

5 Other Environmental Considerations

5.1 Growth Inducement

The California Environmental Quality Act (CEQA) Guidelines Section 15126.2(e) requires an environmental impact report (EIR) to consider the growth-inducing impacts of a project. Growth-inducing impacts are characteristics of a project that could, either directly or indirectly, foster economic or population growth or the construction of additional housing or development in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could induce growth in the surrounding environment. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. The CEQA Guidelines state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Examples of growth-inducing aspects of a project may include the following:

- Extension of utility lines, construction of roads, or construction or expansion of water/wastewater facilities.
- Encouragement of growth in surrounding areas through economic stimulus (e.g., construction of shopping centers, industrial facilities, and residential areas).
- Revisions to land use policies, such as General Plan amendments, annexations, and rezones.
- Removal of an obstacle to growth and development, such as removal of a constraint on a required public service.

A project that is determined to be potentially growth inducing may result in subsequent environmental effects as a result of such growth. These indirect secondary effects of growth can result, for example, in significant increased demand on community and public service infrastructure, increased traffic and noise, and degradation of air and water quality. Such potential secondary effects of growth are assessed in separate reports for the proposed project and associated environmental impact report.

5.1.1 Extension/Expansion of Utilities

Construction of new roadways could result in potential inducement of growth if a roadway is constructed in a previously undeveloped or underdeveloped area by improving accessibility. The project site is located within a highly urbanized area that is currently served by existing roadway/access infrastructure. The proposed project would include off-site circulation improvements, including roadway improvements and provisions of additional lanes, in the surrounding roadway network (refer to Figure 4.15-15, Traffic Impacts and Improvements for Buildout). While the proposed project would increase roadway capacity, such off-site improvements would facilitate traffic circulation to existing developed areas in the vicinity of the project site, which is a highly urbanized area. Therefore, the proposed project would not directly or indirectly induce growth in the area surrounding the project due to the extension or expansion of roadways in previously undeveloped or underdeveloped areas.

The proposed project would result in an incremental increase in demand of water and wastewater services. It is anticipated that the proposed project would require new points of connection for domestic water, fire water, and sewer from the existing utility lines. All proposed connections to existing utility infrastructure would be sized to

adequately serve anticipated project buildout. Similarly, all existing water and sewer facilities that the proposed project would connect to are adequately sized to serve the proposed project without the need to expand (refer to Section 4.17, Utilities and Services Systems, and Figures 2.10-A through 2.10-E). Further, the project site and surrounding areas are highly urbanized currently served by existing utility infrastructure. The proposed project would not be extending any utility or service system into undeveloped areas that are currently unserved by utilities. Therefore, the proposed project would not directly or indirectly induce growth in the area surrounding the project site as a result of the provision of new infrastructure involving roadways or utilities.

5.1.2 Economic Stimulus

The proposed project is located on a site that is currently underutilized as a 65,000-seat stadium and 132-acre parking lot. Redevelopment of the project site is considered infill in a previously disturbed area. As described above, the proposed project would result in economic stimulus through the implementation of a San Diego State University (SDSU) Mission Valley Campus Master Plan, which would include 1,565,000 square feet of office, innovation, research and development, and academic/administrative uses; 4,600 new residential units, 95,000 square feet of commercial space; and a new 35,000-capacity multipurpose Stadium.

The office, innovation, research and development, and academic/administrative use is expected to generate approximately 5,324 jobs (Appendix 4.13-1). The commercial component is sized to serve the proposed campus project and is not anticipated to attract significant traffic or compete with existing commercial uses throughout Mission Valley. No industrial facilities are proposed. Implementation of the proposed project would include construction of approximately 4,600 residential units, including housing for students, faculty, and staff, in proximity to a vibrant university village atmosphere. However, the proposed project would not encourage additional growth because the project site is considered a previously developed, infill site which is largely surrounded either by existing development or is largely constrained (i.e., the San Diego River to the south and Interstate 15 to the east).

In addition to the direct growth as a result of the development of the project site, a project may also indirectly encourage or induce economic stimulus. As explained in Section 4.13, Population and Housing, the proposed project's economic contribution has three components:

- Direct contribution. The direct contribution includes the total full-time and part-time employees, labor income (including the value of benefits), economic output, and value-added associated with the construction expenditures to build the project and subsequent operation of businesses on the site.
- Indirect contribution. The indirect economic contribution is attributable to purchases from suppliers within San Diego County. The indirect contribution also captures the additional input purchases from local suppliers by the suppliers. These additional purchases create subsequent rounds of indirect effects.
- Induced contribution. The induced contribution includes spending by construction employees or employees that work at businesses at the Mission Valley site, and employees of suppliers at local businesses, including grocery stores, restaurants, and service providers.

Direct and indirect contributions are analyzed in Section 4.13, Population and Housing and were determined to be less than significant. Relative to the proposed project's potential induced contributions to economic stimulus, induced job growth was also calculated in Appendix 4.13-1. As explained above, induced economic contributions includes the spending by construction employees or employees that work at businesses at the project site, and the employees of suppliers at local businesses, including grocery stores, restaurants, and service providers. As calculated in Appendix 4.13-1, the number of employees indirectly created by the proposed project is estimated at

5,117 jobs. This total would be considered as part of the overall employment within San Diego County. As shown in Table 4.13-6 in Section 4.13, employment in San Diego County is estimated to increase by 460,492 by 2050. The proposed project's induced contribution to this total of 5,117 jobs represents 1.1% of the increased employment in San Diego County over the next 30 years. Therefore, economic stimulus resulting from the project would not directly or indirectly induce growth in the area surrounding the project site.

5.1.3 Revisions to Land Use Policies

Because SDSU is a component of the California State University (CSU), which is a state agency, the proposed project is not subject to local government planning and land use plans, policies, or regulations. However, for informational purposes, the proposed project has considered these planning documents and the project's site location within, and relationship to, each. The proposed project would be subject to state and federal agency planning documents, but would not be subject to regional or local planning documents such as the City's General Plan, Mission Valley Community Plan or City municipal zoning code.

In consideration of the above, the proposed project includes a Campus Master Plan, as contemplated by San Diego Municipal Code Section 22.0908, which would establish a full-time equivalent student ceiling of 15,000 for the SDSU Mission Valley campus. No other revisions to land use policies, General Plan Amendments, annexations, or rezones are required. For additional discussion, please refer to Section 4.10, Land Use and Planning. While the Campus Master Plan would establish the number of full-time equivalent students by 15,000 for the SDSU Mission Valley campus, there are no changes to land use policies, including General Plan amendments, annexations, and rezones that would result in any indirect or direct growth in the area surrounding the project.

5.1.4 Removal of an Obstacle to Growth and Development

The proposed project would demolish the existing San Diego County Credit Union (SDCCU) Stadium and provide for the redevelopment of the project site, including a new Stadium. No other constraints to growth and development would be removed as a result of implementation of the proposed project. The proposed project would be developed in a campus configuration and would be consistent with the Draft Final Mission Valley Community Plan, as well as the San Diego Association of Governments Smart Growth Map. Therefore, the removal of an obstacle to growth and development, such as removal of a constraint on a required public service, would not directly or indirectly induce growth in the area surrounding the project site.

5.2 Environmental Effects Found Not To Be Significant

5.2.1 Introduction

CEQA requires that an EIR focus on the significant effects of the proposed project on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the finding in the Initial Study is subsequently received.

Section 21100(c) of the Public Resources Code requires that an EIR contain a statement briefly explaining the reasons why various possible significant effects of a project were determined not to be significant and were,

therefore, not discussed in detail in the Draft EIR. The CEQA Guidelines provide that the statement may be in the form of an attached copy of the Initial Study. (CEQA Guidelines, Section 15128.)

In this case, the Initial Study (Environmental Checklist) was prepared and circulated with the Notice of Preparation for public review on January 18, 2019 (Appendix 1-1). The Initial Study concluded that the proposed project would not result in potentially significant impacts relative to the following environmental impact categories:

- Agriculture and Forestry Resources

Therefore, as stated in the Initial Study/Notice of Preparation, these topics need not be addressed further in this EIR. For information purposes, following summary is presented.

5.2.2 Agriculture and Forestry Resources

According to the San Diego County Important Farmlands Map (California DOC 2016), the proposed project site is designated as “Urban and Built-Up Lands.” The project area does not include any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, development of the proposed project would not convert agricultural land to non-agricultural uses. The project area is not currently zoned for agriculture, nor does the project site include any land under a Williamson Act contract. No surrounding uses are designated as farmland or forest land; therefore, no changes in the existing environment are anticipated that would convert farmland, as defined, to nonagricultural use or forest land to nonforest use. No impacts to agricultural resources or forest land are anticipated to occur as a result of the proposed project.

5.3 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) requires that an EIR identify any significant irreversible environmental changes associated with a proposed project. Such changes include, for example, the intensification of land use, the use of non-renewable resources during the initial and continued phases of the proposed project, or irreversible damage from environmental accidents associated with the proposed project. The potential for such environmental changes is discussed below.

5.3.1 Intensification of Land Use

Under the proposed project, the existing land uses on the project site would be redeveloped to permit a new 35,000-capacity multipurpose stadium; approximately 4,600 dwelling units and 95,000 square feet of campus-serving commercial/retail uses; 1,565,000 square feet of office,; approximately 400 hotel rooms with 40,000 square feet of conference space; and approximately 86 acres of parks, recreation and open space. Redevelopment of the project site to accommodate more-intensive land uses to the area would result in a long-term increase in housing and employment as discussed in Section 4.13, Population and Housing, and Section 5.1, Growth Inducement. Development of small areas of land that have not previously been developed also would occur during construction, which would result in the removal of potential habitat (i.e., riparian habitat, foraging habitat, and migration corridors) for sensitive wildlife and plant species. However, despite converting the existing land use from a Stadium and parking lot into a campus, the proposed project would improve the integration of existing uses with a functional use of space that currently sits vacant as a paved parking lot and oversized Stadium. As a result, the commitment of these

nonrenewable resources is reasonable and justified under the circumstances, and with appropriate mitigation, irreversible environmental change impacts associated with intensification of land uses would be **less than significant**.

5.3.2 Nonrenewable Energy Consumption

Construction of the proposed project would result in the use of nonrenewable resources and energy sources. This consumption would occur during the construction phase of the proposed project and would continue throughout its operational lifetime. In particular, project construction would require fossil fuels, a nonrenewable resource, to power construction vehicles, delivery, and employee vehicles. Construction of the proposed project would require consumption of resources that are not renewable or that may renew so slowly as to be considered nonrenewable. Construction equipment also would use electricity and natural gas. Use of these energy sources would be considered a permanent commitment of resources. In addition, a variety of resource materials would be used during the construction process, including certain types of lumber and other forest products; concrete and aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; water; and fossil fuels such as gasoline and oil and fabricated materials. The commitment of such materials and fuels would be considered irreversible.

Once operational, the proposed project would consume more energy on a daily basis than what is presently consumed on site. The resources that would be committed during operation of the proposed project would include water, as well as fossil fuels including natural gas, for purposes of electricity demand for the proposed new buildings, building heating and hot water, and transportation. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the proposed project, and the existing, finite supplies of these natural resources would be incrementally reduced. Assuming at least a portion of the energy used during operations would be provided by nonrenewable resources, the proposed project would result in the commitment of nonrenewable energy resources during operation. (See EIR Section 4.5, Energy, for analysis of the proposed project's impacts relative to energy consumption.)

Although nonrenewable resources would be utilized during the construction and operational phases of the proposed project, the commitment of these resources is reasonable and justified under the circumstances, particularly as the proposed project is designed to accommodate the existing and projected demand for student housing. As discussed in EIR Section 4.5, the proposed project's use of energy will not have a substantial effect on statewide, regional, or local energy resources; the proposed project will comply with all applicable energy standards; and there is a less-than-significant potential for the proposed project to result in wasteful, inefficient, or unnecessary consumption of fuel or energy. Further, the proposed project would achieve Leadership in Energy and Environmental Design (LEED) Silver rating or its equivalent by implementing a variety of water and energy efficiency features that would offset some of the impacts related to these resource areas. CSU/SDSU's commitment to achieving LEED Silver rating for the proposed project ensures that it would be designed and operated in an environmentally-conscious and sustainable manner.

Project impacts related to consumption of nonrenewable resources are considered to be less than significant because the proposed project would not use unusual amounts of energy or construction materials. Because the proposed project would not consume an unusual amount of energy or materials, and would implement design features to operate in a sustainable manner, potential impacts associated with nonrenewable energy consumption would be **less than significant**.

5.3.3 Accidental Hazardous Release

The CEQA Guidelines Section 15126.2(d) also states that irreversible damage can result from environmental accidents associated with the project. Construction activities on the project site would involve the transportation, use, and storage of commonly used hazardous materials such as diesel fuel, gasoline, lubricating oil, grease, solvents, and other janitorial supplies. These materials would be transported and handled in accordance with all federal, state, local, and SDSU guidelines and regulations applicable to the management and use of hazardous materials.

The proposed project would increase the routine transport, use, and disposal of hazardous materials and/or wastes generated by the campus; however, all hazardous wastes would be managed and handled in full compliance with SDSU Environmental Health and Safety procedures, and state and federal law (see EIR Section 4.8, Hazards and Hazardous Materials, for analysis of the proposed project's impacts relative to hazardous waste and materials). Although accidental spills or unauthorized releases of hazardous materials during construction, including ground clearing and foundation excavation, potentially could result in soil contamination, as discussed in EIR Section 4.8, Hazards and Hazardous Materials, implementation of the mitigation measures described in EIR Section 4.8.6 would reduce all such impacts to levels below significance.

In light of the multitude of federal, state, and local regulations governing the use of hazardous substances, and with implementation of the mitigation measures set forth in EIR Section 4.8, Hazards and Hazardous Materials, the proposed project is not expected to involve activities that would damage the environment or pose a risk to public health. Therefore, impacts associated with irreversible damage from environmental impacts associated with the proposed project would be **less than significant**.

5.3.4 Biological Resources

The project site would be altered by grading and development of the proposed project. Specifically, the proposed project would result in permanent direct impacts to approximately 164.2 acres on site, of which 163.8 acres (99.7% of the project on-site impacts) are to existing, developed areas. The remaining impacts to native vegetation communities or land covers include 0.04 acres of Baccharis-dominated Diegan coastal sage scrub, 0.01 acres of coastal sage scrub, 0.34 acres of southern cottonwood willow riparian forest, and 0.02 acres of unvegetated channel, as well as to 0.07 acres of U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife jurisdictional non-wetland waters, as well as 0.29 acres of California Department of Fish and Wildlife riparian vegetation. A complete listing of potential impacts is provided in Section 4.3.5. Off-site impacts to 3.5 acres consist of impacts to urban/developed areas (2.7 acres) and disturbed habitat (.8 acres).

Potentially significant impacts are limited to direct and indirect impacts to sensitive natural communities, jurisdictional features, and least Bell's vireo; southwestern willow flycatcher and California gnatcatcher (if determined to be present); and nesting birds protected under the Migratory Bird Treaty Act. Mitigation to reduce all impacts to a level less than significant includes habitat preservation in a mitigation bank and/or on site, avoidance of the breeding bird season or pre-construction surveys for nesting birds, and implementation of construction noise limitations/setbacks, if necessary. With implementation of the recommended mitigation measures identified in Section 4.3.6, all potentially significant impacts would be reduced to less than significant. As a result, impacts associated with irreversible changes to biological resources would be **less than significant**.

5.3.5 Mineral Resources

As discussed in Section 4.11.1 of EIR Section 4.11, Mineral Resources, the project site is located within Mineral Resource Zone 2 (MRZ-2), as indicated on the State of California Department of Conservation California Geological Survey, which indicates areas known or inferred to have mineral resources, the significance of which is undetermined based on available data (DOC 2000). However, the project site is underlain by fill soils placed during grading for stadium construction in 1966, Quaternary alluvial flood-plain deposits, and the Friars Formation. In addition, the site is urban, currently the location of existing development, and does not have an operating mine, sampling, or availability of 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. Therefore, the project site is not currently a known mineral resource that would be of value to the region and the residents of the state. Further, the project site is constrained by existing surrounding development, the presence of shallow groundwater, and the limited construction time frame contemplated by San Diego Municipal Code Section 22.0908 for development of the River Park and Stadium on any potential mining operations that could occur. As a result, impacts associated with irreversible changes to, or commitments of, mineral resources would be **less than significant** (see EIR Section 4.11, Mineral Resources, for analysis of the proposed project's impacts relative to mineral resources).

5.3.6 Conclusion

In summary, construction and operation of the proposed project would result in the irretrievable commitment of nonrenewable resources, which would limit the availability of these particular resources for future generations or for other uses during the life of the proposed project. However, the proposed project includes requirements for energy and water conservation so that use of those resources would be of a relatively small scale compared to similar development without such requirements. Additionally, the proposed project would accommodate growth forecasted for the Mission Valley area, as discussed in Section 4.13, Population and Housing. The loss of such resources would not be highly accelerated when compared to existing conditions and growth projections for San Diego County. The proposed project's irretrievable commitments of resources have been evaluated and, based on that evaluation, the proposed project's consumption of those resources is justified (14 CCR 15126.2(c)). Therefore, although irretrievable commitments of resources would result from the proposed project, such changes would be **less than significant**.

5.4 Significant Unavoidable Impacts

The proposed project would result in significant, unavoidable impacts to the following resources as discussed in Section 4 of this EIR:

- Air Quality (Regional Air Quality Strategy compliance, construction-related exceedances, operational exceedances, cumulative impacts)
- Cultural Resources (historic resources)
- Noise (nighttime construction, off-site construction, cumulative impacts)
- Population and Housing (cumulative impact)
- Public Services and Recreation (fire and emergency medical services cumulative impact)
- Transportation (roadway segments, intersections, freeway segments, ramps)

Impacts would be mitigated, but not to a level of less than significant, or otherwise no feasible mitigation measures exists within the control of CSU, which would reduce certain impacts to less than significant.

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