6 Alternatives

6.1 Introduction

The California Environmental Quality Act (CEQA) requires the lead agency, in this case the California State University (CSU) Board of Trustees, to consider a range of reasonable and feasible alternatives to the proposed project and analyze the impacts of those alternatives. By comparing these alternatives to the proposed project, the advantages of each alternative can be analyzed and evaluated.

CEQA Guidelines Section 15126.6(a) requires that an environmental impact report (EIR) "describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives." Thus, the focus of this alternatives analysis is on those alternatives that can reduce the proposed project's significant impacts; alternatives that merely reduce the project's less-than-significant impacts receive less attention. Further, Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a range of reasonable alternatives; an EIR need not consider alternatives that are infeasible. "Feasible" is defined in the CEQA Guidelines Section 15364 to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Further, "feasibility" encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App3d 410, 417). There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the "rule of reason." The "rule of reason" governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision-making.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (California Public Resources Code Section 21002.1), the purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

The analysis in this EIR indicates that implementation of the San Diego State University (SDSU) Mission Valley Campus Master Plan Project (proposed project) would result in potentially significant impacts to the following environmental issue areas:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Noise
- Population and Housing

- Public Services and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Of the above impacts, the following were identified as impacts that were significant and unavoidable with implementation of all feasible mitigation measures as discussed in Chapter 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 cumulative impact)
- Transportation

Impacts would be mitigated, but not to a level of less than significant. Further, no feasible mitigation measures are available within the control of CSU to reduce certain impacts to less than significant.

All other potential impacts associated with the proposed project, including impacts to Aesthetics and Visual Quality, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, and Wildfire, would be less than significant.

6.2 Criteria for Selection of Alternatives

The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines Section 15126.6(c). The alternatives must (1) meet most of the project objectives, (2) be feasible, and (3) avoid or substantially lessen the significant impacts resulting from the project.

6.2.1 Project Purpose and Objectives

SDSU is projected to grow in the future to help meet the exiting and projected need to accommodate more higher education students in California. The proposed SDSU Mission Valley Campus Master Plan would constitute the next step in SDSU's long-term planning effort.

The underlying purpose of the proposed project is to implement a SDSU Mission Valley campus, including a new multipurpose Stadium, faculty/staff/student residences and homes, academic/office/innovative uses, hotel rooms and conference space, and commercial/retail uses to support SDSU's academic, educational and cultural mission through the demolition and redevelopment of the existing San Diego County Credit Union (SDCCU) Stadium; and the restoration and revitalization of a River Park pursuant to the framework set forth in San Diego Municipal Code (SDMC) Section 22.0908.

To implement this underlying purpose, the project objectives are to:

1. Enable CSU to expand SDSU's education, research, entrepreneurial, innovation technology, and athletic programs to accommodate increasing demand for higher education within a vibrant SDSU Mission Valley campus, innovation district, and Stadium venue proximate to SDSU's existing main campus.
2. Situate and design a River Park, shared parks and open space, and recreation areas in a manner that integrates the site's natural features and green space into the SDSU Mission Valley campus.
3. Restore and revitalize the River Park.
4. Establish a sustainable, walkable, efficient, and transit-oriented SDSU campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development.
5. Create a new, 35,000-capacity multipurpose Stadium as the "home" for SDSU Division I collegiate football and other events and make the new Stadium fully operational in time for the opening of the SDSU 2022 football season.
6. Provide an SDSU Mission Valley campus innovation village with up to approximately 1.6 million square feet for academic, office, research and development and technology transfer uses with adequate faculty, staff, student and employee parking.
7. Demolish the existing SDCCU Stadium in accordance with SDMC Section 22.0908.
8. Enhance transit ridership through pedestrian and bicycle improvements, and transit connections to the existing Metropolitan Transit System (MTS) Trolley Station and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line.
9. Provide up to 4,600 residences with a mix of student, faculty, staff, workforce, and affordable housing, with adequate parking, within a vibrant, transit-oriented university village setting and in proximity to trolley and other public transportation uses to reduce reliance on automobiles.
10. Provide neighborhood-serving retail with adequate parking to serve students, faculty, staff, alumni, neighborhood residents, businesses, and park and other visitors engaging in academic, cultural, athletic and artistic endeavors, as well as game-day sporting and other events.
11. Provide hotel/hospitality services, including up to 400 hotel rooms and 40,000 square feet of conference space and associated parking, to support visitors to campus, Stadium, and other events; meeting and conference facilities; and academic opportunities for undergraduate and graduate students in SDSU's hospitality and tourism management programs.
12. Provide potential employment opportunities in close proximity to the campus and transit.
13. Encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships.
14. Meet the City's greenhouse gas (GHG) emission reduction goals as required by SDMC Section 22.0908.

15. Reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic design elements.
16. Create a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape.
17. Bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space.
18. Generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the SDSU campus and the San Diego region.
19. Implement a Transportation Demand Management Plan that incorporates land use, employer, and resident strategies, to encourage transit use and reduce vehicle miles traveled .

6.2.2 Feasibility

CEQA Guidelines Section 15126.6(f)(1) also identifies factors to be taken into account to determine the feasibility of alternatives. The factors are site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

6.2.3 Evaluation of Significant Impacts

According to CEQA Guidelines Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. The alternatives are evaluated to determine if, as anticipated when selected as alternatives, they eliminate any significant adverse environmental impacts or reduce those impacts to less than significant. Project-related impacts are considered to be those that are identified prior to the incorporation or implementation of any mitigation measures.

The performance of an alternative relative to a project is evaluated to determine the "comparative merits of the alternative" (CEQA Guidelines Section 15126.6(a)). This analysis is based, in part, on a comparison to a project's impacts. This analysis also includes a discussion of the relative feasibility of each alternative.

6.3 Rationale for the Selection of Alternatives

This alternatives discussion focuses on alternatives to the proposed project or its location that are capable of avoiding or substantially reducing any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project's objectives, as listed in Chapter 2, Project Description, and restated above.

As part of an alternatives analysis, CEQA requires an EIR to address a No Project (No Build) Alternative. The purpose of describing and analyzing a No Project (No Build) Alternative is to allow the decision makers to compare the impacts of approving a project with the impacts of not approving the project. This EIR addresses the No Project (No Build) Alternative in Section 6.4.1 of this EIR.

EIRs should also identify any alternatives that were considered by the lead agency but rejected as infeasible, and briefly explain the reasons why the lead agency made such a determination. Among the factors that may be used in an EIR to eliminate alternatives from detailed consideration are (1) failure to meet most of the basic project objectives, (2) infeasibility, and/or (3) inability to avoid significant environmental impacts.

In accordance with these requirements and based on comments received during the EIR Notice of Preparation and scoping process for the proposed project (see Appendix 1-1), five alternatives were identified, including the No Project (No Build) Alternative, Stadium Re-Use Alternative, Reduced Density Alternative, Stadium and River Park Alternative, and Alternative Stadium Location alternatives to the proposed project. Each alternative is further analyzed below (see Section 6.4).

6.3.1 Project Alternatives

Five project alternatives were developed during the conceptual planning phase of the proposed project, including the required No Project Alternative (CEQA Guideline Section 15126.6(e)). These alternatives were selected in an effort to reduce the proposed project's identified significant impacts:

(1) "No Project Alternative." The No Project Alternative assumes that the proposed project would not be developed, and the existing environmental conditions in the project area would remain in their current state. As such, the project area would continue to be a parking lot and 68,000-seat Stadium. Note, however, that CEQA also recommends that the No Project Alternative analysis analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(3)(C)). In this case, the No Project Alternative would be inconsistent with the City's current planning efforts, including the Mission Valley Community Plan Update and the San Diego River Master Plan, which call for development of the project site with a variety of land uses similar to the proposed project. Similarly, the No Project Alternative would not be consistent with the City's CAP, which establishes transit priority areas, such as the project site, and directs the development of these sites to include a mix of land uses at densities and intensities that support adjacent transit. The No Project Alternative would be inconsistent with these recent planning efforts.

(2) "Stadium Re-Use Alternative." The Stadium Re-Use Alternative would restore SDCCU Stadium to the original configuration of approximately 51,000 seats, as first constructed in 1968. Under this alternative, the proposed project would be re-configured around the existing SDCCU Stadium to achieve similar land uses and intensities as the proposed project to the extent feasible based on existing grades, topography, and accommodating the floodplain.

(3) "Reduced Density Alternative." The Reduced Density Alternative would develop similar land uses in the same configuration as the proposed project and have the same physical impacts as the proposed project; however, the Reduce Density Alternative would reduce the intensity of such development. Under this alternative, the following use intensities would be developed:

- Stadium with a capacity of 35,000 (same as the proposed project)
- Up to 550 apartment units
- Up to 10,000 square feet of neighborhood commercial
- Up to 130,000 square feet of campus/office

- Up to 100 hotel rooms
- Similar parks, recreation, and open space uses as the proposed project.

(4) "Stadium and River Park Only Alternative." The Stadium and River Park Only Alternative was developed in response to comments received on the Notice of Preparation, which called for the project site to only be developed with a new Stadium, with the remainder of the project site developed as a park. Under the Stadium and River Park Alternative, the project site would be developed with a 35,000-capacity multipurpose Stadium, surface parking lot containing approximately 6,050 parking spaces, and a River Park. This alternative would generally be consistent with the 1984 Mission Valley Community Plan land uses and zoning for the project site, prior to the adoption of SDMC Section 22.0908 and the 2019 Final Draft of the Mission Valley Community Plan Update.

(5) "Alternative Stadium Location Alternative" entails construction of the 35,000-capacity multipurpose Stadium on SDSU's existing main campus east of College Avenue, north of Interstate (I) 8. The SDSU Mission Valley campus proposed project's non-stadium land uses would be developed at the Mission Valley campus project site, including the 4,600 residential uses, up to 1.6 million square feet of office space, approximately 95,000 square feet of commercial/retail uses, up to 400 hotel rooms, and 86 acres of parks, recreation, and open space. To accommodate such land uses, the existing SDCCU Stadium would be demolished.

Analysis of the impacts of each of these alternatives relative to the proposed project is presented in this chapter. For each of the alternatives identified, the EIR conducted the following assessment:

- Description of the alternative
- Identification of the impacts of the alternative and evaluation of the significance of those impacts
- Evaluation of each alternative relative to the proposed project, specifically addressing consistency with the project objectives, feasibility, avoidance or reduction of significant impacts, and comparative merits.

In summary, the five alternatives evaluated in Section 6.4 were developed to avoid or lessen the significant environmental impacts of the proposed project as identified in this EIR and explained above. The alternatives address the significant impacts identified in the environmental analysis presented in Chapter 4.

6.3.2 Alternatives Considered But Rejected

6.3.2.1 City Stadium Reconstruction EIR Project and Alternatives

The City of San Diego (City) considered a proposed project and numerous alternatives for the reuse of the project site (see City's Stadium Reconstruction EIR, SCH No. 2015061061, City of San Diego 2015). The City's proposed project was to construct a new multipurpose sports stadium with a permanent seating capacity of up to 68,000 seats, expanding to approximately 72,000 seats for special events, and capable of hosting professional football games, other professional and amateur sports, entertainment, cultural, and commercial events. Under the City's proposed project, the existing stadium would have been demolished subsequent to construction of the new stadium to avoid displacing stadium events for up to 2 years during construction, including the football games of the Chargers, SDSU, and bowl games. The City's proposed project also would have constructed associated hardscape and landscape improvements throughout the project site.

In that same EIR (SCH No. 2015061061), the City evaluated project alternatives. All such alternatives centered on a new stadium for the National Football League (NFL) San Diego Chargers. For example, the City's EIR, though not certified, considered and rejected the following three alternatives on the project site during its EIR scoping process: (1) using the stadium site for a regional park, (2) expanding the San Diego River Park, (3) constructing a parking structure to accommodate stadium event parking, and (4) demolishing the existing stadium prior to construction of a new stadium. The two park alternatives were considered but rejected as infeasible because they did not meet any of the City's project objectives. The parking structure option was considered, but rejected as infeasible because it resulted in greater access/egress and parking impacts than the City's proposed project or any of the alternatives. Demolishing the existing stadium prior to construction of a new stadium was also considered but rejected as infeasible because it would have displaced all stadium events for the up to 2 years during the construction phase of the proposed project.

Further, the City 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. The two downtown alternative site locations were rejected primarily because they would result in inadequate parking, would require zoning and other discretionary entitlements, and could not be acquired or controlled by the City in the time frame needed to provide a stadium in time for identified football seasons. In addition to the above-identified alternatives, the City considered but rejected No Project Alternatives and other stadium site locations within the existing stadium site.

6.3.2.2 Other Alternatives Considered but Rejected

The CSU considered and likewise rejected applicable alternatives in the City's Stadium Reconstruction EIR (SCH No. 2015061061, City of San Diego 2015), and it considered and rejected other additional alternatives described in Sections 6.3.2.3 through 6.3.2.5, below.

6.3.2.3 NFL Stadium Alternative

The CSU considered a NFL Stadium Alternative. The alternative would include construction of a football stadium to accommodate a NFL team on the stadium site. The NFL Stadium Alternative was considered, but ultimately rejected as infeasible because it would not eliminate or reduce any project impacts. Further, SDMC Section 22.0908 requires that the sale provide for "(1) A new Joint Use Stadium for SDSU Division 1 collegiate football and other Potential Sports Partners including but not limited to professional, premier, or MLS soccer and *adaptable for the NFL"* (italics *added*). This alternative assumed a minimum of a 50,000-capacity stadium constructed on the project site of the proposed Stadium. In addition, this alternative assumed that the proposed tailgate park/multipurpose recreation site west of the stadium would be constructed as a parking garage to accommodate additional stadium capacity.

As explained in Section 4.10, Land Use and Planning, the proposed project Stadium site is approximately 15 acres and includes a large concourse area designed to be expandable to accommodate an NFL stadium. Accordingly, the proposed project was determined to be consistent with the requirements of SDMC Section 22.0908(c)(1).

Because the remaining uses, including hotel, residential, campus, and parks and open spaces would be the same under this alternative, impacts would be the same or similar as the proposed project. Impacts related to land use and planning, and population and housing would be the same as the proposed project. Physical impacts associated with the development footprint to biological resources, cultural resources, paleontological resources, and tribal cultural resources also would be the same as the proposed project. However, due to the size of an NFL stadium,

which is anticipated to seat 50,000 spectators, a number of impacts would be greater than those of the proposed project. These impacts include the following.

1. Construction-related air quality, energy, GHG emissions, and noise impacts would be greater than the proposed project due to the larger size of the stadium; therefore, additional construction duration would be required, as compared to the proposed project.
2. Operational-impacts (including air quality, energy, GHG emissions, noise, and traffic impacts related to an increase in vehicle trips coming to a larger stadium) would be greater than the proposed project. While the overall number of average daily vehicle trips to the project site would be limited by the number of parking spaces, the conversion of the Tailgate Park/multipurpose recreation site west of the stadium site to a parking garage to accommodate additional stadium capacity would generate an increase in the total number of vehicle trips to the project site during major events. This would result in greater daily air emissions, energy usage, GHG emissions, greater traffic-related noise, and higher traffic levels and impacts to the surrounding roadway network.
3. Utility impacts under the NFL Stadium Alternative would be similar compared to the proposed project; however, the increase in stadium capacity would require additional water usage and sewer capacity. Therefore, demand for these utilities would be greater as compared to the proposed project.
4. While impacts related to aesthetics and visual resources would be similar compared to the proposed project, the larger NFL stadium would represent additional changes in visual resources as compared to the proposed project.
5. Impacts related to potential bird-strikes due to vertical construction would be similar compared to the proposed project; however, the larger size of the NFL stadium may increase this impact as compared to the proposed project's smaller Stadium.
6. Impacts related to an increase in demand for parks and recreation facilities, both at the project and cumulative level would be similar to the proposed project; however, the impacts would be greater due to the conversion of the Tailgate Park/multipurpose recreation site west of the stadium site to a parking garage to accommodate the parking requirements of a larger stadium.

The NFL Stadium Alternative would achieve some but not all of the project objectives. Specifically, the NFL Stadium Alternative would be inconsistent with Objective 5 that calls for a 35,000-capacity stadium that is ready to open by 2022. 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.

6.3.2.4 All Park Alternative

During CSU's EIR Notice of Preparation, comments were received suggesting the entire project site be developed as a park and include the restoration of the adjacent Murphy Canyon Creek. Under the All Park Alternative, the existing SDCCU Stadium would be demolished, similar to the proposed project, and the project site would be graded to accommodate various parks, recreation, and open space uses. Under this alternative, there would be no housing, hotel, mixed-use campus, research park, retail, or stadium uses; rather, the entire project site would be converted to parks, recreation, and open space including passive and active open space uses.

Overall, impacts under the All Park Alternative would be reduced compared to the proposed project. Specifically, grading and land development-related construction activities would be somewhat less compared to the proposed project in terms of earth moving and potential import of soil to raise portions of the project site out of the floodplain. Overall construction-related impacts would generally be reduced due to the absence of developing buildings on the project site; however, demolition of the existing uses would result in the same impacts as the proposed project and extensive grading would be required to construct a regional park on this site. This would reduce construction-related impacts to air quality, energy, GHG emissions, and noise.

Physical impacts would be similar to the proposed project because most of the project site would be disturbed through demolition of existing buildings and construction of park facilities under the All Park Alternative. Specifically, physical impacts to biological resources, cultural resources (including historic resources), geology and soils (including paleontological resources), and tribal cultural resources, would be similar compared to the proposed project.

Operational impacts under this alternative would be reduced compared to the proposed project. Under the All Park Alternative, the number of daily trips to the project site would be significantly reduced compared to the proposed project. Accordingly, operational impacts related to air quality, energy, GHG emissions, noise, and traffic would be reduced. Similarly, the All Park Alternative would reduce demand for sewer and water, natural gas, electricity, and telecommunications facilities; as well as for school, library, police, fire and emergency services, and parks and recreational services. Therefore, impacts to public services and recreation and utilities and utility systems would be reduced compared to the proposed project. Impacts to hazards and hazardous materials, hydrology and water quality, and wildfire would be reduced compared to the proposed project because the project site would not introduce new residents into the project area and instead would convert the project site to a large, landscaped park.

The All Park Alternative would be consistent with the adopted 1984 Mission Valley Community Plan, which identified the project site for park and recreation and commercial recreation land uses; however, this alternative would be inconsistent with the Final Draft of the Mission Valley Community Plan, as well as SDMC Section 22.0908. Therefore, this alternative would be inconsistent with the City's current planning efforts.

While the All Park Alternative would not provide any residential uses, and therefore, there would be no impacts to population and housing, this alternative would not facilitate the provision of housing, including affordable housing, and would hinder efforts by the City to achieve its Regional Housing Needs Assessment (RHNA) goals. Similarly, the All Park Alternative would preclude transit-oriented development in a recognized Transit Priority Area (TPA), which would impede efforts to achieve state-mandated GHG reductions through the construction of transit-oriented development in an area already served by a trolley line with plans for additional transit service (i.e., MTS Trolley Green Line and future Trolley Purple Line).

The All Park Alternative is considered feasible because there is nothing precluding development of the project site as a regional park; however, the cost associated with such a project would be significant, and the future use as a

regional park would not cover the expected costs of demolishing the existing SDCCU Stadium and the extensive grading and landscaping required to develop a large-scale regional park. To finance such a project, a bond measure may be put on a future ballot for the residents of the City of San Diego to vote on; or fundraising or other financing measures including sale(s) of other City-owned property or a significant increase in parks development impact fees may be required to fund these improvements.

The All Park Alternative would not meet the project objectives or achieve the objectives to the same degree as the proposed project. Specifically, the All Park Alternative would not achieve the underlying purpose of the proposed project because it would not implement a SDSU Mission Valley campus, including a new Stadium, faculty/staff/student residences and homes, academic/office/innovative uses, hotel rooms, and commercial/retail uses to support SDSU's academic, educational and cultural mission through the demolition and redevelopment of the existing SDCCU Stadium.

Further, the All Park Alternative would not enable the CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate increasing demand for higher education within a vibrant SDSU Mission Valley campus, innovative research center, and Stadium venue (Objective 1); establish a sustainable, walkable, and transit-oriented SDSU Mission Valley campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development (Objective 4); create a new 35,000-capacity Stadium in time for the 2022 collegiate football season (Objective 5); provide an SDSU Mission Valley campus with up to approximately 1.6 million square feet for academic, office, research and development and technology transfer uses (Objective 6); enhance transit ridership and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line (Objective 8); provide up to 4,600 residences with a mix of housing, including student, faculty, staff, workforce, and affordable housing near a vibrant university village atmosphere and in proximity to trolley and other public transportation uses to reduce reliance on automobiles (Objective 9); provide neighborhood-serving retail uses (Objective 10); provide hotel/hospitality services (Objective 11); provide employment opportunities (Objective 12); encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships (Objective 13); create a "sense of place" with a campus open space system and an "outdoor space" forming a campus landscape (Objective 16); and generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the benefit of the SDSU Mission Valley campus and the San Diego region (Objective 18).

The All Park Alternative would provide for a River Park and other shared parks and open space (Objective 2); demolish the existing SDCCU Stadium (Objective 7); and may facilitate Objective 15 (reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic design elements) and Objective 17 (bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space); however, it would not meet these Objectives to the same degree as the proposed project.

Because the All Park Alternative 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.

6.3.2.5 "Single Channel" Murphy Canyon Creek Alternative

The CSU received comments expressing interest in 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 is 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). The remaining vertical improvements would remain largely unchanged; however, 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.

Overall, impacts under the "Single Channel" Murphy Canyon Creek Alternative would be similar to the proposed project as similar construction and operational uses would be developed. Specifically, physical impacts would be similar to the proposed project because the project site would maintain the same intensity of development as contemplated by the proposed project. Impacts to biological resources, cultural resources (including historic resources), geology and soils, including paleontological resources, and tribal cultural resources, would be similar compared to the proposed project.

Operational impacts under this alternative would be similar compared to the proposed project. Under the "Single Channel" Murphy Canyon Creek Alternative, the number of daily trips to the project site would be similar to the proposed project. Accordingly, operational impacts related to air quality, energy, GHG emissions, noise, and traffic would be similar to the proposed project. Similarly, the "Single Channel" Murphy Canyon Creek Alternative would have similar demand for sewer and water, natural gas, electricity and telecommunications facilities; as well as for school, library, police, fire and emergency services and parks and recreational services as the proposed project. Therefore, impacts to public services and recreation and utilities and utility systems would be similar to the proposed project. Impacts to hazards and hazardous materials, hydrology and water quality, and wildfire would also be similar to the proposed project.

As with the proposed project, the "Single Channel" Murphy Canyon Creek Alternative would be consistent with the proposed draft Final Mission Valley Community Plan Update; however, as described below, 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 within the 7-year time frame in SDMC Section 22.0908. Overall, impacts to land use and planning and population and housing would be similar to the proposed project.

The "Single Channel" Murphy Canyon Creek Alternative would be largely similar to the proposed project with the above-noted exceptions to the configuration of the eastern half of the project and the alignment of the southeastern access road (i.e., the extension of Rancho Mission Road) (see Figure 6-1A).

However, the "Single Channel" Murphy Canyon Creek Alternative is considered infeasible because the flooding of the project site is the result of floodwaters both from flooding that occurs north of the project site due to an undersized culvert, as shown in Figure 6-1B and 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 Kinder Morgan Mission Valley Terminal. At this point, floodwaters surface drain through the Kinder Morgan site, cross San Diego Mission Road, and continue to surface flow onto the project site as shown in Figure 6-1B. CSU lacks site control necessary to make the off-site improvements needed to address the undersized culvert situation 3,000 feet north of the project site; therefore, floodwaters would necessarily continue to enter the project site through the Kinder Morgan property.

The proposed project has accommodated this flooding through the provision of open space which drains into the River Park area and ultimately into the San Diego River. However, creating a "single channel" to accommodate these flows would require widening Murphy Canyon Creek from the Kinder Morgan property, including upsizing an

existing culvert, to where floodwaters enter the project site and then diverting Murphy Canyon Creek to the southwest through the project site, roughly along the alignment of the River Park within the proposed project. Further, this alternative would cause the need to relocate existing infrastructure for the MTS Trolley, and to reinforce existing trolley abutments to withstand floodwaters (see Figure 6-1A).

Other reasons for rejecting this alternative as infeasible are that the various permits that would be required to impact and widen Murphy Canyon Creek to this extent, including permits from the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife for impacts to wetlands and waters of the United States. While it is feasible to secure such permits, doing so without control of the property to the north is not reasonably and foreseeably accomplished in a successful manner within a reasonable period given the requirement in SDMC Section 22.0908 to complete construction of the Stadium and River Park within 7 years of execution of the Purchase and Sale Agreement, taking into account economic, environmental, social, and technological factors (see CEQA Section 21061.1 and Guideline 15364). The proposed project, in contrast, would not require any federal or state permitting for Murphy Canyon Creek because there are no project improvements, features, or facilities (ie, impacts) proposed within Murphy Canyon Creek. Project permits for other wetlands impacts are not anticipated to preclude construction of the River Park within 7 years.

Additional permitting would be required due to the location of a fuel line that runs north/south along the eastern edge of the project site, just west of Murphy Canyon Creek. The fuel line from the Kinder Morgan Mission Valley Terminal, northeast of the project site, turns east approximately 250 feet north of Rancho Mission Road and exits the project site. Relocating this fuel line for approximately 1,350 feet would require permits and approvals outside the discretion of the CSU. Potential temporary disruption of this fuel line, which serves as a major supply to the downtown San Diego and San Diego Port areas, would also risk disruptions to a major natural resource that supports the region's economy. These permits and approvals also require several years of planning and approval processes; and no such permits/approvals could be obtained in the time required to construct a fully operational Stadium prior to the 2022 football season (Objective 5). Moreover, the proposed project does not require the need to relocate the fuel line because, as stated, the project has no impact on Murphy Canyon Creek. The proposed project would accommodate the 100-year storm event by conveying any overflow in a more natural flow pattern, allowing for the flooding waters to permeate the natural fields and delivering cleaner water to the San Diego River.

6.3.2.6 Existing SDSU Campus Alternative Project Location Alternative

An off-site alternative to develop the entire proposed project on the existing SDSU campus was considered. Under this alternative, a new Stadium with a capacity of 35,000, 4,600 residences, 1.565 million square feet of office, and 95,000 square feet of commercial/retail would be constructed on the existing SDSU campus site. Due to existing site constraints on the SDSU campus, no parks, recreation and open space would be built. This alternative was rejected 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. This alternative would also preclude implementation of several of the project objectives, including the provision for parks, recreation, and open space.

6.4 Alternatives Analysis

The alternatives evaluated in Sections 6.4.1 through 6.4.5 below, were developed to avoid or lessen the significant environmental impacts of the proposed project as identified in this EIR. The alternatives address the significant impacts identified in the environmental analysis presented in Chapters 4-1 through 4-18, This analysis of

alternatives focuses on the proposed project's effects found to be significant, and provides a comparison analysis of the alternative's effects to the proposed project, as shown in Table 6-1. In addition, the following analysis also provides a qualitative comparison of those environmental effects of the proposed project that were determined to be less than significant.

6.4.1 No Project Alternative

Description of the No Project Alternative

The No Project Alternative considers the effects of forgoing the proposed project entirely, and leaving the project site in its current condition. Under the No Project Alternative, the proposed project would not be approved and the existing 71,500-seat multipurpose stadium, 18,870-space surface parking lot, and San Diego Trolley Station would remain as shown in Figure 6-2, No Project Alternative. The No Project Alternative allows decision makers to compare the impacts of the proposed project to retaining the existing condition of the project site. The No Project Alternative describes the environmental conditions that existed at the time that the environmental analysis commenced when the Notice of Preparation was released on January 18, 2019 (CEQA Guidelines, Section 15126.6 (e)(2)). The difference between the proposed project and the No Project Alternative is immaterial when the latter assumes development pursuant to existing planning documents. Therefore, only the potential of forgoing the proposed project completely is considered under analysis of the No Project Alternative.

Comparison of Impacts to the Proposed Project

The No Project Alternative would produce no changes on the project site, because the project site would remain in its current condition, effectively eliminating those project impacts discussed in this EIR. There would be no change to aesthetics related to conflicting with applicable zoning that governs scenic quality or an increase in light or glare under the No Project Alternative. There would be no air or GHG emissions associated with project construction and operation; and the No Project Alternative would not increase emissions of volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter 2.5 microns in diameter or less ($PM_{2.5}$), or particulate matter 10 microns in diameter or less (PM_{10}). There would be no land disturbance so there would be no impacts to biological or cultural resources, and no mitigation would be required. Under the No Project Alternative, no buildings or structures would be constructed, nor would the existing SDCCU Stadium or parking lot be removed; therefore, no impacts related to geologic hazards or hazards and hazardous materials would not occur. No temporary or permanent ambient noise or groundborne vibration impacts would occur due to demolition or construction activities under the No Project Alternative. No new housing would be constructed; therefore, no population-inducing impacts would occur. Because there would be no change in the existing conditions, there would be no increase in the number of vehicles accessing the project site and on area roadways and intersections, or increase in demand for public utilities or services and adequate emergency access would be available on area roadways. Lastly, wildfire hazards would not change under this alternative.

Evaluation of Significant Impacts

Under the No Project Alternative, there would be no development on the proposed project site. The existing 71,500-seat multipurpose stadium, 18,870-space surface parking lot, and San Diego Trolley Station would remain. As outlined below, this alternative would generally avoid potentially significant impacts associated with construction and operation of the proposed project. However, this alternative would not alleviate the deficit in student amenities in the proposed project vicinity or reduce the demand for a mix of housing in the neighborhoods surrounding the campus. Additionally, this objective would not meet the objectives of the proposed project.

Aesthetics and Visual Quality

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a TPA shall not be considered significant impacts on the environment." The proposed project includes residential and employment opportunities, is located on an infill site and within a TPA, as identified by the City of San Diego (City of San Diego 2019). As such, any aesthetics impact the proposed project may produce cannot be considered a significant impact on the environment. In addition, as demonstrated in Section 4.1.4, construction and operation of the proposed project would not result in significant impacts to existing views, and visual quality and character, or conflict with the underlying zoning and other regulations governing scenic quality, or increase in light and glare affecting day or nighttime views of the project site. Therefore, it was determined that the proposed project would not result in significant impacts to scenic views or vistas, scenic resources within a state highway, and scenic quality, or create new sources of substantial light and glare.

Under the No Project Alternative, there would be no demolition, construction, or operational activities; therefore, no additional potentially significant aesthetic impacts would occur. Because the No Project alternative would not alter the visual character or quality of the project site, there would be no impacts to aesthetics or visual quality compared to the proposed project.

Air Quality and Greenhouse Gas Emissions

Construction and operational activities associated with the proposed project would result in an increase in the emission of criteria pollutants and GHGs. Impacts related to project emissions of VOC, NO_X, CO, $PM_{2.5}$, and PM_{10} would remain significant and unavoidable based on a comparison of the proposed project's construction and operational emissions to the San Diego County Air Pollution Control District (SDAPCD) thresholds. Further, the proposed project would result in significant, unavoidable impacts regarding conformity with the applicable air quality plan. The proposed project was determined not to result in significant impacts related to GHG emissions.

Under the No Project Alternative, there would be no demolition activities or construction of additional buildings, or change in existing uses and emissions on site. Thus, no potentially significant impacts relating to air quality and GHG emissions would occur. However, the No Project Alternative would be inconsistent with the City of San Diego Climate Action Plan (CAP) because it would not provide for development within a designated transit priority area and would hinder the City's efforts to reduce GHG emissions in the near-term. Because there would be no construction or operational emissions beyond those under existing conditions for the No Project Alternative, impacts to air quality and GHG emissions would be reduced compared to the proposed project.

Biological Resources

The proposed project would result in significant impacts to special-status wildlife species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat without mitigation. Proposed mitigation measures would reduce the potential for direct and indirect impacts on special-status plant and wildlife species, sensitive natural communities, jurisdictional waters, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible and compensatory mitigation provided to address significant impacts. Impacts to biological resources would be reduced to less than significant.

Under the No Project Alternative, there would be no site disturbance or alteration of existing structures on site; therefore, no potentially significant impacts to biological resources would result. Impacts to biological resources would be reduced compared to the proposed project.

Cultural and Tribal Cultural Resources

The proposed project would contribute to potentially significant impacts to cultural resources, including significant and unavoidable impacts to historic resources as a result of the demolition of SDCCU Stadium. Impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation.

Under the No Project Alternative, the existing SDCCU Stadium would not be demolished, and there would be no development or ground-disturbing activities. Therefore, there would be no potentially significant impacts to cultural resources. Impacts would be reduced compared to the proposed project, and the significant and unavoidable impacts to historical resources (SDCCU Stadium) would be avoided. Overall impacts to cultural and tribal cultural resources would be reduced compared to the proposed project.

Energy

The proposed project would result in less-than-significant impacts related to use of energy resources because the proposed project would not engage in wasteful or unnecessary energy usage, and all new buildings would be designed to meet current energy conservation building code requirements.

Because the No Project Alternative would not involve any development, demolition, or construction, it would not consume additional energy, and no impact to energy resources would occur. The existing SDCCU Stadium would continue to operate with outdated and inefficient electrical equipment compared to a new Stadium constructed to meet current building code requirements. Overall, impacts to energy would be reduced compared to the proposed project.

Geology/Soils

The proposed project would result in potentially significant impacts to geology and soils. These impacts are related to liquefiable, corrosive, and unstable soils, and the potential for paleontological resources to be present. Mitigation measures are identified to ensure impacts to geology and soils, including paleontological resources, associated with implementation of the proposed project would be fully mitigated to less-than-significant levels.

Under the No Project Alternative, because there would be no development of additional buildings or soil disturbance associated with construction, no potentially significant impacts would arise regarding geology, soils, and paleontological resources. Impacts would be reduced compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would result in impacts related to the routine transport or disposal of hazardous materials due to the potential to encounter asbestos, asbestos containing material (ACM), lead based paints (LBP), and polychlorinated biphenyl (PCBs) during the demolition process. Furthermore, the proposed project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of contaminated soil. Other significant impacts include impacts from existing groundwater monitoring and remediation wells on the project site, potential to expose future residential buildings to cumulative carcinogenic risks, and potential exceedances of applicable Federal Aviation Administration (FAA) regulations and safety hazards. Compliance with mitigation measures would reduce identified impacts to less than significant.

The No Project Alternative would not result in any impacts related to hazards and hazardous materials because it would not modify the project site through demolition, construction, or operational activities, nor introduce a new population to the project site. Impacts would be reduced compared to the proposed project.

Hydrology and Water Quality

Design of the proposed project considered the hydrology of the project site and the need to accommodate future flooding of portions of the project site while providing for water quality treatment in compliance with all requirements, including implementation of the City's Municipal Separate Storm Sewer System (MS4) permit requirements and National Pollutant Discharge Elimination System (NPDES) permit requirements. The proposed project also converts approximately half of the project site from an impervious parking lot area into park, recreation, and open space areas, which would reduce the amount of impervious area and runoff. With the inclusion of drainage and stormwater treatment improvements, the proposed project would result in less-than-significant impacts related to hydrology and water quality.

Although the project site is located within the Murphy Canyon Creek floodplain, the No Project Alternative would not alter the project site through demolition, construction, or operational activities; therefore, this alternative would not result in any changes to the existing hydrology on site or create a risk for people or property on the project site from flooding. However, the No Project Alternative would not provide for any type of water quality treatment and would keep the existing, impervious surface parking lot, which would increase the amount of stormwater runoff compared to the proposed project. Therefore, impacts to hydrology and water quality would be somewhat greater compared to the proposed project.

Land Use and Planning

Impacts related to land use and planning would be less than significant because the proposed project would not physically divide an established community or result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As analyzed in Section 4.10, the proposed project would be consistent with SDMC Section 22.0908 and not conflict with the draft Final Mission Valley Community Plan Update, the San Diego River Park Master Plan, or the City's CAP.

The No Project Alternative would not affect land use and planning because no development would occur on the project site and the current land uses are consistent with the City's existing land use and zoning regulations. However, the No Project Alternative would be inconsistent with the City's current planning efforts, including the draft Final Mission Valley Community Plan Update and San Diego River Master Plan, which call for development of the project site with a variety of land uses similar to the proposed project. Similarly, the No Project Alternative would not be consistent with the City's CAP, which establishes TPAs, such as the project site, and directs that development of these sites to include a mix of land uses at densities and intensities that support adjacent transit. The No Project Alternative would be inconsistent with these recent planning efforts and SDMC 22.0908, therefore, impacts to land use and planning would be greater compared to the proposed project.

Mineral Resources

The proposed project would not impact mineral resources because the project site does not contain known mineral resources 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.

The No Project Alternative would not involve any construction or operational activities on the project site. Therefore, no impacts to mineral resources would result under the No Project Alternative; and future extraction of potential

resources would not be precluded to the same extent as the proposed project. Therefore, impacts to mineral resources would be reduced compared to the proposed project.

Noise

The proposed project would result in significant impacts related to an increase in short-term temporary and long-term ambient noise levels and generation of groundborne vibration due to short-term construction activities, long-term increase in operational traffic, and nighttime events at the future stadium. Noise impacts would be mitigated to a less-than-significant level with the exception of noise from nighttime construction activities, off-site roadway and utility improvements, and permanent operation-related noise impacts at the nearest noise sensitive land uses to the northwest of the project site.

The No Project Alternative would not result in noise or vibration impacts because no construction or operational activities would occur on the project site beyond existing conditions. Thus, impacts associated with noise would be reduced compared to the proposed project.

Population and Housing

The proposed project would result in growth due to an increase in future residents and employees. On a cumulative level, the proposed project, in conjunction with other proposed residential and mixed-use projects in Mission Valley, would result in a significant increase in the amount of growth anticipated in the Mission Valley area by both the San Diego Association of Governments (SANDAG) and draft Final Mission Valley Community Plan Update. Therefore, the proposed project would result in a cumulatively considerable impact to population and housing that would be considered significant and unavoidable.

The No Project Alternative would not induce population growth and would not impact housing or divide an existing community. Therefore, under this alternative, no impacts to population and housing would occur. However, the No Project Alternative would hinder the City's attainment of its share of the RHNA because it would preclude development of 4,600 units planned for in the draft Final Mission Valley Community Plan Update. Overall, impacts would be reduced compared to the proposed project.

Public Services and Recreation

Direct impacts to public services and recreation associated with project implementation would be less than significant with mitigation. However, without mitigation, cumulative impacts related to increased demand for fire and emergency medical services, and schools would be considered significant. Identified mitigation would reduce the proposed project's cumulative impacts to schools; however, cumulative impacts to fire and emergency medical services would remain significant and unavoidable.

The No Project Alternative would not result in any construction or operational activities; therefore, the alternative would not contribute to an increase in demand for public services or recreational facilities. The No Project Alternative would not provide for the same level of parks and recreation uses as the proposed project (i.e., over 80 acres of parks, recreation, and open space); thus, the existing parks deficiency in the Mission Valley and Navajo community planning areas would be greater when compared to the proposed project. Overall, impacts to public services and recreation under the No Project Alternative would be reduced compared to the proposed project.

Transportation

The proposed project would result in significant traffic impacts at local intersections, roadway segments, and freeway segments by increasing in traffic in the project vicinity. Compliance with mitigation measures would reduce transportation impacts; however, because certain identified mitigation measures are outside the control of the CSU to implement, **Impacts TR-1 through TR-32** would remain significant and unavoidable.

The No Project Alternative would not result in significant transportation impacts because it would not result in any construction or operational activities on site that would generate an increase in traffic or changes to the transportation system. Impacts would be reduced compared to the proposed project.

Utilities and Service Systems

Significant impacts would result from off-site infrastructure improvements and generation of significant amounts of construction waste by the proposed project. Construction of off-site utilities would result in noise impacts that would remain significant and unavoidable with implementation of identified mitigation measures.

The No Project Alternative would result in no development or operational activities; therefore, it would not result in impacts to utilities and service systems. Impacts would be reduced compared to the proposed project.

Wildfire

The very northern and southern portions of the project site are located within Very High Fire Hazard Severity Zones (VHFHSZ) as mapped by the California Department of Forestry and Fire Protection (CAL FIRE) and the San Diego Fire-Rescue Department (SDFD). It was determined that the proposed project would result in significant impacts related to emergency response, emergency call volumes, and on-site evacuation, and that the proposed project could exacerbate wildfire risks. Proposed mitigation measures would reduce these impacts to less than significant.

The No Project Alternative would not alter the project site or result in any operational activities on the project site. The project site would still be within the VHFHSZ as mapped by CAL FIRE and be required to comply with all applicable requirements under any future development scenario. No impacts related to wildfire hazards would occur under the No Project Alternative as the alternative would not introduce any new buildings to the project site. Impacts would be reduced compared to the proposed project.

Relationship to Project Objectives

The No Project Alternative would not achieve any of the project objectives. Specifically, the No Project Alternative would not enable the CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate increasing demand for higher education within a vibrant SDSU Mission Valley campus, innovative research center, and stadium venue (Objective 1); establish a sustainable, walkable, and transit-oriented SDSU Mission Valley campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development (Objective 4); create a new 35,000-capacity stadium (Objective 5); provide an SDSU Mission Valley campus with up to 1.6 million square feet for academic, office, research and development and technology transfer uses (Objective 6); enhance transit ridership and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line (Objective 8); provide up to 4,600 residences with a mix of housing, including student, faculty, staff, workforce, and affordable housing near a vibrant university village atmosphere and in proximity to trolley and other public transportation uses to reduce reliance on

automobiles (Objective 9); provide neighborhood-serving retail uses (Objective 10); provide hotel/hospitality services (Objective 11); provide employment opportunities (Objective 12); encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships (Objective 13); and generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the new SDSU Mission Valley campus and the San Diego region (Objective 18).

Further, the No Project Alternative would not provide for a River Park and other shared parks and open space (Objective 2); demolish the existing SDCCU Stadium (Objective 7); reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic design elements (Objective 15); create a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape (Objective 16); or bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space (Objective 17).

Feasibility

The No Project Alternative would not develop the project site, leaving it in its current condition as an underutilized Stadium and parking lot. Though this is feasible, it would not achieve any of the project objectives, including allowing the CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate a growing higher education student body for the benefit of San Diego and the region. This alternative would also not implement SDMC Section 22.0908, adopted by San Diego voters, nor would it contribute towards achieving RHNA goals for the City of San Diego. Similarly, the No Project Alternative would preclude a transit-oriented campus development in a recognized transit priority area, which would frustrate efforts to achieve state-mandated GHG reductions through construction of such development in an area already served by a trolley line with plans for additional transit service (i.e., the MTS Trolley Green Line and future Trolley Purple Line.

6.4.2 Stadium Re-Use Alternative

Description of the Stadium Re-Use Alternative

The Stadium Re-Use Alternative involves retaining the existing SDCCU Stadium and restoring it to its original design, as constructed in the late 1960s. The alternative would forgo construction of a new 35,000-capacity multipurpose Stadium and concourse on the project site. All other project components, including campus uses, campus residential, campus hospitality, retail space, trolley/transit opportunities, and associated infrastructure, utilities, facilities, and other amenities, would be constructed under this alternative to achieve similar land uses and intensities as the proposed project as shown in Figure 6-3, Stadium Re-use Alternative. Because the existing SDCCU Stadium would remain, proposed uses on the project site would be reconfigured and may require a reduction in the amount of parkland, with the Stadium being located in the center of the project site instead of the northwestern portion. This alternative would reduce impacts related to demolition of the existing SDCCU Stadium and construction of a new Stadium, but result in similar impacts overall, and would increase event-related impacts due to the larger seating capacity of the Stadium compared to the proposed project.

Comparison of Impacts to the Proposed Project

The Stadium Re-Use Alternative would produce similar changes to the project site as the proposed project, with the exception of constructing a new Stadium and demolishing the existing SDCCU Stadium. Construction and

operational activities under this alternative would result in criteria air pollutant and GHG emissions, though these emissions would be reduced without construction of a new Stadium. Impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat would still occur under this alternative. As this alternative would occur on the same site, significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources would still occur. Impacts related to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process would occur under this alternative because, while the existing SDCCU Stadium would not be demolished, it would experience significant upgrades which have the potential to encounter these materials. Similar to the proposed project, this alternative would also result in impacts related to the routine transport or disposal of contaminated soil and impacts from existing groundwater monitoring and remediation wells on the project site, potential to expose future residential buildings to cumulative carcinogenic risks, and potential exceedances of applicable FAA regulations. This alternative would result in reduced impacts related to ambient noise levels and groundborne vibration generated during demolition of the existing SDCCU Stadium, but would still result in temporary noise impacts associated with construction activities. The Stadium Re-Use Alternative would result in growth due to the future residents and employees that would result from the proposed project. This alternative would still result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project area. Additionally, significant impacts would result from off-site infrastructure improvements.

Evaluation of Significant Impacts

Under the Stadium Re-Use Alternative, the SDCCU Stadium would be restored to the original configuration of approximately 51,500 seats, and proposed project campus land uses would be re-configured around the existing SDCCU Stadium to achieve similar land uses and intensities as the proposed project. As outlined below, this alternative would avoid potentially significant impacts associated with demolition of the existing SDCCU Stadium and construction of the new Stadium (i.e., impacts to historic resources), but would require significant additional amounts of imported fill to raise the building pads above the 100 year flood plain, and would otherwise result in similar or potentially greater impacts as the proposed project.

Aesthetics and Visual Quality

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered significant impacts on the environment." The proposed project includes residential and employment opportunities; it is located on an infill site and within a TPA as identified by the City of San Diego (City of San Diego 2019). As such, any aesthetics impacts the proposed project may produce cannot be considered a significant impact on the environment. In addition and as demonstrated in Section 4.1.4, construction and operation of the proposed project would not result in significant impacts to existing views, visual quality and character, or substantial conflicts with zoning and other regulations governing scenic quality. Therefore, it was determined that the proposed project would not result in significant impacts to scenic views or vistas, scenic resources within a state highway, and scenic quality, or create new sources of substantial light and glare.

The Stadium Re-Use Alternative would result in similar land uses and development intensities the proposed project. Therefore, the exemption for projects within a TPA would still apply, and no potentially significant aesthetics impacts would occur under the Stadium Re-Use Alternative. However, due to the size of SDCCU Stadium and relatively inefficient land plan that would result from designing around an existing use, the remaining vertical improvements would be necessarily at a greater scale of development, predominately in the form of taller buildings, in order to achieve similar density and intensity of development. As a result, and due to the size of the existing SDCCU Stadium, impacts to aesthetics and visual quality would be greater compared to the proposed project.

Air Quality and Greenhouse Gas Emissions

Construction and operational activities associated with the proposed project would result in an increase in the emission of criteria pollutants and GHGs. Impacts related to project emissions of VOC, NO_X, CO, $PM_{2.5}$, and PM_{10} would remain significant and unavoidable based on a comparison of the proposed project's construction and operational emissions to the SDAPCD thresholds. Further, the proposed project would result in significant, unavoidable impacts regarding conformity with the applicable air quality plan. The proposed project was determined not to result in significant impacts related to GHG emissions.

Under the Stadium Re-Use Alternative, the existing SDCCU Stadium would not be demolished, and the new Stadium would not be constructed. Therefore, air quality and GHGs emissions associated with construction of the new Stadium and Stadium demolition activities would not occur under the Stadium Re-Use Alternative. Significant, unavoidable impacts due to construction emissions would be reduced. However, the remainder of the project site would still be developed to achieve similar land uses and intensities as the proposed project. Additional imported fill material would also be required to raise the project site out of the floodplain, which may offset the construction-related emissions reduced by not demolishing the existing SDCCU Stadium and re-using the recycled material as base for a new Stadium. Further, the Stadium Re-use Alternative would result in more intense development to achieve similar levels of development compared to the proposed project due to the inefficient design that results from planning around SDCCU Stadium. Therefore, this alternative is likely to result in similar impacts, including significant and unavoidable impacts due to operational emissions and conformity with the applicable air quality plan, as the proposed project with regard to air quality. Impacts related to GHG would be similar due to similar operational uses compared to the proposed project.

Biological Resources

The proposed project would result in significant impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat. Proposed mitigation measures would reduce the potential for direct and indirect impacts on special-status plant and wildlife species, sensitive natural communities, jurisdictional waters, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible and compensatory mitigation provided to address significant impacts. Impacts to biological resources would be reduced to less than significant.

The Stadium Re-Use Alternative would result in similar impacts to biological resources as the proposed project. Temporary impacts during project construction would be slightly reduced under the Stadium Re-Use Alternative because no demolition of the existing SDCCU Stadium or construction of a new Stadium would occur. Operational impacts to biological resources, mostly in the form of bird strike impacts, would be increased compared to the proposed project due to the size of SDCCU Stadium and taller buildings that would occur to achieve similar intensity of development as the proposed project. Overall, impacts to biological resources would be similar compared to the proposed project.

Cultural and Tribal Cultural Resources

The proposed project would result in potentially significant impacts to cultural resources, including significant and unavoidable impacts to historic resources as a result of the demolition of SDCCU Stadium. Impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation measures.

Under the Stadium Re-use Alternative, significant, unavoidable impacts to historical resources associated with the demolition of SDCCU Stadium would be reduced to less than significant because this alternative would focus on restoring, not demolishing, SDCCU Stadium to its original configuration. SDCCU Stadium would remain oversized compared to the needs of SDSU. Other impacts to cultural resources, including impacts to archeological resources and human remains, would be similar to the proposed project and would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and tribal cultural resources would be reduced compared to the proposed project.

Energy

The proposed project would result in a less-than-significant impact related to use of energy resources because resulting energy use from implementation of the proposed project is not wasteful or unnecessary, and efficiencies are gained on a per-service population basis.

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. The remaining uses would be similar under the Stadium Re-use Alternative as the proposed project; thus, impacts to energy would be similar. Overall, impacts to energy would be slightly increased compared to the proposed project due to the increases stadium size and age of SDCCU Stadium.

Geology/Soils

Potentially significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources, associated with implementation of the proposed project would be fully mitigated to less-than-significant levels by mitigation measures outlined in Section 4.6.6 of this EIR.

Under the Stadium Re-Use Alternative, because development of the same project site would occur, these impacts would remain potentially significant, and the same mitigation measures would apply to reduce impacts to less-than-significant levels. Impacts to geology and soils, including paleontological resources, would be similar compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would result in impacts related to the routine transport or disposal of hazardous materials due to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process. Furthermore, the proposed project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of contaminated soil. Other significant impacts include impacts from existing groundwater monitoring and remediation wells on the project site, potential to expose future residential buildings to cumulative carcinogenic risks, and potential exceedances of applicable FAA regulations and safety hazards. Compliance with mitigation measures would reduce identified impacts to less than significant.

The Stadium Re-Use Alternative would result in similar impacts related to the potential to encounter asbestos, ACM, LBP, and PCBs because, even though demolition of the existing SDCCU Stadium would not occur, this alternative would require significant renovation activity would result in potential exposure to these materials. All other impacts related to hazards and hazardous materials would remain potentially significant under this alternative, and the

same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar compared to the proposed project.

Hydrology and Water Quality

The proposed project design considered the hydrology of the project site and was designed to accommodate the future flooding of portions of the project site while providing for water quality treatment in compliance with all requirements, including implementation of the MS4 permit requirements and NPDES permit requirements. The proposed project would convert approximately half of the project site from an impervious parking lot into parks, recreation and open space areas, which would reduce the amount of impervious area and runoff. As a result of implementing the proposed project design and drainage and stormwater treatment improvements, the proposed project would result in less-than-significant impacts related to hydrology and water quality.

The Stadium Re-Use Alternative would result in similar impacts to the proposed project. Because demolition and stadium construction activities would not occur, overall soil disturbance impacts may be reduced under this alternative for the stadium site; however, the remainder of the project site would be developed similar to the proposed project. To raise the remainder of the project site out of the floodplain, additional fill material may be required; however, the Stadium Re-use Alternative would be subject to the same permit requirements and would have similar water quality treatment features as the proposed project. Overall, impacts to hydrology and water quality would be similar compared to the proposed project.

Land Use and Planning

Impacts related to land use and planning would be less than significant because the proposed project would not divide an established community or result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As analyzed in Section 4.10, the proposed project would be consistent with SDMC Section 22.0908 and not conflict with the draft Final Mission Valley Community Plan Update, the San Diego River Park Master Plan, and the City's CAP.

The Stadium Re-Use Alternative would result in no new impacts to land use and planning because it would involve retaining the existing SDCCU Stadium and developing the project site to achieve similar land uses and intensities as the proposed project, which would not conflict with the draft Final Mission Valley Community Plan Update, the San Diego River Park Master Plan, and the City's CAP. However, the Stadium Re-use Alternative would conflict with SDMC Section 22.0908(j), which provides that "*Such sale shall result in the demolition, dismantling, and removal of the Existing Stadium and construction of a new Joint Use Stadium*" (emphasis added). Accordingly, impacts to land use and planning would be slightly greater compared to the proposed project.

Mineral Resources

The proposed project would not impact mineral resources because the project site does not contain known mineral resources 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.

The Stadium Re-Use Alternative would result in similar impacts to mineral resources because this alternative would be constructed on the same project site. Impacts would be less than significant, similar to the proposed project.

Noise

The proposed project would result in significant impacts related to temporary and ambient noise levels and generation of groundborne vibration. Noise impacts would be mitigated to a less-than-significant level with the exception of noise from nighttime construction activities, off-site roadway and utility improvements, and permanent operation-related noise impacts at the nearest noise sensitive land uses to the northwest of the project site.

The Stadium Re-Use Alternative would result in similar impacts to the proposed project because it would develop similar land uses and intensities as the proposed project, with the exception of removal of the existing SDCCU Stadium and construction of a new Stadium. Noise and vibration impacts related to the location of the new Stadium and demolition of the existing SDCCU Stadium would be reduced under this alternative. Noise levels resulting from potentially larger stadium audiences would be greater; however, they would be located further from adjacent noise-sensitive land uses, and would be buffered by a larger, more enclose stadium configuration, similar to existing conditions. Overall, noise impacts would be reduced compared to the proposed project.

Population and Housing

The proposed project would result in growth due to the future residents and employees that would result from the project. At a cumulative level, the proposed project, in conjunction with other proposed residential and mixed-use projects, would result in a significant total of the projected growth anticipated in the Mission Valley area by both SANDAG and draft Final Mission Valley Community Plan Update estimates. Therefore, the proposed project would result in a cumulatively considerable impact to population and housing that would be significant and unavoidable.

The Stadium Re-Use Alternative would result in the same impacts, including a significant unavoidable cumulative impact, as the proposed project because it would involve development of similar land uses and intensities as the proposed project, minus the new Stadium, and would result in similar population increase. Impacts would be similar compared to the proposed project.

Public Services and Recreation

Direct impacts to public services and recreation would be less than significant with mitigation. However, cumulative impacts related to fire services, schools, emergency medical services, and recreation facilities would remain significant and unavoidable.

The Stadium Re-Use Alternative would result in similar impacts as the proposed project because it would involve development of similar land uses and intensities as the proposed project, minus the new Stadium and the potential for less parkland, but would result in similar population increase. Overall, impacts would generally be similar compared to the proposed project.

Transportation

The proposed project would result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project vicinity. Compliance with mitigation measures would reduce transportation impacts; however, because many of the identified mitigation measures are outside the control of the CSU to implement, **Impacts TR-1 through TR-32** would remain significant and unavoidable.

The Stadium Re-Use Alternative would result in similar impacts as the proposed project as it proposes development of similar land uses and intensities as the proposed project, with a slightly larger Stadium. None of the significant

and unavoidable impacts (**Impacts TR-1 through TR-32**) would be reduced or avoided, similar to the proposed project. Transportation impacts would be similar to the proposed project.

Utilities and Service Systems

Significant impacts would result from off-site infrastructure improvements and generation of significant amounts of construction waste by the proposed project. Construction of off-site utilities would result in noise impacts that would remain significant and unavoidable even with implementation of mitigation measures.

The Stadium Re-Use Alternative would result in similar impacts as the proposed project because it would develop similar land uses intensities as the proposed project and have similar demands for sewer, water, solid waste, and electrical and natural gas service . However, it would result in reduced impacts related to solid waste generation as the existing SDCCU Stadium would not be demolished and materials from this demolition would not have to be removed from the project site. Overall impacts would be similar as the proposed project.

Wildfire

The very northern and southern portions of the project site are located within VHFHSZs as mapped by CAL FIRE and the SDFD. It was determined that the proposed project would result in significant impacts related to emergency response, emergency call volumes, and on-site evacuation and that the project could exacerbate wildfire risks. Proposed mitigation measures would reduce these impacts to less than significant.

The Stadium Re-Use Alternative would result in similar impacts compared to the proposed project because it would be located on the same project site and develop similar land uses and intensities. Impacts to wildfire would be mitigated to less than significant, similar to the proposed project.

Relationship to Project Objectives

The Stadium Re-Use Alternative would not achieve Objective 5 (creating a new, 35,000-capacity multipurpose stadium as the "home" for SDSU football and other events within the desired time frame) and Objective 7 (demolishing existing stadium in accordance with SDMC Section 22.0908). These two project objectives are essential to satisfying the San Diego voter requirements codified in SDMC Section 22.0908. Further, while the Stadium Re-Use Alternative would develop similar land uses and intensities as the proposed project, it would be designed around the existing SDCCU Stadium and would not provide for as efficient or walkable of a land plan. Accordingly, the Stadium Re-Use Alternative would not meet Objective 4 (a sustainable, walkable, and transit-oriented SDSU Mission Valley campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development); Objective 8 (enhance transit ridership through pedestrian and bicycle improvements, and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line); and Objective 16 (create a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape) to the same degree as the proposed project. The Stadium Re-Use Alternative would achieve the remaining objectives.

Feasibility

The Stadium Re-Use Alternative is considered compatible with the proposed campus development as analyzed throughout this EIR. However, such an 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. Rather, this alternative

would retain 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 reducing impacts to historic resources (CUL-1 through CUL-3).

6.4.3 Reduced Density Alternative

Description of the Reduced Density Alternative

The Reduced Density Alternative would develop the same mix of uses on the project site; however, aside from the 35,000-capacity stadium, the remaining uses would be reduced to approximately 10% of the proposed project to reduce and avoid operational impacts including air quality, noise, and traffic-related impacts as shown in Figure 6-4, Reduced Density Alternative. As described in Section 6.1, above, the Reduced Density Alternative would include the following land uses:

- Stadium with a capacity of 35,000 (same as the proposed project)
- Up to 550 apartment units
- Up to 10,000 square feet of neighborhood commercial
- Up to 130,000 square feet of campus/office
- Up to 100 hotel rooms
- Similar parks, recreation and open space uses as the proposed project.

Comparison of Impacts to the Proposed Project

Overall, impacts under the Reduced Density Alternative would be reduced compared to the proposed project. Specifically, grading and land development-related construction activities would be similar to the proposed project in terms of earth moving and potential import of soil to raise portions of the project site out of the floodplain; however, overall construction-related impacts would be reduced due to the reduction in the amount of vertical improvements. This would reduce construction-related impacts to air quality, energy, GHG emissions, and noise.

Physical impacts would be similar to the proposed project because the project site would be disturbed through construction activities under the Reduced Density Alternative. Specifically, physical impacts to biological resources, cultural resources (including historic resources), geology and soil (including paleontological resources), and tribal cultural resources would be similar compared to the proposed project.

Operational impacts would be reduced compared to the proposed project. Under the Reduced Density Alternative, the number of daily trips to the project site would be reduced compared to the proposed project. Accordingly, operational impacts related to air quality, energy, GHG emissions, noise, and traffic would be reduced. Similarly, the Reduced Density Alternative would reduce demand for sewer and water, natural gas, electricity and telecommunications facilities; as well as for school, library, police, fire and emergency services and parks and recreational services. Therefore, impacts to public services and recreation, and utilities and utility systems would be reduced compared to the proposed project. Impacts to hazards and hazardous materials, hydrology and water quality, and wildfire would be reduced compared to the proposed project because the project site would not introduce new residents into the project area and instead convert the project site into a large, landscaped park.

Evaluation of Significant Impacts

Aesthetics and Visual Quality

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered significant impacts on the environment." The proposed project includes residential and employment opportunities, is located on an infill site, and is within a TPA as identified by the City of San Diego (City of San Diego 2019). As such, any aesthetics impact the proposed project may produce cannot be considered a significant impact on the environment. In addition and as demonstrated in Section 4.1.4, construction and operation of the proposed project would not result in significant impacts to existing view, visual quality and character, or substantial conflicts with zoning and other regulations governing scenic quality. Therefore, the proposed project would not result in significant impacts to scenic views or vistas, scenic resources within a state highway, and scenic quality, or create new sources of substantial light and glare.

The Reduced Density Alternative would result in the development of the same site as the proposed project. Therefore, the exemption for projects within a TPA would still apply and no potentially significant aesthetics impacts would occur under the Reduced Density Alternative. However, due to the reduced scale of the Reduced Density Alternative compared to the proposed project, impacts to aesthetics and visual quality would be reduced compared to the proposed project.

Air Quality and Greenhouse Gas Emissions

Construction and operational activities associated with the proposed project would result in an increase in the emission of criteria pollutants and GHGs. Impacts related to project emissions of VOC, NO_X, CO, $PM_{2.5}$, and PM_{10} would remain significant and unavoidable based on a comparison of the proposed project's construction and operational emissions to the SDAPCD thresholds. Further, the proposed project would result in significant, unavoidable impacts regarding conformity with the applicable air quality plan. The proposed project was determined not to result in significant impacts related to GHG emissions.

The Reduced Density Alternative would result in reduced construction-related air quality and GHG emissions due to a reduction in buildings and associated construction activity. Operational emissions would be reduced compared to the proposed project because there would be fewer daily trips as a result of less overall development compared to the proposed project. However, the Reduced Density Alternative would hinder attainment of GHG emissions reductions goals under the City's Climate Action Plan compared to the proposed project because it would not be developed at the same level of intensity at a TPA as the proposed project. Overall, impacts related to air quality and GHG emissions would be reduced compared to the proposed project.

Biological Resources

The proposed project would result in significant impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat. Proposed mitigation measures would reduce the potential for direct and indirect impacts on special-status plant and wildlife species, sensitive natural communities, jurisdictional waters, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible and compensatory mitigation provided to address significant impacts. All impacts would be reduced to less than significant with implementation of recommended mitigation.

The Reduced Density Alternative would result in similar physical impacts to biological resources as the proposed project. Temporary impacts during project construction would be reduced under the Reduced Density Alternative because less overall construction would occur, resulting in a shorter construction duration. Operational impacts to biological resources, mostly in the form of bird strike impacts, would be reduced compared to the proposed project due to the lower scale of buildings that would occur. Overall, impacts to biological resources would be slightly reduced compared to the proposed project

Cultural and Tribal Cultural Resources

The proposed project would result in potentially significant impacts to cultural resources, including significant and unavoidable impacts to historic resources as a result of the demolition of SDCCU Stadium. Impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation measures.

Under the Reduced Density Alternative, impacts to cultural resources, including impacts to historical resources, archeological resources and human remains would be the same as the proposed project. Significant and avoidable impacts to historical resources would remain and impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and tribal cultural resources would be similar compared to the proposed project.

Energy

The proposed project would result in a less-than-significant impact related to use of energy resources because resulting energy use from implementation of the proposed project is not wasteful or unnecessary, and efficiencies are gained on a per-service population basis.

Because the Reduced Density Alternative would result in less overall development than the proposed project, including less construction activity, energy usage would be less. Impacts to energy would be reduced compared to the proposed project.

Geology/Soils

Potentially significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources, associated with implementation of the proposed project would be fully mitigated to less than significant levels by mitigation measures outlined in Section 4.6.6 of this EIR.

Under the Reduced Density Alternative, because development of the same project site would occur, these impacts would remain potentially significant and the same mitigation measures would apply to reduce impacts to less-than-significant levels. Impacts to geology and soils, including paleontological resources, would be similar compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would result in impacts related to the routine transport or disposal of hazardous materials due to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process. Furthermore, the proposed project has the potential to create a significant hazard to the public or the environment through the routine transport or disposal of contaminated soil. Other significant impacts include impacts from existing groundwater monitoring and remediation wells on the project site, potential to expose future residential buildings to cumulative

carcinogenic risks, and potential exceedances of applicable violation of applicable FAA regulations and safety hazards. Compliance with mitigation measures would reduce identified impacts to less than significant.

The Reduced Density Alternative would result in similar development as the proposed project; however, at a reduced scale. All impacts related to hazards and hazardous materials would remain potentially significant under this alternative and the same mitigation measures would apply to reduce impacts to less than significant. Overall, impacts related to hazards and hazardous materials would be similar, but slightly reduced due to the reduction in development intensity, compared to the proposed project.

Hydrology and Water Quality

The proposed project design considered the hydrology of the project site and was designed to accommodate the future flooding of portions of the project site while providing for water quality treatment in compliance with all requirements, including implementation of the MS4 permit requirements and NPDES permit requirements. The proposed project also converts approximately half of the project site from an impervious parking lot area into parks, recreation, and open space areas, which would reduce the amount of impervious area and runoff. As a result of stormwater treatment improvements, the proposed project would result in less-than-significant impacts related to hydrology and water quality.

The Reduced Density Alternative would result in similar impacts to the proposed project. The project site would be developed similar to the proposed project. The Reduced Density Alternative would be subject to the same permit requirements and would have similar water quality treatment controls devices as the proposed project. Overall, impacts to hydrology and water quality would be similar compared to the proposed project.

Land Use and Planning

Impacts related to land use and planning would be less than significant because the proposed project would not divide and established community or result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As analyzed in Section 4.10, the proposed project would be consistent with SDMC Section 22.0908 and not conflict with the draft Final Mission Valley Community Plan Update, the San Diego River Park Master Plan, and the City's CAP.

The Reduced Density Alternative would develop similar land uses as the proposed project, however, at reduced levels. While these land uses would be consistent with the uses anticipated by the draft Final Mission Valley Community Plan Update, they would be significantly reduced. Further, as described above, the Reduced Density Alternative would hinder attainment of GHG emissions reductions goals under the City's CAP compared to the proposed project because it would not be developed at the same level of intensity at a TPA as the proposed project. Accordingly, impacts to land use and planning would be slightly greater compared to the proposed project.

Mineral Resources

The proposed project would not impact mineral resources because the project site does not contain known mineral resources 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.

The Reduced Density Alternative would result in similar less-than-significant impacts to mineral resources because this alternative would be constructed on the same project site. Impacts would be similar compared to the proposed project.

Noise

The proposed project would result in significant impacts related to temporary and ambient noise levels and generation of groundborne vibration. Noise impacts would be mitigated to a less-than-significant level with the exception of noise from nighttime construction activities, off-site roadway and utility improvements, and permanent operation-related noise impacts at the nearest noise sensitive land uses to the northwest of the project site.

The Reduced Density Alternative would result in reduced construction related noise due to the reduced vertical construction activity and may reduce the need for off-site improvements. Also, due to the reduced scale of buildings (besides the Stadium), more intensive construction techniques may be avoided under the Reduced Density Alternative. Operational noise levels would also be reduced compared to the proposed project because there would be fewer daily trips as a result of less overall development compared to the proposed project. Noise levels from the Stadium and Stadium events would be the same because the Stadium would be the same capacity; however, noise levels emanating from the Stadium would be greater because of the reduced scale of the surrounding development, which would not shield Stadium noise on surrounding land uses to the same extent as the proposed project. Overall, noise impacts would be reduced compared to the proposed project.

Population and Housing

The proposed project would result in growth due to the future residents and employees that would result from the project. At a cumulative level, the proposed project, in conjunction with other proposed residential and mixed-use projects, would result in a significant total of the projected growth anticipated in the Mission Valley area by both SANDAG and draft Final Mission Valley Community Plan Update estimates. Therefore, the proposed project would result in a cumulatively considerable impact to population and housing that would be significant and unavoidable.

The Reduced Density Alternative would result in similar land uses as the proposed project, however, at much less intensity. Accordingly, fewer units would result in reduced impacts to population and housing at the cumulative level than the proposed project. However, the Reduced Density Alternative would hinder the City's attainment of its share of the RHNA requirements because it would preclude development of 4,600 units planned for by the latest City planning document (the Final Draft Mission Valley Community Plan Update). Overall, impacts to population and housing would be reduced compared to the proposed project, but would remain significant and unavoidable.

Public Services and Recreation

Direct impacts to public services and recreation would be less than significant with mitigation. However, cumulative impacts related to fire services, schools, emergency medical services, and recreation facilities would remain significant and unavoidable.

The Reduced Density Alternative would result in similar land uses as the proposed project, however, at much less intensity. Therefore, would not induce population growth that would generate a demand for public services or recreational facilities. The Reduced Density Alternative would not provide the same benefits to the City. Overall, impacts to public services and recreation under the Reduced Density Alternative would be reduced compared to the proposed project.

Transportation

The proposed project would result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project vicinity. Compliance with mitigation measures would reduce transportation impacts; however, because many of the identified mitigation measures are outside the control of CSU to implement, **Impacts TR-1 through TR-32** would remain significant and unavoidable.

The Reduced Density Alternative would result in fewer average daily trips than the proposed project. Therefore, the Reduced Density Alternative would be expected to reduce transportation-related impacts. **Impact TR-1** would remain significant and unavoidable. Impacts would be reduced compared to the proposed project.

Utilities and Service Systems

Significant impacts would result from off-site infrastructure improvements and generation of significant amounts of construction waste by the proposed project. Construction of off-site utilities would result in noise impacts that would remain significant and unavoidable with implementation of **MM-NOI-1** and **MM-NOI-2**.

The Reduced Density Alternative would reduce demand for utilities and service systems because it would result in less than development than the proposed project. Demolition of SDCCU Stadium would generate similar amounts of solid waste during construction; however, operation of the Reduced Density alternative would reduce the amount of solid waste generated at the project site. Accordingly, the Reduced Density Alternative would reduce impacts to utilities and service systems compared to the proposed project.

Wildfire

The very northern and southern portions of the project site are located within VHFHSZs as mapped by the CAL FIRE and the SDFD. It was determined that the proposed project would result in significant impacts related to emergency response, emergency call volumes, and on-site evacuation and that the project could exacerbate wildfire risks. Proposed mitigation measures would reduce these impacts to less than significant.

The Reduced Density Alternative would result in similar impacts as the proposed project because it would be located on the same project site and develop the project site with the same land uses and intensities. However, because the Reduced Density Alternative would introduce less overall development into the project site, wildfire risks would be reduced. Overall, impacts to wildfire would be slightly reduced compared to the proposed project.

Relationship to Project Objectives

The Reduced Density Alternative would meet some of the project objectives; however, it would not meet all the project objectives or achieve the objectives to the same degree as the proposed project. Specifically, the Reduced Density Alternative would not achieve the underlying purpose of the proposed project because it would not implement the SDSU Mission Valley campus, including a new Stadium, faculty/staff/student residences and homes, academic/office/innovative uses, hotel rooms, and commercial/retail uses to support SDSU's academic, educational and cultural mission through the demolition and redevelopment of the existing SDCCU Stadium. While this alternative would develop the campus, it would not provide sufficient size and scale to support SDSU's mission because it would severely constrain growth anticipated by the University.

Further, the Reduced Density Alternative would not enable CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate increasing demand for higher

education within a new vibrant SDSU campus, innovative research center, and Stadium venue (Objective 1); provide a SDSU Mission Valley campus with up to 1.6 million square feet for academic, office, research and development and technology transfer uses (Objective 6); enhance transit ridership and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line (Objective 8), provide up to 4,600 residences to support student, faculty, staff, workforce, and affordable housing near a vibrant university village setting and in proximity to trolley and other public transportation uses to reduce reliance on automobiles (Objective 9); and generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the benefit of the SDSU Mission Valley campus and the San Diego region (Objective 18).

The Reduced Density Alternative would provide for a River Park and other shared parks and open space (Objective 2); and demolish the existing SDCCU Stadium (Objective 7). The Reduced Density Alternative would achieve Objective 4 (establish a sustainable, walkable, and transit-oriented SDSU campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development); Objective 10 (provide neighborhood-serving retail uses); Objective 11 (provide hotel/hospitality services); Objective 12 (provide employment opportunities); and Objective 13 (encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships); however, not to the same extent as the proposed project.

Lastly, the Reduced Density Alternative may facilitate Objective 15 (reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic design elements); Objective 16 (create a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape); and Objective 17 (bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space).

Feasibility

The Reduced Density Alternative would implement the same land uses as anticipated by SDMC Section 22.0908 and the Final draft Mission Valley Community Plan Update; however, the land development costs, including grading and infrastructure improvements, associated with such a project would be significant, and the future campus uses would not cover the expected costs of demolishing the existing SDCCU Stadium and the extensive grading, improvements, and landscaping required to develop this alternative.

6.4.4 Stadium and River Park Only Alternative

Description of the Stadium and River Park Only Alternative

The Stadium and River Park Only Alternative would include development of a new 35,000-seat multipurpose Stadium, demolition of the existing SDCCU Stadium, surface parking lot containing approximately 6,050 parking spaces, and revitalization and restoration of the River Park, like the proposed project. This alternative would not develop any of the other land uses proposed by the project (i.e., housing, neighborhood commercial, campus/office, or hotel). The proposed Stadium and River Park Only Alternative would be located in the same location as the proposed project and have the same design as contemplated by the proposed project, as shown in Figure 6-5, Stadium and River Park Only Alternative. This alternative would forgo development of approximately 1.6 million square feet of campus office, innovation, and research uses; up to approximately 4,600 residential units in 15

buildings; two hotels with up to approximately 400 rooms; up to approximately 95,000 square feet of commercial/retail uses; and additional open space, parks, and recreation, which were contemplated by the proposed project including the multi-use fields/tailgate park, and campus green, mall and courtyard areas. Rather, these areas would remain sheet graded and used as surface parking for the Stadium with approximately 6,050 parking spaces.

Comparison of Impacts to the Proposed Project

The Stadium and River Park Only Alternative would not result in development of any of the uses proposed by the project except for the proposed 35,000-capacity multipurpose Stadium, surface parking, and revitalization and restoration of the River Park. Therefore, impacts associated with construction and operation of this alternative would generally be reduced compared to the proposed project. This alternative would have reduced impacts related to aesthetics and visual quality, air quality and GHG emissions, biological resources, energy, hazards and hazardous materials, noise, population and housing, public services and recreation, and transportation.

Evaluation of Significant Impacts

Under the Stadium and River Park Only Alternative, the SDCCU Stadium would be demolished and a new 35,000-capacity multipurpose Stadium would be constructed. Additionally, this alternative would involve revitalization and restoration of River Park. As outlined below, this alternative would avoid potentially significant impacts associated with development of approximately 1.6 million square feet of campus office, innovation, and research uses; approximately 4,600 residential units in 15 buildings; two hotels with approximately 400 rooms; up to 95,000 square feet of commercial/retail uses; and 49.4 acres of open space, parks, and recreation, which were contemplated by the proposed project.

Aesthetics and Visual Quality

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered significant impacts on the environment." The proposed project includes residential and employment opportunities, is located on an infill site, and is within a TPA as identified by the City of San Diego (City of San Diego 2019). As such, any aesthetics impact the proposed project may produce cannot be considered a significant impact on the environment. In addition and as demonstrated in Section 4.1.4, construction and operation of the proposed project would not result in significant impacts to existing views, visual quality and character, or substantial conflicts with zoning and other regulations governing scenic quality. Therefore, it was determined that the proposed project would not result in significant impacts to scenic views or vistas, scenic resources within a state highway, and scenic quality, or create new sources of substantial light and glare.

The Stadium and River Park Only Alternative would develop of the same site as the proposed project. Therefore, the exemption for projects within a TPA would still apply, and no potentially significant aesthetics impacts would occur under the Stadium and River Park Only Alternative. Overall, impacts to aesthetics and visual quality would be reduced under this alternative due to the reduction in buildings on the project site and relatively similar visual character of the project site (Stadium with surface parking) compared to the proposed project.

Air Quality and Greenhouse Gas Emissions

Construction and operational activities associated with the proposed project would result in an increase in the emission of criteria pollutants and GHGs. Impacts related to project emissions of VOC, NO_X, CO, $PM_{2.5}$, and PM_{10} would remain significant and unavoidable based on a comparison of the project's construction and operational emissions to the SDAPCD thresholds. Further, the proposed project would result in significant, unavoidable impacts regarding conformity with the applicable air quality plan. The proposed project was determined not to result in significant impacts related to GHG emissions.

Under the Stadium and River Park Only Alternative, no land uses proposed by the project would be constructed other than the proposed 35,000-capacity Stadium, surface parking, and River Park. The existing SDCCU Stadium would be demolished, and a majority of the project site would be graded to construct the stadium and surface parking lot. However, air quality and GHG emissions associated with construction and operation of office, innovation, and research uses, residential buildings, hotels, and commercial/retail uses would not occur. Significant, unavoidable impacts associated with construction and operational emissions and conformity with the applicable air quality plan would be avoided or reduced to less than significant. The Stadium and River Park Only Alternative would not be consistent with the City's CAP, which establishes transit priority areas, such as the project site, and directs the development of these sites to include a mix of land uses at densities and intensities that support adjacent transit. Overall, air quality and GHG emissions would be reduced under the Stadium and River Park Only Alternative compared to the proposed project.

Biological Resources

The proposed project would result in significant impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat. Proposed mitigation measures would reduce the potential for direct and indirect impacts on special-status plant and wildlife species, sensitive natural communities, jurisdictional waters, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible and compensatory mitigation provided to address significant impacts.

The Stadium and River Park Only Alternative would develop less of the project site compared to the proposed project's development footprint. Because this alternative would not develop office, innovation, and research uses, residential buildings, hotels, and commercial/retail uses as contemplated by the proposed project, it would result in reduced impacts related to an increase in human activity, bird strike hazards from reflective building windows, and noise, dust, and other project construction and operation activities. Overall, impacts to biological resources would be slightly reduced compared to the proposed project.

Cultural and Tribal Cultural Resources

The proposed project would result in potentially significant impacts to cultural resources, including significant and unavoidable impacts to historic resources as a result of the demolition of SDCCU Stadium. Impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation measures.

Under the Stadium and River Park Only Alternative, impacts to cultural resources, including impacts to historical resources, archeological resources and human remains would be the same as the proposed project. The SDCCU Stadium would be demolished under this alternative so that significant and avoidable impacts to historical resources would remain the same as the proposed project. Impacts to archeological resources and human remains

would be reduced to less than significant through implementation of mitigation measures. Overall, impacts to cultural and Tribal Cultural resources would be similar compared to the proposed project.

Energy

The proposed project would result in less-than-significant impacts related to an increase in demand for energy resources because the proposed project's energy usage would not be considered wasteful or unnecessary and efficiencies are gained on a per-service population basis.

The Stadium and River Park Only Alternative would involve demolition of the existing SDCCU Stadium and construction of a new stadium. It would forgo development of office, innovation, and research uses, residential buildings, hotels, and commercial/retail uses. Therefore, it would result in less energy use than the proposed project, because fewer buildings would be constructed resulting in a reduction in energy needed to power construction equipment and vehicles, and buildings during operation. Overall, impacts related to an increase in energy demand would be reduced compared to the proposed project.

Geology/Soils

Construction of the proposed project would result in potentially significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources. Compliance with mitigation measures MM-GEO-1 and MM-GEO-2 would ensure impacts would be reduced to less-than-significant levels.

Under the Stadium and River Park Only Alternative, the existing SDCCU Stadium would be demolished and a new stadium and surface parking would be developed along with restoration of River Park. Generally, development of the same project site would occur; therefore, impacts would be similar, and the same mitigation measures would be required as compared to the proposed project. Overall, impacts would be reduced compared to the proposed project because the Stadium and River Park Only alternative would result in less vertical construction.

Hazards and Hazardous Materials

The proposed project would result in impacts related to the routine transport or disposal of hazardous materials due to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process. Compliance with mitigation measures would ensure impacts would be reduced to less than significant. Other significant impacts include impacts from existing groundwater monitoring and remediation wells on the project site that could be damaged or destroyed during construction releasing hazardous materials to the environment, potential to expose future residential buildings to cumulative carcinogenic risks, and potential exceedances of applicable FAA regulations and safety hazards. Compliance with mitigation measures would reduce identified impacts to less than significant.

The Stadium and River Park Only Alternative would result in similar impacts as the proposed project, as demolition of the existing stadium and construction of a new Stadium would still be required. However, because this alternative would not develop residential uses contemplated in the proposed project, it would not result in impacts from the potential to expose future residences to carcinogenic risks, vapor intrusion, groundwater contamination, or aircraft noise hazards. Overall, impacts to hazards and hazardous materials would be reduced compared to the proposed project.

Hydrology and Water Quality

The proposed project was designed to accommodate future flooding of portions of the project site while providing for water quality treatment in compliance with all state and local requirements, including implementation of permit

requirements and NPDES permit requirements. The proposed project also converts approximately half of the project site from an impervious parking lot area into parks, recreation, and open space areas, which would reduce the amount of impervious area and runoff. The proposed project would not violate any water quality standards, interfere with groundwater recharge, alter the existing drainage pattern of the project site, increase the rate or amount of surface runoff, or exceed the capacity of existing or planned stormwater drainage systems. All impacts related to hydrology and water quality are considered less than significant.

The Stadium and River Park Only Alternative would result in similar impacts from soil disturbance, because a similar amount of the project site would be disturbed as the proposed project. Under this alternative, only the new Stadium would be constructed; the existing SDCCU Stadium would be demolished; and River Park would be revitalized and restored. However, the introduction of a large surface parking lot would increase the amount of impervious area compared to the proposed project. The Stadium and River Park Alternative would be required to comply with all state and local requirements and the same water quality treatment requirements as the proposed project; therefore, impacts to hydrology and water quality would be less than significant, similar to the proposed project. Overall, due to the increase in impervious surface area and the additional runoff resulting from the increase in impervious area, impacts to hydrology and water quality would increase slightly compared to the proposed project.

Land Use and Planning

Impacts related to land use and planning would be less than significant because the proposed project would not divide an established community or result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The Stadium and River Park Only Alternative would result in the same impacts to land use and planning as the proposed project. The existing SDCCU Stadium would be demolished and a new 35,000-capacity Stadium constructed, as contemplated by the proposed project. The River Park would be restored consistent with the land use designation included the 1984 Mission Valley Community Plan. However, this alternative does not propose development of any other uses on the project site; therefore, it would be inconsistent with the draft Final Mission Valley Community Plan Update (2019) and SDMC Section 22.0908, which call for campus development of the project site. In addition, this alternative would not be consistent with the City of San Diego's CAP requirements for development in TPAs. Therefore, impacts to land use and planning would increase under the Stadium and River Park Only Alternative compared to the proposed project

Mineral Resources

The proposed project would not impact mineral resources because the project site does not contain known mineral resources that would be of value to the region and the residents of the state, per the City of San Diego's General Plan. The project site is not delineated on a local general plan, specific plan, or other land use plan as a locally important mineral resource recovery site.

The Stadium and River Park Only Alternative would result in similar impacts to mineral resources because this alternative would be constructed on the same project site. Overall, impacts to mineral resources would be the same compared to the proposed project.

Noise

The proposed project would result in significant impacts related to short-term temporary and ambient noise levels and generation of groundborne vibration associated with construction activities. Noise impacts would be mitigated to a less-than-significant level with the exception of noise from nighttime construction activities, off-site roadway and utility improvements, and permanent operation-related noise impacts at the nearest noise sensitive land uses to the northwest of the project site. There is no feasible mitigation available, and these impacts remain significant and unavoidable.

The Stadium and River Park Only Alternative would result in similar noise impacts as the proposed project because the existing SDCCU Stadium would be demolished and a new Stadium constructed, as contemplated by the proposed project. However, noise impacts from construction of campus office, innovation, and research uses, residential buildings, hotels, and commercial/retail uses would be reduced under this alternative. Because residential uses would not be constructed under this alternative, on-site impacts to noise sensitive land uses would not occur. Further, under the Stadium and River Park Only Alternative, less traffic would be generated on a daily basis, and therefore, off-site traffic noise impacts would be reduced to less than significant. Stadium-generated noise impacts would be greater compared to the proposed project because there would be no surrounding buildings with residential or hotel uses that would serve as noise barriers to surrounding noise sensitive land uses, particularly to the north of the Stadium. Overall, noise impacts under the Stadium and River Park Only Alternative would be reduced compared to the proposed project.

Population and Housing

The proposed project would result in growth due to the future residents and employees that would result from the proposed project. At a cumulative level, the proposed project, in conjunction with other proposed residential and mixed-use projects in the area, would result in a significant increase in the amount of projected growth anticipated in the Mission Valley area by both SANDAG and draft Final Mission Valley Community Plan Update estimates. Therefore, the proposed project would result in a cumulatively considerable impact to population and housing that would be significant and unavoidable.

The Stadium and River Park Only Alternative would not involve development of residential uses. This would reduce the population increase estimated to occur under the proposed project from on-site residents, and the cumulative significant and unavoidable impact would be reduced to less than significant. Additionally, this alternative would not include construction and operation of office, innovation, and research uses, hotels, and commercial/retail uses. As a result, this alternative would not result in a permanent new population and would decrease the number of employees than under the proposed project. The Stadium and River Park Only Alternative would not assist the City of San Diego with meeting RHNA requirements because it would not provide for up to approximately 460 affordable units. Overall, impacts to population and housing would be reduced compared to the proposed project.

Public Services and Recreation

Direct impacts to public services and recreation would be less than significant with mitigation. However, cumulative impacts related to fire services, schools, emergency medical services, and recreation facilities would remain significant and unavoidable.

The Stadium and River Park Only Alternative does not include a new permanent residential population and there would be fewer employees compared to the proposed project; therefore, demand for fire services, schools,

emergency medical services, and recreational facilities would be decreased. Cumulative impacts to public services would be reduced to less than significant under this alternative. Overall, impacts to public services and recreation under the Stadium and River Park Only Alternative would be reduced compared to the proposed project.

Transportation

The proposed project would result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project vicinity. Compliance with mitigation measures would reduce transportation impacts; however, because many of the identified mitigation measures are outside the control of the CSU to implement, **Impacts TR-1 through TR-32** would remain significant and unavoidable.

The Stadium and River Park Only Alternative would result in reduced traffic impacts because it would not develop campus land uses contemplated by the proposed project, with the exception of the new 35,000-capacity Stadium and River Park. This would reduce the amount of vehicle trips traveling to and from the project site, and thereby reduce traffic impacts at local intersections, roadway segments, and freeway segments. **Impact TR-1** would remain significant and unavoidable. Impacts to transportation would be reduced under the Stadium and River Park Only Alternative compared to the proposed project.

Utilities and Service Systems

Significant impacts would result from construction of off-site infrastructure improvements and generation of significant amounts of construction waste by the proposed project. Construction of off-site utilities would result in noise impacts that would remain significant and unavoidable even with implementation of mitigation measures.

The Stadium and River Park Only Alternative would result in similar impacts as the proposed project because it would result in similar off-site infrastructure improvements and generate significant amounts of construction waste due to demolition of the existing stadium and construction of a new stadium. Because this alternative would not include construction of campus office, innovation, and research uses, hotels, and commercial/retail uses the amount of solid waste generated would be less than the proposed project. This alternative would reduce demand on local utilities and service systems because it would involve less development as compared to the proposed project. Overall, impacts to utilities and service systems under the Stadium and River Park Only Alternative would be reduced compared to the proposed project.

Wildfire

The very northern and southern portions of the project site are located within VHFHSZs as mapped by CAL FIRE and SDFD. It was determined that the proposed project would result in significant impacts related to emergency response, emergency call volumes, and on-site evacuation and that the proposed project could exacerbate wildfire risks. Proposed mitigation measures would reduce these impacts to less than significant.

The Stadium and River Park Only Alternative would result in similar impacts as the proposed project because it would be located on the same project site and would be subject to the same requirements as the proposed project. However, because the Stadium and River Park Only Alternative does not include permanent residents and would reduce the number of employees on the project site, impacts related to emergency response, emergency call volumes, and on-site evacuation would be reduced compared to the proposed project.

Relationship to Project Objectives

The Stadium and River Park Only Alternative would met some of the project objectives; however, it would not meet all the project objectives or achieve the objectives to the same degree as the proposed project. Specifically, the Stadium and River Park Only Alternative would not achieve the underlying purpose of the proposed project because it would not implement the SDSU Mission Valley campus, including a new Stadium, faculty/staff/student residences and homes, academic/office/innovative uses, hotel rooms, and commercial/retail uses to support SDSU's academic, educational and cultural mission through the demolition and redevelopment of the existing SDCCU Stadium.

The Stadium and River Park Only Alternative would not enable CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate a growing student body within a vibrant university campus, innovative research center, and Stadium venue proximate to SDSU's main campus (Objective 1); provide an SDSU Mission Valley campus with up to 1.6 million square feet for academic, office, research and development and technology transfer uses (Objective 6); enhance transit ridership and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line (Objective 8); provide up to 4,600 residences with a mix of housing, including student, faculty, staff, workforce, and affordable housing near a vibrant university village atmosphere and in proximity to trolley and other public transportation uses to reduce reliance on automobiles (Objective 9); provide neighborhood-serving retail uses (Objective 10); provide hotel/hospitality services (Objective 11); provide employment opportunities at the same level as the proposed project (Objective 12); encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships (Objective 13); and generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the SDSU Mission Valley campus and the San Diego region (Objective 18).

The Stadium and Park Only Alternative would also not establish a sustainable, walkable, and transit-oriented SDSU campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development (Objective 4); reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic design elements (Objective 15); or bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space (Objective 17).

The Stadium and River Park Only Alternative would provide for a River Park and other shared parks and open space c (Objective 2); demolish the existing stadium (Objective 7); and would help achieve a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape (Objective 16), but not to the same degree as the proposed project.

Feasibility

The Stadium and River Park Only Alternative would be consistent with the 1984 Mission Valley Community Plan and include uses permitted under the draft Final Mission Valley Community Plan Update. However, the Stadium and River Park Alternative would conflict with SDMC Section 22.0908 because it would not develop the following uses:

- Facilities for educational, research, entrepreneurial, and technology programs within a vibrant campus village and research park, constructed in phases and to include:
  - Academic and administrative buildings and classrooms;
  - Commercial, technology, and office space;
  - Retail uses serving neighborhood residents and businesses;
  - Hotels;
  - Faculty and staff housing;
  - Graduate and undergraduate student housing;
  - Apartment-style homes for the local community;
  - Other market-rate, workforce, and affordable homes; and
  - Trolley and other public transportation uses and improvements.

Further, similar to the Reduced Density Alternative, the land development costs, including grading and infrastructure improvements, associated with such a project would be significant, and the future use as a Stadium would not cover the expected costs of demolishing the existing SDCCU Stadium and the extensive grading, improvements, and landscaping required to develop this alternative. Similar to the All Park Alternative considered and rejected, to finance the Stadium and River Park Only Alternative, a bond measure may be put on a future ballot for the residents of the City of San Diego to vote on; or fundraising or other financing measures including sale(s) of other city-owned property or collection of significantly increased parks development impacts fees may be used in combination to fund such improvements.

6.4.5 Alternative Stadium Location Alternative

Description of the Alternative Stadium Location Alternative

The Alternative Stadium Location Alternative entails construction of the 35,000-capacity Stadium on SDSU's existing main campus, east of College Avenue, south of I-8. The SDSU Mission Valley campus proposed project's non-Stadium land uses would be developed at the Mission Valley campus project site, including 4,600 residential units, approximately 1,565,000 square feet of office space, approximately 95,000 square feet of commercial/retail, up to 400 hotel rooms, and approximately 86 acres of parks, recreation and open space. To accommodate such land uses, the existing SDCCU Stadium would be demolished (see Figure 6-6A). To accommodate the Stadium in this location an existing parking lot would be removed, Figure 6-6B depicts the location of the Stadium under this alternative. Accordingly, all event traffic associated with the proposed project would instead occur around the existing SDSU campus rather than the SDSU Mission Valley campus project site.

Comparison of Impacts to the Proposed Project

The Alternative Stadium Location Alternative would produce similar changes to the project site as the proposed project, with the exception of constructing a new Stadium at the existing SDSU campus rather than at the project site. Construction and operational activities under this alternative would result in criteria air pollutant and GHG emissions, although these emissions would still be generated at the existing SDSU campus without construction of a new Stadium on-site. Impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat would still occur under this alternative. As this alternative would largely occur on the same project site, significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources would still occur. Impacts related to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process would occur under this alternative because the existing SDCCU Stadium would be demolished. This alternative would also result in noise impacts associated with construction activities, and would introduce construction noise in a new location at the existing SDSU campus compared to the proposed project. The alternative would result in growth due to an increase in future residents and employees that would result from the proposed project. This alternative would still result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project area, and result in additional traffic at off-site roadways and intersections near the existing SDSU campus due to the operation of a new, 35,000-capacity stadium east of College Boulevard. Additionally, new impacts would result from off-site infrastructure improvements. Overall, project impacts would not be avoided under the Alternative Stadium Location Alternative and may increase compared to the proposed project.

Evaluation of Significant Impacts

Aesthetics and Visual Quality

CEQA states that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project within a transit priority area shall not be considered significant impacts on the environment." The proposed project includes residential, and employment opportunities; is located on an infill site; and is within a TPA as identified by the City of San Diego (City of San Diego 2019). As such, any aesthetics impact the proposed project may produce cannot be considered a significant impact on the environment. In addition and as demonstrated in Section 4.1.4, construction and operation of the proposed project would not result in significant impacts to existing views, visual quality and character, or substantial conflicts with zoning and other regulations governing scenic quality. Therefore, it was determined that the proposed project would not result in significant impacts to scenic views or vistas, scenic resources within a state highway, scenic quality, and new sources of substantial light and glare.

Under the Alternative Stadium Location Alternative, a similar level of development would occur; however, it would be spread across two sites: the project site and the SDSU campus. The visual impacts at the project site would be slightly reduced with the absence of a new, 35,000-capacity Stadium, which would allow for less intense vertical development under this alternative compared to the proposed project. However, the introduction of a new, 35,000-capacity Stadium within the existing SDSU campus east of College Avenue, south of I-8 would result in new aesthetic and visual quality impacts in an area not affected by the proposed project. Therefore, aesthetics and visual impacts would be slightly greater under the Alternative Stadium Location Alternative compared to the proposed project.

Air Quality and Greenhouse Gas Emissions

Construction and operational activities associated with the proposed project would result in an increase in the emission of criteria pollutants and GHGs. Impacts related to project emissions of VOC, NO_X, CO, $PM_{2.5}$, and PM_{10}

would remain significant and unavoidable based on a comparison of the proposed project's construction and operational emissions to the SDAPCD thresholds. Further, the proposed project would result in significant, unavoidable impacts regarding conformity with the applicable air quality plan. The proposed project was determined not to result in significant impacts related to GHG emissions.

Under the Alternative Stadium Location Alternative, a similar level of development would occur; however, it would be spread across two sites: the project site and the SDSU campus. The air quality impacts at the project site associated with construction and operation would be slightly reduced compared to the proposed project due to the absence of a new, 35,000-capacity Stadium. However, the introduction of a new, 35,000-capacity Stadium within the existing SDSU campus would result in new air quality impacts in an area not affected by the proposed project. This would result in removal of an existing parking lot, site grading, and construction of a stadium that would result in an increase in construction emissions. Therefore, construction impacts on air quality would be greater under the Alternative Stadium Location Alternative compared to the proposed project, and the significant and unavoidable construction and operational impacts would still occur under this alternative. Because the operational uses would be similar under the proposed project and the Alternative Stadium Location Alternative, operational impacts to air quality and GHGs would be similar under this alternative compared to the proposed project. Overall, air quality and GHG emissions impacts would be slightly greater under the Alternative Stadium Location Alternative compared to the proposed project.

Biological Resources

The proposed project would result in significant impacts to special-status species, sensitive vegetation communities, federally and state-regulated wetlands/riparian areas, and native habitat. Proposed mitigation measures would reduce the potential for direct and indirect impacts on special-status plant and wildlife species, sensitive natural communities, jurisdictional waters, and wildlife corridors by ensuring that special-status resources would be avoided to the extent possible and compensatory mitigation provided to address unavoidable significant impacts.

The Alternative Stadium Location Alternative would result in the same impacts to biological resources as the proposed project at the project site. Temporary impacts during project construction would be slightly reduced under the Alternative Stadium Location Alternative because there would not be construction of a new Stadium on the project site. Operational impacts to biological resources, mostly in the form of bird strike impacts, would be slightly reduced compared to the proposed project because vertical development would be less intense at the project site. However, the off-site Stadium on the SDSU campus would result in potentially new biological impacts compared to the proposed project due to the construction of a new 35,000-capacity Stadium on the SDSU campus. Overall, impacts to biological resources would be similar compared to the proposed project.

Cultural and Tribal Cultural Resources

The proposed project would result in potentially significant impacts to cultural resources, including significant and unavoidable impacts to historic resources as a result of demolition of SDCCU Stadium. Impacts to archeological resources and human remains would be reduced to less than significant through implementation of mitigation measures.

Under the Alternative Stadium Location Alternative, impacts to cultural resources, including impacts to historic resources, archeological resources, and human remains would be the same as the proposed project because the existing SDCCU Stadium would be demolished, and generally the project site would be disturbed. Implementation of mitigation measures would reduce impacts to archeological resources and human remains; however, impacts to historic resources associated with demolishing the SDCCU Stadium would still occur. Construction of the stadium

on the SDSU campus could result in additional potentially significant impacts to cultural resources compared to the proposed project due to disturbance in a new area. Overall, impacts to cultural and Tribal Cultural resources would be similar compared to the proposed project

Energy

The proposed project would result in a less-than-significant impact related to the increased demand for energy resources because energy use associated with implementation of the proposed project is not determined to be wasteful or unnecessary, and efficiencies are gained on a per-service population basis due to compliance with new building codes that require energy efficiency.

Under the Alternative Stadium Location, a similar level of development would occur; however, it would be spread across two sites: the project site and the SDSU campus. The increase in energy demand associated with new development on the project site under this alternative would be slightly reduced compared to the proposed project due to the absence of a new, 35,000-capacity Stadium. However, the introduction of a new, 35,000-capacity Stadium within the existing SDSU campus would result in an increase in energy demand on the campus. This would also result in removal of an existing parking lot, site grading and construction activities in a new area, resulting in increased construction emissions. Therefore, energy impacts associated with construction activities would be greater under this alternative compared to the proposed project. Because operational uses would be similar under the proposed project and the Alternative Stadium Location Alternative, operational impacts would be similar. Overall, impacts to energy would be slightly greater under the Alternative Stadium Location Alternative compared to the proposed project.

Geology/Soils

Potentially significant impacts related to liquefiable, corrosive, and unstable soils, and paleontological resources, associated with construction of the proposed project would be fully mitigated to less-than-significant levels by mitigation measures outlined in Section 4.6.6 of this EIR.

The Alternative Stadium Location Alternative would result in the same impacts to geology and soils as the proposed project for development at the project site. Temporary impacts during project construction would be slightly reduced under this alternative because a new Stadium would not be constructed on the project site. However, construction of the Stadium on the SDSU campus could result in additional impacts to geology and soils and paleontological resources compared to the proposed project due to development in a new area. The Alternative Stadium Location site would be subject to the same mitigation as the proposed project to reduce impacts to less than significant. Overall, impacts to geology and soils would be slightly increased compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would result in impacts related to the routine transport or disposal of hazardous materials due to the potential to encounter asbestos, ACM, LBP, and PCBs during the demolition process. Furthermore, the proposed project has the potential to create a significant hazard to the public or the environment through exposure to contaminated groundwater, disturbance to existing groundwater monitoring and remediation wells on the project site, potential to expose future residences to cumulative carcinogenic risks, and potential exceedances of applicable FAA regulations and safety hazards. Compliance with mitigation measures would reduce identified impacts to less than significant.

Development of the project site would result in the same impacts to hazards and hazardous materials, and the same mitigation measures would apply to reduce impacts to less than significant. The Alternative Stadium Location Alternative could result in potentially new impacts to hazards and hazardous materials due to construction of a new, 35,000-capacity Stadium on the existing SDSU campus and removal of an existing parking lot. Overall, impacts related to hazards and hazardous materials would be slightly increased compared to the proposed project.

Hydrology and Water Quality

The proposed project considered the hydrology of the project site and was designed to accommodate future flooding of portions of the project site while providing for water quality treatment in compliance with all requirements, including implementation of the MS4 permit requirements and NPDES permit requirements. The proposed project also converts approximately half of the project site from an impervious parking lot area into parks, recreation, and open space areas, which would reduce the amount of impervious area and runoff. The project's proposed drainage and stormwater treatment improvements would ensure impacts related to hydrology and water quality remain less than significant.

The Alternative Stadium Location Alternative would result in similar impacts at the project site compared to the proposed project because it would result in a similar amount of site development and creation of impervious surface area and would implement the same water quality treatment measures and best management practices. However, construction of the Stadium on the SDSU campus could result in additional impacts to hydrology and water quality compared to the proposed project due to an increase in stormwater runoff and capacity of existing stormwater infrastructure on the campus. The Alternative Stadium Location site would be subject to the same permit requirements as the proposed project to reduce impacts to less than significant. Overall, impacts to hydrology and water quality would be slightly increased compared to the proposed project.

Land Use and Planning

Impacts related to land use and planning would be less than significant because the proposed project would not divide an established community or result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As analyzed in Section 4.10, the proposed project would be consistent with SDMC Section 22.0908 and not conflict with the Final Draft of the Mission Valley Community Plan Update, the San Diego River Park Master Plan, or the City's CAP.

The Alternative Stadium Location Alternative would not result in impacts to land use and planning associated with developing the project site because development of this site is consistent with existing land use and zoning regulations, and would not conflict with the Final Draft of the Mission Valley Community Plan Update, the San Diego River Park Master Plan, or the City's CAP, the same as the proposed project. However, the Alternative Stadium Location Alternative would conflict with SDMC Section 22.0908(j), which provides that "Such sale shall result in the demolition, dismantling, and removal of the Existing Stadium and *construction of a new Joint Use Stadium*" (emphasis added). Under this alternative the existing SDCCU Stadium would be demolished, but a new Stadium would be constructed on the SDSU campus, not on the project site as specified in SDMC Section 22.0908. Constructing a newSstadium on the SDSU campus would require an amendment to the SDSU Campus Master Plan. Accordingly, impacts to land use and planning would be slightly greater compared to the proposed project.

Mineral Resources

The proposed project would not impact mineral resources because the project site does not contain known mineral resources that would be of value to the region and the residents of the state, per the City of San Diego's General Plan. In addition, the project site is not delineated on a local general plan, specific plan, or other land use plan as a locally important mineral resource recovery site.

The Alternative Stadium Location Alternative would result in similar impacts to mineral resources because this alternative would develop the project site. Impacts to mineral resources at the Stadium on the SDSU campus are also anticipated to be less than significant because the campus does not contain mineral resources that would be of value to the region or the state. Therefore, impacts would be similar compared to the proposed project.

Noise

The proposed project would result in significant impacts related to short-term temporary and ambient noise levels and generation of groundborne vibration associated with construction and operation. Noise impacts would be mitigated to a less-than-significant level with the exception of noise from nighttime construction activities, off-site roadway and utility improvements, and permanent operation-related noise impacts at the nearest noise sensitive land uses located northwest of the project site.

The Alternative Stadium Location Alternative would result in similar impacts as the proposed project because it would demolish the existing SDCCU Stadium and develop the same land uses and intensities as the proposed project, with the exception of construction of a new Stadium. Noise associated with nighttime construction activities and off-site road and utility improvements would be the same under this alternative, and the impacts would remain significant and unavoidable. Not including a Stadium on the project site would also reduce operational noise levels for adjacent land uses during stadium events, and these impacts due to stadium events after 10:00 p.m. would be avoided at the project site. Noise levels resulting from construction and operation of a 35,000-capacity Stadium on the SDSU campus would be greater than the proposed project because it would introduce more traffic and event-related noise to the campus, which could exceed acceptable thresholds. Overall, noise impacts would be slightly increased compared to the proposed project.

Population and Housing

The proposed project would result in an increase in growth due to future residents and employees that would result from the project. At a cumulative level, the proposed project, in conjunction with other proposed residential and mixed-use projects in the area, would result in a significant increase in the amount of projected growth anticipated in the Mission Valley area by both SANDAG and draft Final Mission Valley Community Plan Update estimates. Therefore, the proposed project would result in a cumulatively considerable impact to population and housing that would be significant and unavoidable.

The Alternative Stadium Location Alternative would result in the same impacts as the proposed project because it would involve development of the same land uses and intensities as the proposed project, and would result in the same increase in a permanent population and generally the same number of new employees. Impacts to population and housing would be similar compared to the proposed project.

Public Services and Recreation

Direct impacts to public services and recreation due to implementation of the proposed project would be less than significant with mitigation. However, cumulative impacts related to the proposed project's increase in demand for fire services, schools, emergency medical services, and recreation facilities would remain significant and unavoidable.

The Alternative Stadium Location Alternative would result in the generally the same impacts as the proposed project because it would involve development of the same land uses and intensities as the proposed project and would result in the same population increase and demand for public services and recreation. The cumulative impact associated with increased demand for services and the potential for construction of new facilities would remain significant and unavoidable the same as the proposed project. However, because the new Stadium would be located on the SDSU campus, access to emergency facilities and response to the new Stadium may be increased compared to the proposed project. Therefore, impacts to public services and recreation could be slightly increased compared to the proposed project.

Transportation

The proposed project would result in significant traffic impacts at local intersections, roadway segments, and freeway segments by promoting an increase in traffic in the project vicinity. Compliance with mitigation measures would reduce transportation impacts; however, because many of the identified mitigation measures are outside the control of the CSU to implement, **Impacts TR-1 through TR-32** would remain significant and unavoidable.

The Alternative Stadium Location Alternative would result in similar impacts on non-event days as the proposed project as it proposes development of the same land uses and intensities as the proposed project. Transportation impacts on event-days would be reduced on the project site (**Impacts TR-1, TR-28A through TR-28Q, TR-29A through TR-29R, TR-30A through TR-30D,** and **TR-31**); however, these impacts would increase around the off-site Stadium. Because this alternative would introduce traffic impacts in an area that would not otherwise experience new traffic as a result of the proposed project, transportation impacts would be greater under the Alternative Stadium Location Alternative.

Utilities and Service Systems

Construction activities under the proposed project would result in significant impacts associated with off-site infrastructure improvements and generation of significant amounts of construction waste and need for adequate landfill capacity. Construction of off-site utilities would result in noise impacts that would remain significant and unavoidable even with implementation of mitigation measures.

The Alternative Stadium Location Alternative would result in generally the same impacts as the proposed project because it would require demolition of the existing SDCCU Stadium and development of the same land uses and intensities as the proposed project generating the same amount of solid waste. Under this alternative the same population increase and demand for utilities and service systems would occur; however, because the new Stadium would be located on the SDSU campus, the increase in demand for water supply, wastewater capacity, and stormwater facilities to serve the new Stadium could result in impacts compared to the proposed project. Construction of off-site utilities would still be required under this alternative resulting in noise impacts that would remain significant and unavoidable, the same as the proposed project. Therefore, impacts to utilities and service systems would be slightly increased compared to the proposed project.

Wildfire

The very northern and southern portions of the project site are located within VHFHSZs as mapped by CAL FIRE and SDFD. It was determined that the proposed project would result in significant impacts related to emergency response, emergency call volumes, and on-site evacuation, and that the proposed project could exacerbate wildfire risks. Proposed mitigation measures would reduce these impacts to less than significant.

The Alternative Stadium Location Alternative would result in similar impacts as the proposed project because a majority of the land uses would be located on the same project site. Impacts related to emergency response, emergency call volumes, and on-site evacuation, including for the Stadium located on the SDSU campus, could be mitigated to less than significant, the same as the proposed project. Impacts would be similar compared to the proposed project.

Relationship to Project Objectives

The Alternative Stadium Location Alternative would met some of the project objectives; however, it would not meet all the project objectives or achieve the objectives to the same degree as the proposed project. Specifically, the Alternative Stadium Location Alternative would not achieve the underlying purpose of the proposed project because it would not implement the SDSU Mission Valley campus, including a new Stadium, faculty/staff/student residences and homes, academic/office/innovative uses, hotel rooms, and commercial/retail uses to support SDSU's academic, educational and cultural mission through the demolition and redevelopment of the existing SDCCU Stadium. While this alternative would develop the SDSU Mission Valley campus, it would not provide the new Stadium on the project site.

Further, the Alternative Stadium Location Alternative would not enable the CSU to expand SDSU's education, research, entrepreneurial, innovative technology, and athletic programs to accommodate increasing demand for higher education within a new vibrant SDSU campus, innovative district, *and stadium venue* (Objective 1).

The Alternative Stadium Location Alternative would provide an SDSU Mission Valley campus with up to 1.6 million square feet for academic, office, research and development, and technology transfer uses (Objective 6); enhance transit ridership and transit connections to the existing MTS Trolley Station; and accommodate the future alignment for the potential future construction of the MTS Trolley Purple Line (Objective 8); provide up to 4,600 residences with a mix of housing, including student, faculty, staff, workforce, and affordable housing near a vibrant university village atmosphere and in proximity to trolley and other public transportation uses to reduce reliance on automobiles (Objective 9); generate revenue to finance project elements and further support and benefit SDSU's academic and athletic programs for the SDSU Mission Valley campus and the San Diego region (Objective 18); provide for a River Park and other shared parks and open space (Objective 2); and demolish the existing SDCCU Stadium (Objective 7). The Alternative Stadium Location Alternative would achieve Objective 4 (establish a sustainable, walkable, and transit-oriented SDSU Mission Valley campus with enriched pedestrian spaces, walking paths and trails, and active and passive open space and recreation areas, including a pedestrian-scale, vibrant mix of campus uses and development); Objective 10 (provide neighborhood-serving retail uses), Objective 11 (provide hotel/hospitality services); Objective 12 (provide employment opportunities), and Objective 13 (encourage on-campus learning, research, and internship opportunities for students, faculty, and staff through public-private partnerships); however, not to the same degree as the proposed project.

Lastly, the Alternative Stadium Location Alternative would facilitate Objective 15 (reflect SDSU and Mission Valley's heritage through campus planning, architecture, landscape, signage and wayfinding, and cultural and artistic

design elements), Objective 16 (create a "sense of place" within the campus open space, trails, pathways, streets, walkways, and outdoor "space," which form the campus landscape), and Objective 17 (bring together diverse groups of people for intellectual, social, and recreational exchange; foster learning, creativity, collegiality, collaboration, and innovation; facilitate student, faculty, and staff activities with innovative businesses in the community; and create a sense of community derived from actively shared park and recreation space).

Feasibility

The Alternative Stadium Location Alternative would conflict with SDMC Section 22.0908, because it would not develop the new Stadium on the project site. Rather, this alternative would provide a new, 35,000-capacity Stadium on the existing SDSU campus, increasing impacts associated with traffic, noise, air emissions, biological and cultural resources, geology and soils, and visual resources at a new, off-site location. Furthermore, this alternative would not achieve all of the project objectives, nor meet the objectives to the same degree as the proposed project.

6.5 Environmentally Superior Alternative

The Environmentally Superior Alternative is the No Project Alternative. In accordance with CEQA, 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)). Table 6-1 provides a summary comparison of the significant impacts attributable to each of the alternatives relative to the proposed project.

Based on the analysis presented in this chapter and summarized in Table 6-1, the Stadium and River Park Alternative is considered the Environmentally Superior Alternative.

Table 6-1. Comparison of Proposed Project's Significant Impacts to Alternatives

Environmental Impacts	Proposed Project	No Project	Stadium Re-Use Alternative	Reduce Density Alternative	Stadium and River Park Alternative	Alternative Stadium Location Alternative
Aesthetics	Less than Significant Project-level and Cumulative Impacts	Less than proposed project; No Impact.	Greater than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.
Air Quality	Significant And Unavoidable Project-level and Cumulative Impacts	Less than proposed project; No Impact.	Similar to proposed project; remains significant and unavoidable.	Less than proposed project; remains significant and unavoidable.	Less than proposed project; remains significant and unavoidable.	Slightly greater than proposed project remains significant and unavoidable.
Biological Resources	Less than Significant with Mitigation	Less than proposed project; No Impact.	Similar to proposed project; remains significant but mitigable.	Slightly less than proposed project; remains significant but mitigable.	Slightly less than proposed project; remains significant but mitigable.	Similar to proposed project; remains significant but mitigable.
Cultural Resources	Less than Significant with Mitigation	Less than proposed project; No Impact.	Less than proposed project; reduced to less than significant.	Similar to proposed project; remains significant but mitigable.	Similar to proposed project; remains significant but mitigable.	Similar to proposed project; remains significant but mitigable.
Energy	Less than Significant Project-level and Cumulative Impacts.	Less than proposed project; No Impact.	Slightly greater than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.
Geology and Soils	Less than Significant with Mitigation	Less than proposed project; No Impact.	Similar to proposed project; remains significant but mitigable.	Similar to proposed project; remains significant but mitigable.	Less than proposed project; remains significant but mitigable.	Slightly greater than proposed project; remains significant but mitigable.
Greenhouse Gas Emissions	Less than Significant Project-level and Cumulative Impacts	Less than proposed project; No Impact.	Similar to the proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Slightly greater than proposed project; remains significant but mitigable.
Hazards and Hazardous Materials	Less than Significant with Mitigation	Less than proposed project; No Impact	Similar to proposed project; remains significant but mitigable	Slightly less than proposed project; remains significant but mitigable.	Less than proposed project; remains significant but mitigable.	Slightly greater than proposed project; remains significant but mitigable.

Table 6-1. Comparison of Proposed Project's Significant Impacts to Alternatives

Environmental Impacts	Proposed Project	No Project	Stadium Re-Use Alternative	Reduce Density Alternative	Stadium and River Park Alternative	Alternative Stadium Location Alternative
Hydrology and Water Quality	Less than Significant Project-level and Cumulative Impacts	Greater than proposed project; less than significant	Similar to proposed project; remains less than significant.	Similar to proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.
Land Use and Planning	Less than Significant Project-level and Cumulative Impacts	Greater than proposed project; less than significant	Slightly greater than proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.	Greater than proposed project; remains less than significant.	Slightly greater than proposed project; remains less than significant.
Mineral Resources	Less than Significant Project-level and Cumulative Impacts	Less than proposed project; No Impact	Similar to proposed project; remains less than significant.	Similar to proposed project; remains less than significant.	Similar toproposed project; remains less than significant.	Similar to proposed project; remains less than significant.
Noise	Significant and Unavoidable Project-level and Cumulative Impacts	Less than proposed project; No Impact	Less than proposed project; remains significant and unavoidable	Less than proposed project; remains significant and unavoidable.	Less than proposed project; remains significant and unavoidable.	Slightly greater than proposed project; remains significant and unavoidable.
Population and Housing	Significant and Unavoidable Cumulative Impacts	Less than proposed project; No Impact	Similar to proposed project; remains significant and unavoidable	Less than proposed project; remains significant and unavoidable.	Less than proposed project; less than significant impact.	Similar to proposed project; remains significant and unavoidable.
Public Services and Recreation	Significant and Unavoidable Cumulative Impacts	Less than proposed project; No Impact	Similar to proposed project; remains significant and unavoidable	Less than proposed project; less than significant impact.	Less than proposed project; less than significant impact.	Slightly greater than proposed project; remains significant and unavoidable.
Transportation and Traffic	Significant and Unavoidable Project-level and Cumulative Impacts	Less than proposed project; No Impact	Similar to the proposed project; remains significant and unavoidable	Less than proposed project; remains significant and unavoidable.	Less than proposed project; significant but mitigable impact.	Greater than proposed project; remains significant and unavoidable.
Tribal Cultural Resources	Less than Significant with Mitigation	Less than proposed project; No Impact	Similar to proposed project; remains significant but mitigable	Similar to proposed project; remains significant but mitigable.	Similar to proposed project; remains significant mitigable.	Similar to proposed project; remains significant but mitigable.

Table 6-1. Comparison of Proposed Project's Significant Impacts to Alternatives

Environmental Impacts	Proposed Project	No Project	Stadium Re-Use Alternative	Reduce Density Alternative	Stadium and River Park Alternative	Alternative Stadium Location Alternative
Utilities and Services Systems	Less than Significant with Mitigation	Less than proposed project; No Impact	Similar to proposed project; remains significant but mitigable.	Less than proposed project; remains significant but mitigable.	Less than proposed project; remains significant but mitigable.	Slightly greater than proposed project; remains significant but mitigable.
Wildfire	Less than Significant Project-level and Cumulative Impacts	Less than proposed project; No Impact	Similar to proposed project; remains less than significant.	Slightly less than proposed project; remains less than significant.	Less than proposed project; remains less than significant.	Similar to proposed project; remains less than significant.

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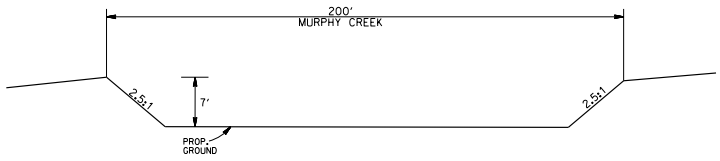

SECTION A-A

NTS

NOTE: EXIST. 10" FUEL AND 36" SEWER TO BE RELOCATED INTO ROAD

200'

CONSTRUCT NEW BRIDGE AND MOVE STREET "1"

STREET "1"

CONSTRUCT NEW TROLLEY BRIDGE

0 30 0 60 120 180 FEET

SOURCE: RICK ENGINEERING 7/22/2019

SDSU Mission Valley Campus Master Plan EIR

SAN DIEGO STATE UNIVERSITY

Figure 6-1A

Murphy Canyon Creek Single Channel Alternative

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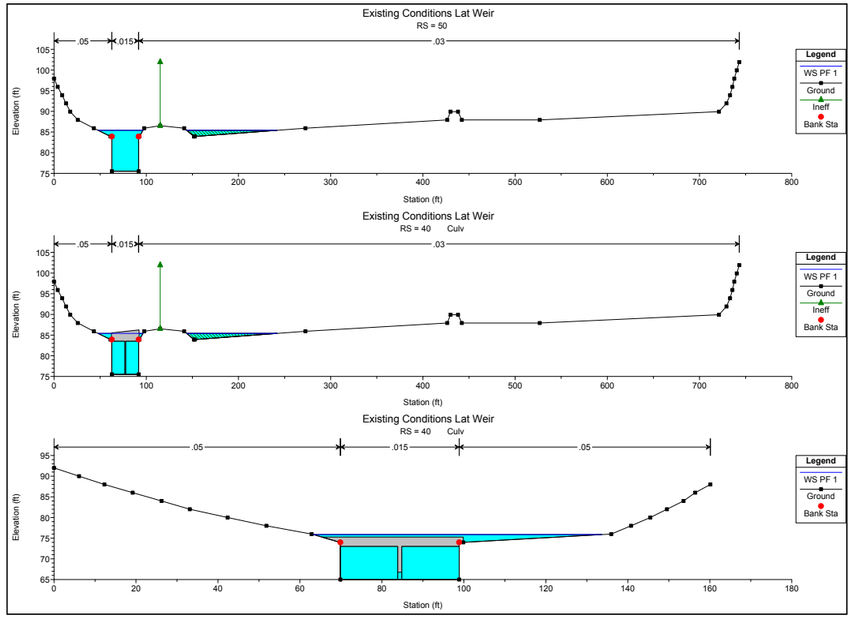

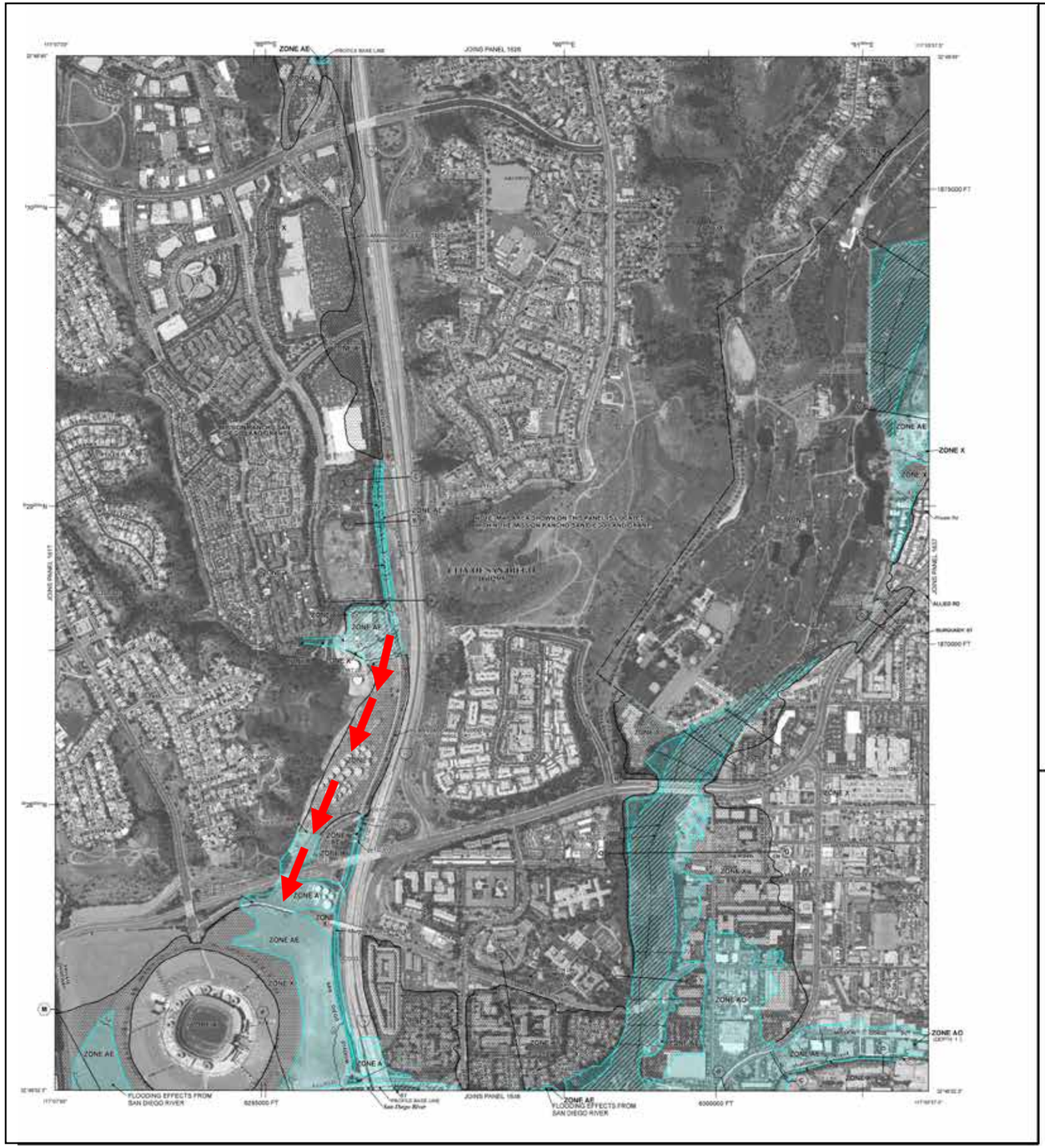

SOURCE: NATIONAL FLOOD INSURANCE PROGRAM 5/16/2019

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Figure 6-1B

Murphy Canyon Creek Single Channel Alternative Offsite Flooding

Z:/Projects/j155501/MAPDOC/DOCUMENT_NAME/EIR/06_Alternatives/Figure 6-1B Murphy Canyon Creek Single Channel Alternative Off Site Flooding

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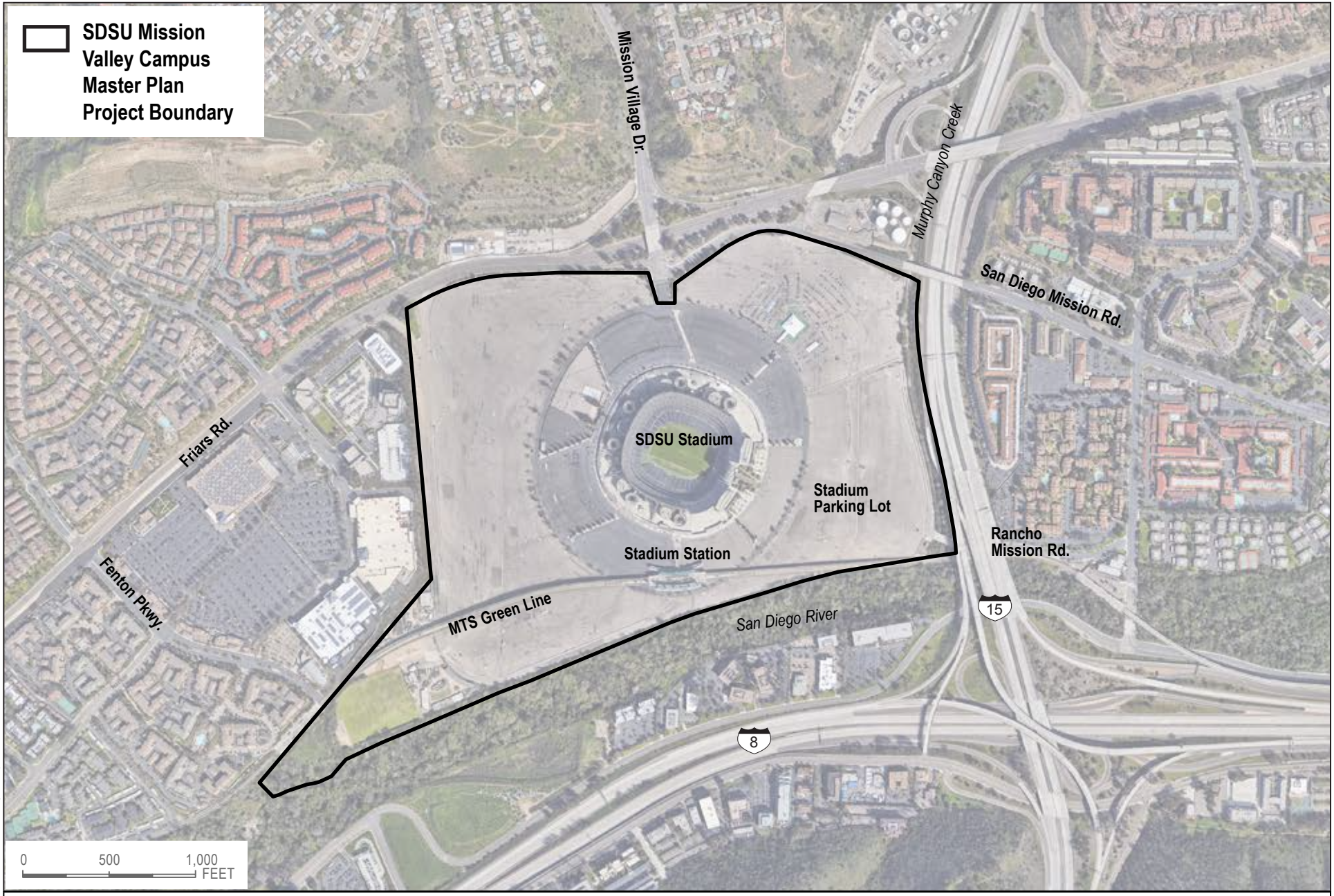

SOURCE: GOOGLE EARTH

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Figure 6-2
No Project Alternative

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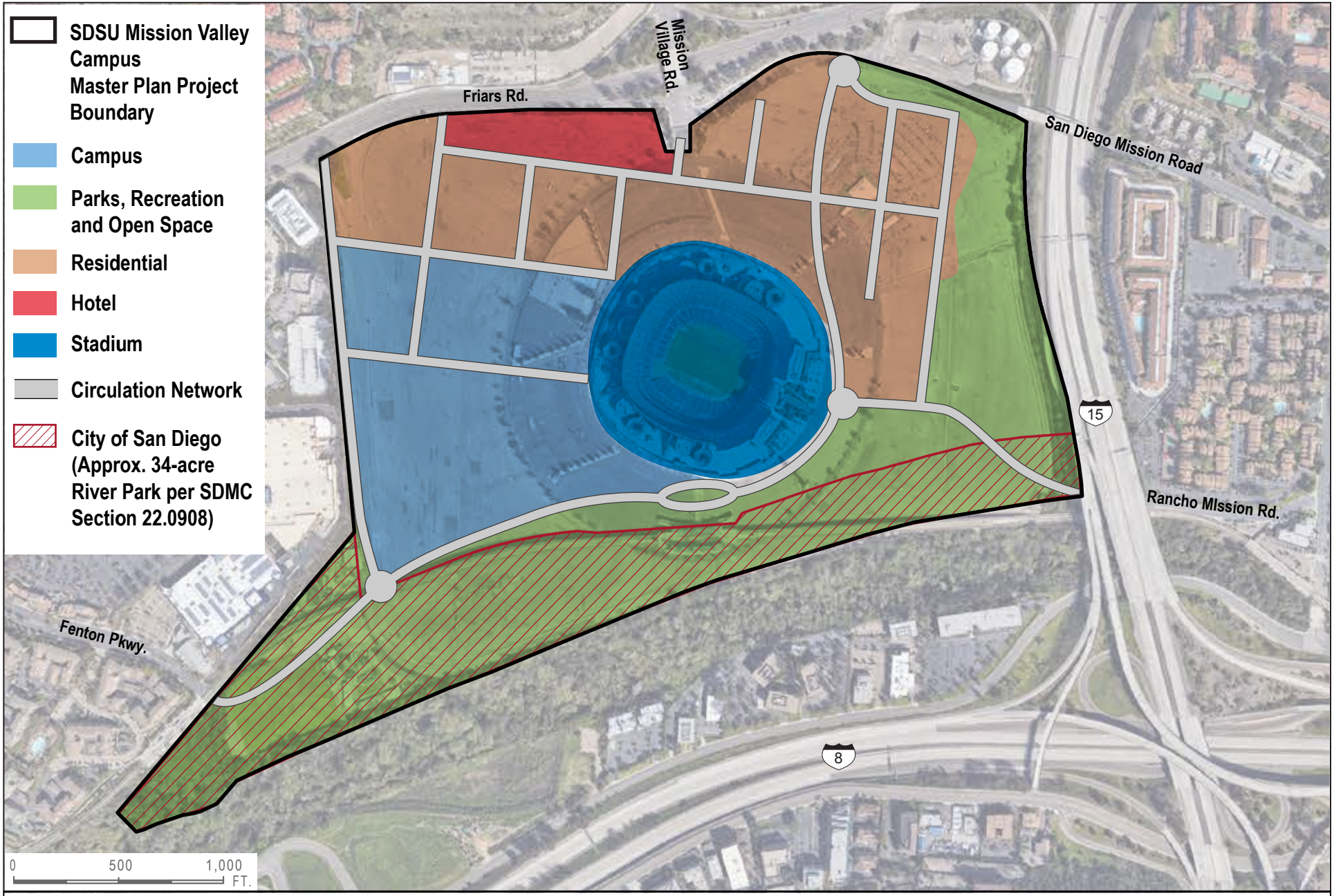

SOURCE: GOOGLE EARTH, CITY OF SAN DIEGO, SANGIS

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SAN DIEGO STATE UNIVERSITY

Figure 6-3
Stadium Re-Use Alternative

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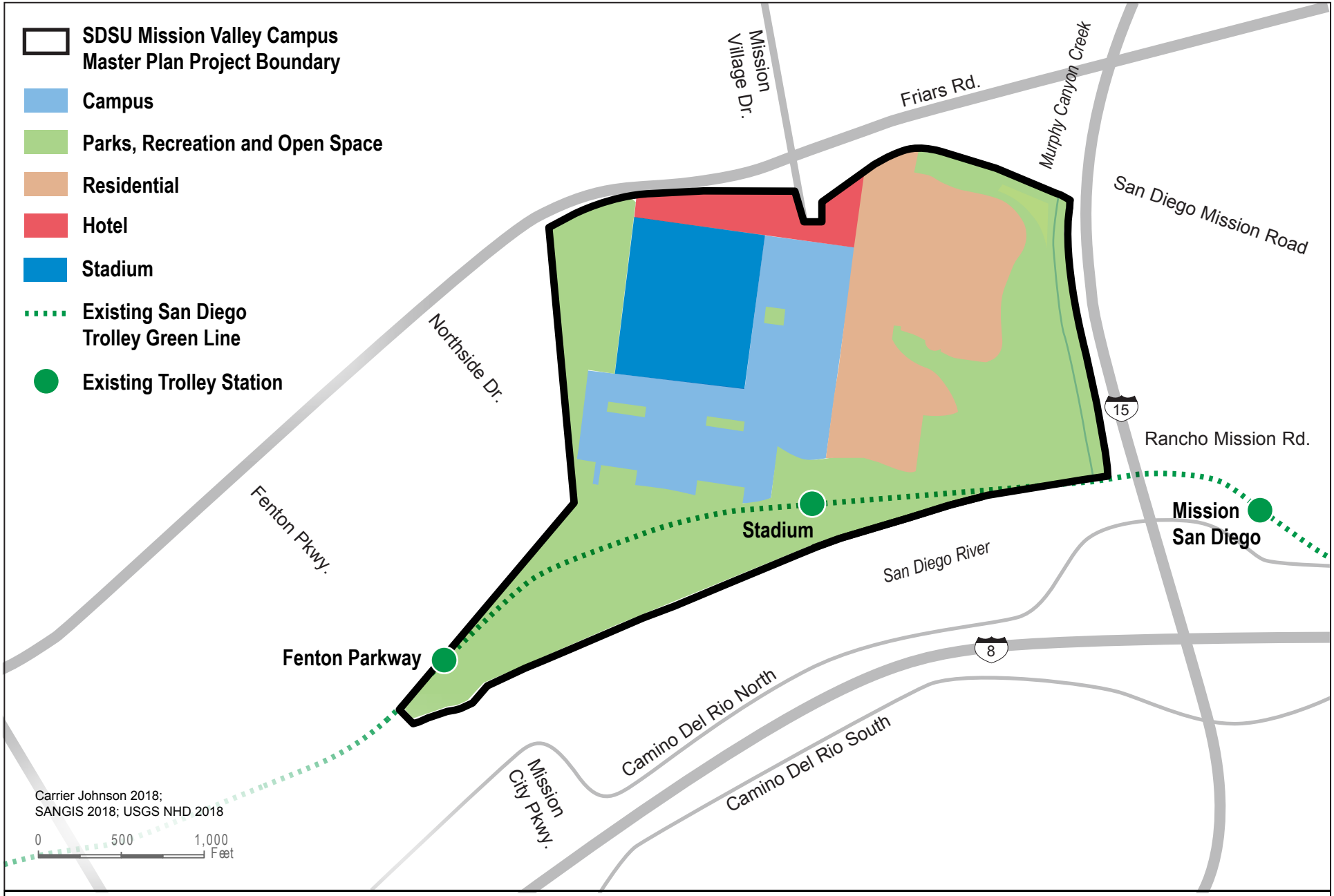

SOURCE: CARRIER JOHNSON

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Figure 6-4
Reduced Density Alternative

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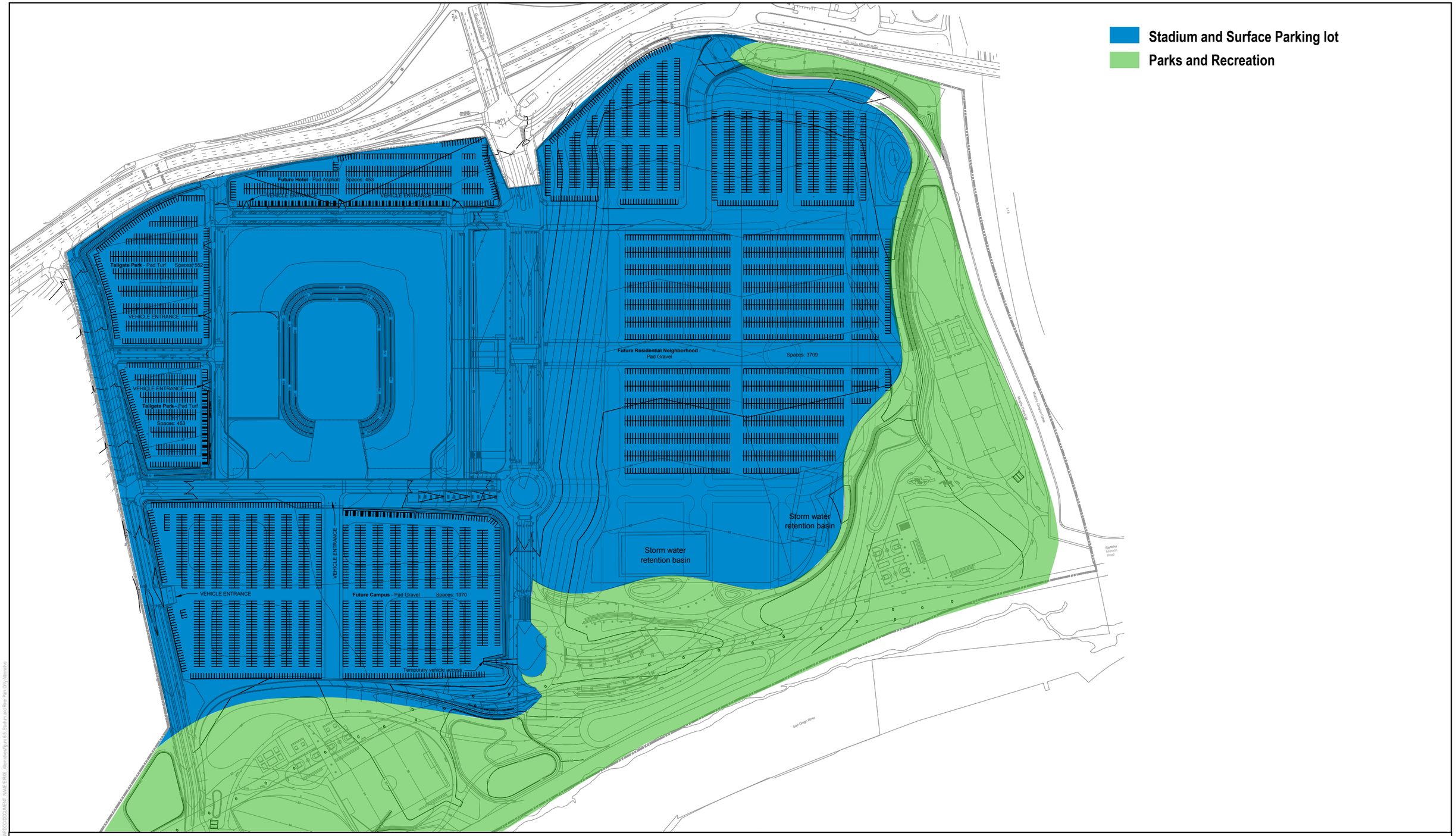

SOURCE: CARRIER JOHNSON 3/4/19

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Figure 6-5
Stadium and River Park Only Alternative

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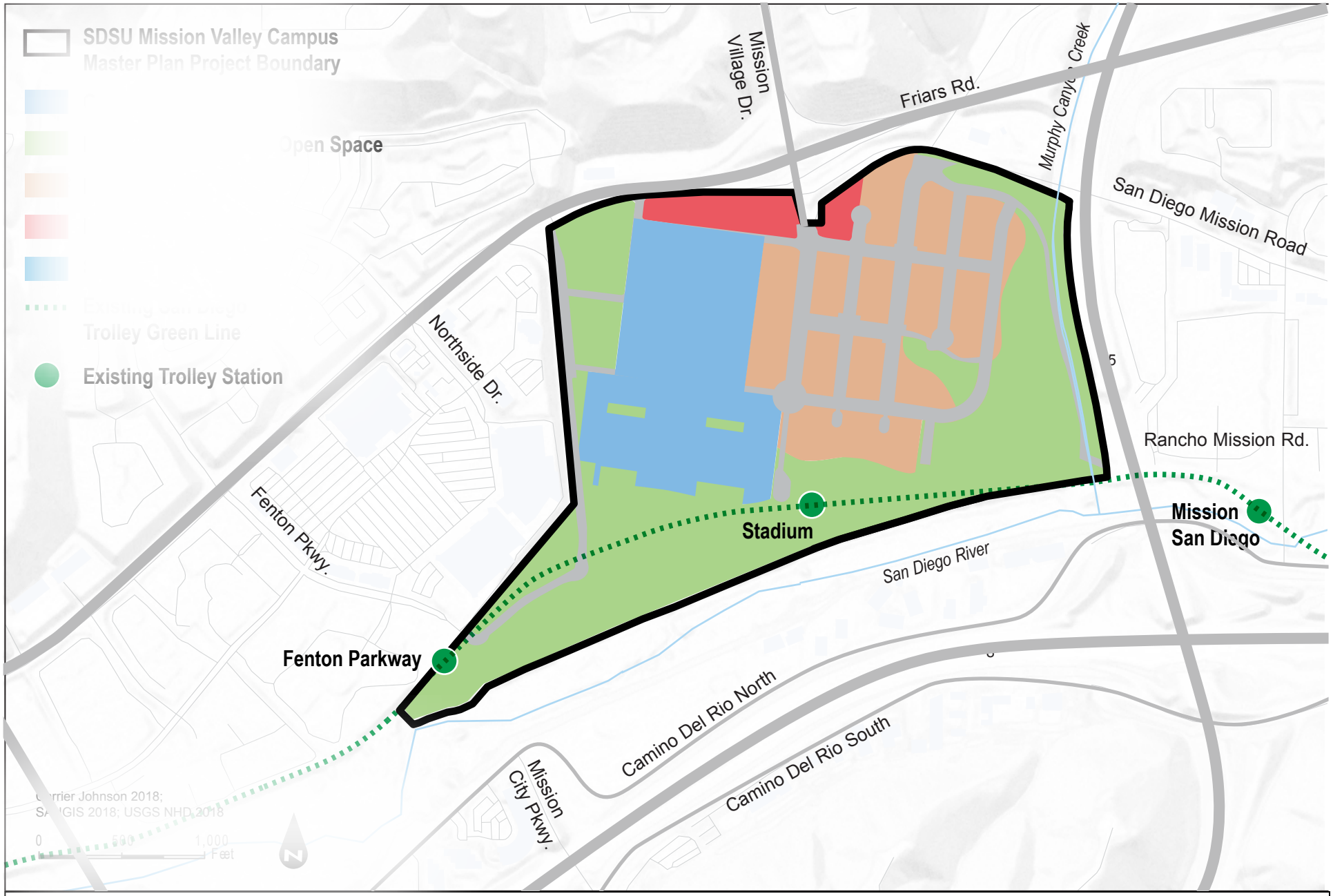

SOURCE: CARRIER JOHNSON

SDSU Mission Valley Campus Master Plan EIR

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Figure 6-6A

Alternate Stadium Location Alternative-Mission Valley Campus

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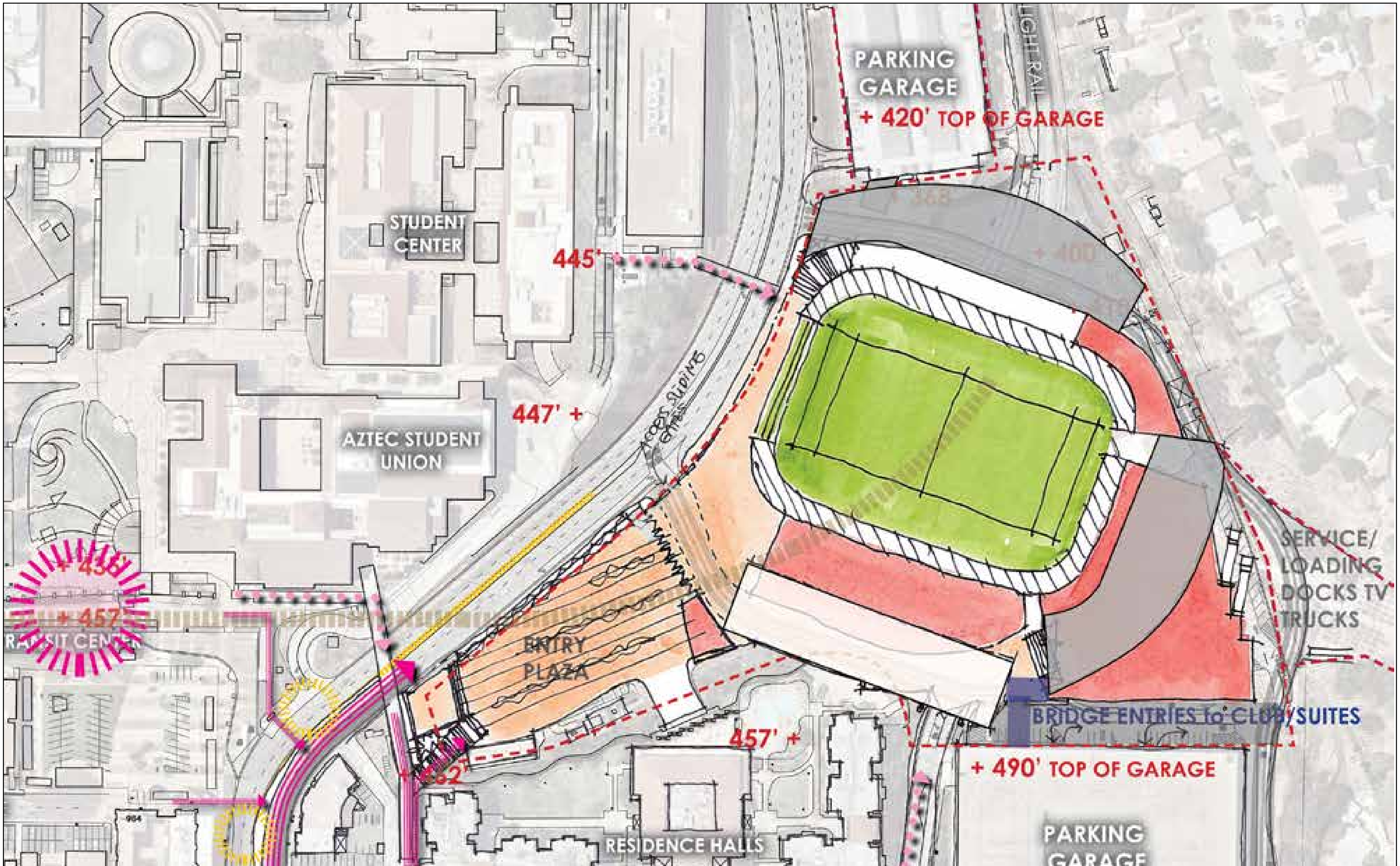

SOURCE: POPULOUS

SDSU Mission Valley Campus Master Plan EIR

San Diego State University

Figure 6-6B

Alternative Stadium Location Alternate-Main Campus

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