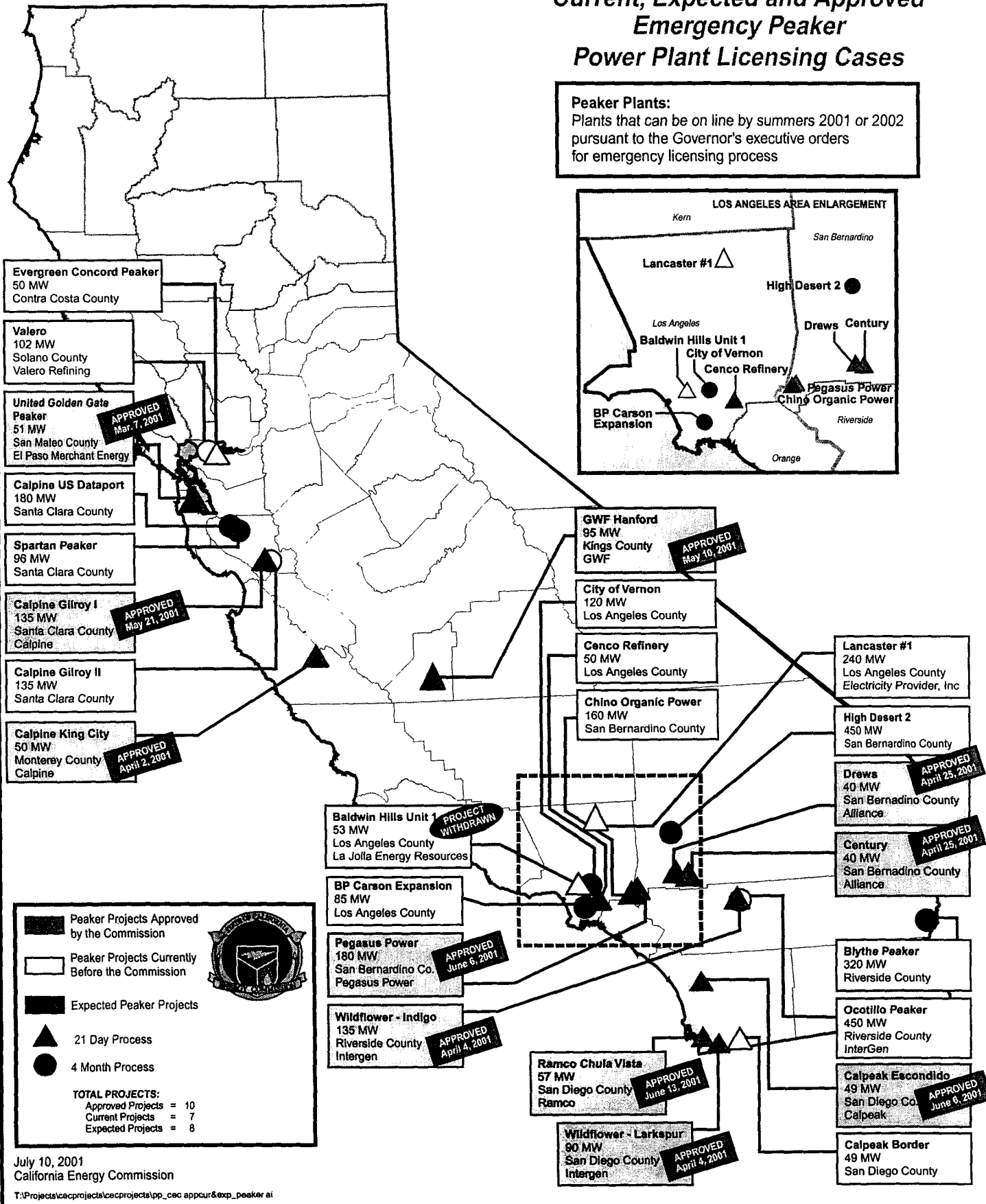
* Estimate

CALIFORNIA ENERGY COMMISSION

Current, Expected and Approved Emergency Peaker Power Plant Licensing Cases

Peaker Plants:

Plants that can be on line by summers 2001 or 2002 pursuant to the Governor's executive orders for emergency licensing process



- Peaker Projects Approved by the Commission
- Peaker Projects Currently Before the Commission
- Expected Peaker Projects
- ▲ 21 Day Process
- 4 Month Process

TOTAL PROJECTS:
 Approved Projects = 10
 Current Projects = 7
 Expected Projects = 8