

## **CHAPTER 8.0**

### **ALTERNATIVES TO THE PROJECT**

#### **8.1 RATIONALE FOR ALTERNATIVE SELECTION**

In an effort to inform decision making concerning a project, CEQA requires that a discussion of alternatives to the project be provided. Specifically, Section 15126.6(a) of the CEQA Guidelines states that an EIR shall, “[d]escribe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Section 15126.6(f) further states, “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” This is defined in the same section of the CEQA Guidelines as not meaning every conceivable alternative to the project, but only a reasonable range of potentially feasible alternatives.

Because an EIR must identify ways to mitigate or avoid significant impacts, the discussion of alternatives should focus on alternatives “to the project or its location” that will substantially lessen or avoid the significant effects of the project, even if the alternatives might impede the attainment of the project objectives or be more expensive (Section 15126.6(b)).

The three critical factors to consider in selecting and evaluating alternatives are:

- 1) Significant impacts from the Project which should be reduced or avoided by an alternative.
- 2) Project objectives.
- 3) Feasibility of the alternatives available.

Each of these factors is discussed below. In addition, the following discussion focuses on those alternatives that are capable of reducing or eliminating significant environmental impacts, even if they would impede the attainment of some project objectives, or would be more costly.

##### **8.1.1 Significant Impacts of the Project**

As discussed throughout the document and summarized in Chapter 7, Mandatory Discussion Areas of this document, the significant unavoidable impacts of the Project include:

- Air Quality
- Biological Resources
- Hazardous Materials/Human Health/Public Safety
- Historic Resources (Built Environment)
- Hydrology and Water Quality
- Land Use
- Noise
- Visual Quality/Neighborhood Character
- Cumulative

The first question to be addressed in evaluating any alternative is whether it could reduce or avoid any or all of these significant impacts that would result from the project as proposed.

### **8.1.2 Project Objectives**

The primary Project objectives are to:

- Develop a sustainable LEED Gold sports, entertainment, and recreational stadium that is capable of hosting NFL and NCAA football games, as well as special events, including the NFL Super Bowl, that is comparable to other recently constructed modern NFL stadiums.
- Replace the existing Qualcomm Stadium with a new stadium to minimize the City's existing long-term maintenance and operational obligations.
- Develop a new stadium on a site currently under contiguous City ownership with nearby access to multiple freeways, and adjacent to existing public transit and transit stations, existing utilities, and enhanced remote parking facilities to encourage mobility and modal shift.
- Construct a fully operational stadium prior to the opening of the 2019 NFL football season and without displacing current NFL football games off-site during construction off-site.

### **8.1.3 Feasibility of Alternatives**

CEQA, the CEQA Guidelines, and case law have found that feasibility can include a wide range of factors and influences. The Guidelines advise that such factors can include (but are not necessarily limited to): 1) suitability of an alternate site; 2) economic viability; 3) availability of infrastructure; 4) consistency with a general plan; 5) consistency with other plans or regulatory

limitations; 6) jurisdictional boundaries; and, 7) whether the project proponent can “reasonably acquire, control, or otherwise have access to the alternative site.” (Section 15126.6(f)(1))

## **8.2 ALTERNATIVES CONSIDERED BUT REJECTED**

Since 2003, a number of stadium proposals have been discussed/considered in the region. Proposals have included sites in Oceanside, Escondido, National City, downtown San Diego, and the existing Qualcomm Stadium site. The following reflect some of those proposals:

- A new stadium at the existing Qualcomm Stadium site, with a public vote anticipated in November 2006.
- A new stadium along the waterfront in National City that would have required the approval of the San Diego Port Commission.
- Two potential stadium sites in Chula Vista: an area near the U.S. Olympic Training Center in Otay Mesa and the South Bay Power Plant site along San Diego Bay.
- Two potential sites in Oceanside: the Centre City Golf Course and an area next to Oceanside Municipal Airport.
- A ballot measure to build a new stadium above the 96-acre Tenth Avenue Marine Terminal in downtown San Diego that was rejected by San Diego voters in 2008, and a second proposal to use the Tenth Avenue Marine Terminal.
- A stadium in Escondido that would have required the acquisition of land near the Interstate 15/Highway 78 interchange.
- A proposed Downtown Stadium east of Petco Park in 2009. A 2010 proposal to expand the San Diego Convention Center to be combined with a new downtown stadium.

In reviewing the above summary of past locations of potential stadium sites, only downtown San Diego has the potential to be a feasible alternative location under CEQA for consideration in this EIR because all other locations are beyond the territorial land use jurisdiction of the City of San Diego on sites not owned by the City and therefore cannot be successfully accomplished by the lead agency within a reasonable period of time consistent with the project objectives. A new stadium downtown would meet some, but not most of the City’s objectives for the Project, and after close consideration, the two downtown alternatives were eliminated from detailed study as infeasible, as discussed below. The locations of the alternative sites are shown on Figure 8-1.

Other alternatives considered by the City or proposed during the scoping process included using the Project site for a regional park, expansion of the San Diego River Park, construction of a parking structure to accommodate stadium event parking, and demolition of the existing Qualcomm Stadium prior to construction of a new stadium. The two park alternatives do not meet any of the project objectives and were therefore eliminated. The alternative of demolishing the existing Qualcomm Stadium prior to construction of a new stadium was also considered. This alternative would displace all stadium events for up to two years. The Chargers, SDSU Aztecs, and both bowl games would need to find another venue for that time and there are no venues within San Diego County of adequate size so this alternative was also eliminated.

### **8.2.1 Downtown San Diego Stadium Alternative**

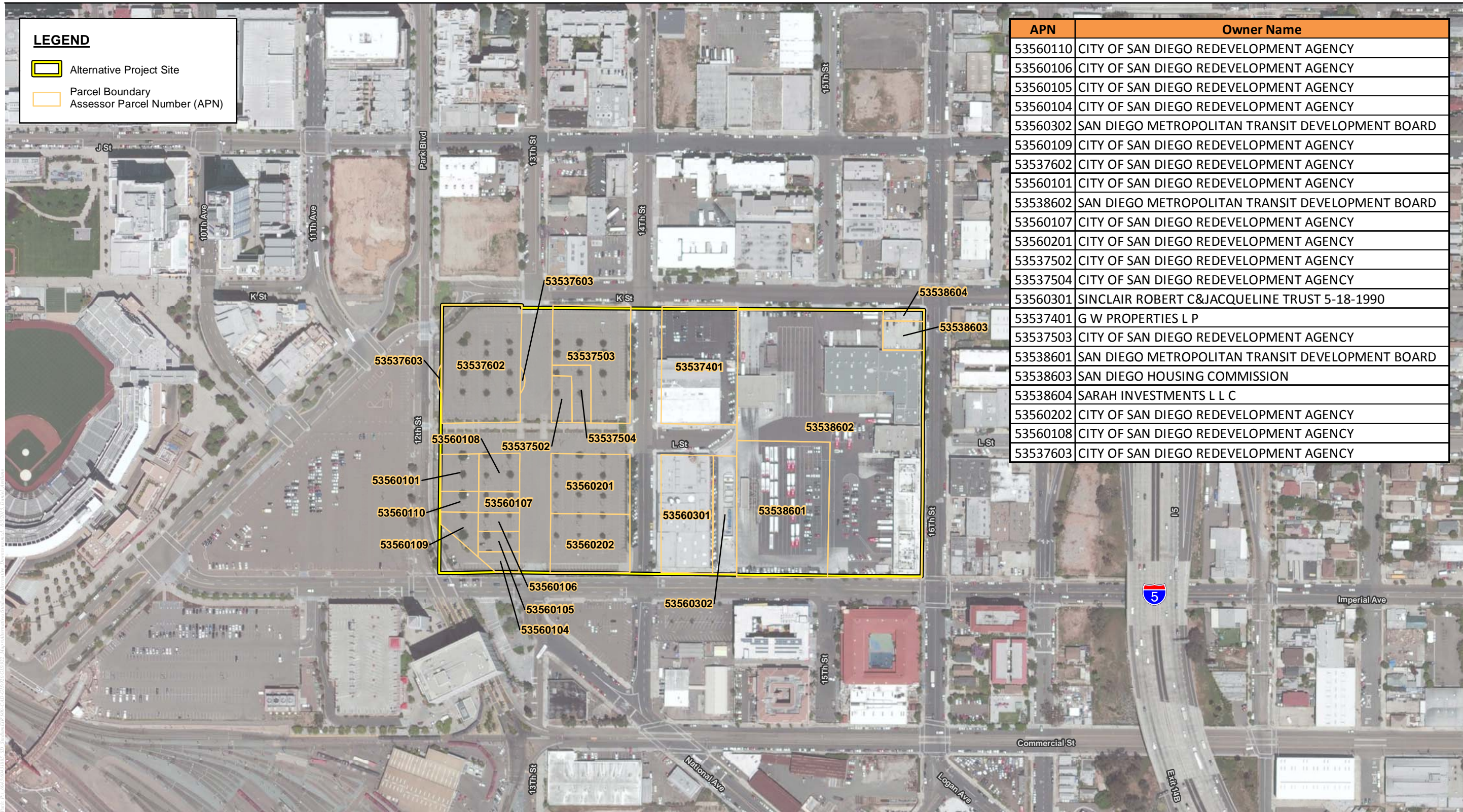
Preliminary concepts have been developed for a new stadium in downtown San Diego with a seating capacity similar to the Project. No plans are available, and the analysis that follows is based upon information generally available from newspaper articles, news reports, public discussions, General Plan, Land Development Code (Centre City Planned District Ordinance), and the Downtown Community Plan.

The 24-acre site for this alternative is located east of Petco Park and southeast of the new Central Library. The site is bordered by K Street on the north, 12th Street on the west, Imperial Avenue on the south, and 16th Street on the east (Figure 8-1, Downtown Alternative Site Location). The stadium would have a north-south orientation, and the use of these two blocks would require the street closure of 14th Street from Imperial Avenue north to K Street.

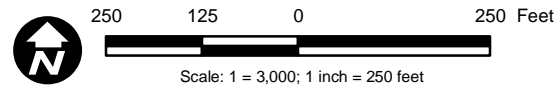
The site has good freeway access, with I-5 approximately 0.1 mile to the east and SR-94 and SR-163 approximately 0.5 mile and 1.0 mile to the northeast, respectively. The site has immediate access to the Green, Blue, and Orange MTS Trolley lines.

This alternative would provide a limited parking lot along the east side of 12th Avenue but would also result in the loss of a full block of parking (12th Avenue/K Street/14th Avenue/Imperial Avenue) that is currently used for Petco Park. An additional constraint on parking at this site is an NFL security requirement that there be a 100-foot buffer surrounding a stadium facility that cannot be used for parking.

This alternative site includes 22 parcels under six different ownerships. The two primary owners are the City of San Diego Redevelopment Successor Agency, which owns the western portion of the site, and the San Diego Metropolitan Transit System, which owns the eastern portion of the site. Private parties and the San Diego Housing Commission own the central and northeast



Source: NAIP 2014, SanGIS 2015.



**Figure 8-1**  
**Downtown Alternative Site Location**

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portions of the site. The central and eastern portion of the site would not be readily available to the City of San Diego for development of a stadium. Land acquisition would increase the overall project cost compared to the Project and would therefore be anticipated to increase the need for public funding. Acquisition of the required parcels would delay project implementation; however, once the land had been acquired, the overall development time frame for this alternative would not differ greatly from the Project. Demolition of the existing structures on the site would occur, followed by site cleanup, debris removal, and construction. The existing uses would need to be relocated elsewhere, subject to the Uniform Relocation Act, including the Imperial Avenue Division (IAD) bus maintenance facility. There is no known relocation site for the IAD, but potential land use, noise, visual, and air quality environmental impacts would be expected with relocation.

Although no study of required infrastructure upgrades is available, development of a Downtown Stadium would undoubtedly require expansion of public services and utilities. The MTS Chief Executive Officer identified that one-third of attendees at NFL games arrive by trolley, and that during the last Super Bowl held at Qualcomm Stadium in 2003, 32,000 attendees arrived via the light rail system (San Diego Union Tribune, February 24, 2015). Meeting a similar demand would require additional improvements in the rail system, specifically high-capacity station platforms as exists at the Project site, particularly given the parking spaces that would be lost through stadium development.

Water and wastewater utilities are largely in place in proximity to the Downtown Stadium site. There are existing City of San Diego water pipelines located adjacent to the site in Park Boulevard (12-inch), Imperial Avenue (8-inch), and 16th Street (12-inch), and crossing the site in L Street (16-inch). Water service to the site could be provided from Park Boulevard, 16th Street or the L Street pipelines. Abandoning a portion of the 16-inch water line in L Street may be required.

Existing wastewater facilities are also located near the Downtown San Diego Stadium site. There are existing City of San Diego sanitary sewer pipelines located adjacent to the site in Park Boulevard (8-inch and 15-inch), Imperial Avenue (12-inch), and 16th Street (8-inch, 14-inch, 39-inch and 84-inch). Sewer facilities crossing the site that would be abandoned or removed include 6-inch and 10-inch pipelines in 14th Street, and a 6-inch pipeline in 15th Street. Wastewater service would be extended to the site from pipelines located along 16th Street allowing for ultimate disposal to the 84-inch interceptor sewer.

The IAD bus maintenance facility has been a consistent consideration in evaluations of the Downtown San Diego Stadium site. The 7.75-acre lot has operated as a transit vehicle fueling and maintenance yard for more than a century, and has been the subject of an environmental

investigation by the County since 1986 (San Diego Union Tribune, November 28, 2009) due to elevated levels of petroleum contaminants and benzene. Leaking fuel tanks have been removed from the site, and a combined total of 3,030 cubic feet of contaminated soil was removed from the site in 1993 and 1997. Further environmental remediation would be required, which changes this alternative to have greater hazardous waste impacts than the Project environmentally inferior to the proposed Project.

MTS has stated that environmental remediation of the bus yard, together with securing a replacement facility, could prevent the initiation of stadium construction by as much as seven years (San Diego Union Tribune, February 24, 2015).

The General Plan Land Use designation for the Downtown San Diego Stadium site is Downtown (within the Multiple Use category), which is intended to provide a range of single and multiple uses in a setting of high intensity appropriate to downtown's unique role as the regional center. This land use designation calls for development that emphasizes the integration of commercial, residential, civic, institutional, and open space uses. A Downtown Stadium would be a high intensity civic use, which would be consistent with the Downtown Multiple Use designation.

The Downtown Community Plan identifies two designations for the Downtown Stadium site. The eastern portion of the site (roughly 20 percent) is designated Ballpark Mixed Use and the remaining western portion (roughly 80 percent) is designated Mixed Commercial. The Mixed Commercial designation is intended to accommodate a diverse array of uses, including residential, artists' studios and live/work spaces, hotels, offices, research and development, and retail, and allow continuing operation of existing service and industrial uses – including light industrial and repair, warehousing and distribution, transportation, and communication services. Mixed uses in the Ballpark District are intended to accommodate major sporting facilities and visitor attractions. The classification contains a broad array of other uses, including eating and drinking establishments, hotels, offices, research and development facilities, cultural and residential uses, live/work use, and parking. A stadium use would be consistent with the Ballpark Mixed Use designation, but not consistent with the Mixed Commercial land use designation. As such, implementation of a stadium at the Downtown site would require a community plan amendment for the area designated as Mixed Commercial.

The site is located within the neighborhood of East Village (Southeast sub-district), which allows a mix of residential, office, retail, and convention center growth, while retaining light industrial uses and support infrastructure such as auto repair shops. A stadium use could be generally consistent with the Southeast sub-district in regards to use based on the complementary nature of the facility and the site's proximity to Petco Park and the Convention Center. However, within the Southeast sub-district, building intensity is generally allowed in the low to middle range for



downtown. Based on stadium design, it could be determined to be inconsistent with the Community Plan Southeast sub-district.

The properties under this alternative are also governed by the Centre City Planned District (CCPD) Ordinance and are zoned predominantly Mixed-Use Commercial (CCPD-MC), with the eastern parcels zoned Ballpark (CCPD-BP). According to Table 156-0308-A of the CCPD Use Regulations, a stadium is not listed as a permitted use; however, Assembly and Entertainment is a permitted use for both Ballpark and Mixed-Use Commercial. A Neighborhood Use Permit would be required for a facility that includes live entertainment or outdoor use areas. Although these uses would be consistent, a zone amendment would be required to reconcile the two different zones on the project site, and a neighborhood use permit would likely be required.

This alternative was eliminated from detailed study because it does not meet most of the project objectives and would not be environmentally superior to the Project due to additional land use, hazardous waste, circulation, and displacement impacts. It cannot be implemented within the required time frame due to potential delays resulting from property acquisition, environmental remediation, IAD relocation, and needed infrastructure improvements. In addition, this alternative would require a zone change and amendment to the Downtown Community Plan. It is unlikely that adequate parking could be provided, as development of the site would remove the surface parking for Petco Park and there is insufficient space for the development of other parking nearby. The site cannot be acquired or controlled by the City in the timeframe needed to provide a stadium for the 2019 NFL season, which is one of the objectives of the Project.

### **8.2.2 Downtown San Diego Stadium Associated with the Convention Center Expansion**

This alternative would be similar to the Downtown San Diego Stadium alternative site discussed above, and it would utilize the same site. However, a non-contiguous expansion of the existing convention center would be co-developed with the new Downtown San Diego Stadium under this alternative. No plans are available for this alternative, and the analysis that follows is based upon information generally available from news reports, public discussions, General Plan, Land Development Code (Centre City Planned District Ordinance) and the Downtown Community Plan.

The capacity of the stadium would be similar to the Project. A convention center exhibit hall would be constructed as a lower level of the new stadium building, and a new convention building would be constructed adjacent to the stadium (where parking had been proposed along the east side of 12th Avenue in the alternative above). The convention center component would require additional funding sources, although there would be some economies of scale realized from joint construction of the two facilities.

In addition, a stadium with a convention center could be generally consistent with the General Plan, Downtown Community Plan, and the East Village neighborhood (Southeast district) as described above. Similarly to the Downtown San Diego Stadium Alternative, this alternative would also require an amendment to the Downtown Community Plan to reconcile the two land use designations (Ballpark Mixed Use and Mixed Commercial) into one Ballpark Mixed Use designation, and could possibly have density conflicts depending on stadium design.

The properties would be governed by the same land use and zoning documents as stated above (the CCPD Ordinance and Community Plan). As indicated above, a stadium would be consistent with the Ballpark Zone with a neighborhood development permit, although the whole site would need to be rezoned into a single zone. However, the secondary use of a convention center is not permitted in the Ballpark zone, but is permitted in the Mixed-Use Commercial zone as Exhibit Halls & Convention Facilities (according to CCPD Ordinance Table 156-0308-A). In order to have both uses on site, the existing use table would have to be modified, a new zone would need to be created, or a specific plan would need to be developed.

This alternative was eliminated from detailed study because it does not meet most of the project objectives. It cannot be implemented within the needed time frame due to potential delays resulting from property acquisition, environmental remediation, bus yard relocation, and needed infrastructure improvements. This alternative would require an amendment to the Downtown Community Plan, a rezone, and possibly a specific plan. It is unlikely that adequate parking could be implemented as development of the site would remove the surface parking for Petco Park and there is insufficient space for the development of other parking nearby. The site cannot be acquired or controlled by the City in the timeframe needed to provide a stadium for the 2019 NFL season, which is one of the objectives of the Project

### **8.2.3 Qualcomm Stadium Site South Alternative**

This site would be located either southeast or southwest of the existing Qualcomm Stadium within the 166-acre Qualcomm Stadium parking lot. The site is owned by the City of San Diego, so it is readily available. The number of future events would increase above current Qualcomm Stadium use similar to the Project.

The development timeframe would likely be extended, and the cost of this alternative would likely be higher than for the Project as a result of the need to realign the trolley tracks and rebuild the station. The site size, availability of parking, and accessibility to freeways and alternative modes of transportation would be the same as the Project. The availability of public services and utilities would also be the same.

Depending on the stadium design and orientation, crowd noise and tailgating noise impacts could be comparable to the Project and existing conditions at Qualcomm Stadium. The replacement of the existing stadium with a new stadium would, however, create significant temporary noise, air quality, and traffic impacts associated with demolition and construction activities. These impacts would be comparable to the construction impacts identified for the Project. Noise levels from both construction and operation would potentially result in significant impacts to biological resources. Impacts to biological resources would likely exceed those of the Project due to the proximity of the San Diego River.

This location would have development that encroaches into the River Influence Area of the SDRPMP (City of San Diego 2013), resulting in additional biological impacts, as compared to the Project, and the stadium design would likely not comply with the building height and setbacks identified in the SDRPMP required within the River Influence Area. This Alternative would have additional visual and land use impacts because it would block additional views into the San Diego River and would not meet the objectives and development guidelines of the MVCP. In addition, this location would create additional transportation impacts because it would conflict with the existing MTS Trolley line and trolley station.

The Qualcomm Stadium South Site Alternative would result in significant land use impacts that would not occur under the Project as it would preclude onsite implementation of the SDRPMP. As opposed to the Project, potential significant impacts to biological resources would occur as a result of construction and operational noise. The Qualcomm Stadium Site South Alternative would require substantial reconstruction of the trolley alignment and station, thereby adding substantial costs. Therefore, this alternative location is infeasible and had been eliminated from detailed study.

### **8.3 ALTERNATIVES CONSIDERED**

Consistent with Section 15126.6 of the CEQA Guidelines, a reasonable range of alternatives to the proposed development must be analyzed. The discussion below analyzes the following: two no project alternatives that would retain the existing stadium; one alternative location for reconstruction of a new stadium onsite; two major renovation alternatives that would retain the existing Qualcomm Stadium; and, one alternative that would both retain the existing Qualcomm Stadium and construct a new stadium on-site at the northeast or northwest corner of the site.

**Table 8-1**  
**Descriptions and Attributes of Alternatives to Project**

	<b>Project</b>	<b>Alternative 1 Stadium in Northwest</b>	<b>Alternative 2 Major Renovation with NFL</b>	<b>Alternative 3 Major Renovation without NFL</b>	<b>Alternative 4a Two Stadiums, New Northeast Stadium</b>	<b>Alternative 4b Two Stadiums, New Northwest Stadium</b>	<b>No Project / No Build without NFL</b>	<b>No Project / No Build with NFL</b>
<b>Description<sup>1</sup></b>	Actual Project	Project but with the new stadium located in northwest of the Project site.	Renovate the existing Qualcomm Stadium result in a stadium comparable to other recently constructed modern NFL stadiums	Renovate the existing Qualcomm Stadium for non-NFL usage only.	Construct new stadium as under the Project but retain existing Qualcomm Stadium structure.	Construct new stadium northwest of the existing Qualcomm Stadium, and retain existing Qualcomm Stadium structure	Leave current site as is, without NFL usage.	Leave current site as is, with NFL usage.
<b>Location of New Stadium</b>	Northeast of the existing Qualcomm Stadium	Northwest of the existing Qualcomm Stadium.	N/A	N/A	Northeast of the existing Qualcomm Stadium.	Northwest of the existing Qualcomm Stadium.	N/A	N/A
<b>New Stadium</b>	Yes	Yes	No	No	Yes	Yes	No	No
<b>Demolition of Qualcomm Stadium</b>	Yes	Yes	No	No	No	No	No	No
<b>No. of stadiums on site</b>	1 (new)	1 (new)	1 (existing)	1 (existing)	1 (new), 1 (existing)	1 (new), 1 (existing)	1 (existing)	1 (existing)
<b>No. Seats</b>	68,000	68,000	70,560	70,560	68,000(new); 70,560 (existing)	68,000(new); 70,560 (existing)	70,560	70,560
<b>Reconfigured Parking Lot</b>	Yes	Yes	No	No	Yes	Yes	No	No
<b>Post-Construction Parking Spaces<sup>2</sup></b>	16,500 <sup>1</sup>	16,500 <sup>1</sup>	16,500 <sup>1</sup>	16,500 <sup>1</sup>	13,500	13,500	16,240	16,240

<sup>1</sup> Future implementation of the River Park Master Plan would result in the loss of additional parking bringing the total to approximately 13,860 spaces.

**Table 8-2  
Project Alternatives Impact Summary**

<b>Issue Area<sup>1</sup></b>	<b>Alternative 1 New Stadium in Northwest</b>	<b>Alternative 2 Major Renovation with NFL</b>	<b>Alternative 3 Renovation without NFL</b>	<b>Alternative 4a Two Stadiums (Northeast)</b>	<b>Alternative 4b Two Stadiums (Northwest)</b>	<b>No Project / No Build with NFL</b>	<b>No Project/ No Build/ Without NFL</b>
<b>Air Quality and Odor</b>	Similar	Less	Less	Less	Less	Less	Less
<b>Biological Resources</b>	Less	Less	Less	Similar	Less	Less	Less
<b>Energy</b>	Similar	Greater	Greater	Greater	Greater	Greater	Less
<b>Geology/Soils</b>	Similar	Less	Less	Similar	Similar	Less	Less
<b>Greenhouse Gas Emissions</b>	Similar	Greater	Greater	Greater	Greater	Greater	Greater
<b>Hazardous Materials/ Human Health / Public Safety</b>	Less	Less	Less	Less	Less	Less	Less
<b>Historical Resources</b>	Similar	Less	Less	Less	Less	Less	Less
<b>Hydrology and Water Quality</b>	Less	Greater	Greater	Greater	Greater	Greater	Greater
<b>Land Use</b>	Less	Less	Less	Similar	Similar	Less	Less
<b>Traffic/Circulation</b>	Greater	Less	Less	Greater	Greater	Less	Less
<b>Noise</b>	Similar	Less	Less	Less	Less	Less	Less
<b>Paleontological Resources</b>	Similar	Less	Less	Less	Less	Less	Less
<b>Public Services and Facilities</b>	Similar	Similar	Similar	Greater	Greater	Less	Less
<b>Public Utilities</b>	Similar	Less	Less	Greater	Greater	Less	Less
<b>Visual Effects and Neighborhood Character</b>	Similar	Less	Less	Greater	Greater	Less	Less
<b>Cumulative Impacts</b>	Similar	Less	Less	Similar	Similar	Less	Less

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify an environmentally superior alternative. Based on the evaluation presented below, it was determined that the No Project Alternative without an NFL Team is the environmentally superior alternative. In instances when a No Project alternative represents the environmentally superior alternative, the above-referenced section of the CEQA Guidelines requires that the EIR also identify an environmentally superior alternative from amongst the other alternatives considered. Alternative 3, Major Renovation of Qualcomm Stadium without an NFL Team, was determined to be the environmentally superior “build” alternative.

### **8.3.1 Alternative 1 - Qualcomm Stadium Site Northwest**

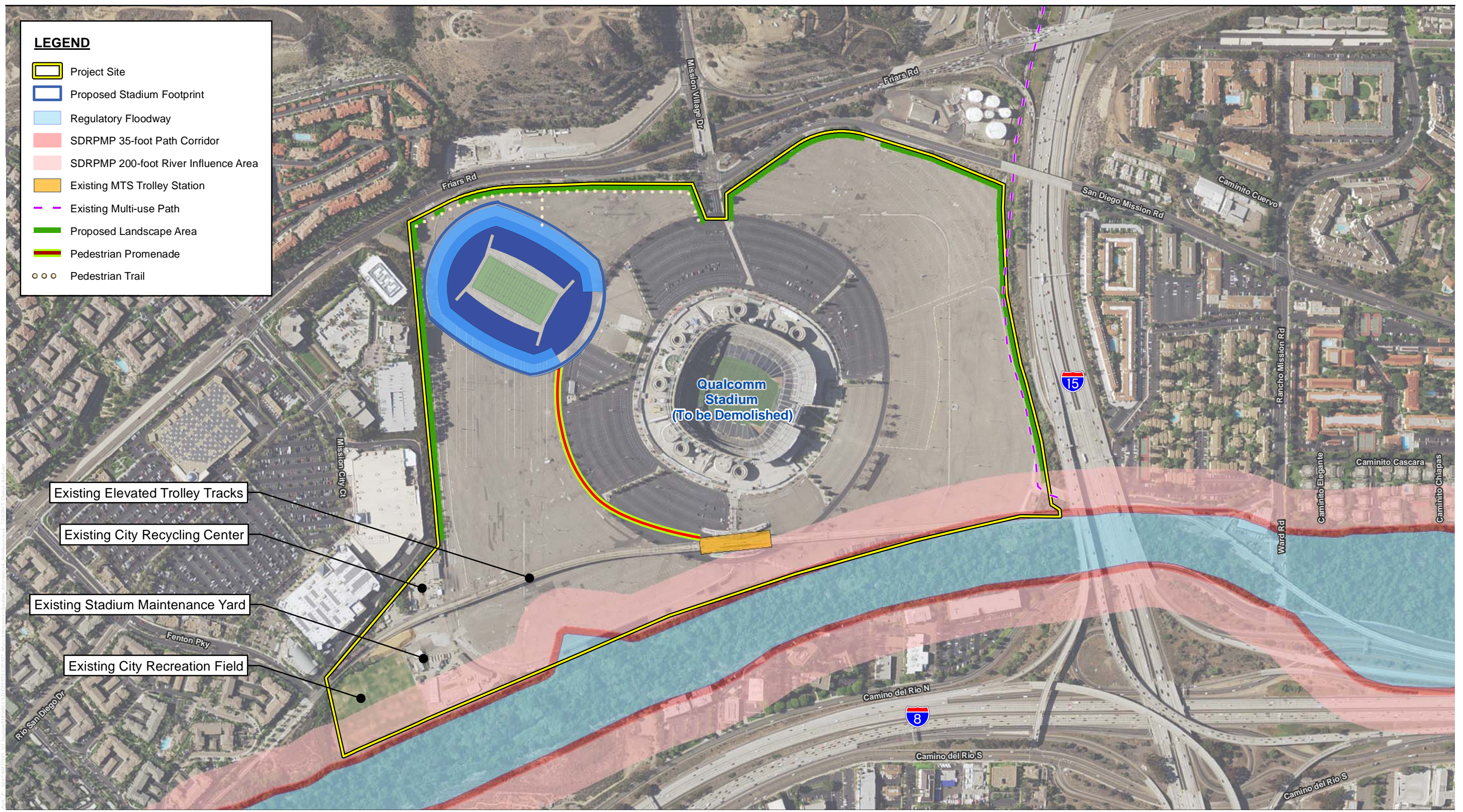
This alternative would meet all of the Project objectives. A new stadium with a capacity and design similar to the Project would be built in the Qualcomm Stadium parking lot, northwest of the existing Qualcomm Stadium (see Figure 8-2, Alternative 1 Northwest Stadium). The current ground surface in this area slopes down in a south and southeasterly direction, from elevations of approximately 100 feet in the northwest corner of the site to an elevation of approximately 52 feet at the central portion of the alternative site. There is an approximately five percent slope across the site, and this alternative would require a significantly smaller amount of soil import than the Project. The construction and demolition schedule would be similar, with a shorter construction phase since there would be less earthwork involved.

The field level of this alternative would be approximately 70 to 80 feet, which would be higher than the Project at 60 to 65 feet. The new stadium would have the same orientation (northwest-southeast) as the Project. Access would remain similar to the Project, as would the number of parking spaces generally available throughout construction, demolition, and post-construction.

Alternative 1 would not propose any new construction or construction staging within the Influence Area of the SDRMP

This alternative would reduce and/or avoid the following significant impacts from the Project:

- Biological Resources
- Hazardous Materials/Human Health/Public Safety
- Hydrology and Water Quality
- Land Use



**LEGEND**

- Project Site
- Proposed Stadium Footprint
- Regulatory Floodway
- SDRPMP 35-foot Path Corridor
- SDRPMP 200-foot River Influence Area
- Existing MTS Trolley Station
- Existing Multi-use Path
- Proposed Landscape Area
- Pedestrian Promenade
- Pedestrian Trail

- Existing Elevated Trolley Tracks
- Existing City Recycling Center
- Existing Stadium Maintenance Yard
- Existing City Recreation Field

Source: NAIP 2014; FEMA; SANDAG.

500 250 0 500 Feet

Scale: 1 = 6,000; 1 inch = 500 feet

**Figure 8-2**  
**Alternative 1**  
**Northwest Stadium**

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### **Air Quality and Odor**

During construction and demolition of Alternative 1, air quality, odor and health risk impacts would result from a nearly identical cross-section of equipment and somewhat similar shorter construction schedule compared to the Project. Similar import material required for Alternative 1 would decrease both criteria and toxic air pollutant emissions associated with haul trucks and grading equipment (e.g. scrapers, bulldozers, graders) and other ancillary equipment (e.g., water trucks, street sweepers) required to move, place and compact large soil volumes. The impacts due to construction, demolition, and operations, would be similar to the Project.

### **Biological Resources**

Direct and indirect impacts from construction and operation of this Alternative would be similar to those described for the Project. With the exception of construction impacts on avian species nesting in ornamental trees and avian collisions during operation as described for the Project, no direct impacts would occur to special status species. No direct impacts would occur to sensitive habitats, including jurisdictional waters and wetlands, wildlife movement, or MSCP MHPAs, and this alternative would not cause establishment and propagation of invasive species. Indirect impacts during construction and operation including exotic species, changes in hydrology, unauthorized access, noise, and lighting would be similar in nature to those described for the Project. Indirect impacts to the biological resources in the San Diego River corridor and the MHPA under Alternative 1 would be the same type and relative magnitude as the Project because the difference in distances of the Project as compared to Alternative 1 from the river is minimal. It would have similar impacts to the Project with respect to the potential for bird strikes on the installed PV panels. Alternative 1's location in the northwest corner would be expected to reduce the magnitude of construction and operational indirect impacts, in particular from lighting and noise, on Murphy Canyon Creek. Because construction and operation the Project would be closer to the creek than Alternative 1, this would result in overall impacts to biological resources that are less than those of the Project.

### **Energy**

Implementation of Alternative 1 would comply with current Title 24 (including any city amendments) and be designed to CALGreen requirements. Alternative 1 would be designed as a sustainable, green building that would achieve a LEED Gold rating and would include installation of PV solar energy similar to the Project. Therefore, energy impacts would be similar to those of the Project.

## **Geology/Soils**

This site is underlain by approximately 35 to 40 feet of alluvial material that is primarily clayey above the groundwater table, with sand below the groundwater table. The geology of the northwest alternative site is somewhat different than the location of the new stadium under the Project, primarily due to the higher elevation and primarily clayey upper soil. A landslide was mapped in this vicinity (Benton 1965a); however, the landslide is not mapped on the State or City Hazard Maps or the regional geologic map, and it is not mentioned in the other literature reviewed for the Project. A landslide was present at this location prior to the development of the existing Qualcomm Stadium, the subsequent grading required for the construction of Qualcomm Stadium in 1966, which lowered Friars Road and the northwest corner of the Project site by approximately 30 to 50 feet, essentially removed the driving force behind a potential future landslide. Fill placed for the existing Qualcomm Stadium at the toe of the mapped feature would also act to buttress the landslide debris, if present.

If formational materials are shallower, and the alluvium is thinner at the Alternative 1 site, the potential for liquefaction may be somewhat reduced, although some hazard is likely to be present along the southern and eastern margins of the alternate site. Since the slope of the formation surface may slope steeply, highly variable pile lengths could be required. Due to the slope of the existing ground, a cut/fill configuration may be required, with cuts on the northwest side, and fills on the southeast side. This could reduce the requirements for fill volumes as compared with the Project, although there could be a need for retaining structures on the northwest side of the alternative site.

Geologic hazards associated with the Alternative 1 project site are essentially the same as those associated with the Project.

## **Greenhouse Gas Emissions**

This Alternative would also generate GHG emissions from construction and operation, including mobile, energy, water, and wastewater sources, related to the new stadium. The new stadium under Alternative 1 involves all the same components as the Project, and involves the same demolition of existing Qualcomm stadium. Therefore, impacts under Alternative 1 would be similar to the Project.

## **Hazardous Materials/Human Health/Public Safety**

Under this alternative the impacts of the Project related to exposure to wildland fires; emergency response plan and evacuation plan compatibility; the exposure of people to toxic substances

(such as pesticides), airport and aircraft safety hazards; and hazards associated with the transport, use, and disposal of hazardous materials would be similar to the Project, wherein the new stadium would be located adjacent and to the northwest of the existing Qualcomm Stadium, and the existing Qualcomm Stadium would be demolished.

Locating the new stadium in the northwest corner of the approximately 166-acre Project site would be expected to reduce Project impacts associated with encountering contaminated soil and groundwater during ground-disturbing activities, as well as to reduce Project impacts associated with closing and/or relocating remediation infrastructure (i.e., groundwater monitoring wells, groundwater extraction wells, or SVE wells). While the possibility of encountering contaminated materials cannot be ruled out for Alternative 1, the amount of contaminated material in the northwestern portion of the Project site is anticipated to be less as compared to the northeastern portion of the Project site, based on the location of on-site contamination that resulted from off-site incidents in the past (refer to Section 4.6 of this EIR). Similarly, based on information reviewed during preparation of this EIR (Geofirma and Intera 2015), less remediation infrastructure is located in the northwestern portion of the Project site; therefore, impacts associated with closing and/or relocating remediation infrastructure would be less with Alternative 1 as compared to the Project.

Alternative 1 would reduce the potential risk of upset impact associated with locating the new stadium within approximately 750 feet of the KMEP MVT (in the event of a tank release and subsequent pool fire or vapor cloud explosion), which is located off-site but to the north/northeast of the Project location. In its Alternative 1 location to the northwest of the existing Qualcomm Stadium, the new stadium and users inside and adjacent to the stadium would be located approximately 1,800 feet from the KMEP MVT. This portion of the Project site is anticipated to remain a parking lot that is also used for intermittent events such as RV shows under Alternative 1. Overall, the Hazardous Materials/Human Health/Public Safety risks associated with Alternative 1 are less than those associated with the Project.

### **Historical Resources**

The existing Qualcomm Stadium has been identified as eligible for individual listing in the NRHP, CRHR, and the City of San Diego Register of Historic Resources as a Historical Landmark at the local level (Heritage 2015). No other eligible or listed resources were identified within the Project site. Like the Project, Alternative 1 includes demolition of the existing Qualcomm stadium and would result in direct and significant impacts to the resource. These impacts could not be mitigated to a level below significant and therefore, are the same level as the Project impacts.

Compared to the Project, Alternative 1 has a similar potential to result in adverse effects and/or destruction of significant archaeological resources under CEQA and City of San Diego guidelines based on anticipated ground disturbance in areas of high archaeological sensitivity. Similar to the Project, Alternative 1 poses no effects to existing religious or sacred uses or to human remains. As such, the impacts of Alternative 1 with respect to historical resources would be similar to the Project.

### **Hydrology and Water Quality**

Implementation of Alternative 1 would result in slightly less temporary impacts than the Project due to the reduced footprint of the 100-year and 500-year floodplain at this location (i.e., less floodplain is available to be displaced under this alternative). The run-on from Murphy Canyon Creek to the east and north of the Project site also would not be impeded with a northwest stadium location. The existing conditions of the east parking lot would continue to act as a conveyance opportunity for the Murphy Canyon Creek floodplain, which would allow run-on drainage to the San Diego River floodway and not require modifications in the post-project condition. The reduction in runoff would be equivalent to that achieved under the Project because current regulatory requirements for additional pervious area and storm water quality improvements would apply. Modifications to the existing storm drain systems would still be required; however drainage System A would be modified instead of System B

### **Land Use**

This alternative would be subject to the same zoning regulations, and the consistency requirements of the General Plan, MVCP, SDRPMP, MCSP, and Montgomery Field ALUCP. Because the use and intensity of the project would be the same, and the existing Qualcomm Stadium would be demolished, the inconsistencies between the policies of the General Plan and MVCP would remain with this alternative. However, this alternative would not require a deviation for the height of the approximately 20-foot retaining wall as the Project would. Under this alternative the stadium would be located further from the KMEP MVT located across San Diego Mission Road. This Alternative would be similar to the Project with respect to the San Diego River in that it too would not place development within the River Influence Area or River Corridor Area. The overall land use impacts associated with Alternative 1 would be slightly less than the Project as a height deviation from the zoning regulations for the retaining wall would not be required.

## **Traffic/Circulation**

Overall potential impacts of Alternative 1 related to Traffic/Circulation and parking would be similar to the Project. However, siting the new stadium in the northwest corner of the approximately 166 acre Project site would displace two access points:

- Marquee Gate (north side of the Stadium along Friars Road and between of Mission Village Drive and Qualcomm way)
- Gate 4 (one of two gates along Qualcomm Way and northwest of the current Stadium)

These access routes would need to be relocated to efficiently channel access and egress under this alternative.

Existing parking would be lost on the northwest quadrant of the Project site in particular the area southeast of the intersection of Qualcomm Way and Friars Road. Similar to the Project, no construction and demolition impacts on Game Day are anticipated under this Alternative. Therefore, this alternative would have a greater transportation/traffic impacts than the Project as two access points would require be displaced by the stadium and would require relocation.

## **Noise**

Implementation of Alternative 1 would generate similar construction and event noise levels as the Project, however, these noise levels would affect nearby residences differently. If located in the northwest corner of the site, the new stadium would be further away from residences to the east, the northeast, and the north, and I-15 traffic noise, but closer to residences to the northwest across Friars Road. Measured ambient noise levels at residences decrease to the west as compared to residences to the east, which are closer to I-15 traffic noise. Therefore, construction noise impacts due to a substantial temporary increase in ambient noise levels would be more likely to occur under Alternative 1 than the Project. Event noise generated under Alternative 1 would be similar to the Project. Under Alternative 1, significant event noise impacts would potentially affect residences to the northwest as opposed to the northeast under the Project.

## **Paleontological Resources**

The impacts of Alternative 1 would be similar to the impacts of the Project. Similar to the Project, estimates of excavations in the moderate sensitivity unnamed stream terrace deposits indicate that Alternative 1 would exceed the excavation threshold in sediments of moderate

sensitivity. Also similar to the Project, there are also potential impacts to the high sensitivity Friars Formation due to foundation development.

### **Public Services and Facilities**

The impacts of Alternative 1 to new or altered governmental services to police protection, fire/life protection, libraries, parks or other recreational facilities, or schools would be similar to the Project. The Alternative 1 stadium would be the same size with similar parking accommodations. Like the Project, this Alternative would not result in the need for significant additional public services or create the need for new or altered facilities. Therefore, impacts associated with public services and facilities would be similar in Alternative 1 as compared to the Project.

### **Public Utilities**

Implementation of Alternative 1 would require existing public utilities (water, sewer, storm drain, electric, gas, communications, and solid waste disposal) to be relocated and/or extended to connect with the new stadium in this location. These relocations or extensions would occur within the existing Qualcomm Stadium parking lot. Service requirements and impacts would be similar to the Project.

### **Visual Effects and Neighborhood Character**

Under Alternative 1, the new stadium in the northwest portion of the Project site would be intermittently visible from nearby freeways and roadways, primarily including I-15, I-8, Friars Road, and Mission Village Drive. In addition, the new stadium would be visible from the stadium parking lot. Since the new stadium location would still be located on the Project site but in a different corner along the northern boundary and would include the same general massing envelope as the existing Qualcomm Stadium, visual impacts related to these public views would be different but the same magnitude and general character as the Project. The views from I-15 and Friars Road would differ as compared to the Project, as under Alternative 1 the new stadium is further from I-15 and closer to Friars Road. Overall, however, Alternative 1 impacts related to alteration of public views and visual character would be similar to the Project.

### **Cumulative Impacts**

Alternative 1 would be expected to result in similar cumulative impacts as the Project. Like the Project, considerable contributions to a cumulative impact would result for the issue areas of with air quality and odor, biological resources, historical resources, hydrology and water quality,

public utilities, and visual effects and neighborhood character. Alternative 1 would reduce some Project impacts, such as indirect biological effects and reduced hazards and hazardous material impacts, land use, and hydrology and water quality; thus, the cumulative contribution from Alternative 1 would be reduced for these issue areas. However, these issues were not found to be cumulatively significant under the Project.

### **8.3.2 Alternative 2 Major Renovation of Qualcomm Stadium with an NFL Team**

Under this alternative, the interior of the existing Qualcomm Stadium would be renovated to provide a stadium comparable to other recently-constructed modern NFL stadiums. The NFL has undertaken a similar approach for major renovation projects in Chicago, Kansas City, and Green Bay. Under this alternative, all previous uses of the existing Qualcomm Stadium, such as football games (professional, collegiate, and high school), soccer games, concerts, dirt events, and parking lot events could resume once major renovations had been completed.

This alternative does not meet the project objective of avoiding any displacement of existing Qualcomm Stadium events during Project construction because there would be no feasible local alternative venue for the NFL, Aztecs, or bowl games during the two-to-three-year construction timeframe. Many of the systems and building features would be less efficient, and this Alternative would not minimize the City's long term maintenance and operational obligations.

Since this alternative would renovate the existing Qualcomm Stadium, construction and demolition activities would be substantially reduced compared to the Project. The existing Qualcomm Stadium has been recommended for listing in the National Register of Historic Places, and, to the extent possible, renovations would be conducted in accordance with the Secretary of Interior Standards.

This alternative does not meet most of the Project's objectives. This alternative would reduce and/or avoid the following significant impacts resulting from implementation of the Project:

- Air Quality and Odor
- Biological Resources
- Hazardous Materials/Human Health/Public Safety
- Historical Resources
- Land Use
- Noise
- Visual Effects and Neighborhood Character

## **Air Quality and Odor**

Renovation of the existing Qualcomm Stadium, under Alternative 2, would result in significantly reduced air quality, odor and health risk impacts compared to the Project. The reduced impacts would primarily be due to the smaller amounts of heavy construction equipment and haul truck trips, and shorter construction schedule as compared to the Project; all earthwork associated with soil import/export, grading, retaining wall construction, and demolition activities required under the Project would not be necessary under Alternative 2 as the existing Qualcomm Stadium would remain and the parking lots would not undergo construction. The impacts due to operations are anticipated to be similar to those for the Project, as the end use remains the same. The reduction of impacts on air quality, odors and health impacts resulting from construction/demolition as compared to the Project would be substantial. The magnitude of impacts would be substantially lessened. Though the scale of construction activities would be greatly reduced as compared to the Project, there is a potential that renovation activities may still result in a significant air quality impact under Alternative 2 from construction due to the scale of activities necessary for the major renovation of the stadium. Overall, impacts to air quality would be less than the Project.

## **Biological Resources**

This alternative would not involve the construction of a new stadium and no substantial demolition activities would occur. No direct impacts would occur to special status species, sensitive habitats (including jurisdictional waters and wetlands), wildlife movement, or MSCP MHPAs, and this alternative would not cause establishment and propagation of invasive species during renovation or operation of the existing Qualcomm Stadium. Renovations included under this alternative would occur within the confines of the existing Qualcomm Stadium or its immediate periphery. Existing indirect impacts associated with exotic species, changes in hydrology, unauthorized access, noise, and lighting as a result of the edge effects associated with the operation of the existing Qualcomm Stadium and parking lot events would continue to occur. The magnitude of these indirect impacts would be reduced from the Project, as demolition and construction would be confined to the existing Qualcomm Stadium. In addition, the location of the existing Qualcomm Stadium is further removed from biological resources along Murphy Canyon Creek, thereby reducing the potential for operational noise impacts and bird strikes. The implementation of Alternative 2 would result in reduced impacts on biological resources as compared to the Project.



## **Energy**

The renovations under Alternative 2 would not remodel the existing stadium to meet LEED Gold standards, so the building would be less energy efficient than the Project. Alternative 2 would not include PV facilities that would be part of the Project. Therefore, energy impacts would be greater than the Project.

## **Geology/Soils**

Renovations to the existing Qualcomm Stadium would not impact geologic resources. The alternative would be designed and implemented in accordance with State and City requirements. With the implementation of design and construction in accordance with CBC and the SDMC, there would be no significant impacts as a result of geologic hazards or soil conditions associated with Alternative 2. Therefore, impacts would be slightly less than under the Project.

## **Greenhouse Gas Emissions**

Alternative 2 would require fewer construction activities (e.g. demolition) and construction-related GHG emissions compared to the Project. Under Alternative 2, annual activities would increase in a manner similar to the Project. As this alternative would retain some inefficient energy systems, it is expected that operational GHG emissions would be anticipated to be greater than with the Project.

## **Hazardous Materials/Human Health/Public Safety**

Implementation of Alternative 2 would avoid the majority of the Project's safety and hazards impacts associated with construction of the new stadium and demolition of the existing stadium. Renovations to the existing Qualcomm Stadium would be anticipated to disturb asbestos, ACM, and/or PCB- or LBP-containing materials. Therefore, areas proposed for renovation would be required to be surveyed and hazardous materials, if present, would be removed and disposed of in accordance with local, state, and federal regulations. Similarly, based on the extent of renovations, the City would be required to update emergency response plans and evacuation plans to reflect changes to the design of the stadium and emergency and/or evacuation routes. Overall, the Hazardous Materials/Human Health/Public Safety risks associated with Alternative 2 would be less than those associated with the Project.

## **Historical Resources**

As discussed in Alternative 1, the existing Qualcomm Stadium has been identified as eligible for individual listing in the NRHP, CRHR, and the City of San Diego Register of Historic Resources. No other eligible or listed resources were identified within the Project. This alternative includes retention of the existing Qualcomm Stadium and substantial renovations for NFL use. It is possible the renovations associated with Alternative 2 would be completed in a manner that meets the Secretary of Interior's Standards for Rehabilitation when possible; however, the renovations for this alternative would be substantial. While somewhat reduced as compared to the Project, implementation of this alternative would result in direct and significant impacts to the resource.

Alternative 2 would have less potential to result in adverse effects and/or destruction of significant archaeological resources under CEQA and City of San Diego guidelines than the Project because there would be less excavation and earthwork. Similar to the Project, Alternative 2 poses no effects to existing religious or sacred uses or to human remains. As such, the archaeological impacts of Alternative 2 would be similar to the Project.

## **Hydrology and Water Quality**

Alternative 2 would result in different impacts than the Project. With the existing stadium remaining, there would be no permanent or temporary impacts to the existing floodplain and storm drain systems A and B would remain as currently constructed. Infrastructure upgrades would be required for the storm drain system C, which drains the interior areas of the existing stadium to the San Diego River. As part of the renovations, regulations for storm water management improvements would apply if renovations included the pedestrian areas outside of the stadium. This would result in a decrease in runoff volume and associated pollutant load relative to existing conditions, but water quality impacts would be expected to be higher than those of the Project due to design constraints under renovation versus new construction, as only the portion of the drainage system conveying stormwater from the stadium interior would be modernized.

## **Land Use**

Alternative 2 would not require deviations from the San Diego Land Development Code as the renovation would be accomplished within the allowable height limit of 250 feet while providing a design comparable to that of recently completed NFL stadium renovations. A retaining wall would not be required so a wall height deviation would not be necessary. As is the case with the Project, Alternative 2 would have significant and unavoidable impacts to Land Use from the

inconsistency of some of the goals and polices in the GP and MVCP related to noise and alterations to a historic resource. However, because Qualcomm stadium would not be demolished, there would be no impact from the removal of a landmark. Land Use impacts under Alternative 2 would be less than the Project as it would also not require deviations from the San Diego Land Development Code.

### **Traffic/Circulation**

Implementation of Alternative 2 would avoid the majority of the Project's potential Traffic/Circulation impacts associated with construction of the new stadium and demolition of the existing stadium. The anticipated scale of a substantial renovation work would proportionately require the need for construction equipment to be utilized as part of the renovations but would be considerable less than that associated with construction of a new stadium. Therefore, this Alternative would have less impacts than the Project.

### **Noise**

Under Alternative 2, construction noise levels would be less than the Project as the major pavement demolition, earthwork, stadium construction, and the demolition of the existing Qualcomm would not be required, as well as the renovation activities at the existing Qualcomm Stadium would be further from residences than under the Project. Noise levels generated during stadium events would be similar to the Project, assuming the renovation would include similar noise attenuation design (i.e., partial roof) as the Project. However, event noise levels at residences would be less than under the Project, as existing residences are located farther away from the existing Qualcomm Stadium than they would be from the new stadium under the Project.

### **Paleontological Resources**

Alternative 2 would not involve a new stadium and would not require substantial grading or disturbance to the site. Therefore the impacts would be less than those of the Project. The impacts of the Alternative 2 renovations to the existing Qualcomm Stadium for NFL usage would likely include impacts to medium, and potentially to high, sensitivity formations.

### **Public Services and Facilities**

Alternative 2 would provide major renovations to modernize the existing stadium, but would not increase the size or capacity of the existing Stadium. Therefore this Alternative would not result in the need for additional public services, or create the need for new or altered facilities.

Therefore, impacts associated with public services and facilities would be similar in Alternative 2 as compared to the Project. Under this Alternative, the southernmost portion of the parking lot would remain available for implementation of the SDRMP, similar to the Project.

### **Public Utilities**

Alternative 2 would result in less public utilities impacts than the Project, as no substantial infrastructure modifications would be required.

### **Visual Effects and Neighborhood Character**

Under Alternative 2, the renovated Qualcomm Stadium would be intermittently visible from nearby freeways and roadways, primarily including I-15, I-8, Friars Road, and Mission Village Drive. In addition, the renovated stadium would be visible from the stadium parking lot. Since the renovated stadium would include similar height, bulk, and location as the existing Qualcomm Stadium, visual impacts related to these public views would be less than under the Project. Therefore, Alternative 2 impacts related to alteration of public views and visual character would be less than the Project.

### **Cumulative Impacts**

Because of the retention of Qualcomm Stadium, many issues areas would have reduced impacts and thus, less contribution to a cumulative impact. The cumulative air quality impact that would result with the Project would be substantially reduced as construction emissions would be reduced under Alternative 2. Similarly, the significant cumulative impact to public utilities due to the volume of waste entering local landfills as a result of demolition under the Project would be reduced with Alternative 2. The cumulative impacts related to bird strikes would not result from Alternative 2. While design constraints would limit improvements to water quality, Alternative 2 would reduce the cumulative impact to hydrology and water quality associated with the Project floodplain as there would not be dual stadium foundations on the Project site at any time. The cumulatively significant visual impact resulting from the Project due to the loss of the landmark Qualcomm Stadium would not result under Alternative 2 as the stadium would remain. While Qualcomm Stadium would not be demolished, the substantial renovations under this alternative would alter the historic resource in a manner that would make a significant contribution to a historic cumulative impact.

### **8.3.3 Alternative 3 – Major Renovation of Qualcomm Stadium without an NFL Team (Environmentally Superior Build Alternative)**

This alternative addresses the long-term viability of the existing Qualcomm Stadium if the NFL approves the Chargers' relocation outside of the City. Without an NFL team, 70,560 seats would no longer be required at the Stadium. While it is assumed that the Aztecs and the bowls would continue to play football games at the existing Qualcomm Stadium, another major tenant, such as a Major League Soccer (MLS) team, would also be needed in order to minimize the City's long term maintenance and operational obligations. If another major tenant entered into a lease agreement for use of the existing Qualcomm Stadium, a smaller seating capacity, from 30,000 to 50,000 seats, could be utilized. The stadium would be renovated and modernized, and the seating area would be modified to provide fewer seats and to create a more intimate game or event experience. The exterior structure of the stadium would not be significantly altered, but the upper seating levels would be removed, renovated, or not utilized. Access and parking would remain unchanged.

Under this renovation and modernization alternative, previous uses, such as football games (collegiate and high school), soccer games, concerts, dirt events, and parking lot events would continue. The majority of the renovation could occur outside the football season, and this alternative may not require the Aztecs and bowl games to relocate during renovations since a smaller capacity during phased renovation could be acceptable to the tenants. The design of this alternative could incorporate temporary expansion of seating beyond a 50,000 capacity for the Holiday Bowl, other major collegiate football games, or other large assemblages.

While another major tenant may use the stadium for more event days that currently used for major sporting events, the number of vehicle trips for each event would be substantially reduced due to the more limited seating capacity as compared to the Project.

The park improvements called for in the SDRMP would not be constructed, but would be developed in the future as funding becomes available.

This alternative would not meet most of the City's stated objectives for developing the Project. because it would not be capable of hosting NFL football games, and would not result in a new stadium that minimizes the City's high existing long-term maintenance and operations obligations due to the aging existing facility.

This alternative is proposed to provide an alternate use of the stadium if the Chargers relocate, and it would reduce and/or avoid the following significant impacts from the Project:

- Air Quality and Odor
- Biological Resources
- Hazardous Materials/Human Health/Public Safety
- Historical Resources
- Land Use
- Noise
- Visual Effects and Neighborhood Character

### **Air Quality and Odor**

Renovation of the existing Stadium under Alternative 3 would result in substantially reduced air quality, odor and health risk impacts compared to the Project. The reduced impacts would primarily be due to the smaller amounts of heavy construction equipment and haul truck trips, and shorter construction schedule as compared to the Project. Earthwork associated with soil import/export, grading, retaining wall construction, and demolition activities required under the Project would not be necessary under Alternative 3 as the existing stadium would remain and the parking lots would not undergo construction. The impacts due to operations are anticipated to be similar to those for the Project, as the end use remains the same. However, air quality, odors, and health impacts resulting from construction/demolition under this alternative would be reduced as compared to the Project.

### **Biological Resources**

This alternative would not involve the construction of a new stadium. Some demolition activities would potentially occur, but they would be confined to the existing Stadium. No direct impacts would occur to special status species, sensitive habitats (including jurisdictional waters and wetlands), wildlife movement, or MSCP MHPAs. Renovations included under this alternative would occur within the confines of the existing Qualcomm Stadium. Existing indirect impacts associated with exotic species, changes in hydrology, unauthorized access, noise, and lighting as a result of the edge effects associated with the operation of the existing Qualcomm Stadium and parking lot events would continue to occur. The magnitude of these indirect impacts is not expected to change as a result of renovations. Implementation of Alternative 3 would not result in any substantial changes to existing conditions as they relate to impacts on biological resources. The location of the existing Qualcomm Stadium is further removed from biological resources along Murphy Canyon Creek, thereby reducing the potential for operational noise impacts and bird strikes. Impacts would be less than those associated with the Project.

## **Energy**

Alternative 3 would not result in a stadium designed to achieve LEED Gold certification, so the building would be less energy efficient than the Project. Alternative 2 would not include PV facilities that would be part of the Project. Therefore, energy impacts would be greater than those of the Project.

## **Geology/Soils**

Alternative 3 consists of a renovation of the existing Qualcomm Stadium with a major tenant other than the existing NFL team. Renovations to the existing Qualcomm Stadium would not impact geologic resources. The alternative would be designed and implemented in accordance with State and City requirements. With the implementation of design and construction in accordance with CBC and the SDMC, there would be no significant impacts under Alternative 3 as a result of geologic hazards or soil conditions. Impacts would be less than those associated with the Project.

## **Greenhouse Gas Emissions**

Alternative 3 would require fewer construction activities (e.g. demolition) and construction-related GHG emissions compared to the Project. Under Alternative 3, annual activities would increase in a manner similar to the Project. As this alternative would retain some inefficient energy systems, it is expected that operational GHG emissions would be anticipated to greater than with the Project.

## **Hazardous Materials/Human Health/Public Safety**

The safety and hazards impacts associated with implementation of Alternative 3 would be less than those associated with the Project, as the majority of the Project's safety and hazards impacts would be avoided. Hazardous materials abatement would be required under Alternative 3 during renovations. The Project's risk of upset impact associated with the new stadium's location within 750 feet of the KMEP MVT would be avoided with Alternative 3. Since substantial excavation would not be required, the risk of exposure to contaminated soils associated with the Project would be avoided.

## **Historical Resources**

As previously discussed, the existing Qualcomm Stadium has been identified as eligible for individual listing in the NRHP, CRHR, and the City of San Diego Register of Historic

Resources. No other eligible or listed resources were identified within the Project. Alternative 3 includes retention of the existing Qualcomm Stadium with renovations for non-NFL use. It is possible the renovations associated with Alternative 3 could be completed in a manner that meets the Secretary of Interior's Standards for Rehabilitation; however, the extent, nature, and type of renovations planned for the existing Qualcomm Stadium have not been developed at this point but would be less substantial than what may be expected as part of Alternative 2. Therefore, while impacts would be somewhat less as compared to the Project, the renovations for Alternative 3 are assumed to result in direct and significant impacts to the resource.

Compared to the Project, Alternative 3 has the potential to result in adverse effects and/or destruction of significant archaeological resources under CEQA and City of San Diego guidelines based on potential ground disturbance in areas of high archaeological sensitivity needed to complete proposed actions. Similar to the Project, Alternative 3 poses no effects to existing religious or sacred uses or to human remains.

### **Hydrology and Water Quality**

Under Alternative 3 there would be no permanent or temporary impacts to the existing floodplain and storm drain systems A and B would remain as currently constructed. Infrastructure upgrades would be required for the storm drain system C, which drains the interior areas of the existing stadium to the San Diego River. As part of the renovations (i.e., redevelopment) regulations for storm water management improvements would apply if renovations included the pedestrian areas outside of the stadium. This would result in a decrease in runoff volume and associated pollutant load relative to existing conditions, but water quality impacts would be expected to be higher than those of the Project due to design constraints under renovation versus new construction, as only the portion of the drainage system conveying stormwater from the stadium interior would be modernized.

### **Land Use**

Alternative 3 would not require a deviation from the San Diego Municipal Code as a retaining wall would not be required. As is the case with the proposed Project, Alternative 3 would have significant and unavoidable impacts to land use from the inconsistency of some of the goals and policies in the GP and MVCP related to noise and alterations to a historic resource. However, because Qualcomm Stadium would not be demolished, there would be no impact from the removal of a landmark. Land Use impacts under Alternative 3 would be less than the Project. There would be no conflicts with GP or the MVCP under this alternative.



**Traffic/Circulation**

Implementation of Alternative 3 would avoid the majority of the Project's potential Traffic/Circulation impacts associated with construction of the new stadium and demolition of the existing stadium. Renovation work would be less than Alternative 2 and substantially less than the Project. Less construction equipment would be utilized as part of the renovations and less short-term construction impacts associated with construction workers traffic and material and equipment deliveries. Traffic/Circulation impacts under this Alternative would be less than the Project.

**Noise**

Under Alternative 3, construction noise levels and event noise levels would be less than those associated with the Project. These noise levels would be reduced due to the greater distance to sensitive residential receptors.

**Paleontological Resources**

Alternative 3 would retain the existing stadium and include renovations to the existing Qualcomm Stadium to support a different major tenant. As this Alternative would not involve a new stadium, the impacts would be less than those of the Project.

**Public Services and Facilities**

This Alternative would have less demand on public services and facilities as it would not expand the existing Qualcomm Stadium, but instead would reduce its size and capacity; therefore impacts to this Alternative would be less than the Project and would not result in additional public services or create the need for new or altered facilities. Under this Alternative, 32-34 acres in the southern portion of the parking lot would remain available for implementation of the SDRMP, similar to the Project.

**Public Utilities**

Alternative 3 would not result in any public utilities impacts, as no infrastructure modifications would be required. The extension of utility lines required to serve the project would not be required, as the utilities serving the existing Qualcomm Stadium would be utilized.

## **Visual Effects and Neighborhood Character**

Under Alternative 3, the renovated stadium would be intermittently visible from nearby freeways and roadways, primarily including I-15, I-8, Friars Road, and Mission Village Drive. In addition, the renovated stadium would be visible from the stadium parking lot. Since the renovated stadium would include similar height, bulk, and location as the existing Qualcomm Stadium, visual impacts related to these public views would be less than under the Project. Therefore, Alternative 3 impacts related to alteration of public views and visual character would be less than the Project.

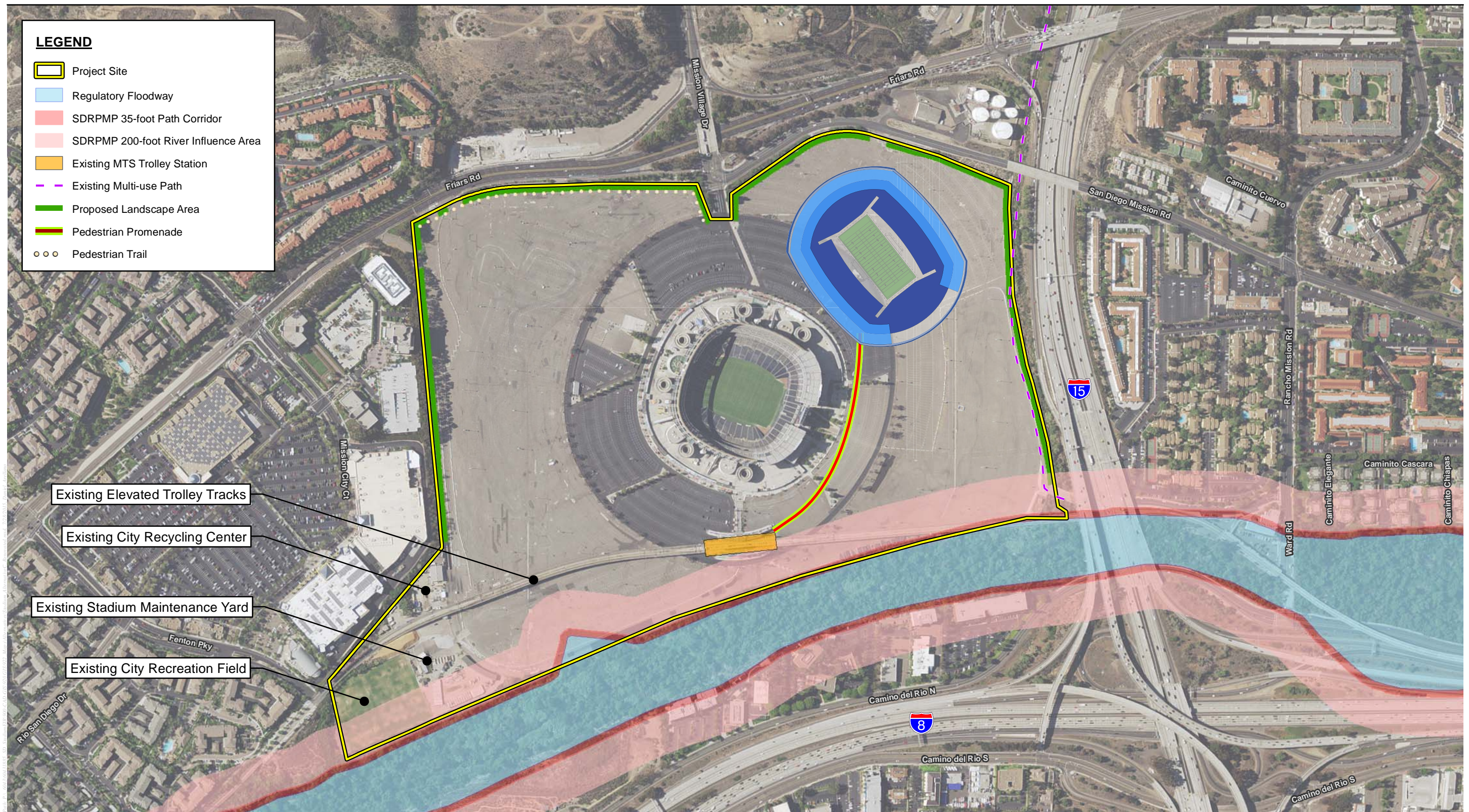
## **Cumulative Impacts**

Similar to Alternative 2, the retention of Qualcomm Stadium would result in many reduced impacts and thus, the avoidance or lesser contribution to a cumulative impact as compared to the Project. This alternative would avoid the significant cumulative impacts to biologic resources, hydrology and water quality, and visual resources that would result from the Project. The cumulative contribution to air quality, public utilities, and historic resources would be substantially reduced under Alternative 3 relative to the Project.

### **8.3.4 Alternative 4a Construction of a New Stadium in the northeast corner of the site with Retention of the Existing Qualcomm Stadium**

This alternative would be similar to the Project, but it would also retain the existing Qualcomm Stadium instead of demolishing it (see Figure 8-3a, Alternative 4a Two Stadiums, New Northeast Stadium and Retain Qualcomm Stadium). The new stadium would occur in the northeast corner of the existing Qualcomm Stadium site. The new stadium would be similar in appearance, size, scale, and location to the Project, including the importation of fill material. However, there would be considerably less demolition activity and fewer debris removal haul trips.

This alternative would have greater environmental impacts to Energy, GHG, Public Services, Traffic/Circulation, Utilities, and Visual Effects. While this alternative would meet some of the Project objectives while retaining the historic resource of the existing stadium, it would not meet most of the Project objectives, including the objective of minimizing the City's long-term maintenance and operations obligations. Under this Alternative, the City's financial obligation would be to maintain two stadiums instead of one. The new stadium would be used for the majority of events, including all professional and collegiate football games. The number of stadium events would not substantially change, but the number and size of the miscellaneous events would likely be smaller.



- LEGEND**
- Project Site
  - Regulatory Floodway
  - SDRPMP 35-foot Path Corridor
  - SDRPMP 200-foot River Influence Area
  - Existing MTS Trolley Station
  - Existing Multi-use Path
  - Proposed Landscape Area
  - Pedestrian Promenade
  - Pedestrian Trail

Source: NAIP 2014; FEMA; SANDAG.

500 250 0 500 Feet

Scale: 1 = 6,000; 1 inch = 500 feet

**Figure 8-3a**  
**Alternative 4a**  
**Two Stadiums, New Northeast Stadium and Retain Qualcomm Stadium**

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Site access would remain generally the same, but parking would be permanently reduced to approximately 13,500 spaces, and it would be expensive to maintain the existing Qualcomm Stadium with no tenant, no revenue, and no feasible reuse of the existing stadium that would protect its historical integrity.

Because the existing Qualcomm Stadium is being recommended for listing on the National Register of Historic Places (Heritage 2015), this alternative would avoid impacts to the existing Qualcomm Stadium as an historic resource. This alternative would also reduce and/or avoid the following significant impacts that would result from implementation of the Project:

- Air Quality and Odor
- Hazardous Materials/Human Health/Public Safety
- Historical Resources
- Noise

### **Air Quality and Odor**

Retention of the existing Stadium combined with construction of a new stadium at the northeast corner, under Alternative 4a, would result in reduced air quality, odor and health risk impacts compared to the Project as it would not require demolition of the existing stadium. As such, a substantial number of trips associated with demolition debris and soil export hauling associated with the Project would not be required. Emissions from earthwork associated with soil import/export and grading would occur. The impacts due to operations are anticipated to be higher due to maintenance associated with both facilities. The magnitude of activity necessary for the construction of a new stadium would be similar, however air quality impacts associated with existing stadium demolition would be avoided. Therefore in this Alternative the impacts to air quality and odor would be less than the Project because demolition of the existing Qualcomm Stadium would not occur; impacts from operation would be slightly greater than the Project due to the presence and maintenance of two stadiums.

### **Biological Resources**

Direct and indirect impacts from construction and operation associated with implementation of Alternative 4a would be similar in nature and magnitude to those described for the Project.

### **Energy**

Alternative 4a would include construction of a new stadium designed as a sustainable, green building that would achieve a LEED Gold rating and would include installation of PV solar

energy similar to the Project. Some additional energy would be consumed by maintenance activity at Qualcomm Stadium, including security lighting. Therefore this alternative would have greater energy impacts than the Project.

### **Geology/Soils**

From a geologic, geotechnical, and soils perspective, the Alternative 4a would have the same impact analysis as the Project.

### **Greenhouse Gas Emissions**

Alternative 4a would require fewer construction activities (e.g. demolition) compared to the Project. The new Stadium constructed for Alternative 4a would increase annual activities and GHG emissions similar to the Project. However, maintenance activity (vehicle trips, electricity consumption, landscaping) at the existing Qualcomm Stadium would result in additional emissions from mobile, area, and energy sources. Therefore, impacts related to GHG emissions would be greater than the Project.

### **Hazardous Materials/Human Health/Public Safety**

The safety and hazards impacts associated with implementation of Alternative 4a would be similar to those of the Project. The risks associated with an accident at the Kinder Morgan Energy Partners Mission Valley Terminal would be the same as for the Project. However, safety and hazards impacts associated with the demolition of the existing Qualcomm Stadium, such as potential exposure to asbestos and lead paint during demolition, would be eliminated under Alternative 4a.

### **Historical Resources**

As discussed in Alternative 1, the existing Qualcomm Stadium has been identified as eligible for individual listing in the NRHP, CRHR, and the City of San Diego Register of Historic Resources. No other significant resources are present. This alternative includes retention of the existing Qualcomm Stadium and constructing a new stadium northeast of the existing stadium, within the existing Qualcomm Stadium parking lot. Overall, the construction of a new stadium would ultimately introduce new visual effects that would be out of character with the historical resource and alter its setting. The setting of the existing Qualcomm Stadium contributes greatly to the design quality, visual narrative, feeling, character, and workmanship of the building. Adding a stadium comparable in size or larger than the existing Qualcomm Stadium would affect the monumental massing and sculptural quality of the historical resource. Character-defining

features, like the stark concrete finishes, continuous bands of lighting, open-end circular forms, and horseshoe shape, may be blocked from key perspectives or viewsheds, such as along Friars Road or Mission Village Drive, that convey the original stadium's size and Brutalist design philosophies. While retention of the existing stadium would reduce the level of impact as compared to the Project, the construction of a new stadium located northeast of the existing stadium would cause an indirect and significant impact to the historic significance of the existing Qualcomm Stadium due to the resultant change in the existing Qualcomm Stadium's setting.

Compared to the Project, Alternative 4a has the potential to result in adverse effects and/or destruction of significant archaeological resources under CEQA and City of San Diego guidelines based on potential ground disturbance in areas of high archaeological sensitivity needed to complete proposed actions. Similar to the Project, Alternative 4a poses no effects to existing religious or sacred uses or to human remains. As such, the impacts of Alternative 4a would be similar to the Project.

### **Hydrology and Water Quality**

Implementation of Alternative 4a would have more impacts than the Project because there would be less available space to mitigate the floodplain impacts of the Project since the existing stadium would not be demolished. With the existence of two stadiums, there would not be an opportunity to compensate for floodplain impacts caused by the new stadium. More drainage infrastructure upgrades would be required to minimize flooding within both the new and the existing stadium. Allowing the second stadium to remain would offer more onsite pervious area and require storm water management regulations to be implemented under redevelopment requirements.

### **Land Use**

Although Qualcomm stadium would not be demolished, and there would be no impact from the removal of a landmark. Similar to the Project, this alternative would require a deviation for the height of the 20-foot retaining wall required opposite the KMVP MVT across San Diego Mission Road. Also similar to the Project, Alternative 4a is inconsistent with the goals and objectives of the GP and the MVCP for noise and alterations to the environment around a historic resource. Land use impacts associated with implementation of Alternative 4a would be similar to those of the Project.

**Traffic/Circulation**

Traffic/Circulation and parking impacts associated with implementation of Alternative 4a would have the potential to exceed those of the Project. Available on-site Stadium parking would be reduced with the displacement of parking on the new stadium footprint. No new potential parking spaces that would be gained if the current existing Qualcomm Stadium remains. Additionally, internal circulation would be affected due to reduced circulation options (less land available) on site with two stadiums. Therefore, traffic/circulation impacts would be greater than under the Project.

**Noise**

Under Alternative 4a, construction noise impacts would be the same as the Project, except it would not include temporary noise generated during the demolition of the existing Qualcomm. Event noise generated at the Stadium in the northeast corner would be the same as the Project.

**Paleontological Resources**

Retention of the existing Qualcomm Stadium would have lower impacts to paleontological resources than its demolition. However, this alternative would require substantial grading similar to the Project. Therefore, this Alternative would have slightly lesser impacts to paleontological resources than the Project.

**Public Services and Facilities**

The existing Qualcomm Stadium is currently adequately served with public services. Under Alternative 4a, however, some additional demand for public services would be created by the need to conduct maintenance activities at the existing Qualcomm Stadium. Therefore, impacts associated with public services and facilities would be greater for Alternative 4a as compared to the Project.

**Public Utilities**

Implementation of Alternative 4a would require public utilities (water, sewer, storm drain, electric, gas, communications, and solid waste disposal) installation, extension, and some relocation of onsite utilities to serve the new and existing stadiums. Utility use would be slightly above that required for the Project due to ongoing maintenance of the existing Qualcomm Stadium. The combined use would not exceed the capacities of the existing public utility



systems. Nevertheless impacts on public utilities under this Alternative would be greater than that of the Project.

### **Visual Effects and Neighborhood Character**

Under Alternative 4a, the dual stadium presence would be intermittently visible from nearby freeways and roadways, primarily including I-15, I-8, Friars Road, and Mission Village Drive. In addition, the dual stadium presence would be visible from the stadium parking lot. Since the dual stadium presence would include approximately double the general massing and footprint envelope as the existing Qualcomm Stadium and be greater in magnitude and general character, visual impacts related to these public views would be greater than under the Project. Therefore, Alternative 4a impacts related to alteration of public views and visual character would be greater than the Project.

### **Cumulative Impacts**

Significant cumulative impacts associated with the Project, including biological resources and hydrology and water quality would increase in severity with Alternative 4a. While Qualcomm Stadium would not be demolished, the development of a new stadium next to it would alter the setting of the historic resource in a manner that would make a significant contribution to a historic cumulative impact. Similarly, while the stadium would remain as a visual landmark in the Mission Valley community, the presence of a new stadium adjacent to it would substantially alter the visual character and a significant cumulative impact would result. Air quality emissions associated with existing stadium demolition would be avoided and thus, reduce the alternative's cumulative contribution to an air quality impact. The significant cumulative impact to public utilities due to solid waste disposal during demolition and construction activities would not result with Alternative 4a.

#### **8.3.5 Alternative 4b Construction of a New Stadium in the northwest corner of the site with Retention of the Existing Qualcomm Stadium**

This alternative would be similar to the Project, but it would construct the new stadium in the northwest corner of the site and retain the existing Qualcomm Stadium instead of demolishing it (see Figure 8-3b, Alternative 4b Two Stadiums, New Northwest Stadium and Retain Qualcomm Stadium). The new stadium would be similar in appearance, size, and scale to the Project, including the importation of fill material. However, there would be considerably less demolition activity and fewer debris removal haul trips.

This alternative would increase impacts to Energy, GHG, Public Services, Utilities, Traffic/Circulation and Visual effects due to the reasons described below. While this alternative would meet some of the Project objectives, by retaining the historic resource of the existing Qualcomm Stadium, this alternative would not meet most of the Project objectives, including the objective of minimizing the City's long-term maintenance and operations obligations. Under this Alternative, the City's financial obligation would be to maintain two stadiums instead of one. The new stadium would be used for the majority of events, including all professional and collegiate football games. The number of stadium events would be similar to the Project, but the number and size of the miscellaneous events would likely be smaller.

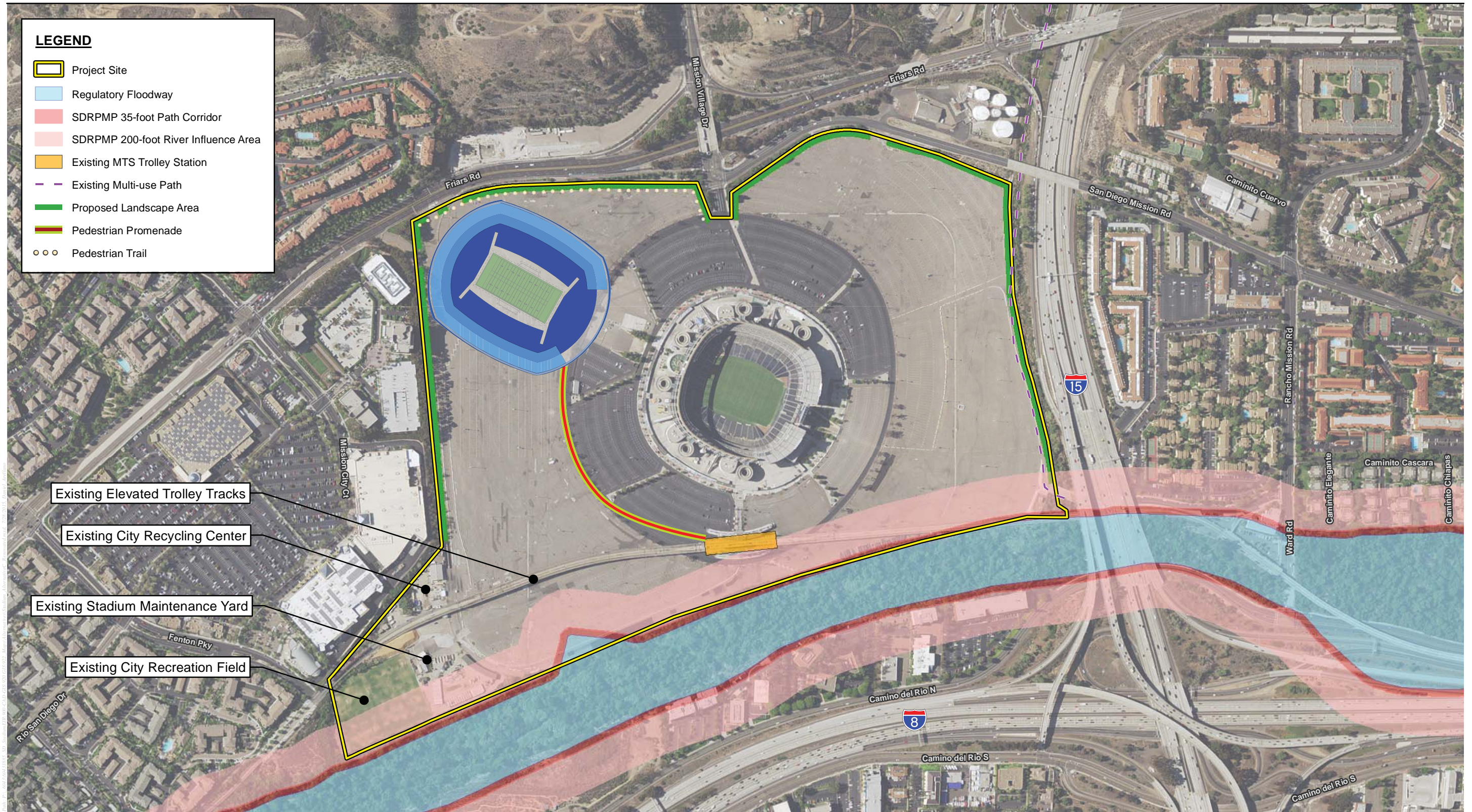
Site access would remain generally the same, but parking would be permanently reduced to approximately 13,500 spaces, and it would be expensive to maintain the existing Qualcomm Stadium with no tenant, no revenue, and no feasible reuse of the existing stadium.

Because the existing Qualcomm Stadium is being recommended for listing on the National Register of Historic Places (Heritage 2015), this alternative was proposed primarily as a means to avoid impacts to the existing Qualcomm Stadium as an historic resource. This alternative would also reduce and/or avoid the following significant impacts that would result from implementation of the Project:

- Air Quality and Odor
- Hazardous Materials/Human Health/Public Safety
- Historical Resources

### **Air Quality and Odor**

Retention of the existing Stadium combined with construction of a new stadium at the northwest corner, under Alternative 4b, would result in reduced air quality, odor and health risk impacts compared to the Project as it would not require demolition of the existing stadium. As such, a substantial number of trips associated with demolition debris and soil export hauling associated with the Project would not be required. Emissions from earthwork associated with soil import/export and grading would occur. The impacts due to operations are anticipated to be higher due to maintenance associated with both facilities. The magnitude of activity necessary for the construction of a new stadium would be similar; however air quality impacts associated with existing stadium demolition would be avoided. Therefore in this Alternative the impacts to air quality and odor would be lesser than the Project because demolition of the existing Qualcomm Stadium would not occur; impacts from operation would be slightly greater than the Project due to the presence and maintenance of two stadiums.



**Figure 8-3b**  
**Alternative 4b**  
**Two Stadiums, New Northwest Stadium and Retain Qualcomm Stadium**

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## **Biological Resources**

Direct and indirect impacts to biological resources would be less under Alternative 4b than the Project because impacts associated with existing stadium demolition would be avoided. The new stadium would be constructed further from Murphy Canyon Creek and the San Diego River, thereby reducing the magnitude of the Project's construction and operation indirect impacts, in particular from lighting and noise, because the Project would be a greater distance from these riparian features. This alternative would result in overall impacts to biological resources that are less than those of the Project.

## **Energy**

Alternative 4b would include construction of a new stadium designed as a sustainable, green building that would achieve a LEED Gold rating and would include installation of PV solar energy similar to the Project. Some additional energy would be consumed by maintenance activity at Qualcomm Stadium, including security lighting. Therefore this alternative would have greater energy impacts than the Project.

## **Geology/Soils**

As analyzed under Alternative 1 above, which would also construct a new stadium in the northwest corner of the Project site, Alternative 4b would have similar geology/soils impacts as the Project.

## **Greenhouse Gas Emissions**

Alternative 4b would require fewer construction activities (e.g. demolition) compared to the Project. The new stadium constructed for Alternative 4b would increase annual activities and GHG emissions similar to the Project. However, maintenance activity (vehicle trips, electricity consumption, landscaping) at the existing Qualcomm Stadium would result in additional GHG emissions from mobile, area, and energy sources. Therefore, impacts related to GHG emissions would be greater than the Project.

## **Hazardous Materials/Human Health/Public Safety**

The safety and hazards impacts associated with implementation of Alternative 4b would be less than those of the Project as a result of the increased distance from the Kinder Morgan Energy Partners Mission Valley Terminal and less interaction with existing remediation infrastructure.

Safety and hazards impacts associated with the demolition of the existing Qualcomm Stadium would be eliminated under Alternative 4b.

### **Historical Resources**

As discussed in Alternative 1, the existing Qualcomm Stadium has been identified as eligible for individual listing in the NRHP, CRHR, and the City of San Diego Register of Historic Resources. No other eligible or listed resources were identified within the Project. This alternative includes retention of the existing Qualcomm Stadium and constructing a new stadium northwest of the existing stadium, within the existing Qualcomm Stadium parking lot. While retention of the existing stadium would reduce the level of impact as compared to the Project, the construction of a new stadium located northwest of the existing stadium would cause an indirect and significant impact to the historic significance of the existing Qualcomm Stadium due to the resultant change in the existing Qualcomm Stadium's setting.

Compared to the Project, Alternative 4b has the potential to result in adverse effects and/or destruction of significant archaeological resources under CEQA and City of San Diego guidelines based on potential ground disturbance in areas of high archaeological sensitivity needed to complete proposed actions. Similar to the Project, Alternative 4b poses no effects to existing religious or sacred uses or to human remains. As such, the impacts of Alternative 4b would be similar to the Project.

### **Hydrology and Water Quality**

Implementation of Alternative 4b would have greater impacts than the Project because there would be less available space to mitigate floodplain impacts since the existing stadium would not be demolished. With the existence of two stadiums, there would not be an opportunity to compensate for floodplain impacts caused the new stadium. This would require more drainage infrastructure upgrades to minimize flooding within both the new and the existing stadium. Allowing the second stadium to remain would offer more onsite pervious area, as a result of two playing fields, and require storm water management regulations to be implemented across the entire site under redevelopment requirements.

### **Land Use**

This alternative would not require a retaining wall, and therefore would not require a deviation from the MVPDO. In addition, this Alternative would not demolish this existing Stadium, so there would be no impact from the removal of a landmark as proposed under the Project. Similar to the Project, Alternative 4a is inconsistent with some of the goals and objectives of the GP and

the MVCP for noise and alterations to the environment around a historic resource. Land use impacts associated with implementation of Alternative 4b would be less than those of the Project.

### **Traffic/Circulation**

Traffic/Circulation and parking impacts associated with implementation of Alternative 4b would have the potential to exceed those of the Project, similarly to Alternative 4a. Available on-site Stadium parking would be reduced with the displacement of parking on the new stadium footprint. No new potential parking spaces would be gained if the current existing Qualcomm Stadium remains. Additionally, internal circulation would be affected due to reduced circulation options (less land available) on site with two stadiums and restricted driveway access. Two access points would need to be re-configured as they would be displaced by the new stadium:

- Marquee Gate (north side of the Stadium along Friars Road and between of Mission Village Drive and Qualcomm way)
- Gate 4 (one of two gates along Qualcomm Way and northwest of the current Stadium)

Therefore, this Alternative would have greater impacts to Traffic/Circulation and parking than the Project.

### **Noise**

Noise associated with demolition of the existing Qualcomm Stadium would be avoided. Alternative 4b would generate similar event noise levels as the Project, however, these noise levels would affect nearby residences differently. If located in the northwest corner of the site, the new stadium would be further away from residences to the east, the northeast, and the north, and I-15 traffic noise, but closer to residences to the northwest across Friars Road. Measured ambient noise levels at residences decrease to the west as compared to residences to the east, which are closer to I-15 traffic noise. Event noise generated under Alternative 1 would be similar to the Project. Under Alternative 4b, significant event noise impacts would potentially affect residences to the northwest as opposed to the northeast under the Project. Overall, the noise impacts of this alternative would be lesser than the Project because the noise resulting from demolition activities would not occur.

### **Paleontological Resources**

The impacts of stadium construction under Alternative 4b would be similar to the impacts of Alternative 1, as there would be excavations in the moderate sensitivity unnamed stream terrace deposits. There would also be potential impacts to the high sensitivity Friars Formation due to foundation development. The Alternative would require substantial grading similar to the Project. Therefore, this Alternative would have similar impacts to paleontological resources as the Project.

### **Public Services and Facilities**

The existing Qualcomm Stadium is currently adequately served with public services. Under Alternative 4a, however, some additional demand for public services would be created by the need to conduct maintenance activities at the existing Qualcomm Stadium. Therefore, impacts associated with public services and facilities would be greater for Alternative 4a as compared to the Project.

### **Public Utilities**

Implementation of Alternative 4b would require public utilities (water, sewer, storm drain, electric, gas, communications, and solid waste disposal) installation, extension, and some relocation of onsite utilities to serve the new stadium. Utility use would be slightly above that required for the Project due to ongoing maintenance of the existing Qualcomm Stadium. The combined use would not exceed the capacities of the existing public utility systems. Nevertheless impacts on public utilities under this Alternative would be greater than that of the Project.

### **Visual Effects and Neighborhood Character**

Under Alternative 4b, the two stadium presence would be intermittently visible from nearby freeways and roadways, primarily including I-15, I-8, Friars Road, and Mission Village Drive. In addition, the two stadium presence would be visible from the stadium parking lot. Since the two stadium presence would include approximately double the general massing and footprint envelope as the existing Qualcomm Stadium and be greater in magnitude and general character, visual impacts related to these public views would be greater than under the Project. Therefore, Alternative 4b impacts related to alteration of public views and visual character would be greater than the Project.



## **Cumulative Impacts**

Similar to Alternative 4a, significant cumulative impacts associated with the Project, including biological resources and hydrology and water quality would increase in severity with Alternative 4b. While Qualcomm Stadium would not be demolished, the development of a new stadium next to it would alter the setting of the historic resource in a manner that would make a significant contribution to a historic cumulative impact. Similarly, while the stadium would remain as a visual landmark in the Mission Valley community, the presence of a new stadium adjacent to it would substantially alter the visual character and a significant cumulative impact would result. Air quality emissions associated with existing stadium demolition would be avoided and thus, reduce the alternative's cumulative contribution to an air quality impact. The significant cumulative impact to public utilities due to solid waste disposal during demolition and construction activities would not result with Alternative 4b.

### **8.3.6 No Project Alternative**

The CEQA Guidelines (§15126.6(e)(2)) require that an EIR specifically discuss a “no project” alternative, which should address both “the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The No Project Alternative assumes that the Project is not implemented. The City would retain the existing land uses on the site, and ongoing uses such as football games, soccer games, concerts, dirt events, and parking lot events would continue. Similar to the Project, this alternative does not preclude the City's implementation of the SDMRP. The No Project Alternative would meet none of the City's objectives for the Project.

Two scenarios for the No Project Alternative are presented below: the first assumes that the Chargers would relocate to another stadium and no NFL team plays at the existing Qualcomm; and, the second assumes that the Chargers or another NFL team would continue to play NFL games at the existing Qualcomm Stadium.

#### **8.3.6.1 No Project Alternative with NFL Team**

If the Chargers do not relocate to another city, then under this alternative it is assumed that the Chargers would continue to play NFL games at the existing Qualcomm Stadium for the foreseeable future beyond the 2015 season.

Qualcomm Stadium would continue to exist in its current state, with only critical maintenance requirements that would ordinarily be required performed.

The magnitude of environmental effects (traffic, noise, air emissions, etc.) would be similar to existing conditions.

This alternative would not involve the construction of a new stadium; therefore, construction activities would be substantially reduced when compared to the Project, and there would no stadium demolition activities. The existing Qualcomm Stadium, recommended for listing in the National Register of Historic Places, would remain in place (Heritage 2015).

While this No Project scenario would meet none of the City's objectives for the Project, it would provide a means to maintain a major City asset and it would reduce and/or avoid the following significant impacts resulting from implementation of the Project:

- Air Quality and Odor
- Hazardous Materials/Human Health/Public Safety
- Historic Resources
- Noise
- Visual Effects and Neighborhood Character

### **Air Quality and Odor**

This Alternative would not involve construction activities and consequently would result in no adverse impacts to air quality, health risks or odors. The operations phase of this Alternative would not involve additional events beyond what is currently occurring. As such, there would be no additional air pollutant emissions. Therefore impacts to air quality and odor under this Alternative would be less than the Project.

### **Biological Resources**

Under this No Project alternative, impacts to biological resources would be similar to occurring at present with the operation of the existing Qualcomm Stadium. Impacts would be less than those occurring with the Project.

**Energy**

The No Project Alternative would not remodel the existing Qualcomm Stadium to meet LEED Gold and current Cal Green building code standards, so the building would be less energy efficient than the Project. The No Project Alternative would not include PV facilities that would be part of the Project. Therefore, energy impacts would be greater than the Project.

**Geology/Soils**

There would be no substantial subsurface disturbance associated with the No Project Alternative with an NFL Team. This No Project Alternative would have less impacts than the Project.

**Greenhouse Gas Emissions**

The No Project Alternative would not result in any construction-related GHG emissions. In addition, the No Project Alternative would not increase annual activities at the Project site and GHG emissions that would be anticipated to increase with the Project. However, the energy efficiencies implemented as part of the Project would not occur. No PV panels for electrical generation would be installed. Therefore, impacts related to GHG emissions would be greater than those of the Project.

**Hazardous Materials/Human Health/Public Safety**

There would be no changes to existing conditions with respect to Hazardous Materials/Human Health/Public Safety under the No Project Alternative with an NFL Team including no exposure to asbestos or contaminated soil. Therefore impacts under this No Project alternative would be less than the Project.

**Historical Resources**

Under this alternative, there would be no substantial changes made to the existing Qualcomm Stadium. The recreational use of the stadium would also stay the same. Ongoing maintenance activity would be conducted in a manner that conforms to Secretary of Interior standards for historic properties. Under this alternative, the significant impacts to the historic resource that occur with the Project would be avoided. Compared to the Project, this alternative has no potential to impact archaeological resources, existing sacred or religious uses, or human remains. As such, this alternative would have less impacts than the Project.

### **Hydrology and Water Quality**

There would be no hydrology and water quality improvements under the No Project Alternative with an NFL Team. Existing site flooding issues and storm water pollution impacts to the San Diego River would remain unchanged. These impacts are greater than those that would occur with the Project as beneficial drainage and water quality improvements would not be implemented.

### **Land Use**

No changes to existing land uses would occur under the No Project Alternative with an NFL Team. Therefore, impacts under this No Project alternative would be less than the Project.

### **Traffic/Circulation**

There would be no traffic or circulation changes under the No Project Alternative. Parking and circulation impacts due to construction would not occur. Therefore, impacts under this No Project alternative would be less than those of the Project.

### **Noise**

Under this alternative, noise levels would remain unchanged. Noise impacts would be somewhat reduced from those of the Project due to the greater distance of the existing stadium from nearby residences. No construction noise impacts would occur. Therefore impacts under this No Project alternative would be less than the Project.

### **Paleontological Resources**

There would be no substantial subsurface disturbance associated with the No Project Alternative with an NFL Team whereas the Project would require substantial grading. Therefore, impacts under this No Project alternative would be less than the Project.

### **Public Services and Facilities**

There would be no changes to public services and facilities under the No Project Alternative with an NFL Team. No increased demand for services during construction would occur. Therefore, impacts under this No Project alternative would be less than those of the Project.

### **Public Utilities**

Minimal changes to existing public utility systems would be required to serve the No Project Alternative with an NFL Team whereas the Project would require improvements to existing utilities. Therefore, impacts under this No Project alternative would be less than the Project.

### **Visual Effects and Neighborhood Character**

Under this No Project Alternative, there would be no changes made to the existing Qualcomm Stadium. Since there would be no changes to existing public views, no impacts would occur with regard to visual effects and neighborhood character. Therefore, No Project Alternative impacts related to alteration of public views and visual character would be less than the Project.

### **Cumulative Impacts**

With no new stadium construction or substantial alteration of the existing stadium, many significant cumulative impacts associated with the Project would not result. Air quality emissions associated with existing stadium demolition or new operational emissions would be avoided and the significant cumulative impact identified for the Project would not result. With no new stadium or PV facilities, the cumulative biological impact due to bird strikes would not occur. There would be no substantial changes made to the existing Qualcomm Stadium or any new facilities constructed around it; thus the cumulative impacts to historic and visual resources would not result. There would be no significant cumulative impact to hydrology and water quality from dual stadium footprints as with the Project. The significant cumulative impact to public utilities due to solid waste disposal during demolition and construction activities would not result.

#### **8.3.6.2 No Project Alternative without an NFL Team (Environmentally Superior Alternative)**

This scenario of the No Project Alternative assumes that the NFL would approve relocation of the Chargers to another stadium. This scenario would meet none of the City's objectives for the Project, and the City would continue to have the responsibility of maintenance cost of the aging stadium.

The San Diego State Aztecs would continue to play football games under their current lease agreement with the City, and the two collegiate football bowl (Holiday and Poinsettia) games would continue annually under negotiated agreements with the City. There would be lower

intensity use of the stadium and fewer large events without NFL games, and this scenario would continue for the foreseeable future because there are no other plans for the site.

Since this alternative would not involve the construction of a new stadium, construction activities would be substantially reduced when compared to the Project, and there would no stadium demolition activities. The existing Qualcomm Stadium, determined eligible for listing in the National Register of Historic Places, would remain in place (Heritage 2015), and stadium renovations would be conducted in accordance with the Secretary of Interior Standards.

This No Project scenario would reduce and/or avoid the following significant impacts resulting from implementation of the Project:

- Air Quality and Odor
- Biological Resources
- Hazardous Materials/Human Health/Public Safety
- Historic Resources
- Land Use
- Noise
- Visual Effects and Neighborhood Character

### **Air Quality and Odor**

This Alternative would not involve construction activities and consequently would result in no adverse impacts to air quality, health risks or odors. The operations phase of this Alternative would result in a reduction in air pollution due to the absence of emissions associated with NFL events at the existing stadium. As such, this Alternative would have less impacts than the Project.

### **Biological Resources**

Impacts to biological resources would be somewhat less than those of the Project due to the reduction in nighttime event lighting and event noise. In addition, there would be no indirect construction and demolition impacts.

### **Energy**

The No Project Alternative without an NFL Team would be less efficient due to existing building envelope and lack of alternative energy structures. This alternative would not include PV facilities that would be part of the Project. However, the number of high intensity events

would be substantially reduced absent the NFL. It is concluded that this lower intensity use would result in energy impacts that are lesser than those of the Project.

### **Geology/Soils**

There would be no substantial subsurface disturbance associated with the No Project Alternative without an NFL Team. Therefore impacts under this No Project alternative would be less than the Project.

### **Greenhouse Gas Emissions**

The No Project Alternative would not result in any construction-related GHG emissions. In addition, the No Project Alternative would result in a decrease in annual activities and GHG emissions that would be anticipated to increase with the Project. However, the energy efficiencies implemented as part of the Project would not occur. No PV panels for electrical generation would be installed. Therefore, impacts related to GHG emissions would be greater than the Project.

### **Hazardous Materials/Human Health/Public Safety**

There would be no changes to existing conditions with respect to Hazardous Materials/Human Health/Public Safety under the No Project Alternative without an NFL Team including no exposure to asbestos or contaminated soil as under the Project. Therefore impacts under this No Project alternative would be less than the Project.

### **Historical Resources**

Under this alternative, there would be no substantial changes made to the existing Qualcomm Stadium. The recreational use of the stadium would also stay the same but without NFL games. Ongoing maintenance activity would be conducted in a manner that conforms to Secretary of Interior standards for historic properties. Under this alternative, the significant impacts to the historic resource that occur with the Project would be avoided. Compared to the Project, the No Project alternative without an NFL team has no potential to impact archaeological resources, existing sacred or religious uses, or human remains. As such, the No Project Alternative would have less impacts than the Project.

## **Hydrology and Water Quality**

Hydrology and water quality impacts under the No Project Alternative without an NFL Team would be greater than those of the Project. Existing site flooding and storm water pollution conditions for the San Diego River would remain unchanged. These impacts are greater than those that would occur with the Project as the beneficial drainage improvements and water quality measures associated with the Project would not be implemented.

## **Land Use**

No changes to existing land uses would occur under the No Project Alternative without an NFL Team. The intensity of existing land use would decrease somewhat absent 10 NFL games per year. Therefore, impacts under this No Project alternative would be less than the Project.

## **Traffic/Circulation**

There would be no traffic or circulation changes under the No Project Alternative. Traffic circulation impacts from facility operations would be reduced as a result of the elimination of NFL events. Parking and circulation impacts due to construction would not occur. Therefore, impacts under this No Project alternative would be less than the Project.

## **Noise**

Under this alternative, existing event noise levels would be reduced as compared to the Project, as the largest generators of event noise, NFL games, would no longer take place and the existing stadium is further from nearby residences than the Project. Therefore, the No Project Alternative would have less impacts than the Project.

## **Paleontological Resources**

There would be no substantial subsurface disturbance associated with the No Project Alternative without an NFL Team. Therefore, the No Project Alternative would have less impacts than the Project.

## **Public Services and Facilities**

There would be less need for police services without NFL events. Therefore impacts to public services and facilities under the No Project Alternative without an NFL Team would be less than the Project.



**Public Utilities**

There would be less use of the stadium without NFL events and less demand put on the existing utility system. The No Project Alternative would have less impacts than the Project.

**Visual Effects and Neighborhood Character**

Under this No Project Alternative, there would be no changes made to the existing Qualcomm Stadium. Since there would be no changes to existing public views, no impacts would occur with regard to visual effects and neighborhood character. Therefore, No Project Alternative impacts related to alteration of public views and visual character would be less than the Project.

**Cumulative Impacts**

Similar to the No Project with an NFL Team Alternative, because no new stadium construction or substantial alteration of the existing stadium would occur, many significant cumulative impacts associated with the Project would not result. Air quality emissions associated with existing stadium demolition or new operational emissions would be avoided and the significant cumulative impact identified for the Project would not result. With no new stadium or PV facilities, the cumulative biological impact due to bird strikes would not occur. There would be no substantial changes made to the existing Qualcomm Stadium or any new facilities constructed around it; thus the cumulative impacts to historic and visual resources would not result. There would be no significant cumulative impact to hydrology and water quality from dual stadium footprints as with the Project. The significant cumulative impact to public utilities due to solid waste disposal during demolition and construction activities would not result.

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