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**APPENDIX A**

**NOTICE OF PREPARATION (NOP) AND  
NOP COMMENT LETTERS**





THE CITY OF SAN DIEGO

Date of Notice: June 22, 2015

PUBLIC NOTICE OF PREPARATION  
OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT  
AND  
SCOPING MEETING

**FILED**  
Ernest J. Dronenburg, Jr., Recorder County Clerk

JUN 22 2015  
BY Amber Stevens  
DEPUTY

The City of San Diego Land Development Review Division will be the Lead Agency and will prepare a Draft Environmental Impact Report for the following project. The City of San Diego will be holding a scoping meeting at 6:00 P.M. on **July 15, 2015** at the **Qualcomm Stadium, Club Level, Club #37**, located at 9449 Friars Road, San Diego, CA 92108 and is inviting your comments regarding the scope and content of the document. **Your comments must be received by 30 days after receipt of this notice.** Please send your written comments to the following address: **Martha Blake, Senior Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to **DSDEAS@sandiego.gov** referencing **Project Name in the subject line.**

**General Project Information:**

- Project No. **Not yet available**, SCH No. **Not yet available**
- Community Plan Area: **Mission Valley**
- Council District: **7**

**SUBJECT: Stadium Reconstruction Project:** City Council approval of the Stadium Reconstruction Project ("proposed project"). Project goals include replacing existing sports and recreation facilities with updated facilities to enable San Diego to continue to host premier recreation events such as NFL football games and Super Bowls, collegiate football games, family entertainment events, concerts, and meeting activities. Project elements include:

- 1) Stadium Construction. The proposed stadium would be located north of the existing trolley line, within the existing developed footprint of the Qualcomm Stadium property. It would have a maximum normal capacity of up to 68,000 seats and could be designed to expand to approximately 72,000 seats for special events. An NFL Super Bowl game would be an example of a special event that would require additional seating. The structure would be up to 1.75 million square feet, with a structure footprint of up to 750,000 square feet. The stadium structure would have a maximum height of 260 feet above ground level including stadium lights and architectural features on the top of the structure.

- 2) Stadium Demolition. The existing Qualcomm Stadium structure with a normal capacity of approximately 71,000 seats would be subject to future demolition and parking would be constructed on the existing stadium site.

**Applicant:** City of San Diego

**Recommended Finding:** This preliminary finding that the project may have a significant effect on the environment is based on an initial review and does not preclude the City making a determination other than EIR pending the outcome of all of the technical reviews. The following issue areas have been identified for additional study:

**Visual Effects/Neighborhood Character, Air Quality, Historical Resources, Greenhouse Gases, Human Health/Public Safety/Hazardous Materials, Hydrology/Water Quality, Geology/Soils, Energy Conservation, Noise, Traffic/Circulation, Public Services, and Utilities.**

**Availability in Alternative Format:** To request this Notice in alternative format, call the Development Services Department at (619) 446-5000 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information contact Martha Blake at (619) 446-5375 or Elizabeth Shearer-Nguyen at (619) 446-5369. All supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth Floor of the Development Services Center. For information regarding public meetings/hearings on the project, contact Project Manager P.J. Fitzgerald at (619) 446-5107. This notice was published in the San Diego Daily Transcript and posted on the City of San Diego website (<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>) under "CEQA Notices and Documents" and distributed on June 22, 2015.

Kerry Santoro  
Deputy Director  
Development Services Department

FILED IN THE OFFICE OF THE COUNTY CLERK

San Diego County on JUN 22 2015  
Posted JUN 22 2015 Removed \_\_\_\_\_  
Returned to agency on \_\_\_\_\_  
Deputy AS

*Amber Stevens*



**Ernest J. Dronenburg, Jr.**  
**COUNTY OF SAN DIEGO**  
**ASSESSOR/RECORDER/COUNTY CLERK**



**ASSESSOR'S OFFICE**

1600 Pacific Highway, Suite 103  
 San Diego, CA 92101-2480  
 Tel. (619) 236-3771 \* Fax (619) 557-4056

[www.sdarcc.com](http://www.sdarcc.com)

**RECORDER/COUNTY CLERK'S OFFICE**

1600 Pacific Highway, Suite 260  
 P.O. Box 121750 \* San Diego, CA 92112-1750  
 Tel. (619)237-0502 \* Fax (619)557-4155

Transaction #: 343502720150622

Deputy: ASTEVENS

Location: COUNTY ADMINISTRATION BUILDING

22-Jun-2015 10:49

**FEES:**

50.00 Qty of 1 Fish and Game Filing Fee for Ref# NOTICE

50.00 TOTAL DUE

**PAYMENTS:**

50.00 Check

50.00 TENDERED

**SERVICES AVAILABLE AT  
OFFICE LOCATIONS**

- \* Tax Bill Address Changes
- \* Records and Certified Copies:  
  Birth/ Marriage/ Death/ Real Estate
- \* Fictitious Business Names (DBAs)
- \* Marriage Licenses and Ceremonies
- \* Assessor Parcel Maps
- \* Property Ownership
- \* Property Records
- \* Property Values
- \* Document Recordings

**SERVICES AVAILABLE ON-LINE AT  
[www.sdarcc.com](http://www.sdarcc.com)**

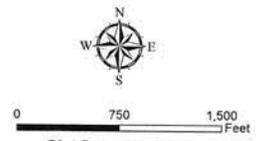
- \* Forms and Applications
- \* Frequently Asked Questions (FAQs)
- \* Grantor/ Grantee Index
- \* Fictitious Business Names Index (DBAs)
- \* Property Sales
- \* On-Line Purchases  
  Assessor Parcel Maps  
  Property Characteristics  
  Recorded Documents



CITY OF SAN DIEGO  
PLANNING DEPARTMENT

### Stadium Replacement Project Location

-  Project Location
-  San Diego River
-  Roads
-  Parcels
-  Trolley Stop
-  Light Rail



Plot Date: 6/18/2015



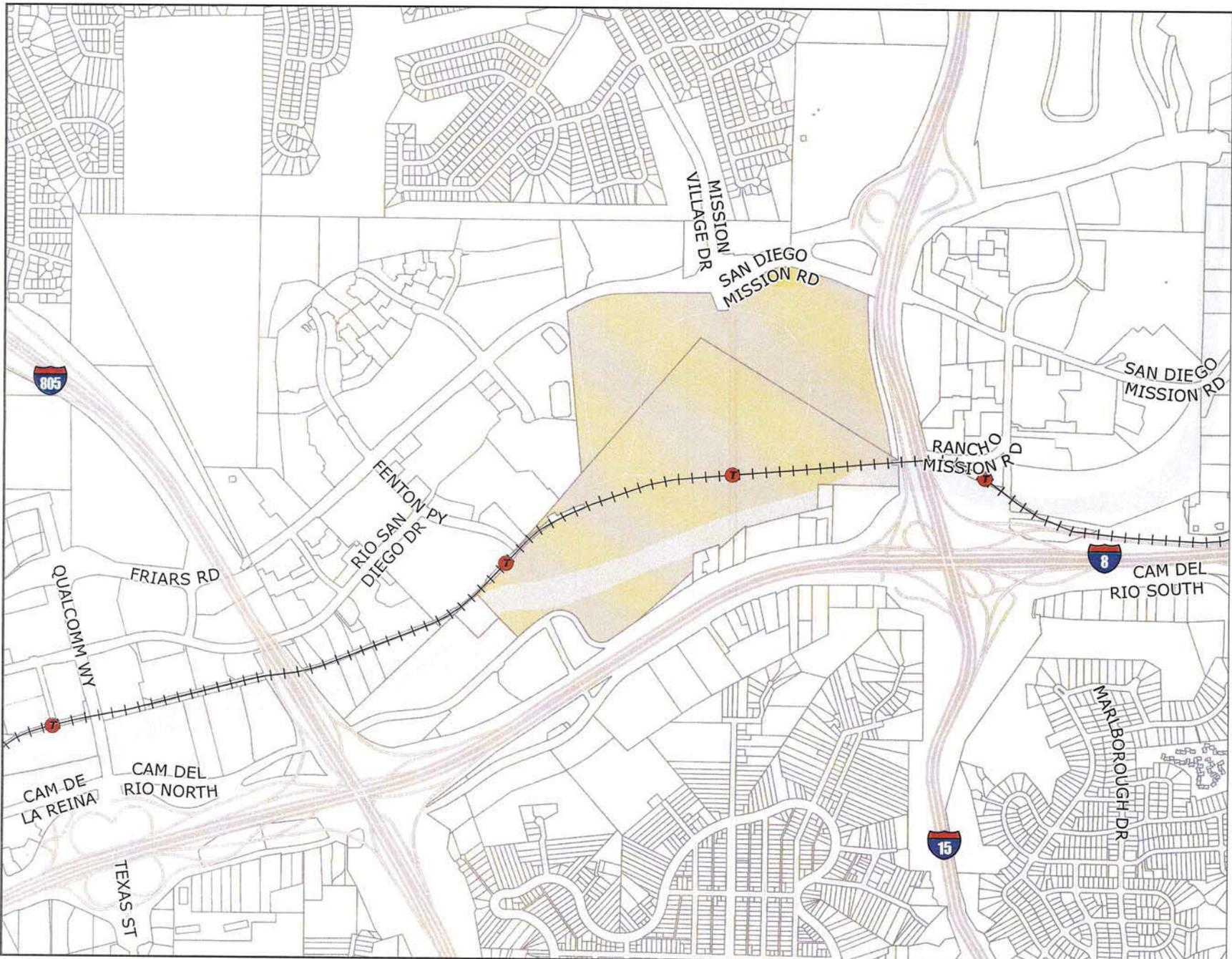
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Created: 6/18/2015  
Drawn: 6/18/2015



Distribution List

State of California

Caltrans, District 11 (31)  
California Department of Fish & Wildlife (32)  
Regional Water Quality Control Board, Region 9 (44)  
California Transportation Commission (51)  
State Clearinghouse (46)  
Native American Heritage Commission (56)

County of San Diego

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County Board of Supervisors  
    Greg Cox, District 1  
    Dianne Jacob, District 2  
    Dave Roberts, District 3  
    Ron Roberts, District 4  
    Bill Horn, District 5  
Air Pollution Control District (65)

City of San Diego

Office of the Mayor (MS 11A)  
City Council  
    Sherri Lightner, Council District 1  
    Lorie Zapf, Council District 2  
    Todd Gloria, Council District 3  
    Myrtle Cole, Council District 4  
    Mark Kersey, Council District 5  
    Chris Cate, Council District 6  
    Scott Sherman, Council District 7  
    David Alvarez, Council District 8  
    Marti Emerald, Council District 9  
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    Ewiiapaayp Band of Mission Indians (225C)  
    Inaja Band of Mission Indians (225D)  
    Jamul Indian Village (225E)  
    La Posta Band of Mission Indians (225F)  
    Manzanita Band of Mission Indians (225G)  
    Sycuan Band of Mission Indians (225H)  
    Viejas Group of Capitan Grande Band of Mission Indians (225I)  
    Mesa Grande Band of Mission Indians (225J)  
    San Pasqual Band of Mission Indians (225K)  
    Ipai Nation of Santa Ysabel (225L)  
    La Jolla Band of Mission Indians (225M)  
    Pala Band of Mission Indians (225N)  
    Pauma Band of Mission Indians (225O)  
    Pechanga Band of Mission Indians (225P)  
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Navajo Community Planners, Inc.

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Tierrasanta Community Council (462)  
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Normal Heights Community Planning Committed (291)  
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EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Notice of Preparation

June 22, 2015

To: Reviewing Agencies  
Re: Stadium Reconstruction Project  
SCH# 2015061061

Attached for your review and comment is the Notice of Preparation (NOP) for the Stadium Reconstruction Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Martha Blake**  
City of San Diego  
1222 First Avenue, MS-501  
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2015061061  
**Project Title** Stadium Reconstruction Project  
**Lead Agency** San Diego, City of

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**Type** NOP Notice of Preparation  
**Description** Project goals include replacing existing sports and recreation facilities with updated facilities to enable San Diego to continue to host premier recreation events such as NFL football games and Super Bowls, collegiate football games, family entertainment events, concerts, and meeting activities.

---

**Lead Agency Contact**

**Name** Martha Blake  
**Agency** City of San Diego  
**Phone** (619) 446-5375 **Fax**  
**email**  
**Address** 1222 First Avenue, MS-501  
**City** San Diego **State** CA **Zip** 92101

---

**Project Location**

**County** San Diego  
**City** San Diego  
**Region**  
**Cross Streets** Friars Road/Qualcomm Way/Mission Village Drive  
**Lat / Long** 32° 46' 58" N / 117° 7' 10" W  
**Parcel No.** 433-250-1300 and 433-250-1600  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** I-15, 18, 805  
**Airports**  
**Railways**  
**Waterways** San Diego River  
**Schools**  
**Land Use** Stadium/Mission Valley - Commercial - Visitor / Community Recreation and Public Recreation

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Toxic/Hazardous; Traffic/Circulation; Water Quality

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**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; San Diego River Conservancy

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**Date Received** 06/22/2015 **Start of Review** 06/22/2015 **End of Review** 07/21/2015

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# Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH# 1506106

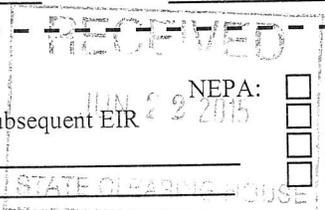
## Project Title: Stadium Reconstruction Project

Lead Agency: City of San Diego Contact Person: Martha Blake  
Mailing Address: 1222 First Avenue, MS 501 Phone: 619-446-5375  
City: San Diego Zip: 92101 County: San Diego

Project Location: County: San Diego City/Nearest Community: San Diego/Mission Valley  
Cross Streets: Friars Road/Qualcomm Way/Mission Village Drive Zip Code: 92108  
Lat. / Long.: 32° 46' 58" N/ 117° 7' 10" W Total Acres: 166  
Assessor's Parcel No.: 433-250-1300 and 433-250-1600 Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
Within 2 Miles: State Hwy #: I-15; I-8; I-805 Waterways: San Diego River  
Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: \_\_\_\_\_

## Document Type:

CEQA:  NOP  Draft EIR  NEPA:  NOI  Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.)  Draft EIS  Other \_\_\_\_\_  
 Mit Neg Dec Other \_\_\_\_\_



## Local Action Type:

General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other City Council

Action

## Development Type:

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Educational \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Recreational Stadium Reconstruction/Demo  Hazardous Waste: Type \_\_\_\_\_  
 Other: \_\_\_\_\_

## Project Issues Discussed in Document:

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Wildlife  
 Coastal Zone  Noise  Solid Waste  Growth Inducing  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Land Use  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Cumulative Effects  
 Other \_\_\_\_\_

## Present Land Use/Zoning/General Plan Designation:

Stadium/Mission Valley - Commercial-Visitor/Community Recreation and Public Recreation

## Project Description: (please use a separate page if necessary)

City Council approval of the Stadium Reconstruction Project ("proposed project"). Project goals include replacing existing sports and recreation facilities with updated facilities to enable San Diego to continue to host premier recreation events such as NFL football games and Super Bowls, collegiate football games, family entertainment events, concerts, and meeting activities. Project element's include:

- 1) Stadium Construction. The proposed stadium would be located north of the existing trolley line, within the existing developed footprint of the Qualcomm Stadium property. It would have a maximum normal capacity of up to 68,000 seats and could be designed to expand to approximately 72,000 seats for special events. An NFL Super Bowl game would be an example of a special event that would require additional seating. The

Note: The state Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

January 2008

structure would be up to 1.75 million net square feet, with a structure footprint of up to 750,000 square feet. The stadium structure would have a maximum height of 260 feet above ground level including stadium lights and architectural features on the top of the structure.

- 2) Stadium Demolition. The existing Qualcomm Stadium structure with a normal capacity of approximately 71,000 seats would be subject to future demolition and parking would be constructed on the existing stadium site.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".  
If you have already sent your document to the agency please denote that with an "S".

- |   |   |
|---|---|
| <input type="checkbox"/> Air Resources Board                            | <input type="checkbox"/> Office of Emergency Services                         |
| <input type="checkbox"/> Boating & Waterways, Department of             | <input type="checkbox"/> Office of Historic Preservation                      |
| <input type="checkbox"/> California Highway Patrol                      | <input type="checkbox"/> Office of Public School Construction                 |
| <input type="checkbox"/> CalFire  | <input type="checkbox"/> Parks & Recreation                                   |
| <input checked="" type="checkbox"/> Caltrans District # 11              | <input type="checkbox"/> Pesticide Regulation, Department of                  |
| <input type="checkbox"/> Caltrans Division of Aeronautics               | <input type="checkbox"/> Public Utilities Commission                          |
| <input type="checkbox"/> Caltrans Planning (Headquarters)               | <input checked="" type="checkbox"/> Regional WQCB # 9                         |
| <input type="checkbox"/> Central Valley Flood Protection Board          | <input type="checkbox"/> Resources Agency                                     |
| <input type="checkbox"/> Coachella Valley Mountains Conservancy         | <input type="checkbox"/> S.F. Bay Conservation & Development Commission       |
| <input type="checkbox"/> Coastal Commission                             | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers and Mtns Conservancy |
| <input type="checkbox"/> Colorado River Board                           | <input type="checkbox"/> San Joaquin River Conservancy                        |
| <input type="checkbox"/> Conservation, Department of                    | <input type="checkbox"/> Santa Monica Mountains Conservancy                   |
| <input type="checkbox"/> Corrections, Department of                     | <input type="checkbox"/> State Lands Commission                               |
| <input type="checkbox"/> Delta Protection Commission                    | <input type="checkbox"/> SWRCB: Clean Water Grants                            |
| <input type="checkbox"/> Education, Department of                       | <input type="checkbox"/> SWRCB: Water Quality                                 |
| <input type="checkbox"/> Energy Commission                              | <input type="checkbox"/> SWRCB: Water Rights                                  |
| <input checked="" type="checkbox"/> Fish & Wildlife Region # 7          | <input type="checkbox"/> Tahoe Regional Planning Agency                       |
| <input type="checkbox"/> Food & Agriculture, Department of              | <input type="checkbox"/> Toxic Substances Control, Department of              |
| <input type="checkbox"/> General Services, Department of                | <input type="checkbox"/> Water Resources, Department of                       |
| <input type="checkbox"/> Health Services, Department of                 | <input type="checkbox"/> Other _____  |
| <input type="checkbox"/> Housing & Community Development                | <input type="checkbox"/> Other _____  |
| <input type="checkbox"/> Integrated Waste Management Board              |   |
| <input checked="" type="checkbox"/> Native American Heritage Commission |   |

### Local Public Review Period (to be filled in by lead agency)

Starting Date June 22, 2015 Ending Date July 22, 2015

### Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: <u>City of San Diego/c/o Kris Shackelford</u>
Address: _____	Address: <u>525 B St., Suite 750</u>
City/State/Zip: _____	City/State/Zip: <u>San Diego/CA/92101</u>
Contact: _____	Phone: <u>619-533-4121</u>
Phone: _____	

Signature of Lead Agency Representative: \_\_\_\_\_

Date: June 19, 2015

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

**NOP Distribution List**

*JO*

Resources Agency

- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Denise Peterson
- California Coastal Commission  
Elizabeth A. Fuchs
- Colorado River Board  
Lisa Johansen
- Dept. of Conservation  
Elizabeth Carpenter
- California Energy Commission  
Eric Knight
- Cal Fire  
Dan Foster
- Central Valley Flood Protection Board  
James Herota
- Office of Historic Preservation  
Ron Parsons

- Dept of Parks & Recreation  
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery  
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.  
Steve McAdam
- Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Fish and Game

- Depart. of Fish & Wildlife  
Scott Flint  
Environmental Services Division
- Fish & Wildlife Region 1  
Curt Babcock

- Fish & Wildlife Region 1E  
Laurie Harnsberger
- Fish & Wildlife Region 2  
Jeff Drongesen
- Fish & Wildlife Region 3  
Charles Armor
- Fish & Wildlife Region 4  
Julie Vance
- Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M  
George Isaac  
Marine Region

Other Departments

- Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- Depart. of General Services  
Public School Construction
- Dept. of General Services  
Anna Garbeff  
Environmental Services Section
- Delta Stewardship Council  
Kevan Samsam
- Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission  
Michael Machado

County: San Diego

- OES (Office of Emergency Services)  
Marcia Scully
- Native American Heritage Comm.  
Debbie Treadway
- Public Utilities Commission  
Leo Wong
- Santa Monica Bay Restoration  
Guangyu Wang
- State Lands Commission  
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics  
Philip Crimmins
- Caltrans - Planning  
HQ LD-IGR  
Terri Pencovic
- California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1  
Rex Jackman
- Caltrans, District 2  
Marcelino Gonzalez
- Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North
- Caltrans, District 4  
Patricia Maurice
- Caltrans, District 5  
Larry Newland
- Caltrans, District 6  
Michael Navarro
- Caltrans, District 7  
Dianna Watson

- Caltrans, District 8  
Mark Roberts
- Caltrans, District 9  
Gayle Rosander
- Caltrans, District 10  
Tom Dumas
- Caltrans, District 11  
Jacob Armstrong
- Caltrans, District 12  
Maureen El Harake

Cal EPA

Air Resources Board

- All Other Projects  
Cathi Slaminski
- Transportation Projects  
Nesamani Kalandiyur
- Industrial/Energy Projects  
Mike Tollstrup
- State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance
- State Water Resources Control Board  
Jeffery Werth  
Division of Drinking Water
- State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality
- State Water Resources Control Board  
Phil Crader  
Division of Water Rights
- Dept. of Toxic Substances Control  
CEQA Tracking Center
- Department of Pesticide Regulation  
CEQA Coordinator

SCH# 2015061061

Regional Water Quality Control Board (RWQCB)

- RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)
- RWQCB 3  
Central Coast Region (3)
- RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)
- RWQCB 5S  
Central Valley Region (5)
- RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office
- RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)

Other \_\_\_\_\_

San Diego River  
Conservancy



THE CITY OF SAN DIEGO

July 13, 2015

Ms. Kris Shackelford  
City of San Diego  
525 B Street  
San Diego, California 92101

Dear Ms. Shackelford:

**SUBJECT: SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT REPORT  
FOR THE STADIUM RECONSTRUCTION PROJECT**

Pursuant to Section 15060 (d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City's Land Development Review (LDR) Division has conducted an initial review for the above-referenced project and has determined that the proposed project may have significant effects on the environment. The preparation of a draft Environmental Impact Report (EIR) is, therefore, proposed.

The purpose of this letter is to identify the specific issues to be addressed in the EIR. The EIR should be prepared in accordance with the "City of San Diego Technical Report and Environmental Impact Report Guidelines" (Updated May 2005). A Notice of Preparation was distributed to the Responsible Agencies and others who may have an interest in the project on June 22, 2015. Changes or additions to the scope of work may be required as a result of input received in response to the Notice of Preparation. In addition, the project may be adjusted over time by the applicant, and these changes would be disclosed in the EIR, or the changes may result in a determination other than EIR.

Each section/issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation of the issue area. The EIR should also include sufficient graphics and tables to provide a complete description of all major project features.

**The project that will be the subject of the EIR is briefly described as follows:**

**Project Location:** 9449 Friars Road, San Diego, CA 92108 (existing Qualcomm Stadium site)

**Project Description:** Approval of the Stadium Reconstruction Project, which includes construction of a new stadium and demolition of the existing Qualcomm Stadium ("proposed project"). A new stadium is proposed to provide an updated facility to enable San Diego to continue to host premier recreation events such as NFL football games and Super Bowls, collegiate football games, family entertainment events, concerts, and meeting activities. More specifically, the proposed project generally includes:

- 1) Stadium Construction. The proposed stadium would be located north of the existing trolley line, within the existing developed footprint of the Qualcomm Stadium property. It would have a maximum normal capacity of up to 68,000 seats and could be designed to expand to approximately 72,000 seats for special events. An NFL Super Bowl game would be an example of a special event that would require additional seating. The structure would be up to 1.75 million square feet, with a structure footprint of up to 750,000 square feet. The stadium structure would have a maximum height of 260 feet above ground level including stadium lights and architectural features on the top of the structure.
- 2) Stadium Demolition. The existing Qualcomm Stadium structure with a normal capacity of approximately 71,000 seats would be subject to future demolition and parking would be constructed on the existing stadium site.

## **EIR FORMAT – KEY ELEMENTS**

Emphasis in the EIR must be on identifying feasible solutions to environmental problems. The objective is not to simply describe and document an impact but to actively create and suggest mitigation measures or project alternatives to substantially reduce identified significant adverse environmental impacts. The adequacy of the EIR will depend greatly on the thoroughness of this effort.

The EIR must be written in an objective, clear, and concise manner, in plain language. Graphics may be used to replace extensive word descriptions and to assist in clarification. Conclusions must be supported with quantitative, as well as qualitative, information.

## **EIR CONTENT**

The EIR shall include a title page including the State Clearinghouse number and the date of publication. The entire EIR must be left justified and shall include a table of contents and an executive summary, as well as the following sections:

## 1. INTRODUCTION

Introduce the purpose of the project with a brief discussion of the intended use and purpose of the EIR. Discuss how the EIR may be used as the basis for subsequent approvals and/or subsequent environmental documents, as appropriate; and describe the parameters for such future use of the EIR. Describe and/or incorporate by reference any previously certified environmental documents that address the project site.

## 2. ENVIRONMENTAL SETTING

Describe the precise location of the project with an emphasis on the physical features of the site and the surrounding area and present it on a detailed topographic map and a regional map. Provide a local and regional description of the environmental setting of the project. Describe any upcoming changes to the area and any cumulative changes that may relate to the project site. Include the existing and planned land uses in the vicinity, on-and off-site resources, the community plan area land use designation(s), whether or not the project is located within the Multi-Habitat Planning Area (MHPA), existing zoning, all utility easements and any required maintenance access, and any overlay zones within this section. Provide a recent aerial photo of the site and surrounding uses, and clearly identify the project location.

## 3. PROJECT DESCRIPTION

Per CEQA Guideline Section 15124, discuss the goals and objectives and major features of the project. Describe any and all of the discretionary actions involved in the project. List and explain the requirements for permits or approvals from federal, state, and local agencies. Describe the proposed project's components, any proposed open space and/or public spaces, project access, and all other major project features. Include a discussion of any off-site improvements associated with the proposed project and describe project phasing. Also provide a brief discussion of previous and existing developments on the project site.

## 4. HISTORY OF PROJECT CHANGES

Chronicle the physical changes that have been made to the project in response to environmental concerns raised during the City's review of the project.

## 5. ENVIRONMENTAL IMPACT ANALYSIS

This section shall analyze those environmental categories having a potential for adverse environmental impacts, either because of the project's effect on the existing conditions, or the effect of existing conditions on the project. The EIR must include a complete discussion of the existing conditions, thresholds, impact analysis, significance, and mitigation for all the environmental issue sections. The EIR must represent the independent analysis of the Lead Agency. The City's current CEQA Significance Determination Thresholds are to be used to establish significant effect unless otherwise directed by the City.

In general, the EIR should discuss all potential direct and indirect impacts associated with each environmental issue area listed below. These environmental issue areas are listed in order of anticipated magnitude of significance. Lastly, the EIR should summarize each required technical study or survey report within each respective issue section, and all requested technical reports must be included as the appendices to the EIR and summarized in the text of the document.

In each environmental issue section, mitigation measures to avoid or substantially lessen impacts must be clearly identified and discussed. The ultimate outcome after mitigation should also be discussed (i.e. significant but mitigated, significant and unmitigated). If other potentially significant issue areas arise during detailed environmental investigation of the Project, consultation with the Development Services Department is required to determine if these areas need to be added to the EIR. As supplementary information is required, the EIR may also need to be expanded.

### **5.1. Land Use**

**Issue 1: Would the project be inconsistent/conflict with the environmental goals, objectives, or guidelines of the Mission Valley Community Plan or City of San Diego General Plan?**

**Issue 2: Would the project be inconsistent/conflict with an adopted land use designation or intensity resulting in indirect or secondary environmental impacts?**

**Issue 3: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project?**

**Issue 4: Would the project be inconsistent/conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan and any applicable MHPA Adjacency Guidelines?**

The EIR shall evaluate consistencies/inconsistencies (including all deviations, variances, etc.) with local, state, and federal regulations [i.e., the City's General Plan (2008), the Mission Valley Community Plan, City of San Diego Land Development Code, and Multiple Species Conservation Program]. If the project is found to be inconsistent with any adopted land use plans, would that inconsistency result in physical affects that could be considered significantly adverse?

### **5.2. Transportation/Traffic Circulation/Parking**

**Issue 1: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Issue 2: Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

**Issues 3: Would the project result in a change in traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**Issue 4: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?**

**Issue 5: Would the project result in inadequate emergency access?**

**Issue 6: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

**Issue 7: Would the project result in an increased demand for off-site parking and/or significant effects on existing parking?**

The project proposes to replace an existing stadium (used for NFL and college football games, along with other special events) with a new stadium for the same uses. A traffic impact analysis must be prepared, to the satisfaction of the City Engineer, to determine if the increase traffic volumes has the potential to result in direct and/or cumulative impacts on the surrounding local circulation network (segments and intersections) and freeways (freeway ramps and mainline).

Describe in this section any required modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways, and interchanges. Discuss any potential traffic impacts on the Mission Valley community, as well as adjacent communities. Discuss the overall traffic generated by the project. Address cumulative traffic impacts, including any future development in the Mission Valley community, as well as adjacent communities, as appropriate. Note the assumption of traffic conditions at build-out. Describe parking proposals, including the use of any off-site parking areas during the construction phases, and address existing and future transit facilities/opportunities.

The EIR shall present mitigation measures that would reduce any identified impacts. Discuss if those measures will mitigate impacts to below a level of significance. If the project results in traffic impacts, which cannot be mitigated to below a level of significance, the Alternatives section of the EIR should include a project alternative that will avoid or further reduce traffic impacts.

### **5.3 Visual Quality/Neighborhood Character**

**Issue 1: Would the project substantially obstruct any vista or scenic view from public vantage points as identified in the community plan?**

**Issue 2: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**Issue 3: Would the project substantially degrade the existing visual character or quality of the site or its surroundings? Would the project create a negative aesthetic site or project?**

**Issue 4: Would the project result in bulk, scale, materials or styles that are incompatible with surrounding development?**

**Issue 5: Would the project substantially alter the existing or planned character of the area? Would the project be of a size, scale or design that would markedly contrast with the character of the surrounding area?**

**Issue 6: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?**

This section should evaluate grading associated with the project and the potential change in the visual environment based on the proposed development. Provide an evaluation of the Visual Quality/Neighborhood Character (Aesthetics) impacts due to the proposed project. Describe the proposed structures in terms of building mass, bulk, height, and architecture. Describe or state whether this complies with or is allowed by the City's standards for the zone. Address visual impacts of the proposed project from public vantage points. Visibility of the site from public vantage points should be identified through a photo survey/inventory and/or photo simulations, and any changes in these views should be described.

Describe how the character of the surrounding area would be affected with development of the project and what design features may be incorporated into the project design to avoid substantial light or glare in the area. Also address any zone deviations (such as height) that could result in substantial impacts to the visual environment.

If significant impacts to Visual Quality/Neighborhood Character are identified, mitigation measures and/or project alternatives that would reduce significant impacts to the extent feasible should be identified. Any and all deviations/variances relating to visual quality/neighborhood character and bulk and scale must be discussed in this section.

#### **5.4 Air Quality**

**Issue 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**Issue 2: Would the project cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Issue 3: Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Issue 4: Would the project's construction activities exceed 100 pounds per day of Particulate Matter (dust)?**

**Issue 5: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

**Issue 6: Would the project create objectionable odors affecting substantial number of people?**

The construction and operation phases of the project have potential to affect air quality. Construction can create short-term air quality impacts through equipment use, ground-disturbing activities, architectural coatings, and work automotive trips. Air quality impacts resulting from the operation of the project would be primarily generated by an increase in automobile trips. An air quality analysis must be prepared which discusses the project's impact on the ability to meet state, regional, and local air quality strategies/standards, as well as any health risks associated with construction.

Describe the project's climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards. Discuss short- and long-term and cumulative impacts on regional air quality, including construction and transportation-related sources of air pollutants. Discuss the potential impacts from the increase in trips to the Regional Air Quality Standards, the overall air quality impacts from such trips, and any proposed mitigation measures. Should the project result in a significant decrease in the levels of service of any roadway or intersection, address the potential of air quality impacts that may result, including the possibility of "hot spots" within the area. Also include a discussion of potential dust generation during construction within this section of the document, together with any proposed dust suppression measures that would avoid or lessen dust related impacts to sensitive receptors within the area.

### **5.5 Global Climate Change**

**Issue 1: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Issue 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?**

This section shall present an overview of greenhouse gases (GHG), including the most recent information regarding the current understanding of the mechanisms behind conditions and trends, and the broad environmental issues related to global climate change. A discussion of current legislation, plans, policies, and programs pertinent to global climate change shall also be included. Per General Plan direction, the EIR shall provide details of the project's sustainable features such as pedestrian access and orientation, sustainable design and building features, and others that meet criteria outlined in the Conservation Element of the General Plan.

The EIR shall address the project's contribution to greenhouse gases. A quantitative analysis addressing the project-generated greenhouse gas emissions, as applicable, shall be provided in a GHG emissions study and summarized in the EIR.

The City has not established thresholds of significance for GHG emissions. The City is utilizing an interim screening threshold, based on available guidance from the California Air Pollution Control Officers Association (CAPCOA) to determine if a project is required to prepare a GHG study. A CAPCOA report, "CEQA & Climate Change" dated January 2008 references a 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation.

Based on the scope of the project, GHG emissions resulting from both construction activities related to the project and on-going operation of the project must be analyzed. The analysis should include, but is not limited to, the five primary sources of GHG emissions: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation, and water usage. The California Air Resources Board (CARB) has developed a year 2020 "business-as-usual" forecast model which represents the GHG emissions that would be expected to occur without any GHG project reducing features or mitigation. To reduce potential impacts to below a level of significance, proposed projects must show a 28.3 percent reduction from the 2020 business-as-usual model.

## **5.6 Energy**

**Issue 1: Would the construction and operation of the proposed project result in the use of excessive amounts of electrical power?**

**Issue 2: Would the proposed project result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?**

CEQA requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy should be included in this section. Address the estimated energy use for the project and assess whether the project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers. A description of any energy and/or water saving project features should also be included in this section. (Cross-reference with Global Climate Change discussion section as appropriate.) Describe any proposed measures included as part of the project or required as mitigation measures directed at conserving energy and reducing energy consumption. Ensure this section addresses all issues described within Appendix F of the CEQA Guidelines.

## **5.7 Noise**

**Issue 1: Would the project result in or create a significant increase in the existing ambient noise levels?**

**Issue 2: Would the project result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with the City's Land Use-Noise Compatibility guidelines?**

**Issue 3: Would the project cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan? Would the project expose people to noise levels which exceed the City's established CEQA Significance Thresholds?**

**Issue 4: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?**

The project site is currently subject to traffic noise from the adjacent streets (Friars Road) and the I-15 and I-8 freeways. The current and proposed uses on the site are not considered sensitive, and so the impacts from off-site noise generators are not expected to be significant. Given that the site is a noise generator, a noise study in accordance with the City's "Acoustical Report Guidelines" should be prepared. The report must assess the effects of existing and projected transportation noise levels on surrounding uses. Include graphics within the noise study, which show the existing and future noise levels and any increased noise levels in 5 dB(A) increments on the conceptual land use plan.

The EIR should discuss how the project would conform to the City of San Diego Municipal Code Noise and Abatement Control Ordinance §59.5.01 and the General Plan. Additionally, construction and operational noise may impact surrounding areas, and the EIR should include a discussion regarding this potential impact.

## **5.8 Geologic Conditions**

**Issue 1: Would the proposed project expose people or property to geologic effects including the risk of life, injury, or death due to hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?**

**Issue 2: Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?**

**Issue 3: Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

The project is located in Geologic Hazard Category 31, characterized as having a high potential for liquefaction with shallow groundwater, major drainages, and hydraulic fills.

The EIR should discuss the potential for either short- or long-term erosion impacts to soils on-site. Geological constraints on the project site, including groundshaking, ground failure, landslides, erosion, and geologic instability should be addressed, as well as seismicity and seismic hazards created by faults present in the project site.

## **5.9 Hydrology/Water Quality**

**Issue 1: Would the project cause a substantial increase in impervious surfaces and associated increased in runoff?**

**Issue 2: Would the project cause substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?**

**Issue 3: Would the project result in an increase in pollutant discharge to receiving waters during construction or operation?**

**Issue 4: Would the project violate any water quality standards or waste discharge requirements?**

**Issue 5: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses of planned uses for which permits have been granted)?**

Anticipated changes to existing drainage patterns and runoff volumes should be addressed in the EIR. A preliminary hydrology study must be provided and measures to protect on-site and downstream properties from increased erosion or siltation must be identified.

Water Quality is affected by sedimentation caused by erosion, by urban run-off carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed or redeveloped, the impervious surfaces could send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-source pollution) into associated watersheds. Sedimentation can impede stream flow. Compliance with the City's Storm Water Standards is generally considered to preclude water quality impacts.

Discuss the project's effect on water quality within the project area and downstream. If the project requires treatment control Best Management Practices (BMPs), submit a Water Quality Technical Report (WQTR) consistent with the City's Storm Water Standards. The report must describe how source control and site design have been incorporated into the project, the selection and calculations regarding the numeric sizing treatment standards, BMP maintenance schedules and maintenance costs, and the responsible party for future maintenance and associated costs. The report must also address water quality, by describing the types of pollutants that would be generated during post construction, the pollutants to be captured and treated by the BMPs. The findings in this report must be reflected within this section of the EIR. Based on the analysis and conclusions of the WQTR, the EIR shall disclose how the project would comply with local, state, and federal regulations and standards.

### **5.10 Health and Safety**

**Issue 1: Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?**

**Issue 2: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment and would the project expose people to potential health hazards?**

**Issue 3: Would the project expose people to toxic substances?**

**Issue 4: Would the project impair implementation of, or physically interfere with, an adopted emergency response plan?**

**Issue 5: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The EIR shall identify known contamination site(s) within the project area and address the potential impact to occupants of the proposed project. This section should also address any other hazardous materials that would be utilized and/or stored on-site. Please provide the types and quantities of hazardous materials along with the locations of storage areas on the plans.

The EIR shall also discuss project effects on emergency routes and access within the project area during and after project construction.

Fire hazards exist where highly flammable vegetation is located adjacent to development. Specialized public safety issues arise in cases where brush management requirements cannot be met. The EIR should discuss the project in terms of health and safety as it relates to fire hazards on and adjacent to the project. The discussion should include a discussion of brush management zones (if required), as well as any other safety measure to be implemented for the site.

### **5.11 Public Services and Facilities**

**Issue 1: Would the proposed project result in the need for new or expanded public facilities, including fire protection, police protection, health, social services, emergency medical, libraries, schools, and parks? If so, what physical impacts would result from the construction of these facilities?**

Discuss if the project would increase demand on existing and planned public services and facilities. Identify fire and police facilities in relation to the project site. Disclose the Fire and Police Departments' current response time to the area. Discuss if the site currently receives six-minute response time for fire crews and equipment, eight-minute emergency services response time, and whether the Police Department's goal of a seven-minute response time for priority

calls are currently able to be met on-site. Discuss if or how the project would alter any existing or planned response times to the site or surrounding service area.

### **5.12 Public Utilities/Public Facilities**

**Issue 1: Would the proposed project result in the need for new systems or require substantial alterations to existing utilities including those necessary for water, sewer, storm drains, and solid waste disposal? If so, what physical impacts would result from the construction of these facilities?**

**Issue 2: Would the project have an effect on or result in a need for new or altered governmental services in any of the following areas: police protection, fire/life safety services, or maintenance of public facilities, including roads?**

The EIR shall include a discussion of potential impacts to public utilities as a result of the project. Identify any conflicts with existing and planned infrastructure, evaluate any need for upgrading infrastructure, and describe any impacts resulting from the construction of needed new facilities.

Discuss the project's construction and operational effects on the City's ability to handle solid waste. The proposed project meets the City's threshold of development of 40,000 square feet or more and therefore a Waste Management Plan must be prepared by the applicant, approved by the City's Environmental Services Department, and summarized in the EIR. The Plan must address recycling and solid waste disposal for demolition, construction, and post-construction occupancy phases of the project.

A Sewer and/or Water Study should be performed to determine if appropriate sewer/water facilities are available to serve the development. The analysis and conclusions of the studies shall be included in the EIR.

The EIR shall include a discussion of the potential impacts to public facilities that may result from the development of the project. The project is proposing development that exceeds 100,000 square feet of non-residential construction; therefore, per the City's CEQA Significance Thresholds, it must be noted if the project is located in a brush hazard area, hillside, or an area with inadequate fire hydrant services or street access. Disclose if any toxic or readily-combustible materials would be used, manufactured, or stored for the project. The EIR shall include a discussion as to whether the project has the potential to negatively impact the maintenance of any public facilities, such as roads and sidewalks.

### **5.13 Biological Resources**

**Issue 1: Would the project directly or indirectly impact any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**

**Issue 2: Would the project have a substantial adverse impact on any Sensitive Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?**

**Issue 3: Would the project have a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?**

**Issue 4: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?**

The project site is located adjacent to sensitive vegetation, along both the southern and eastern boundaries of the project site. A biological resource report must be prepared as part of the EIR, and this report would be a technical appendix to the EIR. The report must be prepared in compliance with the City of San Diego Biology Guidelines, and quantify any potential impacts to resources, both floral and faunal, and propose appropriate mitigation measures should impacts to resources be identified. The consistency of the proposed project with the provision of the MSCP should be addressed. Please note that any areas identified for off-site mitigation must be adequately discussed in the resource report and carried through the EIR. Please also include a discussion of any off-site impacts to resources from either off-site mitigation sites or off-site impacts.

#### **5.14 Historic Resources (Archaeological and Built Environments)**

**Issue 1: Would the proposed project result in the alteration and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?**

**Issue 2: Would the proposed project result in any impact to existing religious or sacred uses within the potential impact area?**

**Issue 3: Would the proposed project result in the disturbance of any human remains, including those interred outside of formal cemeteries?**

The project site is within proximity of recorded archaeological sites. An archaeological record search shall be conducted for the project area (area of potential effect) to access any recently recorded sites that may be adversely impacted by the development proposal, and the information shall be summarized within the EIR. This report should assess the project's potential for impacting prehistoric and/or historic resources through grading activities, especially in previously undisturbed soil, and discussed in the EIR. If appropriate, the EIR should identify requirements for archaeological monitoring during grading operations and specify mitigation for any discoveries.

The City of San Diego criteria for determination of historic significance, pursuant to the CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states that "A project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment." Please evaluate the potential historicity of the existing Qualcomm Stadium building, which exceeds 45 years in age, and, if potentially historic, what mitigation requirements would be required to mitigate any impacts.

#### 6. CUMULATIVE EFFECTS

When this project is considered with other past, present, and reasonable foreseeable future projects in the project area, implementation could result in significant environmental changes, which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts must be discussed in a separate section of the EIR.

Additionally, the Cumulative Impacts section must address the project's contribution to greenhouse gases. Quantify the greenhouse gas emissions associated with the project and the extent to which that contribution affects global climate change. Discuss current relevant legislation (AB32, SB97) and how the proposed project's air quality analysis conforms to state requirements. (This discussion may reference and summarize the detailed analysis presented in the Energy and Global Climate Change sections of the EIR.)

#### 7. MITIGATION MEASURES

Mitigation measures should be clearly identified and discussed. A Mitigation, Monitoring, and Reporting Program (MMRP) for each issue area with significant impacts is mandatory and projected effectiveness must be assessed (i.e. all or some CEQA impacts would be reduced to below a level of significance, etc.). At a minimum, the MMRP should identify: 1) the department responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. In addition to separate issue area mitigation discussions, a consolidated, stand alone, all issue area MMRP should also be included in the EIR in a separate section and a duplicate separate copy must also be provided to EAS.

#### 8. EFFECTS NOT FOUND TO BE SIGNIFICANT

Provide a discussion of the environmental issue areas that were determined not to be significant and describe the reasons for this determination. For the Stadium Reconstruction project, it is anticipated that these would include Agricultural Resources, Forestry Resources, Mineral Resources, and Population and Housing. If issues related to these areas or other potentially significant issues areas arise during the detailed environmental investigation of the project, consultation with EAS is recommended to determine if subsequent issues area discussion needs to be added to the EIR. Additionally, as supplementary information is submitted (such as with the technical reports), the EIR may need to be expanded to include these or other additional use areas.

## 9. NEW INFORMATION/PROJECT AMENDMENTS

If the project description changes, and/or supplementary information becomes available, the EIR may need to be expanded to include additional issue areas. This must be determined in consultation with EAS staff.

## 10. MANDATORY DISCUSSION AREAS

In accordance with CEQA Section 15126, the EIR must include a discussion of the following issue areas:

- A. Any significant environmental effects that cannot be avoided if the proposed project is implemented. Include impact threshold criteria used. Provide mitigation measures where appropriate; including triggers, details, responsible entities, and a monitoring and report schedule. Include a sentence on the significance of each impact area discussed, with effect of the proposed mitigation if appropriate. Do not include analysis in this sentence.
- B. Any significant irreversible environmental changes that would result from the implementation of the proposed project.
- C. Growth-inducing impacts of the proposed project. The Growth Inducement analysis should conclude: 1) how the project is directly and indirectly growth inducing (i.e. fostering economic or population growth by land use changes, construction of additional housing, etc.), and 2) if the subsequent consequences (i.e. impacts to existing infrastructure, requirement of new facilities, roadways, etc.) of the growth inducing project would create a significant and/or unavoidable impact, and provide for mitigation or avoidance. Address the potential for growth inducement through implementation of the proposed project; accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

## 11. ALTERNATIVES

The EIR must place major attention on reasonable alternatives that avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. See Section 155364 of the CEQA Guidelines for the CEQA definition of "feasible."

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for rejection must be explained in detail and demonstrate to the public the analytical route followed in rejected certain alternatives.

The following alternatives must be considered:

**A. No Project/No Build**

This alternative should describe an alternative that leaves the site as it is currently developed, with the existing uses, including NFL, continuing. Demolition of the stadium would not occur, and no new development would take place. Discuss the environmental effects that could increase or decrease as a result of this alternative, such as land use, traffic, historic, air quality, GHG, and noise.

**B. No Project/No NFL**

This alternative should describe an alternative that would not demolish the existing stadium, and all uses with the exception of NFL football would continue to utilize the stadium. Discuss the environmental effects that could increase or decrease as a result of this alternative, such as land use, traffic, historic, air quality, GHG, and noise.

**C. Rehabilitate Existing Stadium: NFL Option**

This alternative would not demolish the existing stadium, but would rehabilitate the stadium to meet current NFL standards for pro-football stadiums. Discuss the effects that could increase or decrease as a result of this alternative, such as land use, traffic, historic, air quality, GHG, and noise.

**D. Rehabilitate Existing Stadium: No NFL**

This alternative would also rehabilitate the existing stadium, for all existing uses with the exception of NFL football. Discuss the effects that could increase or decrease as a result of this alternative, such as land use, traffic, historic, air quality, GHG, and noise.

**E. Two Stadium Option**

This would involve construction of a new stadium, but exclude the demolition of the existing Qualcomm Stadium. Reuse of the existing stadium may occur. Discuss the effects that could increase or decrease as a result of this alternative, such as waste, temporary construction impacts, traffic, and historic resources.

**F. Alternative Location for the Project**

Discuss other on- or off-site locations that might be feasible which would avoid or substantially reduce significant impacts associated with the project at the proposed location and still achieve the basic project objectives.

If through the environmental analysis process, other alternatives become apparent which would mitigate potentially significant impacts, these alternatives must be discussed with EAS staff prior to including them in the EIR. It is important to emphasize that the alternatives section of the EIR

Page 17  
Ms. Kris Shackelford  
July 13, 2015

should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

12. REFERENCES

Material must be reasonably accessible. Use the most up-to-date possible and reference source document.

13. INDIVIDUALS AND AGENCIES CONSULTED

List those consulted in preparation of EIR. Seek out parties who would normally be expected to be a responsible agency or an interest in the project.

14. CERTIFICATION PAGE

Include City and Consulting staff members, titles, and affiliations.

15. APPENDICES

The Technical Appendices to the EIR should include the NOP and any letters of comment received during review of the NOP, as well as copies of all accepted technical studies.

Prior to starting work on the EIR, it is recommended that we meet with your staff to discuss this proposed scope of work and the environmental review process. Please contact Martha Blake at (619) 446-5375 if you have any questions regarding the CEQA analysis; or P.J. Fitzgerald, Project Manager at (619) 446-5107, for general questions regarding the proposed project.

Sincerely,



Kerry Santoro  
Deputy Director  
Development Services Department

KS/mb



## Stadium Reconstruction – Public Comments

2015	Name	Title/Agency	# Submittals	Format (Email, Attachment, Audio)
June 29	Jacob Armstrong	Chief, Development Review Branch – Caltrans	1	Attachment
July 20	Gail Sevens	Environmental Program Manager, South Coast Region – CA Dept. of Fish and Wildlife	1	Attachment
July 21	Susan Baldwin	Senior Regional Planner, SANDAG	1	Attachment
July 20	Donna Frye	Former City Council	1	Attachment
July 2	James Royle	Chairperson, Env. Review Committee – SD County Archaeological Society	1	Attachment
July 19	Michael Beck	San Diego Director, Endangered Habitats League	1	Attachment
July 21	Rob Hutsel	Executive Director, San Diego River Park Foundation	1	Email
July 19	Cindy Moore	Chair, Serra Mesa Planning Group	1	Email
July 14	Jim Peugh	Conservation Committee Chair, San Diego Audubon Society	1	Email, Audio (transcribed)
July 16	Jason Riggs	Chairman, San Diego Stadium Coalition	1	Email
July 20	Douglas Carstens	Attorney, Chatten-Brown & Carstens	1	Attachment
July 22	Julie Hamilton	Attorney, Law Office of J. Hamilton	1	Attachment
July 15 – July 18	Dan McLellan	Individual	5	Email
July 8	AK Faucher	Individual	1	Email
July 8	John and Sally Smith	Individuals	1	Email
July 8	Kantilal Desai	Individual	1	Email
July 8	Ken Faucher	Individual	1	Email
July 8	Larry Hennessee	Individual	1	Email
July 9	Barry Getzel	Individual	1	Email
July 10	Armando Gallegos	Individual	1	Email
July 13	Ben Johnson	Individual	1	Email
July 14	Ross Christie	Individual	1	Email
July 15	Howard Kahn	Individual	1	Email
July 15	Paul Faucher	Individual	1	Email
July 15	Robert Hingtgen	Individual	1	Email
July 16	Bruce Sims	Individual	1	Email
July 16	John Hoyer	Individual	1	Email
July 18	Debora Greene	Individual	1	Attachment
July 19	Don Wood	Individual	1	Email
July 20	Jesse Arroyo	Individual	1	Email
July 20 – July 21	Jose Quinones, Jr.	Individual	3	Email
July 21	Jody Ebsen	Individual	1	Email



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

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11-SD-15

PM 6.81

Stadium Reconstruction

SCH#2015061061

Ms. Martha Blake  
City of San Diego  
1222 First Avenue, MS-501  
San Diego, CA 92101

Dear Ms. Blake:

The California Department of Transportation (Caltrans) has received the Notice of Preparation dated, June 22, 2015, for the Stadium Reconstruction Project located adjacent to the Interstate 15 (I-15) at Friars Road. Caltrans has the following comments:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the Caltrans Guide for the Preparation of Traffic Impact Studies. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide. [www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

All State-owned signalized intersections affected by this project should be analyzed using the intersecting lane vehicle (ILV) procedure from the Caltrans Highway Design Manual, Topic 406, page 400-21.

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips. A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy; therefore, please refer to the policy for more information and requirements.

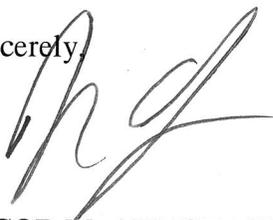
<http://www.dot.ca.gov/hq/traffops/signtech/signdel/policy/13-02.pdf>

The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable LOS. Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

If you have any questions on the comments Caltrans has provided, please contact Roy Abboud of the Development Review Branch at (619) 688-6968.

Sincerely,



JACOB M. ARMSTRONG, Chief  
Development Review Branch



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
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www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



July 20, 2015

Ms. Martha Blake, Senior Planner  
City of San Diego Development Services Department  
1222 First Avenue, MS-501  
San Diego, California 92101  
DSDEAS@sandiego.gov

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Stadium Reconstruction Project (SCH No. 2015061061)**

Dear Ms. Blake:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Stadium Reconstruction Project, dated June 22, 2015. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

The proposed project site is located within the existing footprint of the Qualcomm Stadium property located south of Friars Road, west of Interstate 15, and north of the San Diego River and Interstate 8. The proposed project would replace the existing stadium with an updated facility located north of the existing San Diego trolley line. The updated facility would be up to 1.75 million square feet, have a structure footprint of 750,000 square feet (approximately 17 acres), a maximum height of 260 feet, and hold 68,000 to 72,000 seats. The existing stadium would eventually be demolished and replaced with parking.

The NOP does not include Biological Resources as an issue area for study in the DEIR. The Department disagrees with this assumption; we believe the proposed project could potentially have significant effects to biological resources. Accordingly, we recommend the DEIR include an in-depth analysis of impacts to biological resources.

The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

#### **Specific Comments**

1. The Department is concerned about potential project-related direct and indirect effects on the San Diego River and Murphy Canyon Creek, the sensitive habitats they support, the

adjacent upland habitat, and the sensitive species that occur in both the riparian and upland habitats in proximity to the redevelopment proposal (see Exhibit 1).

Specifically, we are concerned about biological effects (e.g., wildlife movement, behavior such as breeding activity) from both project-related construction and operational (i.e., long-term) disturbances to these biological resources resulting from:

- encroachment by humans and domestic animals;
  - possible conflicts resulting from wildlife-human interactions at the interface between the proposed development and the biological buffer;
  - line-of-sight disturbances;
  - noise;
  - light;
  - glare;
  - shading; and
  - hydrological changes both within the reach of the San Diego River adjacent to the project site and downstream.
2. Based on the proximity of the San Diego River corridor, any redevelopment project (including alternatives) needs to recognize the importance of adequate and appropriately managed riparian buffers for protecting riparian habitat. Riparian buffers serve numerous functions for riparian habitat and the species they support, including: (a) expansion of the habitat's biological values (e.g., buffers are an integral part of the complex riparian ecosystems that provide food and habitat for the fish and wildlife they support); (b) protection from direct disturbance by humans and domestic animals; and (c) reduction of edge effects from, for example, artificial noise and light, line-of-sight disturbances, invasive species, and anthropogenic nutrients and sediments (streams should not be burdened by anthropogenic pollutants which often represent levels beyond their natural assimilative capacity).

In determining the adequate buffer width, as measured from the outside edge of the riparian habitat, it is necessary to consider that edge effects can penetrate up to 650 feet into habitat. The Fish and Game Commission Policy on the Retention of Wetland Acreage and Habitat states, "Buffers should be of sufficient width and should be designed to eliminate potential disturbance of fish and wildlife resources from noise, human activity, feral animal intrusion, and any other potential sources of disturbance."<sup>1</sup>

The City's MSCP SAP identifies the San Diego River corridor as a habitat linkage between core resource areas (riparian habitat and adjacent upland vegetation communities in proximity to the redevelopment proposal are within the Multi-Habitat Planning Area [MHPA]). The City has previously acknowledged (e.g., Grantville Redevelopment Project [SCH# 2004071122]) that for redeveloped proposed to occur along the San Diego River corridor that "the San Diego River riparian habitat and adjacent Diegan coastal sage scrub are still areas of relatively high species diversity and abundance and provide a regional

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<sup>1</sup> <http://www.fgc.ca.gov/policy/p4misc.aspx#WETLANDS>

wildlife corridor” between Mission Trails Park and Mission Bay Park, and that “these habitats and linkages are crucial for wildlife species survival and reproduction within the Redevelopment Area and surrounding region.” The above statements remain applicable for the stadium reconstruction project proposal, therefore the Department encourages the City to focus on protecting the biological resources associated with the San Diego River corridor by including design features that provide an enlarged biological buffer along the affected areas of the San Diego River<sup>2</sup>.

The Department recommends that the stadium reconstruction proposal include a minimum 100 foot wetland buffer in order to comply with the Biology Guidelines and the MSCP conditions of coverage for least Bell’s vireo (*Vireo bellii pusillus*: vireo). The buffer should be designed such that post-construction storm water facilities and brush management areas are located within the development footprint and not in the buffer and adequate fencing with signs discouraging human intrusion, illegal dumping, and water pollution should be installed. Any proposal for the placement of public trails (if applicable) within the upland buffer should be kept to a minimum. Any buffer areas not already within the MHPA should be added to it and managed accordingly.

Providing a wetland buffer is also important to ensure MSCP conditions of coverage for vireo are being met. The San Diego River population of vireo (CESA- and federal Endangered Species Act-listed endangered, MSCP covered) is recognized as a major population within the MSCP plan area (MSCP 1995 and 1996 Species Evaluations). Surveys on the San Diego River conducted during 2011 detected 67 territorial male least Bell’s vireo, 42 confirmed pairs, and 5 transient individuals (Kus and Lynn 2011<sup>3</sup>). As a condition of coverage for least Bell’s vireo for the MSCP SAP, Area Specific Management Directives are to include measures to provide for appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to the species. Although the Department may recommend a buffer greater than 100 feet for other, more sensitive areas along the River, we believe that 100 feet is a reasonable minimum for this portion of the San Diego River.

3. Aerials taken before the construction of the current stadium (i.e., prior to 1966, see <http://historicaerials.com>) show the San Diego River occupying a considerable portion of the stadium property, sweeping north and then west through the area of the current stadium in a wide, braided system. Murphy Canyon Creek can be seen running in a southwesterly direction, entering the San Diego River west of the current confluence. In order to accommodate installation of the fill pad on which the current stadium and parking lot are located, Murphy Canyon Creek was relocated to the eastern property line, and the San Diego River was channelized and relocated to the southern edge of the property. Any

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<sup>2</sup> The Department has commented on various development proposals along the San Diego River where we emphasized the importance of providing an adequate wetland buffer in relation to the development footprint (e.g., Shawnee/CG7600 Master Plan, Grantville Redevelopment Project, Grantville Master Plan, Draft San Diego River Natural Resource Management Plan [NRMP], and San Diego River Park Master Plan).

<sup>3</sup> Kus, B.E. and Lynn, S. 2011. Distribution, Abundance, and Breeding activities of the Least Bell’s Vireo along the San Diego River, California. 2011 Annual Data Summary. Prepared for the San Diego River Conservancy.

plan to redevelop the site should consider returning Murphy Canyon Creek to a more natural configuration, and allowing the San Diego River channel to occupy a greater area.

Any development on the project site should be located such that it does not preclude restoration of Murphy Canyon Creek and the San Diego River to nearer their historic conditions. The development footprint should be outside the River Corridor Area, described in the San Diego Municipal Code as the 100-year floodway as mapped by the Federal Emergency Management Agency plus a 35-foot wide area on each side of the floodway<sup>4</sup>.

The southern and eastern areas of the current stadium parking lot, despite being fully paved, are periodically subject to inundation from Murphy Canyon Creek and the San Diego River and, as such, are a component of the stream bed and channel. Any project activity that will divert or obstruct the natural flow of, or change or use material from the bed, channel, or bank (which may include associated riparian resources) of a river or stream, including an activity that seeks to exclude the stream from its floodplain, such as installation of fill to bring portions of the site out of the 100-year flood zone, could trigger the need for the project applicant (or "entity") to notify the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department would determine whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA would require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the City's Environmental Impact report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA the document should fully identify the potential impacts to the stream or riparian resources, including flood plain exclusion, and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.

4. The DEIR should accurately and thoroughly disclose how the proposed project is consistent with the City's MSCP SAP (e.g., how it conforms to the general planning policies and design guidelines in Section 1.4.2 of the SAP, and the land use adjacency guidelines in section 1.4.3 of the SAP), and how the project would avoid and minimize biological impacts to the maximum extent practicable. Also, the DEIR should address biological issues that are not addressed in the SAP and Implementing Agreement (IA), such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the SAP and IA.
5. One of the principles of the San Diego River Park Master Plan is to reorient development towards the San Diego River. The NOP's project description does not provide specific details of the stadium reconstruction proposal and whether additional development would be co-located in association with replacing the stadium. Situating additional development in such a manner could result in otherwise avoidable indirect impacts to the San Diego

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<sup>4</sup> San Diego Municipal Code; Chapter 15, Article 14, Division 3, pages 6 and 7: Planned Districts, §1514.0302 (a) and Diagram 1514-03A San Diego River Park Subdistrict Components.

River and the associated biological resources and adjacent upland areas, as well as potentially contribute to cumulative impacts.

If components of the reconstruction project include windows or glass doors on the side of the building facing the River, or amenities (e.g., outdoor tables) intended to attract human activities between the building and the biological buffer, we request that the project description in the DEIR (a) include that the windows and glass doors facing the biological buffer would be of non-reflective glass and would be treated to prevent indoor light from shining through them (see <http://www.flap.org/film.htm>) to avoid or minimize avian collisions because of reflection during the day and disorientation from indoor lighting shining out through windows at dusk and after dark, and (b) prohibit the placement of tables and other amenities that would encourage prolonged human presence between the building and the biological buffer.

6. The Department suggests the DEIR include a discussion about the proposed project's conformance to the City's draft San Diego River NRMP<sup>5</sup>. The Department awarded the City a Local Assistance Grant (Contract # P0150007) in 2001 to fund the preparation of the San Diego River NRMP. The Department received and commented on a draft of the NRMP in February 2004, but the plan has yet to be finalized. The purpose of NRMPs are to ensure the implementation of the management goals and objectives of the MSCP SAP's Framework Management Plan. NRMPs also include Area Specific Management Directives for those species requiring them as an MSCP condition of coverage, and occurring within the plan area. Within the San Diego River Park plan area, these species could include (but are not limited to): southwestern pond turtle (*Emys marmorata* ssp. *pallida*), orange-throated whiptail (*Cnemidophorus hyperythrus beldingii*), Cooper's hawk (*Accipiter cooperii*), least Bell's vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), and tricolored blackbird (*Agelaius tricolor*).
7. One of the purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible" [CEQA Guideline, §15002 (a)(3)]. Because of the proximity of the San Diego River, the MHPA, and sensitive species and habitats that could be negatively affected by the proposed project, the CEQA alternatives analysis is extremely important. The Department is interested in the DEIR describing a "range of reasonable alternatives to the project (particularly options to expand/maximize open space in proximity to the MHPA), 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," as required by Section 15126.6(a) of the CEQA Guidelines. The alternatives should include an "alternative [that] would impede to some degree the attainment of the project objectives, or would be more costly" [§15126.6(b) of the CEQA Guidelines]. "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed

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<sup>5</sup> Draft San Diego River Natural Resource Management Plan, Nov. 6, 2003, produced by Merkel & Associates on behalf of the City of San Diego, Park and Recreation Department; as a deliverable for Local Assistance Grant #P015007

decision making" [§15126.6(f) of the CEQA Guidelines]. For example, the Mission Valley Community Plan (October 2008) identifies proposals to provide a community park (as an active park, oriented to organized sports) in the vicinity of San Diego Jack Murphy Qualcomm Stadium and utilize the San Diego River corridor for passive recreation. Any consideration given to such a proposal should ensure that the least intensive activities are adequately buffered from environmentally sensitive lands along the San Diego River corridor. The Department will consider the alternatives analyzed in the context of their relative impacts on biological resources on both a local and regional level.

8. The project description in the DEIR should include the use of native plants in the landscaped areas adjacent to the MHPA/biological buffer. The applicant should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas adjacent and/or near native habitat areas. Exotic plant species not to be used include those species listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory. This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping adjacent to native habitat areas should not use plants that require intensive irrigation, fertilizers, or pesticides. Water runoff from landscaped areas should be directed away from the MHPA/biological buffer and contained and/or treated within the development footprint.
9. All construction and post-construction best management practices (BMPs) should be located within the development footprint (i.e., included in the impact analysis for loss of habitat). The DEIR should include a figure(s) depicting the location of BMPs in relation the development footprint. Additionally, all post-construction BMPs such as grass swales, filter strips, and energy dissipaters, should be outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas.

#### **General Comments**

10. The DEIR document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
11. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DEIR should include the following information.
  - a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
  - b) A thorough assessment of rare plants and rare natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status

Diversity Database in Sacramento should be contacted at (916) 322-2493 or [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

- d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
12. The DEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. This discussion should focus on maximizing avoidance, and minimizing impacts. Additionally, a cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  13. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
  14. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
  15. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel,

including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

16. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Marilyn Fluharty at [Marilyn.fluharty@wildlife.ca.gov](mailto:Marilyn.fluharty@wildlife.ca.gov).

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

Enclosure:

Exhibit 1. Sensitive habitats and species in proximity to the redevelopment proposal.

cc: Scott Morgan, State Clearinghouse  
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad Office







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July 21, 2015

File Number 3330300

Ms. Martha Blake  
 City of San Diego, DSC  
 1222 First Avenue, MS 501  
 San Diego, CA, 92101

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- Mexico*

Dear Ms. Blake:

**SUBJECT:** Comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Stadium Reconstruction Project ("proposed project").

Thank you for the opportunity to comment on the NOP for the Stadium Reconstruction Project.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination, and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP/SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the proposed project and related traffic analysis consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed.

**Multimodal Transportation Analysis**

The current San Diego River Park Master Plan (Plan) establishes an interim alignment for the San Diego River Trail pending the river park development at the stadium. As such, SANDAG requests that the proposed project take into account the San Diego River Park Master Plan (as it likely already intends to); consider establishing an ultimate alignment for the San Diego River Trail; and, as appropriate, consider ways the proposed project could support Plan implementation.

SANDAG also requests that the traffic studies and transportation mitigation measures for the proposed project consider implementing a Qualcomm (Fenton Parkway) to Mission City Parkway bike and pedestrian bridge, which is included in the San Diego River Trail Gaps Analysis originally completed for the San Diego River Conservancy and updated by SANDAG in 2014.

## **Transportation Demand Management (TDM)**

In considering mitigation for regional transportation impacts around the Qualcomm Stadium Reconstruction Project, consider integrating the following TDM measures:

- Provide dynamic message signs along Friars Road between I-805 and Mission Gorge Road to alert motorists of queues or slowdowns that result from stadium events.
- Provide discounted transit passes for event attendees or discounted ticket prices for attendees who take transportation alternatives.
- Offer secure bike parking and bike valet services to encourage biking to the stadium site.
- Designate a transportation coordinator to manage, monitor, and promote TDM programs for visitors and employees.
- Promote and provide space for shared mobility services (e.g. carshare, bikeshare, on-demand rideshare services) to help reduce automobile traffic and parking demand.
- Provide transportation kiosks that display real-time information about regional transit services and TDM programs.

Regional TDM programs and services such as online ridematching and multimodal trip planning can be promoted to employees and visitors to assist with reducing traffic congestion in and around the proposed project. Information on these programs can be accessed through [iCommuteSD.com](http://iCommuteSD.com), and the SANDAG TDM division can assist with integration of these measures as part of this project.

## **Other Considerations**

We appreciate the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Stadium Reconstruction Project.

We encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications, which can be found on our website at [www.sandag.org/igr](http://www.sandag.org/igr):

- (1) Designing for Smart Growth, Creating Great Places in the San Diego Region
- (2) Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
- (3) Trip Generation for Smart Growth
- (4) Parking Strategies for Smart Growth
- (5) Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports
- (6) Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities
- (7) Riding to 2050, the San Diego Regional Bike Plan
- (8) SANDAG Regional Parking Management Toolbox

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or [susan.baldwin@sandag.org](mailto:susan.baldwin@sandag.org).

Sincerely,



SUSAN BALDWIN  
Senior Regional Planner  
sstra/sba

July 20, 2015

**ATTN:** Martha Blake, Senior Planner, City of San Diego Development Services

**RE:** Comments in response to Notice of Preparation for Draft Environmental Impact Report for **Stadium Reconstruction Project**; Project No. **Not yet available**; SCH No. **Not yet available**; Community Plan Area: **Mission Valley**, Council District: 7

**Include a San Diego River Park as one of the options in the required Alternatives Analysis**

I am submitting the following comments for the above referenced **Stadium Reconstruction Project**.

Please include in the Draft Environmental Impact Report (DEIR) an alternatives analysis for a San Diego River Park utilizing at least the same amount of acreage as proposed for the Stadium Reconstruction Project. This alternative will meet the project goals of providing updated recreation facilities to enable San Diego to continue to host recreation events such as family entertainment events, concerts and meeting activities.

A San Diego River Park would be beneficial for the public and visitors alike because it could provide new and updated recreation facilities. This would enhance public access and enable San Diego to increase the number and type of recreational events and activities at the site. Examples include such things as providing an amphitheater for concerts, festivals and entertainment events, a recreational facility, soccer fields, ball fields, running tracks, hiking trails, public meeting and gathering spaces and open space. The site is situated close to transit, including the trolley.

A San Diego River Park will help address the park deficiencies in Mission Valley, while providing recreational and economic value as a regional asset to our existing park, recreation, and open space system. There is an identified funding source for at least 20-acres of the park and opportunities are available for funding additional acreage.

The inclusion of a San Diego River Park in the alternatives analysis serves a dual purpose, because the information can be used for the Mission Valley Community Plan Update.

A San Diego River Park has been contemplated for years, and is already discussed in existing City planning and financing documents including the Mission Valley Community Plan, the 2013 Mission Valley Public Facilities Financing Plan and the San Diego River Park Master Plan. A San Diego River Park at this site is also consistent with the City of San Diego's General Plan, including the basic principles, core values and the recreation element.

### **Mission Valley Community Plan (MVCP)**

The 1985 MVCP recognized the lack of public parks in Mission Valley: *"The need for active and passive recreational opportunities will increase as residential development increases in the Valley"* and identifies City-owned land in Mission Valley as a location for park facilities.

The MVCP also discussed financing with possible *"incorporation into a facility benefit financing program (FBA), financing as a condition of approval of any San Diego Jack Murphy Stadium reuse program; and/or other means found feasible during the implementation studies."*

Unfortunately, very little has changed since 1985 to address the park needs. Mission Valley is still park deficient and has only one dedicated public park, Sefton Field, located within the community, with approximately 8 usable acres. Another 17-acre neighborhood park is being planned within the Civita project as a required condition of the development.

A San Diego River Park will help address the existing park deficiencies, while providing added value as a regional asset to our existing park, recreation and open space system.

In addition, an alternatives analysis will serve a dual purpose because it can be used for the Mission Valley Community Plan Update. The City of

San Diego recently held a public workshop to begin that update which includes issues such as recreation and the San Diego River Park and Open Space.

It is possible the same consultant (AECOM) who is working on the Stadium Reconstruction Project EIR will also be working on the Mission Valley Community Plan Update. On May 12, 2015, the mayor requested and the city council approved *“Four As-Needed Planning Consultant Agreements with AECOM, Dyett & Bhatia, PlaceWorks, and RRM Design Group”* for a total value of \$8.5 million. The anticipated work includes assisting staff with *“3 comprehensive community plan updates,”* according to the Request for Human Resources Approval for Purchase Requisition.

### **Mission Valley Public Facilities Financing Plan (PFFP)**

The 2013 interim update to the PFFP *“considers the cost for a community park and calculates a public parkland requirement for the community, which equates to 2.4 acres per thousand population.”* According to the PFFP, the required park acreage needed to address current and future needs just in Mission Valley is approximately *“96.80 acres.”*

*“The entire park acreage and projected population is used in determining the park component of the Development Impact Fee (DIF). The DIF provides a funding source for the park improvements and is paid by new development at building permit issuance.”*

*“Possible sites for neighborhood parks could be in the vicinity of the Levi Cushman development and in the vicinity of Qualcomm Stadium for the community park as recommended in the community plan. In order to meet the standard of 2.8 acres of parkland per 1,000 population set forth in the General Plan, the City may impose additional fees on discretionary projects on a case-by-case basis.”*

Although a financial analysis is not required by CEQA, it is helpful to know that funding sources have already been identified in the PFFP for a 20-acre community park. It is estimated to cost \$17,876,260. The PFFP assumes the community park would be located on city-owned land in the vicinity of the stadium and therefore no land acquisition costs are included.

The PFFP also states,

*“As an assessment option, physical improvements, financial or land contributions for improvements, or development of public facilities such as parks in lieu of direct payment of assessments may be considered. The magnitude of the future public facilities required in Mission Valley strongly suggests that the landowners and responsible government agencies work closely together to minimize cost and ensure their timely installation.”*

This option could allow developers to build the public park and associated recreational facilities at the stadium site. In addition, because the City of San Diego owns the land, it could be utilized for mitigation to potentially offset impacts from new development projects in Mission Valley and areas in close proximity.

### **San Diego River Park Master Plan (SDRPMP)**

The SDRPMP describes the importance of the entire reach of the San Diego River Park and explains how the City of San Diego would benefit.

*“The San Diego River Park will unify the City. Every neighborhood in and adjacent to the river valley should connect to the San Diego River Park, linking each of these neighborhoods to the City’s other great parks and to each other. In addition, developed parks are proposed along the river, offering an even larger spectrum of experiences to park users. The river park will also connect isolated pockets of development along the river with established neighborhoods, knitting the valley as a whole and cultivating a river valley identity.”*

*“The San Diego River Park’s most significant benefit may be its ability to create a new way to see the City. By linking two of the area’s richest natural and recreational resources, Mission Bay Park and Mission Trails Regional Park, the San Diego River Park will offer a new way to recreate and move within the City. The San Diego River Park stands to become as vital a resource as the City’s other great parks. Together with these two existing parks, the San Diego River Park will create a distinctive and identifiable park infrastructure which will become a source of pride and contribute to a new identity for the City.”*

The following is specific to the Stadium Reconstruction Project site.

Part of the project site is envisioned as an active recreation area including such things as *“ball fields, soccer fields, an amphitheater, active sports complex and a natural children’s play area.”*

*“This site is the last remaining City-owned property that is large enough to be in scale with the river valley. A river-oriented community park could provide public recreation facilities adjacent to the naturalized open space San Diego River Park, which would complement Mission Bay Park and Mission Trails Regional Park.”*

It is a *“critical location for meeting community-based park and recreation needs in Mission Valley, as identified in the Mission Valley Community Plan”* and there are *“no acquisition costs required; land is currently owned by City of San Diego.”*

## **General Plan**

The General Plan integrates guiding principles which describe its essential structure and *“reflects the core values that guide its development.”* The first core value listed is:

*“An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean.”*

The General Plan’s Strategic Framework Element includes our physical environment as something we value and includes the following: *“...a future that meets today’s needs without compromising the ability of future generations to meet their needs; parks and public spaces, accessible by foot, transit, bicycle, and car, as areas for neighborhood, community and regional interaction and convenient recreation...”*

The Recreation Element of the General Plan also addresses the importance of parks. Its stated purpose is, *“To preserve, protect, acquire, develop, operate, maintain and enhance public recreation opportunities throughout the City for all users.”*

## **Alternatives May Have Been Determined in Advance**

I am also raising my concern that the alternatives to be analyzed may have already been determined based on staff comments at the July 14, 2015, City Council meeting ( ITEM-S500: Establishment of Stadium Reconstruction Project CIP and Amendment to AECOM Agreement for Environmental Review Services). At that meeting, staff identified project alternatives in their presentation, even though the deadline for submitting public comments had not passed. However, I am assuming that, in compliance with CEQA, all public input will be reviewed and given full consideration.

## **Possible Piecemeal Approach to Development**

CEQA, Section 2.1.1 states that, *“The correct and complete definition of all reasonably foreseeable elements of a proposed project is the single most important element of the CEQA compliance process.”*

It is next to impossible to know how much acreage is being proposed since that information is not included in the project description. Also, based upon the best public information available, it is not clear if the project includes the entire site or just part of it. For this reason, there is a concern that the City is attempting to piecemeal or segment the project by failing to mention that the plans may include more than is noticed in the NOP. If this is the case, a full and complete analysis of the entire project, not just the stadium, must be included in the EIR.

The confusion regarding the project description and whether it accurately describes what the City is actually planning to build is due to conflicting public information.

First, on April 1, 2015, Councilmember Scott Sherman proposed developing the 166-acre site with 6,000 new residential units, 3 million square feet of office space, some retail and hotel space and a 20 acres of park. This development plan was proposed with or without a stadium.

Then on May 18, 2015, the mayor's task force issued a report stating that 75 acres of the site should be sold to a developer to build ancillary development to help offset the cost for the stadium.

All indications were that the Mayor supported the recommendations of the task force he created.

However, on July 13, 2015, an article in the *Voice of San Diego*, stated that the mayor *"has simply dropped the idea that real estate development around the new stadium will help pay for the new stadium."*

And the mayor's spokesman said *"that although the mayor's task force did recommend ancillary development, it was just that: a recommendation."* It appeared that the mayor had a plan to pay for the stadium that did not rely on ancillary development, but no details were shared with the public.

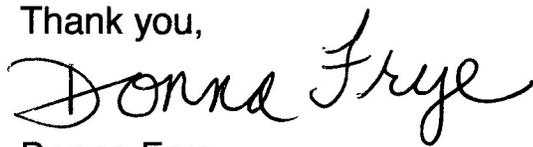
This was a huge change; the public was now being told that the EIR had nothing to do with ancillary development and the property around the stadium, whereas before, we were told it had everything to do with it.

Just two days ago, on July 18, 2015, an article by Jonathan Horn in *The San Diego Union -Tribune* quoted Matt Awbrey, *"a spokesman for San Diego Mayor Kevin Faulconer, ...that San Diego is in better shape than St. Louis when it comes to a new stadium for the Chargers. He said the city already has the land for a new venue - the Qualcomm Stadium site - and a financial framework laid about by a Faulconer appointed task force."*

It now appears the ancillary development *is* part of the project. Please ensure that a full and complete project is described and analyzed in the DEIR.

Finally, please add my name to the interested parties list for this project.

Thank you,

A handwritten signature in cursive script that reads "Donna Frye". The signature is written in black ink and is positioned above the printed name.

Donna Frye





# San Diego County Archaeological Society, Inc.

Environmental Review Committee

2 July 2015

To: Ms. Martha Blake  
Development Services Department  
City of San Diego  
1222 First Avenue, Mail Station 501  
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Stadium Reconstruction Project

Dear Ms. Blake:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File



# ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



July 19, 2015

Martha Blake  
Senior Planner  
City of San Diego Development Services Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

## Re: Notice of Preparation, Qualcomm Stadium Reconstruction Project

Dear Ms. Blake,

The Endangered Habitats League (EHL) would like to offer the following comments on the subject project. For your reference, EHL is a regional conservation organization focused on biodiversity conservation and land use. We have been engaged on City of San Diego land use and MSCP issues since 1991. For this project NOP we highlight the following topic areas and concerns.

- 1. Process, impact and alternatives analysis.** It is our opinion that the project must be processed under an Environmental Impact Report. (The NOP seems to indicate that an EIR may not be necessary pending review of technical documents.) Among other products, an EIR will provide an important analysis of alternatives and cumulative impacts, critical for a project of this scope and location. Important issues such as the Mission Valley community park deficit and integration with the San Diego River Park should be analyzed. This issue was not identified in the NOP Notice as needing additional study, as it clearly does.
- 2. Financing and scope.** The question of whether a stadium is even a viable land use is a matter of public record. Not only have the Chargers signaled that they are not interested in this location, it seems clear that a stadium project cannot proceed without outside financing. Since early April, at least some City of San Diego elected officials have opined that financing a stadium reconstruction would require potentially thousands of residential and mixed-use units to be developed on this City owned site. It is important that the public is aware that a financing plan for the proposed stadium project would include significant impacts across the entire suite of CEQA impact issues. Failure to analyze the whole of the project is in violation of CEQA Guideline Section 15378: ***"The term project refers to the whole of an action that has the potential, directly or ultimately, to result in a physical change to the environment. This includes all phases of a project that are reasonably foreseeable, and all related projects that are directly linked to the project."***

We appreciate your consideration of our comments.

Michael Beck  
San Diego Director



## Leighton, Lynette

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**Subject:** FW: Stadium Reconstruction Project

**From:** [rhutsel@sandiegoriver.org](mailto:rhutsel@sandiegoriver.org) <[rhutsel@sandiegoriver.org](mailto:rhutsel@sandiegoriver.org)>

**Sent:** Tuesday, July 21, 2015 6:05 PM

**To:** DSD EAS

**Cc:** [rob@sandiegoriver.org](mailto:rob@sandiegoriver.org)

**Subject:** Stadium Reconstruction Project

Dear Ms. Blake,

Thank you for the opportunity to respond to the Notice of Preparation of a DEIR for the Stadium Reconstruction Project.

We appreciate that many items will be required to be studied as a DEIR is prepared. We appreciate that the City staff has most likely already identified many potential significant impacts to be included.

We request that we receive all notices of meetings being held or materials be distributed. As a stakeholder with an interest in the health and condition of the San Diego River as well as the provision of park and other public facilities along the San Diego River and its tributaries, we are very interested in this project.

We will limited our comments at this time to:

1. We believe that in the DEIR it is essential that the project be defined more completely.

- Will the contour of the land be altered? If so, what are the impacts to the floodway, 100 year floodplain, wetlands, required buffers for wetlands, and multiple habitat planning area?
- We believe that it is essential that if the land contours are proposed to be altered in any of the potential project designs or alternatives, that the impact of these on the before mentioned items must be studied and included in the analysis
- What are the project boundaries? Is all 166 acres included or is it a smaller or larger project?
- Does this project include the proposed "Purple" mass transit line and if so, this should be included in the analysis of this project
- Will the proposed park and trail improvements be separated out as a different project which could proceed before, during or after the stadium reconstruction project
- Is Murphy Canyon Creek drainage which runs along the eastern edge of the site included in the analysis and as part of this project?

2. The aquifer under the site is an important asset for the directly and indirectly associated ecosystems, including the San Diego River. The impacts of contouring the site, including removal of any dirt to create the new stadium, on groundwater and the surface waters of the San Diego River should be studied.
3. We request that a Wetlands Delineation should be conducted as part of the analysis.
4. The City of San Diego has explored restoration of the San Diego River adjacent to the Stadium site. An analysis should be done to determine how this work would impact the project. Especially if recontouring of the land is proposed wo alter the 100 year floodplain.
5. It is our understanding that a major sewer line traverses the south (river) side of the parking lot. Will this pipe be removed or re-aligned as part of this project. If so, what are the potential impacts and opportunities to expand the floodway and riparian habitat.
6. Sediment has been a concern within Murphy Canyon Creek. This impacts of any proposed project design should address how it will reduce sedimentation.
7. The San Diego River is a 303d listed impaired water body. How will this project impact the constituents of concern?
8. Flooding has been a significant issue within the Stadium parking lot. The DEIR should address this issue and offer alternatives which improve this public safety and environmental issue.
9. The community of Mission Valley is significantly below national and city standards for providing public parks. The Mission Valley Community Plan identifies this site as one of two opportunities to address this issue. Any project design should explore alternatives which maximize the potential to address this concern. The DEIR should also explore whether some of this park land could be located outside of the Floodway and Wetland Buffer areas but within the 100 year Floodplain. The DEIR should also include an analysis of when these public park areas would be closed or impacted by events at the new Stadium or associated areas including the parking lot.
10. The San Diego River is an ecologically significant area. While fragile, it is also resileant. The DEIR should include an analysis of the impacts of the project on the ecosystem, including the aquatic ecosystem.

11. The placement of the stadium should be analyzed to provide alternatives which minimize the noise, visual, hydrologic, and biologic impact to the San Diego River ecosystem and the San Diego River Park system as identified in the City of San Diego River Park Master Plan and other documents.

Thank you for the opportunity to comment on this important project for our San Diego River, our City and our Region.

Rob Hutsel  
Executive Director  
The San Diego River Park Foundation

Engaging people to create a better future for the San Diego River. Learn more at [www.sandiegoriver.org](http://www.sandiegoriver.org)



## Leighton, Lynette

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**From:** Cindy [<mailto:C.a.moore@sbcglobal.net>]

**Sent:** Sunday, July 19, 2015 6:23 AM

**To:** DSD EAS

**Subject:** Stadium Reconstruction Project

The Serra Mesa Planning Group on July 16, 2015 approved a "Motion to request to include the Serra Mesa Community (excluding the Birdland area) to the EIR." Since the Qualcomm Stadium site is located adjacent to Serra Mesa the draft EIR should include a study of any and all impacts to Serra Mesa.

Cindy Moore

Chair, Serra Mesa Planning Group

This e-mail and any attachments contain AECOM confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.



July 14, 2015

Ms. Martha Blake, Senior Planner  
Development Services Center  
City of San Diego  
1222 First Avenue, MS 501  
San Diego, CA 92101

Via email: [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

Dear Ms. Blake:

**SUBJECT: STADIUM RECONSTRUCTION PROJECT, COMMENTS ON NOTICE OF PREPARATION**

The San Diego Audubon Society works to protect birds, other wildlife, and their habitats. As such, we are concerned with potential impacts of the Stadium Reconstruction Project that may not be addressed in the EIR. The June 22, 2015, Notice of Preparation (NOP) lists the issue areas that will be covered in the EIR. Biological Resources were not included in this list, though this project is very likely to have significant impacts on biological resources. The July 13, 2015, Scope of Work for the EIR does address Biological Resources. We urge that the latter apply and that the potential biological impacts be identified and measures to avoid them be included in the DEIR when it is completed. We are also concerned that this document does not address the full impacts of the actual project. This piecemealing might make a casual observer less likely to appreciate the potential biological impacts of the project. We will address these issues in the following paragraphs.

**BIOLOGICAL RESOURCES (WILDLIFE CORRIDOR)**

Murphy Canyon and its tributary canyons are north of the stadium site. They include a few thousand acres of open space habitat covered with native and other vegetation. That habitat is occupied by a broad range of local wildlife. The San Diego River is immediately south of the project area and connects many thousands of acres of habitat along its path both to the east and west of the stadium. The stadium site stands between those two wildlife rich areas. Wildlife movement between the two is degraded because of the fragmentation from development and infrastructure but is still very important. The value of providing connectivity among habitat areas has become better and better appreciated in recent decades.

Some obvious reasons for maintaining connectivity among habitat areas is to increase genetic diversity in populations in the connected areas, to allow appropriate predator/prey relationships, allow young animals to move into their own territories, allow for recovery of populations after setbacks such as disease or fires, allow for relocation to avoid threats to survival, and for seasonal movements to take advantage of seasonal seeds, prey animals, water, etc. Currently the choke point in the corridor from Murphy Canyon to the River is a 35-foot wide stormwater channel that runs north to south and is between the off-ramp from I-15 southbound to I-8 westbound and the east edge of the stadium parking lot. The channel is down to about 35 feet wide in at least one place, but it probably provides for some corridor value

for a broad range of animals. Since the parking lot is unused most days and almost all nights, the adjacent activity would not discourage use of that narrow corridor. The parking lot itself is probably also heavily used by wildlife at night, though smaller animals would be vulnerable to nocturnal predators such as owls and foxes, coyotes, etc. So, there is currently a usable, though less than ideal, corridor for movement from the habitat areas of Murphy Canyon to those of the SD River.

If the stadium is closer to the east side of the parking lot, it will substantially reduce the value of this corridor. The drawing on the invitation for the EIR scoping letter shows the replacement stadium immediately adjacent to the previously mentioned off-ramp which would dramatically reduce the usability of that wildlife corridor and increase the fragmentation between those two habitat complexes. We urge that the EIR acknowledge the impact of the location of the replacement stadium on that corridor and provide mitigation measures that will preserve or improve its usability for wildlife.

A drawing by Rick Engineering on page 4 of the Chargers Stadium Advisory Group Report shows a concept for the San Diego River Park area at the stadium site. It also shows a broad vegetated space running along the east side of the parking lot. A natural area in that location could be designed to add scenic value and passive recreational value as well as providing a very useful corridor for wildlife movement between the habitat areas of Murphy Canyon and the River. We urge that the DEIR identify a broader flood control channel that is wide enough that it can accommodate flood flows while supporting a reasonable amount of vegetation in the channel as well as a buffer area as mentioned above to provide a secure wildlife corridor in spite of the new and heavily lighted stadium.

The EIR should also provide tracking and monitoring data to show what species are present in Murphy Canyon and in the San Diego River that might use the wildlife corridor in the vicinity of the stadium. It should also provide analysis to show what type, width, light levels, disturbance, etc. measures are needed to allow safe wildlife movement through this corridor for the species that will potentially use it.

#### BIOLOGICAL RESOURCES (BIRD STRIKES)

The drawings of the stadium that have been released by the City show it to have a light and transparent look as opposed to the fortress look of the current stadium. It is not clear if this transparent look is to be done with large openings or with large window areas. If the new stadium will have large glass areas, through which a bird can see the sky on the other side, it is very likely that a large number of birds will try to fly through and be injured, killed, or disabled. We urge that the EIR fully address the potential bird strike impact of the new stadium and identify measures that will fully offset those impacts. This analysis should include at-risk, threatened, endangered species, species that are unique to the area, and any others that are listed as "covered" by the City's MSCP.

#### HYDROLOGY AND WATER QUALITY

The current stormwater channel on the east side of the stadium parking lot is not adequate in capacity or stability. It has occasionally overflowed into the stadium parking lot losing parking revenue for the City, requiring reimbursement for property damage, and requiring costly maintenance and reconstruction. The City and future development on the stadium site would benefit substantially from widening this channel to increase its capacity and to allow vegetation remain in the channel to slow water velocities in the channel. Doing so would also reduce its vulnerability and increase its wildlife corridor value and its scenic value for the redevelopment.

However, other concept drawings have appeared in the media that show either the new stadium or dense urban development that appears to be very close to the off-ramp mentioned above, leaving no room for a wildlife corridor. We assume these concepts must anticipate that the storm flows will be placed in underground pipes with streets or buildings over it. Doing so would have substantial negative water quality on the San Diego River and wildlife habitat and movement value. We urge that the EIR not include such alternatives.

#### GLOBAL CLIMATE CHANGE

The Statement of Work proposes considering the guidance from the CAPCOA analysis of January 2008 as a threshold to determine if analysis and mitigation relating to climate change is required in the EIR. We urge that the CAPCOA analysis not be used. The data on which it is based is not relevant to this project. And it is also completely out of date since much has been learned about the impacts of Green House Gasses on our environment and on our future since the analysis was done for that study. The Greenhouse Gas analysis for this project should be oriented toward helping implement the Goals of the City's Climate Action Plan.

#### DEFINITION OF THE PROJECT

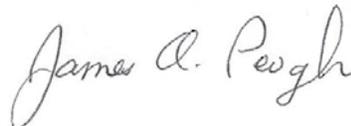
The NOP states that the elements of this project are Stadium Construction and Stadium Demolition. However, it is very clear that a considerable amount of other development will be constructed on the stadium site to help fund the Construction and Demolition of the stadium. This appears to be a clear example of Piecemealing and a violation of CEQA. Since the stadium cannot be built without the additional development, we urge that the EIR analyze and provide mitigation for the impacts of the environmental impacts of the additional development on the site that will contribute funding to the project as well as the Stadium Construction and Demolition. This additional development on the site will substantially increase the degradation of the wildlife linkage from Murphy Canyon to the San Diego River and require a larger and better protected and buffered area, on the south or east side of the project site.

#### CUMULATIVE IMPACTS

If, for some reason, the City decides to risk the Piecemealing mentioned in the previous paragraph, we urge that the City at least analyze the impacts and identify mitigation for the environmental impacts of the additional development on the stadium site that will help fund it as an anticipated Cumulative Impact. Those impacts would include at least the wildlife corridor and bird strike impacts of those additional developments in conjunction with those of the Construction and Demolition of the stadium itself.

Please include the San Diego Audubon Society when distributing information on this development, including presentations, public hearings, zoning changes, environmental review, decisions points, etc. In case of questions or for follow up discussions, I can be reached at [peugh@cox.net](mailto:peugh@cox.net) or 619-224-4591.

Sincerely,



James A. Peugh  
Conservation Committee Chair  
San Diego Audubon Society

## **SD Stadium EIR**

Jim Peugh – San Diego Audubon Society, Conservation Chair

Transcription of Comments from audio recordings, provided by Kerry Santoro (City of SD) on 21 July 2015

Transcribed by Lynette Leighton (AECOM) on 23 July 2015

### **Audio Recording 1 of 2:**

I'm Jim Peugh from the San Diego Audubon Society; I'm the Conservation Chair for the [San Diego] chapter.

I have 3 concerns.

1. The wildlife corridor between Murphy Canyon and SD River.

Right now it's just down a narrow storm drain. It's about 35 ft wide.

If the stadium is – well first, the whole stadium is sort of below budget [in the] wildlife corridor, or the stadium parking lot now; it's not good, but it's the best we have.

One of the photogra- one of the drawings showed the stadium being right up against the freeway, which would mean that the effective corridor would be cut off completely, and so I noticed that the NOP said that the biological resources would not be analyzed – that there was no possible biological impact.

But, that's not true, because the wildlife corridor could be shut off.

So, I think you desperately need to analyze the wildlife corridor value, and you desperately need to make some measurements to see what kind of wildlife uses it, and then get a good biologist to determine what kind of wildlife might be using it, and then specifically put in mitigation for it – figure out how much of a corridor you should put in so the wildlife can effectively use it.

2. And, the other thing is, the storm drain channel that's over next to the freeway on the east side of the project blows out all the time, and so the City's going to have to fix that sometime.

And, I'm sure you're not going to move the stadium toward that, and then allow that to blow out and flood the stadium like it floods the parking lot now.

So, they're going to have to do something about that channel, and so as part of doing something about that channel, I would really encourage that they widen it enough so that it helps as a wildlife corridor, and so that it'll be wide enough so that they won't have to clear it completely to get it to flow, so then that would improve the corridor value of it.

And, then there needs to be a buffer between the parking lot and that linkage,...

## **SD Stadium EIR**

Jim Peugh – San Diego Audubon Society, Conservation Chair

Transcription of Comments from audio recordings, provided by Kerry Santoro (City of SD) on 21 July 2015

Transcribed by Lynette Leighton (AECOM) on 23 July 2015

3. And then the other thing is, it seems like this EIR is only for half of a project because we know that there's some other development that's going to have to be on the site to pay for the project, so it seems to me that this is a prime example of piece-mealing.

And, I suspect that someone will take legal action about that because you're not just replacing the stadium; you're replacing it and then getting other funding for it.

And so – but if the city chooses not to do that, then they at least need to analyze the cumulative impacts of other development that will result from this project on this site and analyze for the environmental impacts, particularly my interest is the biological impacts of the cumulative impact on the stadium and what other development it draws to the area and those are my comments; thank you.

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### **Audio Recording 2 of 2:**

Oh, and I'm also concerned because the design looked real airy, and I haven't seen a model or design so I don't know if that airiness is because of open areas or because of glass.

And, if it's because of glass, then there's a real significant – you know, this is a real birdy area since it's right next to the river.

If it's glass, the City really needs to analyze the impact on bird strikes, and everybody knows how you avoid them now, but the environmental impact report needs to address those and show how they're going to use, you know, the commonly used techniques for avoiding bird strikes. And, one of the most important for an area like this is a case where the bird can see the sky through glass and then it just thinks it's flying toward the sky, and it isn't, and it's flying toward the glass.

So, the City really needs to be specific about looking into the measures that it takes to prevent bird strikes and incorporating them in the building.



## Leighton, Lynette

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**From:** Jason Riggs [<mailto:jason.riggs@gmail.com>]

**Sent:** Thursday, July 16, 2015 11:25 AM

**To:** Blake, Martha

**Subject:** Public Comments on Scope of EIR for Chargers Stadium in Mission Valley

Martha Blake, Senior Planner

City of San Diego Development Services Center

1222 First Avenue, MS 501

San Diego, CA 92101

Ms. Blake,

I am writing to provide my comments on the scope of the Draft Environmental Impact Report for a new football stadium for the Chargers. I understand that the proposed project is the reconstruction of the Qualcomm Stadium in Mission Valley.

While I agree that the Chargers may need a new stadium, I believe the EIR must look at alternatives to construction of a new stadium at the existing Qualcomm site, including construction of a stadium in the downtown East Village area. Given all the changes to Mission Valley since the stadium was constructed, the current site is just not appropriate for a large-scale, public development like a football stadium. I also want to add some additional thoughts as to what should be covered in any EIR for a stadium.

First, as I noted above, the EIR should analyze a wide range of alternatives relating to the site and the stadium. The EIR should analyze establishing a regional park at the Qualcomm site and putting the new stadium in the East Village. In my opinion, creating a new regional park here would be a major benefit to the community and would be a far superior use of the site than constructing a new stadium at the existing site. I would like to see a thorough and comprehensive analysis of the East Village alternative.

Also the EIR must analyze what happens if a portion of the property is used for other development. The use of a portion of the property for development has been widely discussed and must be analyzed. It would be an incomplete analysis of the project to ignore what future development will be at the Qualcomm site, and the related environmental impacts, given all of the discussion about the future development, including discussion by the Mayor's task force and other City Council members. The community must have a full understanding of the potential environmental impacts of the entire project. It is clearly reasonably foreseeable that a portion of the property will be developed to raise money for the stadium.

Second, the site is contaminated and construction at the site could pose health risks to nearby residents, and the nearby river habitat, as well as attendees. This issue must be thoroughly addressed in the EIR. I am aware that there has been extensive remediation at the site and the EIR should disclose the current status of the remediation and the City's position on the remediation. I recall that the City has sued Kinder Morgan to get them to clean up the mess they made, and it's still unclear whether the site is safe and what the impacts will be of construction at the site. I would like to understand the effects of construction of a stadium at a site on the north side of the existing stadium. This is closer to the tank farm and I suspect the areas of contamination.

I am not an engineer, but common sense dictates that excavating dirt, constructing a new stadium on already contaminated land and demolishing the old stadium would impact these ongoing cleanup activities and could further increase the negative impacts by spreading the contamination further by exposing toxins into the air and water. The impacts of this on the river, the habitat and the community must be studied. A full health risk assessment is needed on this issue. We also need to understand what the effects will be of dewatering associated with any construction. What will happen to existing remediation activities and infrastructure? And it will be important to know the position of other regulatory agencies and Kinder Morgan, and what other approvals are needed. Although not an EIR issue, we need to understand the costs associated with all of this.

Third, the Qualcomm site is close to the river and the EIR should disclose risks associated with flooding and liquefaction. I believe the current stadium is within a floodplain zone, which means that it could flood if a large storm comes through. Are the environmental impacts of a flood, including the contaminated water that would flow from the site, going to be analyzed in the environmental report? What happens if there is flooding during construction? What new infrastructure must be built to keep the site safe for flooding? Is new construction permitted in this area by the City's rules and zoning and the FEMA standards, and would this affect species using the river? Because the current stadium is so close to a river and above a water table, it is in a liquefaction zone, so it will be greatly impacted by an earthquake. What will be the impacts of a stadium holding 70,000 people in a flood or liquefaction event?

Fourth, traffic at the existing stadium, surrounding streets and freeways is awful and will only get worse. Not only will construction create a traffic nightmare, but after the stadium is completed, more events will occur, meaning even more traffic. We need a detailed traffic analysis of the construction traffic on our community and the effects of a stadium event occurring during construction, as well as the effect of holding more events at the new stadium. We also need to understand very clearly the construction traffic and related air quality, noise and health risk implications, both to residents living near the stadium as well as along major routes. If the construction is done at the same time the existing stadium is operational, how will the impacts be handled? Is the environmental report going to analyze the negative impacts of more traffic and air quality in Mission Valley? Since there is only one entrance to the stadium, which is also bordered by the river, there is no way to improve these conditions.

Fifth, the notice indicates that parking would be provided on the location of the existing stadium. Will it be structured parking or surface parking? If the current stadium remains operational while construction occurs, how will the Chargers make up for lost parking? What will happen to the land owned by the water department? If the water department land is not used, then how will the parking be provided? The EIR should analyze an alternative of structured parking since it is not clear that the water department land will be available. And what will be the increased construction with a large parking structure? And how will it impact traffic flow? What about tailgating? The report must address how parking would be provided onsite if the demolition of Qualcomm is delayed. The report should address where attendees would park during construction of new stadium and demolition of old stadium, both of which will significantly limit available parking on the site. Will this spill into surrounding neighborhoods? The noise and air quality impacts of that should be analyzed. How will reduced on-site parking and increased reliance on off-site parking impact traffic patterns and non-stadium parking needs around the stadium? How will reduced on-site parking impact public transportation use?

Also, the EIR should analyze tearing down Qualcomm first then constructing a new stadium within the same footprint. The Chargers could play in some interim location for 2 or 3 years. That should be analyzed and evaluated in the EIR.

And one final consideration—cost is a major concern. We understand that the money to fund the City and County's share of the stadium costs could be \$500 million or more. This money is going to come from the City and County's general fund. What cuts will be made by the City and County of services to the residents to pay for it, and what are the impacts of these cuts? Cuts in police, fire, parks, recreation, health care and other

essential services will have very significant environmental impacts. For example, if there are cuts to the parks maintenance budgets, what will be the environmental impacts to parks? If fire department budget is cut, what will be the impact on fire department resources to prevent large fires? This all should be analyzed. We need clarity as to how the City and County are going to spend \$500 million or more of general fund revenues and what the impacts will be on the community.

I look forward to the EIR including analysis of the issues set forth in this letter.

Regards,

Jason M. Riggs

Chairman, San Diego Stadium Coalition

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July 20, 2015

Martha Blake, Senior Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: Possible Stadium Reconstruction Project in Mission Valley

Dear Ms. Blake,

We write to express our concern about, and objections to, the process that appears to be taking shape for hasty approval of a football stadium and associated mixed use development in Mission Valley that would involve demolition of the historic Qualcomm Stadium (formerly San Diego Jack Murphy Stadium). The stadium, designed by Gary Allen, is one of the last remaining mid-century multi-purpose stadiums left in the United States. Review of its future and potential re-use of the site should be informed by a thorough, legally adequate environmental review pursuant to the California Environmental Quality Act (CEQA).

Our law firm has been involved in efforts to ensure CEQA is properly implemented in projects throughout the state, including in sports stadiums. We helped oppose special exemptions for football stadium proposals in the Cities of Industry and Los Angeles (Farmers Field), and continue to be opposed to public agencies providing special treatment or unique processes for sports stadiums. We view the Mission Valley proposal as the latest in this string of poor policy decisions seeking quick approval and avoidance of CEQA rather than protection of the environment and affected communities to the greatest extent possible and necessary. We provide comments on the notice of preparation (NOP) for an environmental impact report for the potential project below. Given the extremely limited information provided in the NOP, we urge the City to reissue the NOP with substantially more information as requested herein.

**I. NOTICE OF PREPARATION PROCEDURAL REQUIREMENTS**

**A. NOP Does Not Satisfy CEQA Requirements**

The NOP failed to identify whether the project or an alternative was on list established pursuant to Government Code § 65962.5. See Public Resources Code § 21092.6. Pursuant to Section 65962.5(d), the State Water Resources Control Board is directed to compile a list of, among others, the following: all underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code; and all cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, that concern the discharge of wastes that are hazardous materials.

Here, the Qualcomm site or Kinder Morgan site next door may be on the applicable State Water Board lists. The factors leading to including a site on such lists are present, meaning there is a reasonable likelihood that the site has either been added to the list or the site was inadvertently omitted from the list. The purpose of the list—to notify the public as to the risks of developing projects on these types of contaminated sites—is present in this case and warrants notice in the NOP.

#### **B. NOP Does Not Properly Describe the Project**

The NOP failed to describe the need for voter approval, the use of public bond funding or the reasonably foreseeable adjacent development project, which the Citizens' Stadium Advisory Group (CSAG) report makes clear is an integral part of any funding plan. (See Attached CSAG Report).

The NOP failed to identify where the stadium would be relocated on the property, stating only that the current stadium footprint would be rebuilt for parking. Changing the location would move the stadium closer to sensitive receptors located immediately northeast and northwest of the site, and, if moved south, closer to the San Diego River.

The NOP fails to describe when the existing stadium will be demolished, stating only that the "Qualcomm stadium structure... would be subject to future demolition and parking would be constructed on the existing stadium site." The NOP fails to clarify how parking would be provided onsite if the demolition of Qualcomm is delayed, or whether the parking would be surface parking or a parking structure. If structured parking is foreseeable, the EIR must examine the construction impacts related to the structured parking. The NOP does not describe whether the Chargers would need to play temporarily in an offsite location while the new stadium is being constructed.

The NOP does not describe the City's ongoing litigation involving soil and groundwater contamination from the adjacent Kinder Morgan property, which has contaminated the Qualcomm stadium site. Further, the NOP does not discuss whether relocating the new stadium to a different area of the site may impact ongoing monitoring and remediation activities.

#### **C. NOP Does Not Notify All Responsible Agencies**

The purpose of a NOP is to solicit not just comments from the public, but also guidance from other public agencies on the scope and content of the environmental information to be included in the EIR. Pub. Res. Code § 21080.4(a); 14 Cal. Code Regs. § 15375. The lead agency must send the NOP to all public agencies with authority over the project or resources affected by the project, including each responsible agency, trustee agency, each federal agency involved in funding or approving the project. Pub. Res. Code § 21080.4(a); CEQA Guidelines § 15082(a).

There are a number of potentially responsible agencies: County of San Diego (County Bond offering), Regional Water Quality Control Board (401 certification), San Diego Air

Pollution Control District (air quality permits), San Diego County Regional Airport Authority (consistency determination), U.S. Army Corps of Engineers (404 permit), U.S. Fish and Wildlife Service (take permit) and California Department of Fish and Wildlife (SAA and take permit). It appears that the NOP was not sent to the San Diego County Regional Airport Authority, U.S. Army Corps of Engineers or U.S. Fish and Wildlife Service.

## II. PROJECT DESCRIPTION

### A. CEQA Requires EIR to Consider the “Whole of the Action”

CEQA requires an analysis of the “whole of an action, which has the potential for physical impact on the environment.” CEQA Guidelines, § 15037. The determination of the scope of a project is a question of law. *See Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70, 83 (2010) (applying *de novo* review to question of project scope).

In the seminal case of *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal. 3d 376 (1998), the California Supreme Court set aside an EIR for failing to analyze the impacts of the reasonably foreseeable multiphase project. That case involved a plan by the University of California to move its School of Pharmacy units to a new building, of which only about one-third was initially available. *Id.* at 393. The EIR acknowledged that the school would eventually occupy the remainder of the building, but the EIR only discussed the environmental effects relating to the initial move. *Id.* at 396. The court concluded that the EIR should have analyzed both phases. *Id.* at 399. In so holding, the court announced the following test: “[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” *Id.* at 396.

### B. Mixed-Use Development of Site Is a Reasonably Foreseeable Consequence of the Stadium Project and Should Be Evaluated by the EIR

Multiple reports and proposals closely link the need to include a mixed-use development (e.g., residences, commercial, hotel, etc.) with the new stadium to make it financially feasible for the Chargers without being an economic burden on the community (the “Mixed-Use Development”). A “stadium plus parking” project is substantially different from a “stadium and Mixed-Use Development” project. Even though no formal applications for the Mixed-Use Development have been proposed at this time, the following demonstrates that it is a reasonably foreseeable consequence of the stadium project and has been sufficiently described to allow meaningful analysis in the EIR.

#### 1. Citizens’ Stadium Advisory Group (CSAG) Report

The Mayor of San Diego commissioned CSAG to study the feasibility of building a new

stadium in San Diego without taxpayer support. CSAG issued its findings in May 2015, a month before the NOP was issued. The close proximity of timing between the Report being issued and the NOP supports a conclusion that the CSAG Report provides a reasonable representation of the project scope.

CSAG advised the City to include, as a key component of the project's financing, the \$225 million sale of 75 acres of land surrounding the new stadium to a private developer for a mixed-use development.

In addition to using the \$225 million sale price as roughly 16% of the financing for the stadium development itself, "CSAG recommends [that] the tax revenue from the 75-acre development should pay for community benefits (including parks, additional parking, road and transit upgrades), and to help the City and County recoup its [sic] capital costs." CSAG Site Selection and Financing Plan at p. 2. CSAG estimates that the tax revenue would "conservatively yield \$5.5 million annually, resulting in roughly \$116 million in net present value." *Id.* at p. 15. It is unclear how the City would finance any of these aspects of the project without the revenue from the land-sale and mixed-use development. The Mixed-Use Development would include "3,300 housing units, 1 million square feet of commercial space, 175,000 square feet of retail space, and a 500-room hotel." *Id.* This issue should be fully addressed by the EIR.

## **2. Councilman Sherman's Proposal**

San Diego City Councilman Scott Sherman has also announced a development plan in conjunction with a new stadium, calling the mixed-use development a chance to create a new "catalyst for economic development . . . [that can] be an overall economic engine and amenity... in the City of San Diego."<sup>1</sup>

## **3. Relocating Stadium To Northeast Corner Of Site Removes a Key Obstacle for the Mixed Use Development**

Building the new stadium in the northeast or northwest corner of property removes a key obstacle to the future Mixed-Use Development project, meaning the EIR should analyze the reasonably foreseeable consequences. *See California Unions for Reliable Energy v. Mojave Desert Air Quality Management District*, 178 Cal. App. 4th 1225, 1241, 1242 (2009) (EIR failed to analyze not-yet-planned road paving project because air district's approval "was the first step in a process of obtaining governmental approval for such road paving"). A public agency's decision to authorize an activity that starts in motion a chain of events that will result in foreseeable impacts on the physical environment is treated as approval of a project subject to CEQA. *See, e.g., San Lorenzo Valley Community Advocates for Responsible Educ. v. San Lorenzo Valley Unified Sch. Dist.*, 139 Cal. App. 4th 1356, 1379 (2006) (school consolidation is

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<sup>1</sup> *See* City of San Diego, *Councilmember Sherman Releases Stadium Options*, YOUTUBE (April 2, 2015), [https://www.youtube.com/watch?v=P\\_td8p9vPXU](https://www.youtube.com/watch?v=P_td8p9vPXU).

project on basis of potential traffic and parking impacts).

#### **4. Mixed-Use Development Would Substantially Impact the Environment**

According to the CSAG report, the development would include “a low- to mid-rise mixed-use village concept consisting of 3,300 housing units, 1 million square feet of commercial space, 175,000 square feet of retail space, and a 500-room hotel.”<sup>2</sup> In addition, the CSAG report also contemplates the restoration and enhancement of a 31-acre San Diego River Park on land that is now part of the stadium site, including the addition of walking and bike paths.

Even if the Mixed-Use Development ultimately involves a different use configuration than that identified by CSAG, the CSAG report nonetheless provides a reasonably foreseeable framework for analyzing environmental impacts associated with the stadium project.

Including the Mixed-Use Development in the EIR would affect a number of resource areas, including, but not limited to: traffic and Transportation (substantially adding to already major congestion and traffic impacts); parking (reducing onsite parking options and increasing parking demand); noise (onsite sensitive receptors impacted by the stadium and freeway traffic, while adding to overall project noise levels); air quality (increasing overall air emissions and locating sensitive receptors onsite); water supply (need to identify water supply for additional residential and commercial demand); health risks (onsite sensitive receptors impacted by the stadium emissions and freeway traffic); hazardous waste (exposing onsite sensitive receptors to ongoing contamination risks); aesthetics; and construction impacts.

#### **C. Accurate Description of Construction Equipment and Truck Trips Must Be Provided To Properly Evaluate Demolition and Construction Activities**

To complete demolition and construction activities within the rapid schedule necessary to meet NFL timelines, construction of the new stadium and demolition of the old stadium would likely need to be done concurrently, or at least with the potential for significant overlap. Unless the City is willing to accept a condition that the construction and demolition cannot overlap, then the EIR must analyze worst case assumptions of concurrent construction/demolition activities.

An accurate construction fleet mix and schedule of activities must be provided to allow a detailed evaluation of construction/demolition impacts, including health risks, air quality, traffic, parking and noise impacts.

The construction/demolition phase will require numerous offsite truck trips. Given the highly congested traffic environment around the stadium and the limited access routes, a critical environmental concern will be how offsite truck trips will impact the community. As a result, the EIR must accurately describe the expected truck routes, the volumes of trucks and the

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<sup>2</sup> CSAG Report, p. 15

frequency of trucking activities to give the public a meaningful opportunity to evaluate project impacts, including related to traffic, noise, air pollution, health risks and environmental justice concerns.

**D. Temporary Use of Offsite Stadium**

The Chargers may need to play temporarily in an offsite stadium while the new stadium is being constructed, which must be fully analyzed in the EIR, including traffic, noise, parking and air quality impacts. If a temporary location is not used, how will parking and traffic be impacted if the new stadium is under construction while the Chargers continue to use the existing stadium?

**E. Changes to the Stadium Location, Frequency of Events, and Nature of Events Are Critical to Understanding Operational Impacts**

The proposed stadium would not merely replace the existing Qualcomm stadium. The EIR must fully describe and evaluate the operational impacts from these changes, including the following.

Location change: According to the NOP, parking would be built on the current stadium site, so the new stadium will be located elsewhere on the property. Based on the CSAG report, the stadium would make room for the Mixed-Use Development. Given the proximity to sensitive receptors on the east and west side of the property (200 feet or less from the property boundary), changing the stadium location will result in important environmental consequences, including changes to localized air quality impacts, health risks, noise and aesthetics, which must be analyzed in the EIR.

Frequency of Events: According to the CSAG report, the frequency of events would increase at the new stadium, which would host a year-round source of activities. Increasing the frequency of events would significantly impact the community and environment, even if the impacts from any given event do not change. *See Berkeley Keep Jets Over the Bay Commission v. Board of Port Commissioners*, 91 Cal. App. 4th 1344 (2001) (EIR failed to analyze how increasing the frequency of night flights would adversely affect residents). The EIR should include the number of events for past representative years and provide a list of the projected number of events for the future. Environmental impacts related to the expected scope of events must be analyzed.

Nature of Events: The CSAG report identified a range of events that could be held at the new stadium. Events other than NFL games have the potential to create different impacts, such as increased noise effects, which should be evaluated in the EIR.

### **III. ENVIRONMENTAL IMPACTS**

#### **A. Significant Impacts to Qualcomm Stadium and Other Cultural Resources Must be Analyzed and Mitigated.**

Qualcomm Stadium satisfies the requirements for designation of a historical resource under CEQA. Under Public Resources Code § 21084.1: “For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.”

According to CEQA Guidelines § 1504.5: “Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.”

Qualcomm Stadium (formerly San Diego Jack Murphy Stadium) has been recognized for historic attributes. Its demolition should be evaluated as a potentially significant adverse impact to a major cultural landmark. The Mission Valley Community Plan called the stadium “probably the most distinct landmark in Mission Valley,” with an “award-winning design” that has “made it a community landmark.” (p. 167.) It has played host to the Super Bowl three times, in 1988, 1998, and 2003, as well as the World Series in 1984 and 1998 and the Major League All-Star Game in 1978 and 1992. It is one of only three stadiums in history to have hosted all three events.

The Save Our Heritage Organisation (SOHO) has emphasized the significance of the stadium. Designed by Gary Allen, it is one of the last remaining mid-century multi-purpose stadiums left in the United States. A classic example of the Brutalist architectural school, it

possesses “innovative design features which include pre-cast concrete, pre-wired light towers, and spiral concrete pedestrian ramps,” which led to the stadium’s receipt of the American Institute of Architects Honor award in 1969 for outstanding design. This marked the first time in history that a San Diego design firm had received a national honor.<sup>3</sup>

Additionally, the project site is in an area of high sensitivity for archaeological resources. For example, the EIR for nearby Quarry Falls notes that “the project site is located in an area of high sensitivity for cultural resources, and earth-moving activities would have the potential to affect unknown resources located within the undisturbed areas of the project site.”<sup>4</sup>

## **B. Quantitative Studies Are Needed to Establish “Baseline” Conditions**

Mere projections of baseline information are insufficient for baseline analysis. *Fairview Neighbors v. County of Ventura*, (1999) 70 Cal. App. 4th 238; *Save Our Peninsula Committee v. Monterey Bd. of Supervisors*, (2001) 87 Cal. App. 4th 99 [CEQA “requires that the preparers of the EIR conduct the investigation and obtain documentation to support a determination of preexisting conditions.”]. Further, *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931 states that recitation of raw data without explanation of how such levels were derived or maintained “does not provide an adequate description of the existing environment.” *Citizens for East Shore Parks v. State Lands Commission*, (2011) 202 Cal. App. 4th 549 held the proper baseline for analysis of environmental impacts is “what [is] actually happening,” not what might happen or should be happening.

**Traffic:** The City is required to conduct traffic studies of existing conditions on game days. The City must present actual data on traffic counts and not mere projections. This is especially important because the NFL is increasingly scheduling games on days other than Sunday, which will impact rush hour traffic. In 2015, the Chargers have two scheduled preseason games at Qualcomm, one on Thursday and one on Saturday. During the regular season, two Monday night games are scheduled to be held at Qualcomm.<sup>5</sup>

**Air Quality/Health Risks/GHG:** To evaluate emissions from onsite activities and stadium-related traffic (onsite and offsite) requires the City to have actual game day trip counts to ascertain impacts on air quality, health risks and greenhouse gas emissions. For ambient air quality impacts and health risks from toxic air contaminants, it is important to identify current emissions sources to evaluate impacts with moving the stadium closer to nearby residents.

**Cultural and Historical Resources:** The City must determine whether Qualcomm stadium is an historical resource for purposes of CEQA, as well as the potential to impact underground cultural resources if the site is moved (with related excavation). As such, the City must complete

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<sup>3</sup> SOHO has identified the stadium as an important historical resource. See <http://www.sohosandiego.org/endangered/mel2007/stadium.htm>.

<sup>4</sup> City of San Diego, Quarry Falls Project Program EIR, July 2008 Update, p. 6.

<sup>5</sup> [http://espn.go.com/nfl/team/schedule/\\_/name/sd/san-diego-chargers](http://espn.go.com/nfl/team/schedule/_/name/sd/san-diego-chargers).

an historical evaluation of the stadium and study the probability of impact to underground resources based on historical and paleontological activities in the area.

Hazardous Wastes: The City must fully evaluate and describe the current status of the monitoring and remediation activities associated with the Kinder Morgan soil and groundwater contamination, including the location of any monitoring or extraction wells that could be impacted by changing the stadium location. In addition, the City must evaluate the current level of contamination on the Qualcomm property and the potential for contamination to worsen as the water table rises (with Kinder Morgan reducing extraction activities) to assess the impact of project-related site changes and excavation.

Noise: Game-day traffic counts in the vicinity of the stadium are also necessary to determine noise impacts to the neighborhoods nearest to the proposed stadium. Both preseason games and three regular season games are night games and have the potential elevate ambient noise in the surrounding neighborhoods during night hours. It is also important to obtain noise readings from the stadium's current location to understand the impact of moving the stadium closer to nearby residents.

Without this type of baseline data, the City cannot properly establish the environmental setting and its analysis is not based on substantial evidence.

### **C. Impacts to Sensitive Receptors**

The proposed project is close to a number of sensitive receptors that will be adversely affected by project construction, demolition and operations.

There are multiple residential areas immediately surrounding the site. On the east side, an adjacent residential development is approximately 185 feet from the property line. Similarly, on the west side, residences are located within several hundred feet of the property line or less. The San Diego campus of the University of Redlands is also about half a mile west of the stadium. Additionally, at least two hotels or motels are located proximate to the stadium: Motel 6 (4380 Alvarado Canyon Rd.), and San Diego Marriott Mission Valley (8757 Rio San Diego Dr.). There are at least three daycare centers within approximately half a mile of the stadium complex, including the YMCA Childcare Resource Service, the Children's Home Society, and Gethsemane Christian Preschool.

The Office of Environmental Health Hazard Assessment (OEHHA) developed the California Communities Environmental Health Screening Tool: CalEnviroScreen Version 2.0 (CalEnviroScreen 2.0), as a screening methodology to identify California communities that are disproportionately burdened by multiple sources of pollution. CalEPA has used the tool to designate California communities as disadvantaged pursuant to Senate Bill 535.<sup>6</sup> A search on

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<sup>6</sup> See Office of Environmental Health Hazard and Assessment, CalEnviroScreen Version 2.0, <http://oehha.ca.gov/ej/ces2.html>.

CalEnviroScreen 2.0 reveals several disproportionately burdened communities near the Project Site, the closest being 1.2 miles away. (See Exhibit A attached hereto.) As shown in Exhibit A, residential communities surround the project and are listed as having a higher percentage “Pollution Burden.”

CalEnviroScreen 2.0 identifies communities with higher “Pollution Burdens” based on various characteristics related to local pollution risks, such as ozone levels, particulate matter concentrations, and proximity to hazardous materials. Based on a CalEnviroScreen report for the area surrounding the Qualcomm property, communities to the east, west and south are identified as having a high Pollution Burden (see attached CalEnviroScreen Report For Area Near Qualcomm Site). A number of communities with a high Pollution Burden are also located along possible transportation routes that could be impacted by the project. Accordingly, the EIR should analyze impacts to potential disadvantaged communities that may be impacted by the stadium project.

The San Diego River immediately south of the project is important to plants and animals and to recreational users of the river. The San Diego River should be considered a location for recreational users and other sensitive receptors.

#### **D. Traffic, Transportation and Parking**

Overburdened roadways, congested freeways and inadequate transportation infrastructure in the Mission Valley area will be significantly impacted by years of construction/demolition traffic and increased frequency of stadium events.

The Mission Valley Community Plan identified major traffic and transportation deficiencies in the Mission Valley area including the following:

(1) *“Many streets are under-designed and route an excessive number of cars on streets that were never intended for such volumes,” and “the transportation system for Mission Valley falls far short of the ideal.”*<sup>7</sup>

(2) *The major streets in the area are not built to major street standards at this time and are experiencing congestion, especially during the peak-hour periods. This congestion is both a function of incomplete or undersigned major streets, and the congestion on the freeways during peak hours causing backup onto the surface street system.”*<sup>8</sup>

(3) Existing problems would be exacerbated by the stadium project, which is located on Friars Road, the primary arterial through Mission Valley, upon which other traffic flow in the area relies. The Mission Valley Community Plan highlights that when

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<sup>7</sup> Mission Valley Community Plan at p. 71 (emphasis added).

<sup>8</sup> *Id.*

the existing stadium is used, it “overloads Friars Road,” “overburden[ing] the surface street system” and plans to increase seating in the stadium and to hold additional events there will “generate even more traffic in the future.” The segment of Friars road directly outside the stadium (from Mission Village Drive to Mission Gorge Road) has been identified as a high congestion area.<sup>9</sup>

A Caltrans report identified “unacceptable” traffic and congestion in Mission Valley. According to the I-8 Transportation Concept Summary for San Diego County, the I-8 corridor “currently experiences congestion and operates at unacceptable levels of service during the morning and afternoon peak hours” throughout the Mission Valley area. Caltrans found that “[t]he present transportation system in Mission Valley has inadequate capacity,” and that “it will be unable to handle future local circulation and regional transportation needs.”<sup>10</sup> Caltrans identified a need for “[a] significantly upgraded surface street system in Mission Valley,” which “is needed to reduce reliance on I-8 for travel within Mission Valley. This will require overcoming a problematic “lack of any uniformity” to the street system in Mission Valley, where “[m]any streets are under-designed and transport an excessive number of cars on streets that were never intended for such volumes.” There is also “an inordinate amount of out of direction travel.”<sup>11</sup>

Gridlock and congestion are well known problems in Mission Valley. See: <http://www.voiceofsandiego.org/growth-housing/mission-valley-keeps-getting-more-roads-and-more-traffic/> (“Any San Diegan knows Mission Valley at rush hour is a gridlocked mess.”)

These traffic infrastructural impacts must be considered in the context of a region that is rapidly developing and adding further stress to the strained street system. The population of the area around the stadium is expected to more than double from 33,000 to 75,000.

### 1. Analysis of Impacts to Critical Intersections and Major Arteries

The EIR must consider a wide range of different event activities to fully evaluate the impacts of the project, including, but not limited to: Saturday day games, Sunday day games, weekday evening games, weekday evening non-game events, and weekend non-game events.

The City of San Diego Environmental Analysis Section has established specific criteria to determine if a traffic impact at an intersection, roadway segment, or freeway is considered significant. Both project specific and cumulative project impacts can be significant impacts. These include:

-If any intersection or roadway segment affected by a project would operate at LOS E or

<sup>9</sup> *Id.* at p. 72 (emphasis added).

<sup>10</sup> Interstate-8 San Diego County Transportation Concept Summary, June 2012, pp. 1-2 (emphasis added).

<sup>11</sup> *Id.*

F under either direct or cumulative conditions and the project exceeds specified increases in delay or intersection capacity utilization or volume-to-capacity ratios;

-If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp;

-If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway);

-If a project would result in a substantial restriction in access to publicly or privately owned land;

-If any facility affected by a project would degrade from an acceptable level of service (LOS D or better) to an unacceptable level of service (LOS E or worse).

As a result of these criteria, it appears reasonably possible that the stadium project would cause significant traffic impacts. The segment of I-8 most immediately proximate to the stadium—the segment between I-805 and I-15—receives a Level of Service (LOS) rating of F, a failing rating. In fact, every highway segment for at least four miles in either direction of the stadium (encompassing most of the highway's length within the City of San Diego) currently receives a LOS F rating.<sup>12</sup>

As revealed by the Mission Valley Community Plan and the Quarry Falls EIR, there are a number of heavily impacted intersections in the area of influence that would be adversely affected by the project's construction and operational traffic. Traffic flow analysis will be necessary at key intersections and highway on- and off-ramps (including differentiated analysis of peak morning and afternoon traffic hours), as well as of the anticipated effects of construction and operation of the new facility on those intersections. At a minimum, the following points of traffic concern should be modeled and evaluated in the EIR's transportation analysis (for both construction and operational impacts) under a variety of scenarios (weekend games, weekday games, non-game events such as concerts, etc.):

- I-15 north from Friars Road, south from I-8, north from I-805;
- I-805 north and south from I-8, north from highway 163, south from highway 15, south from highway 94;
- I-8 east and west from I-15, east and west from I-8, west from highway 163, west from I-5, east from College Avenue, east from highway 125;
- I-5 north and south from I-8, south from highway 163, south from highway 94;

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<sup>12</sup> *Id.* at p. 4.

- Friars Road from Mission Gorge Road to Ulric Street;
- Mission Village Drive from Friars Road to Gramercy Drive;
- Camino Del Rio N and Camino Del Rio S from Fairmount Avenue to Qualcomm Way;
- San Diego Mission Road from Friars Road to Twain Road;
- Fenton Parkway (and Fenton Marketplace);
- Northside Drive;
- Mission Gorge Road from Fairmount Avenue to Princess View Drive;
- Fairmount Avenue from Mission Gorge Road to Aldine Drive;
- I-15 exits 7, 7A, 7B, and 6B;
- I-805 exits 17 and 17B;
- I-8 exits 6A, 6B, 7, 7A, 7B, and 8;
- Friars Road intersections with Mission Gorge Road, San Diego Mission Road, Mission Village Drive, Northside Drive, Fenton Parkway, Qualcomm Way, and Mission Center Road;
- San Diego Mission Road with Mission Gorge Road;
- Camino Del Rio N and Camino Del Rio S with Fairmount Avenue;
- Impacts to ingress to and egress from major nearby residences and public and private facilities, including nearby residential communities, Fenton Marketplace, and Kaiser Foundation Hospital.

## **2. Farmers Field EIR Identified Numerous Transportation Impacts**

The Farmers Field EIR provides an example of the type of traffic impacts that may be associated with the stadium project. The Farmers Field EIR identified numerous significant traffic impacts (see attached table).

### **3. Analysis of Impacts to Mass Transit, Bikeways, and Pedestrians**

The City's light rail Green Line passes by and stops at the stadium. Mass transit analysis of the impacts of construction and operation of the facility on the intensity of use of the Green Line and other interconnected transit lines must be conducted.

The City's bus lines numbered 18, 235, 60, 13, and 14 all pass within a short distance of the stadium. Mass transit analysis of the impacts of construction and operation of the facility on the intensity of use of these bus lines and other interconnected transit lines must be conducted.

The City has three classifications for bikeways: Class I (Bike Path or Trail), Class II (Bike Lane), and Class III (Bike Route). Analysis must consider the impacts of construction and operation of the facility on all three classes of bikeways in the area.

The impacts of construction and operation of the facility on pedestrian traffic must also be considered, including pedestrian access from various bus stops for the lines discussed above.

### **4. Parking**

The NOP indicates that parking would be provided on the location of the existing stadium. Will this be surface parking or a parking structure? The EIR must address how parking would be provided onsite if the demolition of Qualcomm is delayed.

The EIR should address where attendees would park during construction of a new stadium and demolition of the old stadium, both of which will significantly limit available parking on the site.

How will reduced on-site parking and increased reliance on off-site parking impact traffic patterns and non-stadium parking needs around the stadium? How will reduced on-site parking impact public transportation use? How will sufficient capacity be ensured? Given that the southern portion of the property may be used for a Mixed Use Development, that would mean there is not sufficient land for surface parking on site. That would require either a parking structure or off-site parking, both of which options should be fully analyzed in the EIR. Also, given that the southerly portion is owned by the water department, the EIR should analyze what the possible environmental effects will be if the water department property is not available for stadium uses. Given that the water department is required to receive market value for the use of its property, the EIR must analyze the entirely possible circumstance that this portion of the property cannot be used for stadium uses (either a stadium or parking).

#### **E. Air Quality**

##### **1. Scope of Analysis**

Air Quality impacts should be analyzed under a variety of scenarios, including:

construction of new stadium; demolition of existing stadium; concurrent construction and demolition; concurrent construction/demolition and operations (if applicable); Mixed-Use Development (overlapping with construction/demolition, if applicable).

Air quality impact analysis of operations should include both operational emissions on a *daily* basis and also on an *annual* basis, as identified by the City of San Diego significance thresholds. The annual analysis will account for increased frequency of events and resultant emissions. The increased frequency of events can cause a significant noise impact even if any particular single event does not change.

## 2. Regional Emissions

The stadium project has the potential to emit significant air emissions that exceed applicable thresholds. These emissions could be individually and cumulatively considerable.

## 3. Localized Emissions

The EIR must analyze localized and ambient air quality impacts for all criteria pollutants from project construction and operations. The City of San Diego CEQA Thresholds state that a project may cause a significant impact if it “[e]xpose[s] sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.”<sup>13</sup> Thus, the EIR should consider localized impacts associated with criteria pollutants (not limited to carbon monoxide), as well as toxic air contaminants.

Further, the San Diego CEQA Thresholds state that an EIR should “[a]pply AAQS as the threshold where accepted methodology exists when the project involves a sensitive receptor or if the potential exists for a significant cumulative air quality impact.” The SCAQMD Localized Significance Thresholds establish a proven, accepted methodology for evaluating localized health risks based on criteria pollutant concentrations and the Ambient Air Quality Standards (AAQS), both for concentration and operational emissions.<sup>14</sup>

Substantial evidence demonstrates that localized concentrations of criteria pollutants can result in significant health impacts, based on both short-term and long-term exposure.

Given the size and intensity of the construction activities that likely would be required, construction of a new stadium may result in significant air quality impacts, given the standards established by the San Diego APCD and City of San Diego. For example, there may be significant impacts related to VOC, CO, and NO<sub>x</sub> during construction, and other projects of this size have resulted in significant air quality impacts. (See, e.g., Farmers Field EIR [finding air quality impacts of new football stadium in Downtown LA had significant and unmitigable

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<sup>13</sup> City of San Diego CEQA Thresholds, p. 7.

<sup>14</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

impacts during construction even with the incorporation of all feasible mitigation measures].)

Due to the increased capacity of the proposed stadium and the proposed adjacent development, the operation of the project may result in potentially cumulative impacts to air quality from increased vehicle trips.

Because the stadium's location has not been identified, the EIR should include worst case assumptions about its location.

#### **4. The Farmers Field EIR Identified Numerous Air Quality Impacts**

The Farmers Field EIR provides an example of the type of air quality impacts that may be associated with the stadium project. The Farmers Field EIR identified air quality impacts at a regional and localized level (see attached table).

#### **F. Health Risks**

##### **1. A Health Risk Assessment (HRA) Must Be Completed Based on Revised OEHHA Guidance**

The Office of Environmental Health Hazard Assessment (OEHHA) adopted a new version of the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual).<sup>15</sup> As discussed in Section 8.2.10 of the Guidance Manual, “[t]he local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.”

Construction impacts must be analyzed with an HRA. Agency guidance indicates that new OEHHA methodology will substantially increase the estimated significance of toxic air contaminants. Because the new OEHHA methodology includes a number of conservative assumptions about potential impacts to infants and children, short term construction emissions could lead to significant HRA results. For example, SCAQMD staff estimate that a six-month construction project for a typical one-acre office project could cause a significant HRA impact.<sup>16</sup>

The proposed stadium could be located within 185 feet of sensitive receptors, including residents on the west and east side of the property (or potentially closer, depending on the nature of the reasonably foreseeable Mixed-Use Development). Modeling estimates must be completed at the following locations: residences located adjacent to the site on the west and east side; the nearest location to the south where recreationists or walkers use the San Diego River.

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<sup>15</sup> See [http://www.oehha.ca.gov/air/hot\\_spots/hotspots2015.html](http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html).

<sup>16</sup> See SCAQMD Staff presentation, Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs, Agenda Item 8b, <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf>.

Operational impacts must be analyzed with an HRA. Moving the stadium closer to sensitive receptors could increase the potential for significant health risks. The HRA should include emissions from at least the following sources:

- (a) Idling trucks;
- (b) Trucks with refrigerated units;
- (c) Charbroiling facilities at stadium restaurants;
- (d) Tailgating activities (including charbroiling);
- (e) Idling cars and RV units while tailgating;
- (f) Fireworks;
- (g) Cooling towers;
- (h) Emergency Diesel Generators
- (i) Other stadium and related sources

Because the stadium's location has not been identified, the EIR should include worst case assumptions about its location.

## **2. Health Risks to Sensitive Receptors at Key Offsite Intersections and Roadways Should Be Evaluated**

The EIR should analyze health risk impacts at congested intersections. The analysis should not be limited to carbon monoxide emissions, but rather should include ambient concentrations of criteria pollutants (which can cause localized health impacts from vehicle emissions) and toxic air contaminants.

## **3. Asthma Impacts From Construction Emissions and Project-Related Traffic Should Be Quantified and Mitigated**

Numerous studies have identified asthma impacts associated with diesel particulate matter exposure. The EIR should analyze the impact of such exposure from construction and operations on nearby residences, including offsite traffic.

## **4. Mixed-Use Development**

The EIR should prepare an HRA and evaluate asthma risks to future residences

associated with the reasonably foreseeable Mixed-Use Development.

The EIR should evaluate impacts of siting residences within close proximity of a major freeway based on the reasonably foreseeable Mixed-Use Development based on guidance from CARB.

#### **5. Soil vapor intrusion risks**

Soil vapor intrusion risks from residual site contamination should be analyzed.

#### **6. Air conditioning and air filter units**

The EIR should evaluate installing air conditioning and air filter units on impacted residences, schools and other sensitive receptors where local air emissions will cause significant health effects from on-site or off-site emissions. *See Los Angeles Unified School Dist. v. City of Los Angeles*, 58 Cal. App. 4th 1019, 1030 (1997) (EIR deficient for failing to evaluate whether air conditioning or filters would mitigate significant localized air quality impacts).

### **G. Noise**

#### **1. Scope of Noise Analysis**

The EIR should conservatively assume that noise impacts from demolition and construction will occur simultaneously. To evaluate worst case noise impacts, the EIR should assume demolition and construction activities occur simultaneously unless the City commits to staging construction activities to ensure that there is no overlap.

The location of stadium is critical to noise assessment. Unless the DEIR identifies a specific location for the stadium footprint, the EIR must analyze multiple “worst case” scenarios of locating the stadium near the east, west and south boundaries to determine the impact on sensitive receptors.

The EIR must apply appropriate noise standards. Noise analysis must include onsite noise and offsite traffic noise. According to City of San Diego CEQA Significance Thresholds, Interior and Exterior Noise Impacts from Traffic Generated Noise, Table K-2, traffic from the project will be significant if it causes noise levels at sensitive receptors (residents, schools, hospitals, etc.) to exceed 45 dBA interior or 65 dBA exterior.

For transportation-related noise, impacts should be considered significant if project-generated traffic results in increases in ambient noise levels that generate a noise level of 60 dBA CNEL or greater at noise-sensitive receptors, based on the City of San Diego General Plan Noise Level Compatibility Standards for multifamily residences.<sup>17</sup> For roadways that currently generate

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<sup>17</sup> See San Diego Marriott Marquis & Marina Facilities Improvement & Port Master Plan

a noise level of 60 dBA CNEL or greater, an increase in ambient noise level of more than 3 dBA CNEL would generally be considered a significant impact. Accordingly, the EIR should consider transportation related impacts.

Increasing the frequency of events can be significant impact under CEQA even if single event noise does not increase. The increased frequency of events can cause a significant noise impact even if any particular single event does not change. (*Berkeley Keep Jets Over the Bay Commission v. Board of Port Commissioners*, 91 Cal. App. 4th 1344 (2001) [EIR failed to analyze how increasing the frequency of night flights would adversely affect residents].) Thus, the EIR must consider how the increased frequency of events at the stadium will adversely impact the environment, including noise-related impacts.

Incremental increases in noise-impacted areas should be evaluated for significance. Increases in noise less than 3 dba should be considered cumulatively significant in areas already heavily impacted by noise, such as the areas around Qualcomm Stadium. (*Los Angeles Unified School Dist. v. City of Los Angeles*, 58 Cal. App. 4th 1019, 1025 (1997) [EIR found insufficient where existing ambient noise level of 72.1 dBA already exceeded the recommended maximum of 70 dBA and would only increase by another 2.8 – 3.3 dBA at build-out, an increase the EIR considered insignificant because the EIR only applied a strict change in dBA threshold without considering whether the project-related impact would be significant for impacted sensitive receptors “in light of the serious nature of the traffic noise problem already existing around the schools”].)

## **2. Construction and Other Types of Noise Must be Considered.**

Construction Equipment - According to the City of San Diego Municipal Code, § 59.5.0404, construction noise is limited to 7:00 am—7:00 pm, Monday through Saturday (except holidays). Further, per Section 59.5.0404(b), “it shall be unlawful for any person, including The City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.” The proposed project construction has the potential to significantly impact a number of sensitive receptors from onsite construction and demolition activities and from offsite traffic noise.

There are multiple residential areas immediately surrounding the site. On the east side, an adjacent residential development is approximately 185 feet from the property line. Similarly, on the west side, residences are located within several hundred feet of the property line.

Construction noise, including demolition, grading, foundation-laying, pile-driving, and construction traffic are all likely, individually and cumulatively, to constitute significant and substantial noise pollution affecting sensitive receptors. This was true for the Convention Center

Phase III, which required substantial mitigation measures.<sup>18</sup> Additionally, the construction of the new 49ers stadium (which does not involve demolition or the transportation of the demolished materials), was expected to generate the following average noise levels (measured at 50 feet): ground clearing (83-84 dBA), excavation (88-89 dBA), foundation-laying (77-88 dBA), building and construction (79-87 dBA), and finishing work (84-89 dBA). Even at 700 feet, the nearest residences were expected to be subjected to an average noise range of 54-66 (with a maximum of 71) dBA, exclusive of background noise.

**Fireworks-** Impacts from fireworks at the stadium should be analyzed.

**Construction Traffic-** The EIR must analyze traffic-related noise impacts onsite, at entrance/exit points, and at major intersections along the truck haul routes, including all intersections where traffic impacts are potentially significant.

**Use of Explosives -** The Candlestick park demolition considered the use of explosives for demolition given the difficulty of demolishing the stadium using mechanical techniques. Here, the City should assume that explosives may be used based on the Candlestick precedent and model noise impacts associated with explosives. Specific locations where explosives may be used and noise impact zones should be analyzed in the EIR.

**Helicopters -**The possible use of helicopters for construction should be analyzed in the EIR, including flight routes, helicopter type and noise contours.

### **3. Operational Noise**

Proximity to sensitive receptors, like residential areas, will impact this calculation. An interior CNEL of 45 dB is set by the State of California Noise Insulation Standards for multiple family dwellings, hotel and motel rooms. Residential units are located directly across I-15 from the stadium complex and already have to deal with substantial ambient noise from the highway. The project proposal may move the new stadium much closer to the residences. This proximity would have impacts during both the construction and operation phases of the new project.

Stadium events, such as sporting events and concerts, will also generate significant noise. For example, outdoor activities and events at the Convention Center were found to have the potential to create significant noise impacts, which required mitigation activities.<sup>19</sup> The sound system for the stadium, including the distribution of speakers, as well as cheering crowds, added traffic, fireworks, etc. must all be factored into the calculations. Based on other recent stadium projects, the EIR should also consider:

- (a) Even before games begin, ambient noise from tailgating in the parking lot; at

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<sup>18</sup> San Diego Convention Center Phase III Expansion and Expansion Hotel Project & Port Master Plan Amendment Final Environmental Impact Report (Sept. 2012), at p. 3-62.

<sup>19</sup> San Diego Convention Center Phase III FEIR at pp. 3-63, 3-66.

Candlestick Park, these noise levels reached 57-61 dBA at the monitoring station 1,350 feet from the edge of the stadium (but reached 75 dBA at roughly 300 feet, with the average around 57-63 dBA); tailgating activities had a significant impact on nearby residents.<sup>20</sup>

- (b) When spectators exited Candlestick Park, ambient noise rose to 63 dBA at the 1,350-foot monitoring station.<sup>21</sup>
- (c) During a game at Candlestick Park, maximum noise levels ranged from 95-103 dBA, and the average was roughly 78-92 dBA. Use of the PA system in the stadium created ambient noise at 1,350 feet of about 56 dBA, cheering ranged from 52-65 dBA, and the national anthem and fireworks generated a sound of 61-62 dBA (at 1,450 feet—closer data is unavailable for these). This was also a significant impact. By contrast, the Padre Gardens Apartments would be only a few hundred feet from the new stadium, and would already have significant ambient noise from I-15.<sup>22</sup>
- (d) At Candlestick Park, non-NFL sporting events were almost identical in the noise levels generated and also qualified as significant impacts on nearby residents.<sup>23</sup>
- (e) Concert events would generate an average noise level of 95 dBA, measured 100 feet from the speakers. Noise levels were comparable to, or slightly lower than maximum crowd noise at an NFL event, and constituted a significant impact on residents.<sup>24</sup>

Additionally, the EIR for Phase III of the Convention Center project noted that HVAC and other air-handling systems, loading and unloading activities, and other stationary and recurring on-site activities also contribute significantly to noise pollution.<sup>25</sup> Ground-borne vibrations caused by vehicle circulation within the proposed parking facilities, on-site delivery truck activity, and added off-site traffic, as well as stationary on-site mechanical equipment, like air handling units, condenser units, cooling towers, exhaust air fans, and electrical power generators could cause noise impacts. Therefore, these activities should be analyzed in the EIR.

#### 4. Noise Impacts on Wildlife.

The EIR should consider noise impacts to sensitive wildlife, which may require

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<sup>20</sup> The 49ers Stadium Project, City of Santa Clara, Draft EIR (July 2009), Sec. 4.10.1.4, p.

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<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *Id.* at pp. 246-48.

<sup>24</sup> *Id.* at pp. 248.

<sup>25</sup> San Diego Convention Center Phase III FEIR at pp. 3-63.

mitigation measures. Notably, impacts to certain avian species during their breeding season may create the need for mitigation, depending on whether or not the project is occupied by the California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird or western snowy plover, and whether or not noise levels from the project, including construction during the breeding season of these species would exceed 60 dB(A) or existing ambient noise level if above 60 dB(A).

#### **5. Mixed-Use Development Noise Impacts**

The EIR should analyze noise impacts to future residences associated with the reasonably foreseeable Mixed-Use Development.

#### **6. Farmers Field EIR Identified Numerous Noise Impacts**

The Farmers Field EIR provides an example of the type of noise impacts that may be associated with the stadium project. The Farmers Field EIR identified significant noise impacts (see attached table). Notably, the proposed project appears to have more sensitive receptors in close proximity to the project site than the Farmers Field project.

### **H. Water Resources**

#### **1. The Proposed Development May Fall Within U.S. Army Corps' Jurisdiction Based on Newly Issued Rules**

The EPA and U.S. Army Corps of Engineers have recently issued new rules clarifying the scope of the "Waters of the United States," which establishes the scope of federal jurisdiction over certain bodies of water pursuant to the Clean Water Act. The San Diego River, which runs directly to the south of the stadium, is a jurisdictional water. The ponds within the river-course approximately half a mile to the east of the stadium appear to also qualify. The new rule also establishes that any water within the 100-year floodplain or within 4,000 feet of the high water mark of such a body of water may fall within federal jurisdiction. The stadium site falls within the 100-year floodplain of the river.

The EIR should include a wetlands delineation and analysis of whether the stadium project would directly or indirectly impact any waters of the United States, and determine whether an Army Corps permit is required.

Impacts from construction and operation of the new stadium that lead to contamination of the San Diego River or any of its tributaries could also be subject to regulation under the Clean Water Act.

Furthermore, construction of the new stadium may substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of the river and floodplain. Further, the project may degrade water quality if it interferes with existing

remediation activities.

## **I. Aesthetics**

### **1. Light Pollution**

Use of the new stadium's bright lights on an increased number of evenings throughout the year would contribute additional light pollution to the area, and would particularly impact nearby residential areas to the east of the site.

Light from additional car headlights resulting from both construction trucks and, once the project is completed, from extra year-round events and increased stadium capacity would also impact nearby residences.

The Farmers Field EIR notes that "New nighttime light sources have the potential to increase ambient nighttime illumination levels and result in spillover of light onto adjacent properties. These effects have the potential to interfere with certain functions including vision, sleep, privacy, and general enjoyment of the natural nighttime condition."<sup>26</sup> Residential and some commercial uses are among the most adversely impacted. For the residential units, the increased proximity and frequency of lights could be a major issue.

Beyond light pollution from artificial lights, glare (during both daytime and nighttime hours) from the reflection of sunlight or artificial light off of highly polished surfaces, such as window glass or reflective materials (including cars parked in the parking lot). Analysis should include potential impacts on glare-sensitive uses, which include light-sensitive uses and transportation corridors (i.e. nearby residential units and nearby roadways, including Friars Road, I-15, and possibly I-8), and should consider the impacts on glare of moving the stadium closer to sensitive residential receptors.

### **2. Visual Impacts**

The stadium project, including the demolition, subsequent construction, and new stadium, would be visible from at least the following locations, which should be analyzed in the EIR: (i) from Friars Road, the major arterial passing to the north of the site; (ii) from I-8, passing to the south of the stadium, across the river, I-15, directly to the east of the stadium, and I-805, half a mile west of the stadium; (iii) from residential units to the east of the stadium, across I-15; (iv) and from residences, businesses, and roadways on the northern and southern slopes of Mission Valley, as well as from residences and public parkland on the northern and southern ridgelines of the Mission Valley canyon in Serra Mesa (to the north) and in Kensington and along N. Mountain View Drive (to the south).

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<sup>26</sup> City of Los Angeles, Convention and Event Center [Farmers Field] Project Draft EIR, April 5, 2012, p. IV.D.2.-1.

The existing stadium has an award-winning design and has become a cultural institution in the region. The stadium “dominates the view from almost any vantage point in the eastern portion of the Valley.” (MVCP, at 167). Replacing this with a different structure could negatively impact the aesthetic integrity of the site.

By moving the stadium closer to the residences to the east of the site, the stadium may also impact the ability of those residences to receive afternoon light. For example, the Farmers Field EIR considers shadowing issues at each solstice and equinox, and places particular emphasis on the impacts to residences. *See* Farmers Field Draft EIR at p. IV.D.1-1—1-37.

## **J. Hazardous Waste and Materials**

### **1. Background to contamination issues with the site.**

The EIR must fully describe how the stadium project will affect ongoing monitoring and remediation associated with the Kinder Morgan site contamination. Kinder Morgan’s Mission Valley Terminal (MVT) is an aboveground storage tank (AST) facility located to the northeast of Qualcomm Stadium. Petroleum products currently or historically stored at the MVT include leaded and unleaded gasoline, gasoline additives, jet fuel, diesel, ethanol and transmix. Petroleum hydrocarbons released from MVT have migrated in the subsurface and contaminated the soil and groundwater underlying the Qualcomm stadium site, triggering remediation and monitoring obligations under the authority of the San Diego Regional Water Quality Control Board to protect the environment and human health. Constructing the stadium project would likely complicate and possibly exacerbate future remediation of the Qualcomm stadium site while potentially creating new risks to future onsite sensitive receptors. Moreover, the stadium project may trigger the need for additional Regional Board approvals to manage and remediate the contamination.

The Regional Board issued a Cleanup and Abatement Order (CAO) to address MVT’s contamination in 1992 (CAO No. 92-01). Since 1992, the Regional Board has issued seven addenda to the CAO, including Addendum 5 in 2005. Addendum 5 requires Kinder Morgan to remediate contamination at the Qualcomm stadium site. Kinder Morgan implemented a remediation response consisting of soil vapor extraction (SVE) coupled with localized dewatering in two areas of the stadium site. Kinder Morgan completed remediation of the primary site on December 2010 and the secondary site in December 2013. Kinder Morgan ceased active remediation on the stadium site in the first quarter of 2014 and submitted a report in March 2014 to the Regional Board that concluded: “by the end of 2013, the selected remedial strategy had removed LNAPL [Light Non-Aqueous Phase Liquid] from the [secondary] LNAPL zone to the extent technically practicable.” Kinder Morgan ceased monitoring on the stadium site following the Regional Board’s approval in January 2015. However, the Regional Board required monitoring to resume in April 2015.<sup>27</sup>

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<sup>27</sup> Regional Board Response to Kinder Morgan Request for Suspension of Groundwater

## **2. There Continues to be Ongoing Uncertainty About the Contamination Risk.**

While remediation efforts may have reduced contamination at the Qualcomm stadium site since the CAO was issued, significant concerns remain that once groundwater levels stabilize onsite, monitoring will show that the Qualcomm stadium site remains impacted by contamination. As explained by the City in a March 2015 letter to the Regional Board “there is still considerable concern that the full effects of the release will impact this [the City’s groundwater resources] for some time, and that mitigation and restoration of the resource is far from over.”<sup>28</sup> For instance, the most recent data suggests that levels of tert-butyl alcohol (TBA) and benzene are rebounding in the LNAPL zone at the stadium site.<sup>29</sup> The rising water table can cause “smearing” in the LNAPL zone, essentially dislodging latent contamination in soils at the stadium site. Following receipt of the City’s analysis, the Regional Board, on April 3, 2015, required Kinder Morgan to resume groundwater monitoring “to determine if groundwater cleanup levels have been achieved in accordance with [the CAO]” following groundwater level stabilization.<sup>30</sup> Kinder Morgan’s proposed monitoring plan, submitted on April 14, 2015, indicated that approximately 20 wells have had TBA, benzene, or MTBE concentrations above state response levels in the last year.<sup>31</sup> Monitoring may trigger additional remediation requirements. The EIR should fully disclose the current status of the ongoing cleanup and monitoring activities, as well as analyze potential impacts to the site contamination from the project. Given the City’s written position on the nature and scope of contamination, the EIR must analyze the potential for pulling of contamination from off-site locations with further de-watering associated with the new stadium construction.

## **3. Stadium Construction May Exacerbate Risks.**

Ongoing testing following groundwater level stabilization may demonstrate continuing contamination risks. In the event monitoring demonstrates the need for additional active remediation, any contemplated redevelopment at the stadium site would require consultation with Kinder Morgan and the Regional Board. If the stadium has had the potential to impact remediation or monitoring activities (likely given the scale of development work and extensive well network on the stadium site), the City may need to work with Kinder Morgan and the Regional Board to amend the CAO and associated work plans. Timing for amending the

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Monitoring and Reporting Requirements (Apr. 3, 2015).

<sup>28</sup> See City of San Diego March 25, 2015 Letter to David Gibson, Executive Officer California Regional Water Quality Control Board re Evaluation Report of Remediation for Kinder Morgan’s Mission Valley Terminal Off-Site Release.

<sup>29</sup> Post-Remediation Groundwater Quality, Mission Valley Aquifer, at 33 (Mar. 25, 2015).

<sup>30</sup> Regional Board Response to Kinder Morgan Request for Suspension of Groundwater Monitoring and Reporting Requirements at 1 (Apr. 3, 2015).

<sup>31</sup> Request for Revision of the Monitoring and Reporting Program at 2 (Apr. 14, 2015).

CAO/work plans could range significantly and should be analyzed in the EIR.

#### **4. City Liability If Environmental Contamination Worsens**

If the City moved forward with construction and demolition without Regional Board approval, it potentially could put itself at risk of being named a responsible party at the stadium site for exacerbating or accelerating the migration of contamination. Exacerbation or acceleration of migration during construction could also subject the City to owner/operator liability under federal law. See *Kaiser Aluminum & Chemical Corp. v. Catellus Development Corp.*, 976 F.2d 1338 (9th Cir. 1992).

#### **5. The City Should Evaluate the Impact of Dewatering.**

Environmental risks due to discharging water from construction dewatering must be analyzed. In the event the significant excavation required for a new stadium and/or Mixed-Use Development requires extensive construction dewatering (which we view as likely given the current dewatering at the Stadium itself), it is foreseeable that the City will need to obtain a NPDES permit from the Regional Board to discharge dewatered groundwater encountered during construction. While under most circumstances construction dewatering can be covered by a Regional Board issued "General Permit," given the quality of groundwater in the area (specifically the high naturally occurring Total Dissolved Solids (TDS)), it is reasonably foreseeable that the Regional Board may require a Time Schedule Order (TSO) prior to discharge. Prior to approving a TSO, the Regional Board must provide the public the opportunity to review and comment on the approval. See, e.g., Cal. Water Code § 13167.5(a)(4) (providing for notice and comment prior to adoption of any a "time schedule order" pursuant to Water Code § 13300) and an aggrieved party can petition the State Board for review. See Water Code § 13320(a). If the State Board denies review, or a party does not prevail on the merits before the Board, an aggrieved party may file a petition for a writ of mandamus with the Superior Court requesting review of the State Board or Regional Board decision. Water Code § 13330(a).

Timing for the review and processing of a TSO can range significantly based on the nature of the request and Regional Board staff resources. In a relevant example, it took approximately four months after the public notice and nine months after the notice of violation necessitating its issuance for the Regional Board to adopt a TSO for the MVT discharge.<sup>32</sup> In general, a Regional Board can take as few as three months to over a year to process and adopt a TSO. In the event a party challenges an issued TSO via writ of mandamus, like any litigation, proceedings may take a year or more before resolution.

The necessity of a TSO appears to be reasonably foreseeable, and should be analyzed in the EIR because the Regional Board issued Kinder Morgan's MVT facility a TSO in 2011 after

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<sup>32</sup> See Regional Board Time Schedule Order No. R9-2011-0052.

determining that naturally occurring TDS had the reasonable potential to cause a violation the water quality objectives established in the Water Quality Control Plan for the San Diego Basin.<sup>33</sup>

## 6. Hazardous materials from demolition

The existing stadium was built in 1967 and, therefore, its demolition could result in the disturbance and transportation of hazardous materials, including asbestos, which must be fully analyzed in the EIR. A complete analysis of the presence of hazardous materials in the existing stadium must be provided.

## 7. Ongoing Litigation Involving the Kinder Morgan Contamination

The City of San Diego is involved with ongoing litigation involving the Kinder Morgan Contamination, which must be thoroughly discussed and analyzed in the EIR.<sup>34</sup> – The City alleged that Kinder Morgan’s slow progress in remediation and abatement entitled the City to damages under a variety of claims. The City additionally alleged that Kinder Morgan had continued to contaminate the site and had permitted additional leaks and discharge of chemicals.

### K. Hydrology

The property is located within the 100-year floodplain. Impacts related to flooding should be evaluated in the EIR. Will flood control infrastructure be required to protect the site from flooding, and if so, what are the implications for other issues areas (biological resources, visual resources, etc.)? (See attached FEMA map.)

### L. Biological Resources

Take of species listed under the federal Endangered Species Act as threatened or endangered is only authorized if the person first receives an incidental take permit from the USFWS, either through the Section 7 consultation process (if another federal agency has discretionary authority over the project) or the Section 10 process (requiring approval of a Habitat Conservation Plan).

Construction and demolition activities for the project may disturb habitat along the San Diego River. Based on a U.S. Fish and Wildlife Service (USFWS) online database search, a project near the Qualcomm site and related portion of the San Diego River has the potential to impact over 50 species managed or regulated by the USFWS, including endangered species such as the Coastal California Gnatcatcher, Least Bell’s Vireo, Southwestern Willow Flycatcher and Western Snowy Plover.<sup>35</sup>

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<sup>33</sup> See *id.*

<sup>34</sup> See *City of San Diego v. Kinder Morgan Energy Partners* (District Court Case No. 07-CV-1883 W) (Court of Appeals Docket #13-55297).

<sup>35</sup> See attached results from the USFWS database search, available at

Under Fish and Game Code § 1600 *et seq.*, a Lake and Streambed Alteration Agreement is required if an activity may substantially adversely affect existing fish or wildlife resources and the activity will: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake.

Section 2081 of the Fish and Game Code allows the California Department of Fish and Wildlife (CDFW) to issue incidental take permits for species listed under the California Endangered Species Act. For species listed under both the federal and state Endangered Species Acts, CDFW may issue a consistency determination under Section 2080.1.

Here, CDFW's authority is generally similar to, but broader than, the USFWS' and Army Corps' authority under statutes described above. Therefore, if the project impacts to the San Diego River or endangered species would require federal approval, then CDFW approval would also be triggered. Even if federal approval is not required, it is possible that impacts to state-listed species or waters of the state could obligate the need for CDFW approval.

#### **M. Greenhouse Gases**

The project's construction and operations would result in new GHG emissions that need to be evaluated for significance. GHG emissions, including those generated by the new trips to and from stadium events, need to be evaluated for significance. GHG emissions from construction need to be evaluated for significance as well.

The Project would generate both direct and indirect GHG emissions via the following emissions sources, including:

1. Construction: Emissions associated with dust control (water), construction debris disposal, and construction-related equipment and vehicular activity;
2. Transportation: Emissions associated with Project-generated vehicular operations;
3. Building Operations: Emissions associated with space heating and cooling, water heating, and lighting;
4. Water: Emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and
5. Solid Waste: Emissions associated with waste streams (embodied energy of materials), trips, energy use, water use, construction.

The proposed project would generate and contribute to cumulative increases in sources of GHGs.

#### **N. Geology and Soils**

A detailed analysis of whether the project would expose people or structures to substantial adverse effects including death as a result of seismic related ground failure, including liquefaction, should be analyzed in the EIR, including considering the following.

San Diego's Seismic Safety Study indicates that there is a high potential for liquefaction at the property. This means that the property is at a moderate to high risk of hazard.<sup>36</sup>

The Seismic Safety Study also outlines the required geotechnical studies for different categories of development. A stadium would fall into Group 3, which includes "places normally attracting large concentrations of people." Based on the hazard category, relative risk, and building type, a stadium project would have to conduct a soil investigation and a geologic investigation prior to receiving planning and development permit approval.<sup>37</sup>

The Seismic Safety Study concludes that developments will require a geotechnical investigation prior to development. All buildings within the high potential liquefaction area require the completion of a geotechnical investigation prior to receiving building permit approval.<sup>38</sup>

#### **O. Land Use**

The project must be evaluated for consistency with land use regulations, under CEQA. The zoning code for the current zone in which the stadium is located, MVPD-MV-CV, states that "no building or improvement, or portion thereof, shall be erected, constructed, converted, established, altered or enlarged, nor shall any premises be used except for one or more of the uses listed for applicable zones in Table 1514-03J." (SDMC § 1514.0305(b).) In turn, Table 1514-03J does not list "stadium" or any use that could be construed as permitting a stadium. While Table 131-05B indicates that stadiums are permitted in the CV zone, Section 131.0520 states that the uses permitted under Section 131-05B "may be further limited by... (3) The presence of environmentally sensitive lands, pursuant to Chapter 14, Article 3, Division 1 (Environmentally Sensitive Lands Regulations); or (4) Any other applicable provision of the San Diego Municipal Code." The property is both located within environmentally sensitive land (floodplain) and in a zone (MVPDMC- CV) that limits further uses otherwise permitted in the CV zone. Stadiums are not permitted in floodplains.

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<sup>36</sup> San Diego Seismic Safety Study Map, Grid Tiles 21 and 26.

<sup>37</sup> San Diego Seismic Safety Study Map, Sheet 2.

<sup>38</sup> San Diego Seismic Safety Study Map, Sheet 3.

As discussed below, the project may require a consistency determination by the San Diego County Regional Airport Authority. Further, the Project could impact on San Diego River Park Master Plan ([http://www.sandiego.gov/planning/programs/parkplanning/pdf/sdriverparkpdf/sdrp\\_master\\_plan\\_full.pdf](http://www.sandiego.gov/planning/programs/parkplanning/pdf/sdriverparkpdf/sdrp_master_plan_full.pdf)), which should be analyzed in the EIR.

#### **IV. A REASONABLE RANGE OF ALTERNATIVES MUST BE ANALYZED**

A reasonable range of alternatives must be addressed. Besides the no project alternative, these could potentially include a downtown stadium such as JMI Realty's proposed joint stadium/convention center east of Petco Park (<http://www.sandiego.gov/real-estate-assets/pdf/stadium/jmifacilitystudy2014.pdf>.) The range should also include remodeling/refurbishing the existing stadium instead of building a new stadium. This would reduce construction impacts and keep the stadium in the center of property to reduce impacts on surrounding sensitive receptors. This would require a temporary location for the Chargers to play while the existing stadium is demolished and a new stadium is constructed at the same location. It would also have reduced impacts on ongoing remediation efforts. The alternatives should include a reduced stadium size, or a stadium for a soccer team in lieu of a football stadium. The City should evaluate a domed stadium option to reduce noise impacts. The City must also evaluate reasonably foreseeable permutations of the Mixed-Use Development. Because the NOP does not identify where the stadium would be located, the EIR should fully analyze impacts associated with locating the stadium on different possible areas of the property. And the EIR must examine the possibility of a large parking structure to accommodate the stadium parking requirements.

Finally, while preservation of the historic stadium would be ideal, alternatives could include creation of a public park and expansion of San Diego River Park. (<http://www.voiceofsandiego.org/topics/opinion/mission-valley-needs-more-of-what-it-doesnt-have-no-more-of-what-it-does/>.)

#### **V. ADDITIONAL GOVERNMENTAL APPROVALS WOULD BE NECESSARY**

Based on a preliminary assessment, it is reasonable to assume that discretionary approvals may be required from one or more of the following responsible agencies that may have approval authority over the stadium, which must be analyzed in the EIR.

*County of San Diego* – CEQA applies to “[a]ctivities financed in whole or in part by a governmental agency.” (CEQA Guidelines § 15002(b).) A governmental bond offering that helps fund a specific development project that will change the physical environment constitutes a “project” under CEQA because it is “[a]n activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.” Pub. Res. Code § 21065(b); CEQA Guidelines § 15378(a)(2).

Where the Legislature has intended to exempt certain bond financing from CEQA, it has

expressly done so. Here, because the County of San Diego bond offering would result in governmental funding of the stadium project, and the stadium would result in changes to the physical environment, the bond offering constitutes a project under CEQA, obligating the need for environmental review.

Because the County bond offering would help fund the stadium project, the County must satisfy CEQA before issuing the bonds. If the City EIR does not fully describe the project (such as by failing to include the reasonably foreseeable Mixed-Use Development), then the County would be obligated to complete its own CEQA review prior to the bond offering.

*Regional Water Quality Control Board* – To approve site contamination or water discharge measures. If a Clean Water Act Section 404 permit is required, the Regional Board would need to issue a Section 401 certification. The Regional Board or State Water Resources Control Board must issue a Section 401 certification if a Section 404 permit is required under the Clean Water Act.

*San Diego Air Pollution Control District* – Operation of the proposed stadium may trigger the need for SDAPCD permits for stationary sources onsite, such as emergency diesel generators. The SDAPCD does not publicly list what permits are held by Qualcomm Stadium. However, other stadium facilities in southern California require permits for emergency diesel generators, charbroiling facilities and air conditioning units. In addition, demolition of the current stadium may require obtaining pre-approval for an asbestos removal plan. (See SDAPCD Rules 361.145, 361.150.)

*San Diego County Regional Airport Authority*-- According to the Montgomery Field Airport Land Use Compatibility Plan map, the Qualcomm Stadium site is within the Montgomery Field Airport Influence Area, Review Area 2. The San Diego Municipal Code § 132.1550(c)(4) requires: “Prior to approval of development within the Airport Land Use Compatibility Overlay Zone, the applicant shall obtain a consistency determination from the SDCRAA for the following types of development: . . . (4) Development that includes a rezone or approval of a land use plan.” Here, the stadium proposal and/or the adjacent development project may require a General Plan or zoning amendment, potentially triggering the need for a consistency review.

According to the Montgomery Field Airport Land Use Compatibility Plan, Section 2.6.2(a)(2), development within Review Area 2 requires a consistency review in the following cases: (1) Any object which has received a final notice of determination from the FAA that the project will constitute a hazard or obstruction to air navigation, to the extent applicable. (2) Any proposed object in an area of terrain penetration to airspace surfaces which has a height greater than 35 feet above ground level. (3) Any project having the potential to create electrical or visual hazards to aircraft in flight, including: electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright lights (including laser lights) in the eyes of pilots or aircraft using the Airport; certain colors of neon lights- especially red and white- that can interfere with night vision goggles; and impaired

visibility near the Airport. The local agency should coordinate with the airport operator in making this determination. (4) Any project having the potential to cause an increase in the attraction of birds or other wildlife that can be hazardous to aircraft operations in the vicinity of the Airport. The local agency should coordinate with the airport operator in making this decision.

If the San Diego Regional Airport Authority determines that the development is inconsistent with the airport land use plan, the project would have to be revised to ensure consistency or the City of San Diego could overrule the Regional Airport Authority after holding two public hearings and making certain findings. *See* San Diego Municipal Code § 132.1555. Notification to the Federal Aviation Administration is also required if the stadium would include heights over 200 feet above ground level.

*U.S. Army Corps of Engineers* – Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates the discharge of dredged or fill material into waters of the United States, including wetlands. On May 27, 2015, the Environmental Protection Agency and Army Corps co-released the final version of a rule clarifying what constitutes waters of the United States, including tributaries, adjacent waters, wetlands and other waters with a significant nexus to waters of the United States. Here, if the stadium proposal and/or the adjacent development project would directly or indirectly result in fill of the San Diego River, a Section 404 permit may be required. If an individual permit is required, NEPA would be triggered.

*U.S. Fish and Wildlife Service* – Take of species listed under the federal Endangered Species Act as threatened or endangered is only authorized if the person first receives an incidental take permit from the USFWS, either through the Section 7 consultation process (if another federal agency has discretionary authority over the project) or the Section 10 process (requiring approval of a Habitat Conservation Plan). Based on a USFWS online database search, a project near the Qualcomm site and related portion of the San Diego River has the potential to impact over 50 resources managed or regulated by the USFWS, including endangered species such as the Coastal California Gnatcatcher, Least Bell's Vireo, Southwestern Willow Flycatcher and Western Snowy Plover. *See* <http://ecos.fws.gov/ipac/project/VTOJ7C5JHRCLBCXGHKSWRKOTHM/overview>. Here, given the presence of listed species in the general project area, it is reasonable to conclude that the stadium project and/or adjacent development have some potential to impact listed species, in which case, approval from the USFWS would be required.

*California Department of Fish and Wildlife (CDFW)* – Under Fish and Game Code § 1600 *et seq.*, a Lake and Streambed Alteration Agreement is required if an activity may substantially adversely affect existing fish or wildlife resources and the activity will: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Section 2081 of the Fish and Game Code allows CDFW to issue incidental take permits under certain circumstances for species listed under the California Endangered Species Act. For species listed under both the federal and state Endangered Species Acts, CDFW may issue a consistency determination under

Section 2080.1. Here, CDFW's authority is generally similar to, but broader than, the USFWS' and Army Corps' authority under statutes described above. Therefore, if project impacts to the San Diego River or endangered species would require federal approval, then CDFW approval would also be triggered. Even if federal approval is not required, it is possible that impacts to state-listed species or waters of the state could obligate the need for CDFW approval.

*National Historic Preservation Act* – Where federal discretionary agency approval is required, the federal agency must satisfy the Section 106 consultation process under the National Historic Preservation Act.

## **VI. ADEQUATE TIME FOR PUBLIC REVIEW AND COMMUNITY ENGAGEMENT MUST BE PROVIDED.**

Given the complexity of demolishing the existing stadium, constructing a new stadium and planning for a potential future Mixed Use Development, the City should give the public more than the minimum period of public review and comment on the Draft EIR. The minimum period will not allow adequate time to review all the technical information and, if necessary, to prepare different analyzes for the City to consider.

Given the high number of sensitive receptors that will be affected by this project, and the potential for communities with a high pollution burden to be impacted, the City should complete additional scoping meetings and EIR workshops to facilitate community outreach and awareness. Given the high percentage of Spanish speakers in San Diego, all materials must be made available in Spanish as well as English.

## **CONCLUSION**

We strongly urge you to conduct adequate environmental review pursuant to CEQA before making any decisions that profoundly affect the future of Mission Valley. The Supreme Court's admonition regarding adequate environmental review must be heeded:

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. (*Laurel Heights I, supra*, 47 Cal.3d at pp. 391–392, 253 Cal.Rptr. 426, 764 P.2d 278.) For the EIR to serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made.

*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449-50. Before the City decides to move forward with a football stadium in Mission Valley, it should develop a full understanding of the environmental consequences of

Martha Blake, Senior Planner  
City of San Diego Development Services Center  
July 20, 2015  
Page 34

such a decision, examine potential alternatives that could avoid the negative consequences, and ensure that those consequences are taken into account in any decisions made.

We reserve the right to provide further comments. We believe that the NOP should be reissued given the paucity of information provided for in the original NOP. We hereby request notice of all further proceedings pursuant to Public Resources Code section 21092.2.

Thank you for your attention and consideration.

Sincerely,

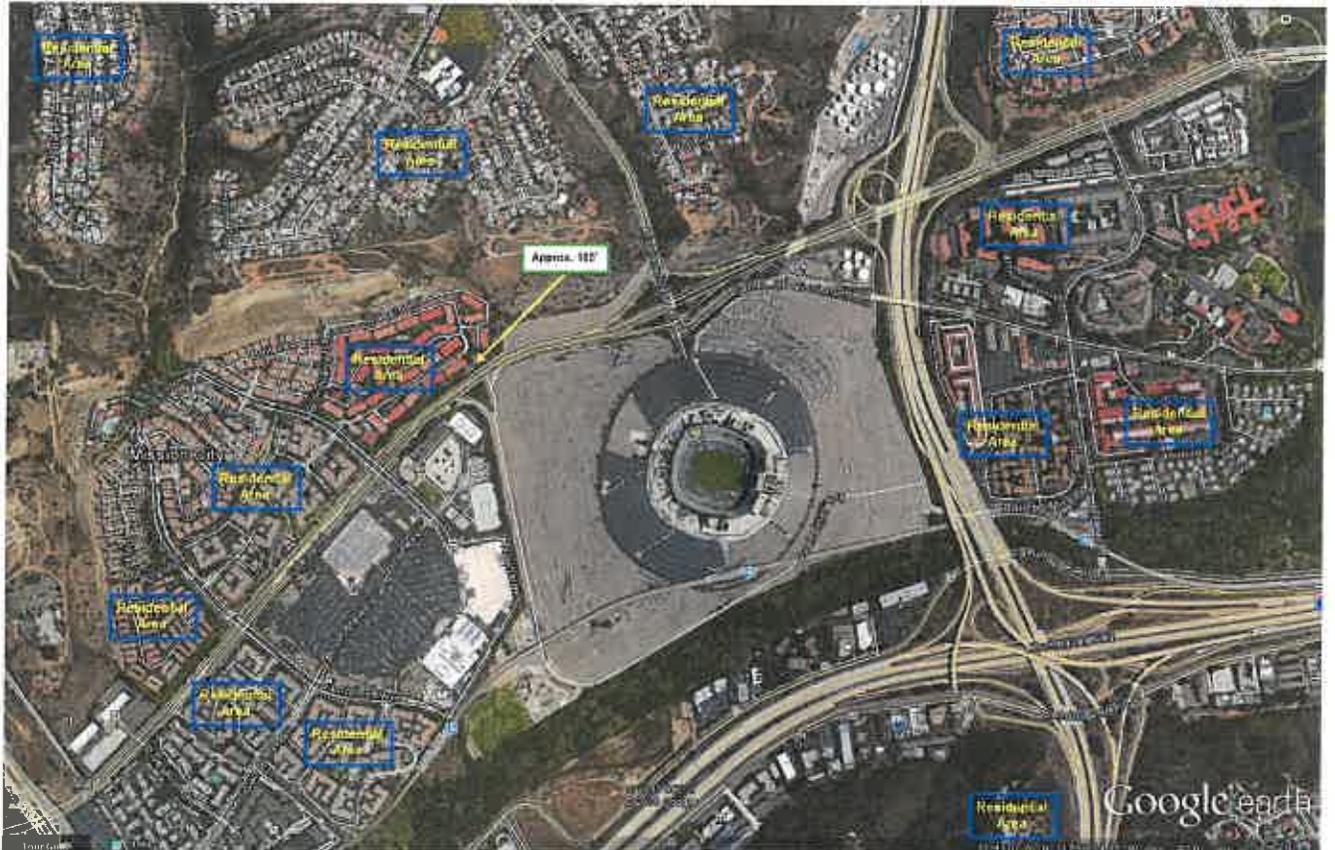
A handwritten signature in black ink, appearing to read "Douglas Carstens", with a long horizontal flourish extending to the right.

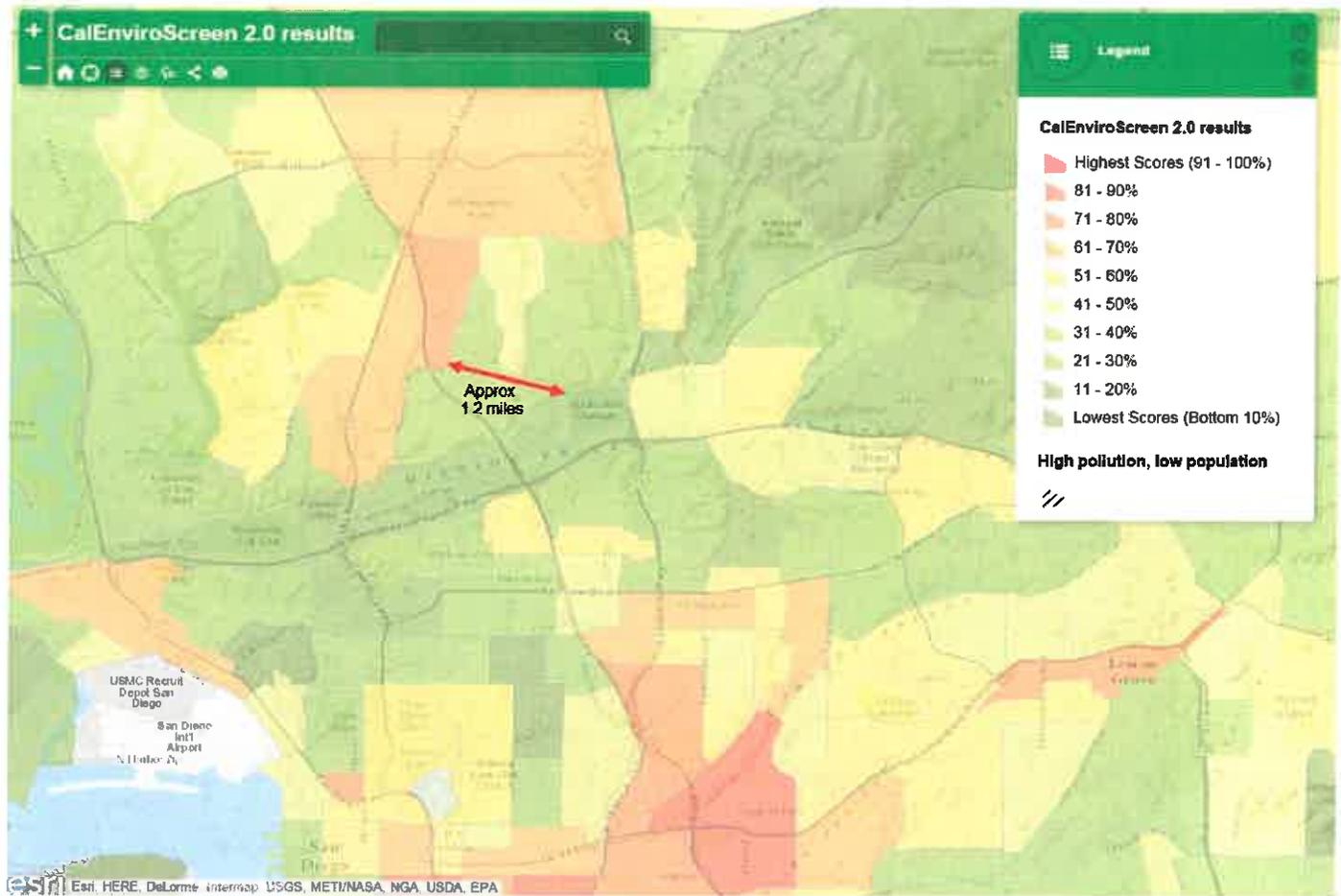
Douglas Carstens

Enclosures

Exhibit A

Potentially Disproportionately Burdened Communities





**CalEnviroScreen 2.0**

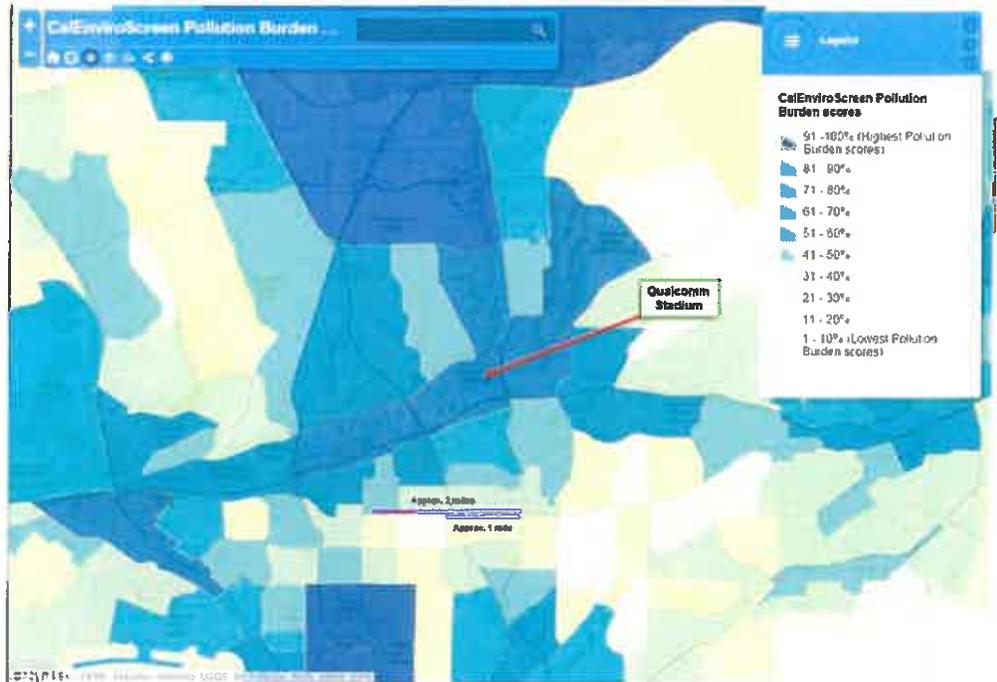
**CalEnviroScreen 2.0  
 Pollution Burden Scores**

Overall CalEnviroScreen scores are calculated from the scores for two broad groups of indicators: Pollution Burden and Population Characteristics. This map shows *only* the combined Pollution Burden scores. The 12 indicators that make up the Pollution Burden are:

- Air Quality: Ozone
- Air Quality: Fine Particles (PM2.5)
- Diesel Particulate Emissions
- Drinking Water Contaminants
- Pesticide Use
- Tank Releases from Facilities
- Traffic Density
- Cleanup Sites
- Groundwater Threats
- Hazardous Waste Sites and Facilities
- Impaired Water Bodies
- Solid Waste Sites and Facilities

These indicators are described in detail in the [CalEnviroScreen report](#).

To explore the map, zoom to a location or type an address in the search bar.



**CalEnviroScreen 2.0**

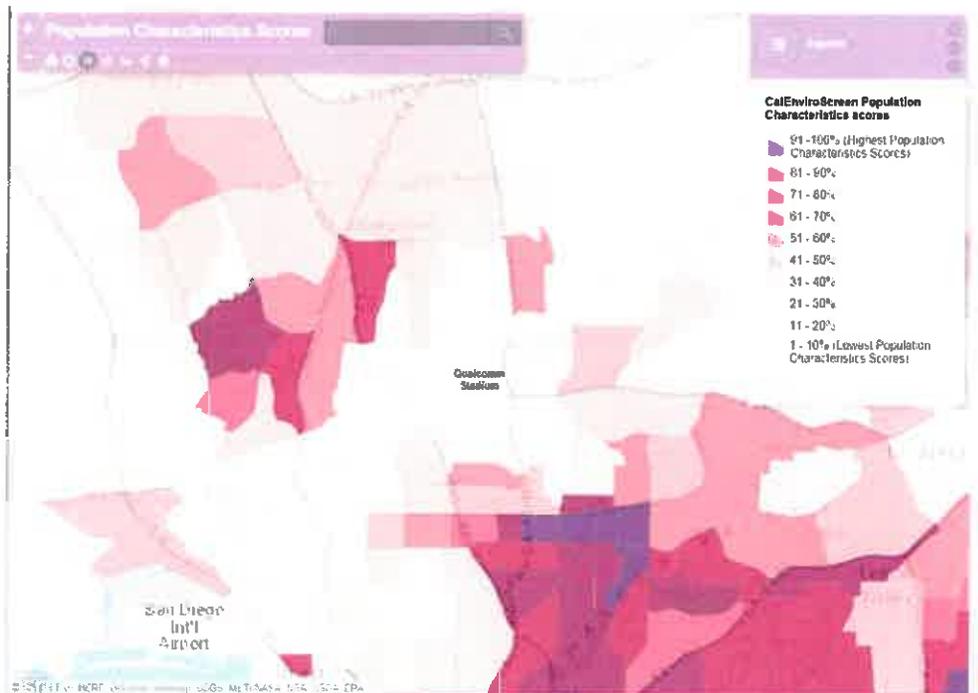
**CalEnviroScreen 2.0  
 Population Characteristics Scores**

Overall CalEnviroScreen scores are calculated from the scores for two broad groups of indicators: Pollution Burden and Population Characteristics. This map shows *only* the combined Population Characteristics scores. The seven indicators that make up the Pollution Burden are:

- Age (Children and Elderly)
- Asthma Emergency Department Visits
- Low Birth Weight Infants
- Low Educational Attainment
- Linguistic Isolation
- Poverty
- Unemployment

These indicators are described in detail in the [CalEnviroScreen report](#).

To explore the map, zoom to a location or type an address in the search bar.





# CSAG

CITIZENS' STADIUM  
ADVISORY GROUP

## Site Selection and Financing Plan for a New Multi-Use Stadium in San Diego

May 18, 2015



# **CSAG** CITIZENS' STADIUM ADVISORY GROUP

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May 18, 2015

The Honorable Kevin L. Faulconer  
Mayor, City of San Diego  
202 C Street  
San Diego, CA 92101

Dear Mayor Faulconer:

It is our honor to submit our report entitled, "Site Selection & Financing Plan for a New Multi-Use Stadium in San Diego."

On January 30, 2015, you announced the creation of the Citizens' Stadium Advisory Group (CSAG). You directed us to do two things: Select one of two proposed sites, and develop a fair and workable financing plan for a new multi-use stadium in San Diego.

Faced with this unprecedented task and pressure from competing stadium dynamics in Los Angeles, CSAG has successfully met its goals. We did so in 108 days, or four months before our original deadline.

We worked collaboratively with all stakeholders, reviewed an enormous amount of data from the past 12 years, hosted a public forum, interviewed dozens of industry experts and civic leaders and maintained an objective and independent eye toward solving one of the region's largest public policy issues. As a result of our collaboration, we are pleased to present our plan as a blueprint for initiating negotiations with the San Diego Chargers.

The attached report answers the two issues you asked us to resolve. A path to a new state-of-the-art stadium now exists in San Diego. We propose a stadium that is modern and efficient, occupying a smaller footprint than the existing stadium, and creating new opportunities and experiences for San Diegans and tourists. We selected the site that works financially for all parties involved. It meets the time constraints presented by the Chargers, and gives the City an opportunity to create an iconic place showcasing a restored and enhanced San Diego River Park and a new walkable entertainment and residential village linked to mass transit that is the new paradigm for smart urban planning and design.

Along with presenting this exciting vision, our plan spells out a list of important recommendations we believe are needed to complete the work we have started. It also addresses the concerns we have heard from the Chargers and the NFL, and reflects the dynamics of San Diego. The most important element – the financing plan – reflects a balanced and shared approach that works for the team, the City, the County and taxpayers. It also ensures a new level of financial competitiveness for the franchise without unduly burdening taxpayers.

Your leadership and our work created momentum that Chargers' fans have built upon. We believe San Diego's mega-region, home to more than 10 million people, is ready to support a new multi-use stadium where the Chargers can thrive, and San Diegans can enjoy a wide range of entertainment and event activities as suggested in our report.

# **CSAG** CITIZENS' STADIUM ADVISORY GROUP

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Thank you for selecting us to serve you in addressing this critical civic matter. We wish you, the City Council, the County of San Diego, and the broader mega-region, the best of luck as you embark on the next phase of this effort. We stand ready to provide further assistance if needed.

Sincerely,



**Adam Day**  
Chairman



**Doug Barnhart**



**Rod Dammeyer**



**Walt Ekard**



**Aimee Faucett**



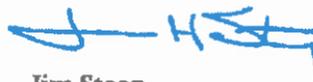
**Jason Hughes**  
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**Mary Lydon**



**Jessie Knight**



**Jim Steeg**

# **CSAG** CITIZENS' STADIUM ADVISORY GROUP

## Site Selection and Financing Plan for a New Multi-Use Stadium in San Diego



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# Executive Summary

San Diego Mayor Kevin L. Faulconer announced the formation of the Citizens' Stadium Advisory Group (CSAG) on January 30, 2015, to chart a workable path to building a new multi-use stadium in San Diego that protects taxpayers and creates a win-win solution for the Chargers and San Diego. The committee is composed of nine civic leaders with experience developing large-scale projects and financing plans.

## CSAG's Plan at a Glance:

- No tax increases.
- No increases to the City's General Fund.
- Does not rely on development to pay for the stadium, parking or stadium-related infrastructure.

## Mayor Faulconer asked the committee to do two things:

1. Select the existing Mission Valley site or the Downtown site for a new multi-use stadium.
2. Develop a financing plan to pay for the facility.

"It's time for us, as a community, to come together to decide the future of the Chargers in San Diego," Mayor Faulconer said at the time. "This independent group will give San Diegans the first real plan. These expert volunteers will explore all possibilities to finance the project, with the clear direction from me that it must be a good and fair deal for San Diego taxpayers."<sup>1</sup>

CSAG completed its work in 108 days, or four months before its original deadline, and two days ahead of the accelerated deadline the committee agreed to early in the process.

CSAG concluded a new multi-use stadium in Mission Valley is the most viable option, and would cost approximately \$1.1 billion, excluding land. To pay for the facility, CSAG outlines revenue streams that exceed \$1.4 billion without increasing taxes.

CSAG's plan lays out a clear and workable path to a new multi-use stadium in San Diego that is fair for everyone, including taxpayers.

In addition to breaking down costs and funding sources, this report explains how the Chargers, the City and County would recoup its investments.

CSAG's financing plan is the first of its kind in San Diego and represents an important break from the past. After years of little progress, due to the collapse of the real estate market, the Great Recession and other issues, CSAG's plan should immediately jump-start negotiations. The City, the County and the Chargers will need to work together to fill in the framework CSAG created.

When the Chargers met with CSAG this past February, the team outlined what it called "guiding principles" that CSAG's financing plan should meet.<sup>2</sup> The committee had made these assumptions prior to meeting with the Chargers and is confident its plan:

- Avoids a two-thirds vote of the electorate (because it does not include a tax increase).
- Will gain the support of the Mayor and a strong majority of the City Council.
- Recognizes the economic realities of our local marketplace and the NFL.
- Does not require "perfectly controlled laboratory conditions" to succeed.

The mega-region San Diego anchors includes more than 10 million people, many of whom have decided keeping the Chargers is a priority. This report should signal to the team that it is time to focus on remaining in San Diego.

For many reasons, including a commitment by the City and County to work with the team to resolve this issue, more progress has been made in the last 4 months than the last 12 years, when the Chargers first introduced plans for a new stadium.

**For the first time in a long time, a fair and workable plan is on the table, one that provides the Chargers with a clear path to remain in San Diego, which is what the team has repeatedly said it wants.**

Based on its research, experience, and meetings with numerous stadium builders and architects, the Citizens' Stadium Advisory Group has concluded a new multi-use stadium at the team's existing Mission Valley location would cost approximately \$1.3 billion including land. This estimate includes:

- \$950 million for the stadium.
- \$204 million for structured parking and stadium-related infrastructure.
- \$180 million (the value of 60 acres of land from the City).

The cost drops to \$1.1 billion when the land value is backed out, and is based on construction starting no later than 2018.

To pay for the proposed stadium, parking, stadium-related infrastructure and operations and maintenance, CSAG's financing plan includes 60 acres of land from the City of San Diego valued at \$180 million, and more than a dozen funding sources that exceed \$1.4 billion, including:

- \$300 million from the Chargers
- \$173 million in bondable construction capital from the team's rent.
- \$200 million from the NFL.
- \$121 million from the County of San Diego.
- \$121 million from the City of San Diego.
- \$225 million from the sale of 75 acres of land.
- More than \$100 million from fans, who would contribute through the purchase of Personal Seat Licenses (PSLs), and ticket and parking surcharges.

**CSAG's financing plan does not rely on tax revenues from development to pay for the stadium, structured parking or stadium-related infrastructure. Moreover, it does not include any new City general fund dollars.**

In addition to the stadium, structured parking and stadium-related infrastructure, CSAG's report outlines \$100 million in estimated future infrastructure costs that would be necessary for the housing, shops, restaurants, and related development that could be built near the stadium. To cover these costs, CSAG recommends revenue streams that include \$116 million from an Enhanced Infrastructure Financing District (EIFD), and \$40 million from Transient Occupancy Tax (TOT) gained from the construction of a new hotel.

CSAG recommends the following for the existing 166-acre Mission Valley site:

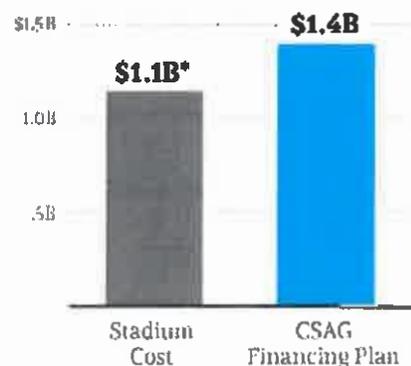
- 60 acres of City-owned land be used for the new stadium, parking and a fan plaza.
- 31 acres be carved out to expand a restored and enhanced San Diego River Park.
- 75 acres be sold to a developer.

CSAG recommends the tax revenue from the 75-acre development should pay for community benefits (including parks, additional parking, road and transit upgrades), and to help the City and County recoup its capital costs.

Under CSAG's stadium proposal, the Chargers would earn many millions of dollars more a year, and the City and the County also stand to benefit.

It has been an honor for CSAG to have played a role in jump-starting this process. The committee looks forward to a successful outcome that keeps the Chargers in San Diego, playing NFL football in a new state-of-the-art multi-use stadium that also hosts San Diego State University, the Holiday and Poinsettia Bowls, and numerous events that benefit our mega-region.

**CSAG's financing plan exceeds anticipated costs:**



\*Not including land from the City valued at \$180 million.

# Summary of CSAG's Work

Building a fair and workable financing plan to serve as the blueprint for negotiations began with research, and it was research that drove CSAG's decisions.



In less than four months, CSAG met with Chargers' representatives, NFL executives, fan groups (including Save Our Bolts, Bolt Pride, and the San Diego Stadium Coalition), Chargers alumni, and other stakeholders, including representatives with the County of San Diego, San Diego State University, and the San Diego Bowl Game Association.

The committee also met with labor groups and developers, as well as stadium architects, including New York-based MEIS and Dallas-based HKS Architects.

At CSAG's request, MEIS designed artist renderings of a new multi-use stadium in Mission Valley.

Stadium design veteran Dan Meis, FAIA, is the Founder and Managing Principal at MEIS. He was the lead designer for the Staples Center in Los Angeles and two existing NFL stadiums – Paul Brown Stadium in Cincinnati and Lincoln Financial Field in Philadelphia. MEIS currently is working on renovations at Paul Brown Stadium and designing a new 60,000-seat soccer stadium in Rome, Italy called "Stadio Della Roma" that includes a mixed-use entertainment village similar to "LA Live" at Staples Center.

HKS Architects designed AT&T Stadium in Dallas and Lucas Oil Stadium in Indianapolis. HKS also is designing the stadium under construction in Minneapolis, Minnesota for the Vikings, as well as the proposed NFL stadium planned for Inglewood, California.

CSAG also consulted with Clark Construction Group, one of three companies that built Petco Park, home of the San Diego Padres; AECOM, which designed numerous sports stadiums, including CenturyLink Field, home to the Seattle Seahawks; Turner Construction Company, which constructed Levi's Stadium, home to the San Francisco 49ers; and numerous investors interested in financing a new stadium in San Diego.

CSAG was self-funded. It received no contributions from outside the nine-member group and no funding from the City of San Diego. It paid for all of its expenses, including a public forum it hosted, and for the services of a communications professional. The committee did receive a tremendous amount of support and information, including new plans and designs, from San Diego's business community, which was instrumental to CSAG's work.

The City Attorney was the only individual who declined an invitation to meet privately with the committee, and recommended that CSAG not meet with the consultants the City and County retained to vet CSAG's financial report.

# Site Selection

Given the accelerated timeline the NFL and the Chargers established, the Mission Valley site emerged as the only option that leads to a ribbon cutting ceremony at a new stadium before the end of the decade.

The path to a new multi-use venue in San Diego exists largely because of Mission Valley.

## Mission Valley

The current Mission Valley site, home to Qualcomm Stadium, holds a great deal of appeal from a financial standpoint due to the fact that the City and the City's Water Department own the land.

The land, which is already zoned for a stadium, fast tracks the region's ability to retain the Chargers, with estimates the site could be shovel-ready by 2017 and built within 30 to 36 months.

The proposed stadium CSAG recommends includes a modern and efficient design and a smaller footprint than the existing stadium, and the area around it has tremendous potential.

It includes plans to restore and enhance the San Diego River Park. Improvements could include opening the river to walking and biking paths, transforming a grossly underutilized Mission Valley site into an iconic destination recognized around the world.

With an existing trolley stop at the stadium, the site is transit-friendly and offers better parking and tailgating opportunities than the Downtown location CSAG analyzed. It is two trolley stops away from San Diego State University, creating strong partnership opportunities with a university that hosts its football games at Qualcomm Stadium.

With 166 acres, the Mission Valley site is expected to become a year-round destination for fans, residents and tourists that could include a sports museum, an entertainment district, a river park, and other attractions people want to visit. There also is room to grow because the City owns 45 adjacent acres.

The site is expected to generate tax revenues to pay for public facilities that provide community benefits including, but not limited to, parking and transit facilities, parks and infrastructure upgrades. The revenues also would generate income for the City and County to help recoup its capital investments.

It is estimated the development would include a hotel, meaning TOT funds would be available.

Once all phases are complete, the developed property, excluding the stadium, could be worth \$3 to \$4 billion based on CSAG's research.



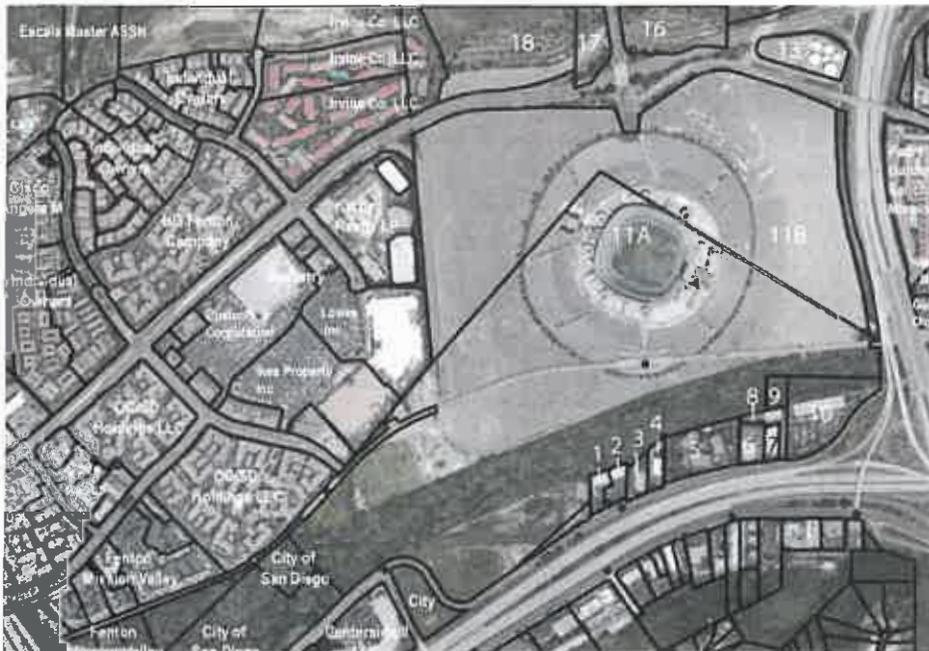
A proposed San Diego River Park sketch drafted by Rick Engineering.

## Support for Mission Valley

The potential of the existing Mission Valley location has not been lost on the Chargers. Over the years, the team has aggressively campaigned for the site.

“Redeveloping the site makes a lot of sense,” the Chargers wrote in 2003. “The site can be transformed from an empty parking lot into a unique and vibrant new community that rivals the best in the world.” The team added: “One hundred acres of asphalt surrounds Qualcomm stadium. For 350 days a year, this parking lot remains largely unused. The Chargers’ concept turns it into a vibrant village with parks, condominiums and shops. Putting homes on transportation corridors is a top priority for this region. The Chargers’ concept embraces that notion and envisions affordable and market rate homes with an easy walk to the trolley station, which, by the way, is built specifically to handle the large crowds generated by a stadium.”

In October 2013, U-T San Diego columnist Nick Canepa wrote: “The drawing board for a new stadium in Mission Valley never was taken down. So the Chargers are going back to it.”<sup>3</sup>



*The Mission Valley site is home to Qualcomm Stadium.*

The Chargers are quoted in Mr. Canepa’s column as saying: “The Qualcomm site drawing board always was there. Now that the economic and housing issues have improved, redeveloping the Qualcomm site is something we’re discussing with our development partner (Colony Capital) as something of interest. A major international company, which I can’t name now, also is interested in partnering with us for stadium naming rights. The site is perfect for private development, for building an urban village.”<sup>4</sup>

This past February, when the Chargers met with the CSAG, the team described its site preference as “agnostic” and said it would be happy with a workable plan for either Mission Valley or Downtown.

**In an interview last month, the Chargers said: “If you can finance the stadium in a way that is acceptable to the public and the Chargers, then it doesn’t matter where it is. People are going to come to the games, no matter where they are.”<sup>5</sup>**

CSAG agrees financing a new multi-use stadium plays the most important role in the reality of its implementation, and Mission Valley is a key driver behind the fair and workable financing plan CSAG developed.

## Downtown

If one were to move the proposed Mission Valley stadium Downtown, where the City does not own any land for a stadium, it would increase hard costs by at least a quarter billion dollars. The City would have to buy multiple parcels of land and pay to relocate and clean a large bus yard, a process expected to take up to 7 years.

**CSAG recognizes Downtown, at first glance, is an appealing location for a new stadium, but a close examination of the site reveals numerous problems that make it unworkable.**

Multiple parcels would have to be purchased, which could lead to eminent domain issues and years of litigation, on top of uncertain real estate costs.

“It’s hard to assemble even 20 acres downtown...and the land east of Petco is both expensive and already occupied,” the Chargers said in 2009.<sup>6</sup>

Relocating the Metropolitan Transit System’s (MTS) bus yard is one of the difficult and expensive steps that would be required to try and piece together enough land for a Downtown stadium. In a February 2015 letter to CSAG Chairman Adam Day, MTS CEO Paul Jablonski said the relocation would take five to seven years and cost up to \$150 million.<sup>7</sup>

For CSAG, the Downtown plan eventually became a non-starter because it relies on a tax increase of at least \$600 million<sup>8</sup> that would require support from two-thirds of the voters.

Numerous polls have shown San Diego voters would soundly reject such a tax increase.<sup>9</sup> The Chargers have proposed the City sell the Qualcomm and Sport Arena sites to a developer in order to raise money to purchase land Downtown.<sup>10</sup> The selloff would require a public vote, the outcome of which is far from certain.

Additionally, a SurveyUSA poll taken in January 2015 found San Diegans prefer the existing Mission Valley site over Downtown by a margin greater than 2 to 1.<sup>11</sup>

Other problems regarding the Downtown site include: lack of developable land; extremely limited tailgating options; issues with nearby residents; and complications surrounding the purchase of Tailgate Park land from the California Department of Finance.

In April 2014, the Chargers were quoted extensively in a U-T San Diego story about the team’s renewed optimism for a stadium at either location—Mission Valley or Downtown...

That story is headlined: “Chargers eye 2016 ballot measure,”<sup>12</sup> and was published months after Rams owner Stan Kroenke purchased land for his proposed stadium in Los Angeles. The article says “a working scenario would see a roughly \$1 billion stadium proposal go before voters in the November 2016 Presidential General Election. The Spanos family and investment partners would put up roughly \$400 million and seek a \$200 million loan from the NFL.”<sup>13</sup> The Chargers are quoted as saying: “We hope that our ongoing meetings with the Mayor’s staff will result in another proposal that can work for the city, the Chargers, and ultimately, the voters.”<sup>14</sup>

CSAG told the Chargers and the NFL that if the team was set on Downtown the committee would work to make it happen if the Chargers bought the land needed for a new stadium and extended its lease at Qualcomm Stadium.



# San Diego Stadium Assessment



The Chargers are supported by a fiercely loyal fan base, and the team has an organic reach that is easy to see, especially on gamedays. The Chargers bring San Diegans together.



Against the backdrop of the stadium tug-of-war with Los Angeles, ongoing contract issues with the team's franchise quarterback, one playoff appearance in the last five years, and a 2015 decision by the league to lift TV blackouts, one would not expect an uptick in season ticket sales. But fans are rallying around the Chargers. "Based on new season-ticket sales and season-ticket renewal numbers, we are approximately 4,500 season tickets ahead of last year's pace," the team said in early May.<sup>15</sup>

So why has a stadium solution not surfaced until now? Why is this time different?

The stadium issue in San Diego has been around for more than a decade. The Chargers first introduced a plan for a new stadium 12 years ago, following a letter the team sent to Mayor Dick Murphy in 2002 expressing concerns about its viability in the existing facility. The team's stadium pursuits included several concepts at numerous sites, including Mission Valley and Downtown.

It is not accurate to suggest any one person, group, or issue thwarted the team's efforts. Multiple factors played a role, including the infamous "ticket guarantee" between the City and the Chargers, which cost San Diego taxpayers tens of millions of dollars and was not lifted until the 2004 season. This adversely affected the political climate for a new stadium at City Hall.

City leaders then faced a \$2 billion pension deficit that nearly bankrupted the City.<sup>16</sup> The pension crisis was resolved, but the real estate collapse hit San Diego hard, as did the Great Recession.

## LA Threat Surfaces

In the latter half of 2014, speculation about the Chargers potentially moving to Los Angeles began.<sup>17</sup>

The rumors became reality in February 2015, less than a month after Mayor Faulconer announced the formation of CSAG and his pledge to resolve San Diego's stadium issue. The mayor shared these messages during his first State of the City. At the time, he was in office 10 months.

On February 20<sup>th</sup> of this year, the Chargers announced plans for a joint stadium with the Oakland Raiders in Carson, California. The news came as a surprise to everyone in San Diego.

According to NFL bylaws, any team that wants to relocate needs the support of two-thirds of the league's owners, or 24 of 32 NFL franchises.<sup>18</sup> The owners want to know what has been done to build a new stadium in the existing market, what's being planned, and whether that market can sustain a franchise well into the future.

Faced with multiple proposals by NFL teams interested in moving to Los Angeles, the league formed the "Committee on Los Angeles Opportunities" earlier this year. The committee is made up of six NFL owners tasked with analyzing stadium plans from existing markets and for L.A.

League executives have told CSAG that members of its group and City representatives would likely be invited to present to the Committee on Los Angeles Opportunities this summer.

The Chargers have not filed for relocation with the league, but the team has said it would be forced to do so if either the St. Louis Rams or the Oakland Raiders file for relocation.<sup>19</sup> Rams owner Stan Kroenke is proposing a privately funded stadium in Inglewood, California that would be capable of housing two home teams.

The Chargers have not released the financing plan for Carson but have said the stadium would be privately financed and based primarily on a record number of sales of PSLs. The team also has said its financing plan would remain viable if the Raiders work out a deal to remain in Oakland.<sup>20</sup>

## San Diego Responds

In San Diego, the Chargers met with CSAG in February, and joined an April meeting with members of CSAG and NFL Executive Vice President Eric Grubman. The Chargers also built a website for CSAG and stocked it primarily with public information.

While unsettling to many Chargers' fans, the efforts to bring NFL football back to L.A. galvanized San Diego.

The past became the past, San Diego dug in, and a massive regional effort surfaced. The hashtag #SaveOurBolts became ubiquitous. Rallies were held. Sports talk radio lit up. News coverage of the stadium issue moved from random to constant, and from the sports page to the front page.

**San Diego is engaged, and the timing could not be better. The political will exists to see this project through, and the City and County are on solid financial footing. Those reasons, and others, make this time different.**

Numerous people and organizations deserve credit, including former Chargers and fan groups who represent tens of thousands of people, many of whom have donated time and money to keep the Chargers in San Diego.

The team has been here for 54 years, and CSAG and many others want to ensure the San Diego Chargers are a member of the NFL family indefinitely.

One of CSAG's goals was to present a plan that would improve the Chargers' finances. The team has been open about its struggles to remain competitive teams who earn more money largely because they play in newer stadiums that generate more revenue than Qualcomm Stadium, which was built 48 years ago.



The Chargers have said they want to share in the costs of a new municipally-owned stadium in San Diego. The team, however, does not want the public's share to rely on development because of the time it would take for those revenues to be realized. Mr. Grubman relayed a similar message when he met with CSAG, encouraging the committee to eliminate the risk if its financing plan included mixed-use development.

CSAG agrees there are better and faster approaches to financing a stadium, which is why its plan does not rely on tax revenues from development to pay for the stadium. The committee, however, was careful not to limit potential options while crafting its financing plan. It heard from numerous developers and private investors who want to fund all or part of the Mission Valley project. CSAG referred these requests to the City.

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The landscape in San Diego is essentially risk-free. This is the team's home, and a plan now exists to keep them here – in a world-class region.

“The San Diego region is thriving and growing,” according to an April 11 commentary in U-T San Diego written by members of the Strategic Roundtable, 32 retired executives and longtime San Diego civic leaders. “San Diego has the highest percentage of 18-35 year olds in the United States, and has three strong economic drivers – innovation, military, tourism – that are growing jobs across the county.”

“Chargers fans come to San Diego from the surrounding mega-region, which includes Tijuana (population 3 million), south Orange County (population 3 million) and parts of Riverside (population 2 million). Combined, we draw fans from a population of more than 10 million people. We have an economically sustainable region that will continue to support the NFL, including future Super Bowls, as much as it has for the past 54 years.”<sup>21</sup>

America's 8th largest city, San Diego is home to 1.3 million residents, and San Diego County is home to 3.3 million residents. The County's population grew by 41,000 in 2013; only three other counties across the United States added more residents that year.<sup>22</sup>



# Costs

## How much would the new municipally-owned stadium cost?

In determining the probable cost of a new stadium in Mission Valley, CSAG noted that since 2009 no NFL stadium project has cost less than \$1 billion. CSAG researched the cost of recently constructed stadiums and reviewed the following estimates for stadium construction:

- Two estimates from Clark Construction Group for construction of two Los Angeles stadiums that were not built.
- An estimate from Turner Construction Company for a stadium on the existing Mission Valley site.
- An estimate by CB Urban Development and Rider Levett Bucknall for a stadium on the existing Mission Valley site.<sup>23</sup>
- A stadium-only estimate prepared by Cumming Construction to evaluate the feasibility of a combined Convention Center/Stadium facility.
- The Mission Valley Stadium Private Financing Proposal prepared by the San Diego Stadium Cooperative Coalition.

In evaluating the above information, CSAG had to make adjustments for estimate inclusions and exclusions to determine the most likely probable cost for a new stadium, including parking and related stadium infrastructure costs.

Assuming the stadium will contain approximately 1,650,000 square-feet of gross area and 65,000 seats, with room for 72,000 seats for Super Bowls and College Football Championship Games, the probable cost of a new facility – including land, parking and stadium-related infrastructure – is estimated at \$1.33 billion. With the land backed out, the cost drops to \$1.15 billion and is based on a construction start no later than 2018.

It is worth noting that the six most recent NFL stadiums opened or under construction “would cost an average of \$1.5 billion dollars if constructed in Southern California,” according to a report released in April, 2015 by the National University System for Policy Research.<sup>24</sup> The average includes four extremely high-end stadiums in San

Francisco, Atlanta, New York and Dallas, each of which includes extravagant expenses covered by the team and not the public.

While the probable cost estimate of the proposed stadium in San Diego is lower than the \$1.5 billion average cost of the most recent premium NFL stadiums, a downward adjustment was made since the proposed stadium would be open air as opposed to covered. Additionally, transit facilities and other infrastructure that would be necessary to support a 65,000-seat stadium are already in place in Mission Valley.

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The proposed San Diego stadium MEIS designed CSAG at the Mission Valley site includes a “canopy, not a roof, to shade much of the seating bowl, and ensure a home field advantage by keeping crowd noise close to the field.

MEIS and other architects who have designed NFL stadiums told CSAG a stadium in Mission Valley would very likely be constructed to take advantage of San Diego’s wonderful year-round climate, meaning it would include ample design features that lower construction and operational costs, and let in natural breezes and sunlight.

There are roof options for the City, County and Chargers to consider, but CSAG recommends that a roof not be included because it would add roughly \$150 million to the project with negative returns anticipated for the investment.

The project as proposed would include land valued at \$180 million (\$3 million an acre for 60 acres) from the City of San Diego, \$204 million in stadium-related infrastructure and parking, and \$950 million for the stadium itself. The cost is all-inclusive and covers design, construction, permits, contingency, testing, inspection and financing – also uses a Design-Build delivery system to ensure reliable

cost containment. CSAG recommends that the stadium be an open-air multi-use facility in comparable quality and amenities as other recent outdoor NFL.

The projected \$204 million of infrastructure includes \$144 million for a 12,000-vehicle parking structure and \$60 million in stadium-related infrastructure costs, including entry/exit improvements, and general site preparation such as utilities, earthwork and tailgate facilities.

CSAG received two estimates for infrastructure costs.<sup>25,26</sup> After accounting for structured parking and stadium-related infrastructure, which is paid for in the core financing plan, there was an additional \$144 million in future infrastructure costs for community amenities to support ancillary development, including general site preparation, utilities, earthwork, sidewalks, lighting, traffic enhancements, and parking. CSAG envisions these costs being paid by using an EIFD (a new statewide tool to help finance needed infrastructure and development projects) and TOT on a new 500-room hotel.

By using these tools, the value of the 75 acres of land to be sold by the City will be increased, providing additional revenues to fund the stadium and further minimizing the impact to the City's General Fund.



“The canopy would not only enhance the fan experience, but also would contribute to the stadium’s state-of-the-art TV broadcast capabilities by reducing glare and shadows and providing for optimal distribution of field lighting and stadium audio,” said stadium design veteran, Dan Meis.

*Conceptual renderings by MEIS showing the exterior (above) and interior (middle) of the new stadium.*

# Financing

## Paying for the new \$1.33 billion\* municipally-owned stadium and operations and maintenance

CSAG recommends the following funding sources to pay for the stadium (\$950M), structured parking, and stadium-related infrastructure (\$204M), or \$1.15 billion in costs.

CSAG assembled more than \$1.4 billion in funding recommendations. Determining the public-private split of the costs is one of the issues that will be resolved during upcoming negotiations between the Chargers, the City and the County.

Chargers	\$300M
NFL	\$200M
City Stadium Fund	\$121M** (\$7M/year over 30 years***)
County Stadium Fund	\$121M** (\$7M/year over 30 years***)
Personal Seat Licenses (PSLs)	\$60M (\$120M total split evenly with Chargers)
Chargers Rent	\$173M (\$10M per season) over 30 years***
SDSU Annual Rent	\$21.6M (\$1.25M/year) over 30 years***
Bowl Games Rent	\$21.6M (\$1.25M/year) over 30 years*
Developer Purchase (sale of 75 acres at \$3 million an acre)	\$225M
Ticket Surcharge	\$84.7M (\$4.75M/year) over 30 years***
Chargers Parking & Surcharge	\$26M (\$1.5M/year) over 30 years***
Additional funding sources stadium is expected to generate	\$50M over 30 years***
<b>Total Recommended Revenues:</b>	<b>\$1.4 Billion</b>

\*Includes City land valued at \$180 million.

\*\*No new taxes.

\*\*\*Net Present Value based upon 4% discount rate over 30 years.

## Chargers/NFL

Twelve years ago, the Chargers offered to pay \$200 million, or half the cost of a new stadium in Mission Valley. Since that time, due to inflation and significant design changes, stadium costs have soared.

Based on CSAG's analysis and information from the Chargers, CSAG believes the Chargers can contribute \$300 million, backfilled by new and increased revenues explained on page 16 of this report.

The NFL has said the league would be willing to contribute \$200 million to build a new stadium in San Diego.

## City/County

CSAG discussed the recommended funding sources with City and County leaders.

The City currently pays approximately \$10 million a year to operate Qualcomm Stadium, including \$4.8 million in annual debt service for Qualcomm. The total remaining debt service is \$52 million and set to expire in 2026.<sup>27</sup>

CSAG has outlined more than \$1.4 billion in funding sources to pay for a new stadium costing roughly \$1.1 billion excluding land, and therefore recommends the City retire 100 percent of its Qualcomm stadium debt before the new stadium opens.

**With proper third-party management, the expectation is the new stadium would break even, at a minimum, therefore the City would no longer be required to subsidize the operations of the stadium as it currently does.**

Additionally, with the Qualcomm Stadium debt paid off, the City would not need to spend millions of dollars a year to retire that obligation. CSAG recommends that a portion (\$7 million a year) of the City's savings be used to contribute toward financing the new stadium.

The County's stadium sub-committee has assured CSAG it would partner with the City on financing, which is why CSAG recommends the County also contribute a minimum of \$7 million a year, or a lump sum payment of at least \$121 million.

## PSLs

While some have questioned San Diego's ability to sell a substantial amount of PSLs, the National University System Institute for Policy Research suggests that "San Diegans would likely support between \$100 and \$150 million in PSLs."<sup>28</sup>

In April, Mr. Grubman, the NFL's Executive Vice President, suggested to CSAG a figure of \$150 million for PSL sales in San Diego, with half going to the Chargers as part of the team's financial contribution for the new stadium.

**CSAG estimates \$120 million in PSLs would be sold, half of which would help fund the public's share of the stadium. The other half would help the Chargers backfill its share of construction costs.**

The Minnesota Vikings expect to sell \$125 million in PSLs for a new stadium scheduled to open next year.<sup>29</sup>

## Chargers Rent

The Chargers current rental agreement with the City of San Diego states that the team must pay "\$2.5 million for each Regular Football Season beginning with the 2004 Regular Football Season; \$3 million for each Regular Football Season beginning with the 2014 Regular Football Season through and including the 2016 Regular Football Season; and, \$4 million for each Regular Football Season through and including the 2020 Regular Football Season,"<sup>30</sup> when the lease is set to expire.

"The team's property taxes, some parking revenues, and the City's suite at Qualcomm" all count against what the Chargers pay, bringing the total to approximately \$1 million a year. Additionally, "the Chargers annual payment due to the City gets eaten away by a series of rent credits, which drastically reduces the team's bill. The City also pays the team each year as part of a settlement to a 2006 American with Disabilities Act lawsuit at Qualcomm."<sup>31</sup>

Rents across the league range and some are tied to concessions, parking and other revenue, so it is difficult to do an apples to apples comparison. The San Francisco 49ers are at the high end, paying \$24.5 million annually in rent.<sup>32</sup>

In Minneapolis, the Vikings will be responsible for \$13 million in annual stadium costs at the stadium under construction, with \$8.5 earmarked as rent, which climbs 3 percent a year until reaching \$20 million in Year 30.<sup>33</sup>

**Based on comparable stadium costs and rent payments, CSAG recommends the Chargers pay rent of \$1 million a game, or \$10 million a year in Year One, with 3% annual increases for 30 years.**

One million dollars per game is less than 10 percent of the expected gross revenues the team would earn on game days in the new stadium.

## Rent From SDSU & Bowl Games

San Diego State University's (SDSU) current contract with the City of San Diego expires after the last game of the 2018 season. Retaining SDSU as a tenant in the new facility would be both beneficial for the City, in helping to recoup costs, and for the University, providing SDSU's Division 1 football program with a premier state-of-the-art space to showcase its football team.

CSAG recommends that an annual rent of \$1.25 million for 30 years (\$21.6M) is charged to SDSU.

Similarly, CSAG recommends that an annual rent of \$1.25 million for 30 years (\$21.6M) is charged to the San Diego Bowl Game Association.

CSAG met with officials from SDSU and the San Diego Bowl Game Association on several occasions, and they assured CSAG they want to be a part of San Diego's stadium solution. Ultimately, contributions from SDSU and the San Diego Bowl Game Association will be based on negotiations or market rate lease agreements and cover access to signage, premium areas, suites, locker rooms, etc. during their games/events.

## Developer Purchase

The local development community supports CSAG's estimate that 75 acres of the stadium site could be sold for \$3 million an acre for a total of \$225 million.<sup>34</sup>

## Ticket Surcharge

CSAG recommends a surcharge of \$5 be placed on Chargers tickets (roughly 650,000 attendees a year). CSAG also recommends a ticket surcharge of \$2 for all other events at the stadium (roughly 750,000 attendees a year).

Other NFL stadiums, including AT&T Stadium, CenturyLink Field, and Lucas Oil Stadium, charge as much as 10 percent in ticket surcharges.

## Chargers Parking & Surcharge

Based on a 12,000 parking-space structure and 10 games a season, with an average of \$25 a spot, parking for Chargers games would generate \$3 million a year in addition to \$360,000 annually from a surcharge of \$3 per vehicle.

CSAG recommends \$1.5 million of this annual revenue be bonded against for construction costs.

## Additional Funding Sources

CSAG has identified other revenue opportunities that have been used to pay for the cost of new NFL stadiums. It anticipates these sources would be able to raise and/or contribute in excess of \$50 million over a 30-year period. Among these items are the sale of seats from Qualcomm Stadium; sales of bricks and/or other recognition elements in the new stadium; naming rights within the stadium (not including suite or club level seating); capital contributions from concession vendors; and infrastructure support from sponsor participation, including non-alcoholic pouring rights, alcohol vendor support, and telecommunication companies support of services including Wi-Fi.

CSAG also researched the option to pursue "crowd fund" and believes there is an ability to raise funds similar to approach the Green Bay Packers successfully used.<sup>35</sup>

# Non-Stadium Financing

Financing future infrastructure costs and creating revenue streams to help the City and County recoup capital costs and pay for operations and maintenance.

The committee settled on the following funding sources to cover future non-stadium related infrastructure costs (\$144 million), and provide long-term revenue streams for the City and County.

Enhanced Infrastructure Financing District (EIFD)	\$116M for 30 years or \$5.5M annually
Transient Occupancy Tax (TOT) – 500-room hotel	\$40M for 30 years or \$2.3M a year (10.5% TOT, 500-room hotel)
Non-Chargers event parking and surcharge	\$3M a year
Concessions from Non-Chargers events	\$1M a year

## Enhanced Infrastructure Financing District (EIFD)

Through the creation of an EIFD, CSAG believes the City and County, working with planners and developers, can ensure long-term revenue streams are opened from the 75 acres of land CSAG is recommending the City sell to a developer. These revenues would pay for public facilities that provide community benefits including, but not limited to, parking and transit facilities, parks, and infrastructure upgrades. The revenues also would generate income for the City and County to help recoup its capital investments.

Based on a low- to mid-rise mixed-use village concept consisting of 3,300 housing units, 1 million square feet of commercial space, 175,000 square feet of retail space, and a 500-room hotel, the tax increment available at market stabilization would conservatively yield \$5.5 million annually, resulting in roughly \$116 million in net present value based on a 30-year term and a 4% discount rate.<sup>36</sup>

Real estate markets change and CSAG realizes what makes sense today may not be what is best several years down the road when site development is in full swing. CSAG would encourage government leaders and planners to be flexible, in order to ensure the development maximizes land value, generates sufficient tax revenues to cover capital investments, and ensures the community’s needs are met.

## Transient Occupancy Tax (TOT)

TOT is a fee accrued as a portion of the total booking cost from a hotel or motel room. It is estimated that a 500-room hotel could be built as part of a future mixed-use development adjacent to the stadium. Based on market comparisons of Mission Valley hotels with an Average Daily Rate of \$159, and assuming an occupancy rate of 75%, a 10.5% TOT rate would yield \$2.3 million per year, with a net present value over 30 years of roughly \$40 million.

# Revenue Opportunities: Chargers

## Revenue streams at the new stadium for the Chargers

Recouping the Chargers’ construction costs through new and enhanced revenue streams.

Stadium naming rights	\$135M to \$165M (over 20 years)*
Naming rights at existing stadium while new stadium is under construction	\$15M (over 3 years)
Personal Seat Licenses (PSLs)	\$60M
Other	\$25M annually

*\*Net Present Value based upon 4% discount rate.*

Naming rights at the new stadium in Mission Valley are expected to range between \$10 million and \$12 million a year, according to CSAG’s research.

In addition to naming rights and PSLs, CSAG identified approximately \$25 million in annual increases in team revenues from the use of a new stadium from the following sources:

- Increased general admission tickets pricing
- Increased concession sales at Chargers’ games
- Increased premiums charged for club and special seating
- Increased premium charged for suite seating
- Ability to secure a premium suite waiver for 10 years
- Increased merchandise sales
- Increased signage and advertising
- Naming rights to club and suite levels
- Revenue from hosting a small number of events other than Chargers games

# Revenue Opportunities: City/County

## Opportunities at new stadium for the City and the County

Other than a small number of events hosted by the Chargers, the proposed multi-use stadium is expected to operate on a year-round basis and host in excess of 200 events, from Super Bowls to corporate events, generating revenue for the City and County for operations and maintenance costs.

It is acknowledged that the NFL is provided all revenue streams and a rent-free facility for a Super Bowl, and therefore no direct revenue can be attributed to that event.

The playing field at the new stadium should accommodate the needs of professional football as the home field for the San Diego Chargers and NFL events, including the Super Bowl and Pro Bowl. The field also should accommodate collegiate football as the home field for the San Diego State University Aztecs, as well as the Holiday Bowl and Poinsettia Bowl.

The facility also should accommodate the San Diego regional California Interscholastic Federation (CIF) High School football playoffs and championships. Additional field sport uses should be accommodated, including soccer, rugby, and lacrosse. The floor area should be able to accommodate large outdoor events, including motor sports, concerts, music festivals, and monster truck jams.

When HKS Architects met with CSAG, it said AT&T Stadium in suburban Dallas, which HKS designed, has become a revenue-generating machine. A little more than half of the stadium's revenues, HKS said, are generated from 3-day rodeos, rock concerts, and other events besides Dallas Cowboy games.



*MEIS rendering.*

# Revenue Streams

In San Diego, the stadium would be expected to host:

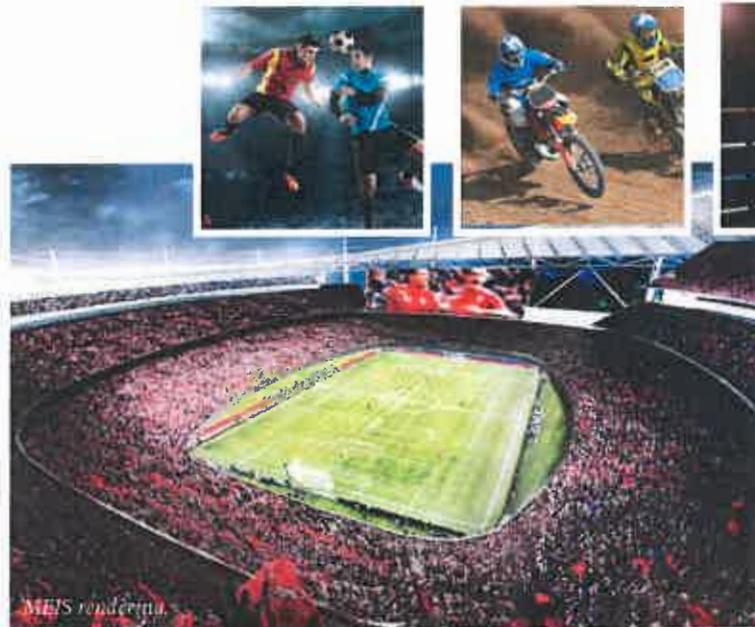
- College Football Championships
- International Soccer/MLS Expansion
- Opening kickoff game for NCAA/season
- Special in-season collegiate games
- Monster Truck Jams
- Motocross/Supercross
- Concerts
- Private events: Bar Mitzvahs; weddings; corporate events; proms; reunions
- Bars; breweries; restaurants open 365 days a year
- Music festivals
- RFP for rideshare company (Uber/Lyft) to have game-day pickup/drop off zone in front of the stadium.
- CIF championships
- Tours of facility
- Film showings
- Movie, TV and Commercial shoots
- Broadcast NFL draft and away games
- Religious events
- Rodeos/Bull riding
- Events held at San Diego River Park
  - » Rugby
  - » Rec Leagues
  - » Youth sports
  - » Concerts
  - » Bowling
- Mountain Dew Tour/X Games
- Dog Shows
- MMA, WWE, Boxing
- 5Ks, 10Ks
- NCAA Championship Lacrosse
- Fantasy sports drafts
- Graduation ceremonies



College Football Championships



Concerts



Other major sporting events like MLS soccer, Motocross, and boxing.



10k runs, graduations and other family events.

# Next Steps

Based on CSAG's extensive review process and thorough analysis of the issues at hand, it recommends negotiations between the City, County and the Chargers commence immediately.

In addition, the outside financial experts retained by the City and County should simultaneously begin vetting CSAG's financing recommendations; work to determine the best way to complete the financing and retire the \$52 million debt the City owes on Qualcomm Stadium before the new stadium opens; and take the City and County portion of the financing plan to the bond market once terms are agreed to. The City and County also should begin soliciting proposals from investors and developers to purchase the 75 acres at the Mission Valley site, as well as stadium architects and builders.

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Further, CSAG recommends that a Joint Powers Authority (JPA) be formed between the County and City to oversee development and ownership of the stadium.

The City and County also should open negotiations with San Diego State University and the San Diego Bowl Game Association with the goal of securing long-term lease agreements for each organization.

The City and County should request an opportunity to present San Diego's stadium plan to the Committee on Los Angeles Opportunities, and NFL Executive Vice President Eric Grubman. This meeting should be held well in advance of the NFL owners meeting in October 2015.

Following the negotiations, the Chargers should launch and fund a citizens' initiative, like the team did this year in Carson, with the goal of gathering enough verified signatures and securing a City Council vote prior to the NFL owners meeting.

# Final Recommendations

## Recommended terms for negotiations with the Chargers

1. The Chargers should sign a 30-year lease with the JPA, and enter into a non-relocation agreement with the JPA.
2. The City and County should create a capital improvement fund for future maintenance and facility upgrades.
3. The City, County and Chargers should share the costs of operations and maintenance. These costs will rise over time so payments should be indexed to inflation.
4. The Chargers should assume the financial risks for naming rights. The team should also cover all construction overages and premium add-ons.
5. The City, County and Chargers should agree to draft a cooperative parking agreement with the owners of office towers in Mission Valley with parking lots that are largely vacant on nights and weekends. The idea would be for fans to park in these large office lots and receive a shuttle ride to and from Chargers games and other events. This service could continue to operate after stadium parking is constructed. It would give fans ample tailgating opportunities and thin out traffic around the stadium.

## Recommendations for the JPA

1. Explore parking options on the south side of the San Diego River to create additional parking and tailgating opportunities.
2. Work with State lawmakers on any environmental compliance issues that surface while also working with regional, state and federal agencies to secure any and all grants for transit, road/freeway work, and parks.
3. Hire a private stadium management company with a proven track record to manage the facility.

For reasons outlined in this report, a path to a new multi-use stadium in San Diego exists. A collaborative effort is needed to build on the momentum San Diegans have created. CSAG would encourage everyone to put San Diego first. If we do, we will achieve greatness, and our new stadium will be a constant reminder of what we can achieve together.

*Special thanks to CSAG's spokesman, Tony Manolatos with Apex Strategies.*

**APEX**  
strategies  
apexstrat.com

*Additional special thanks to reproHAUS for printing the report and to MEIS for creating the stadium renderings. The printing and renderings were done pro-bono.*

**reproHAUS**  
reprohaus.net

**MEIS**  
meisarchitects.com

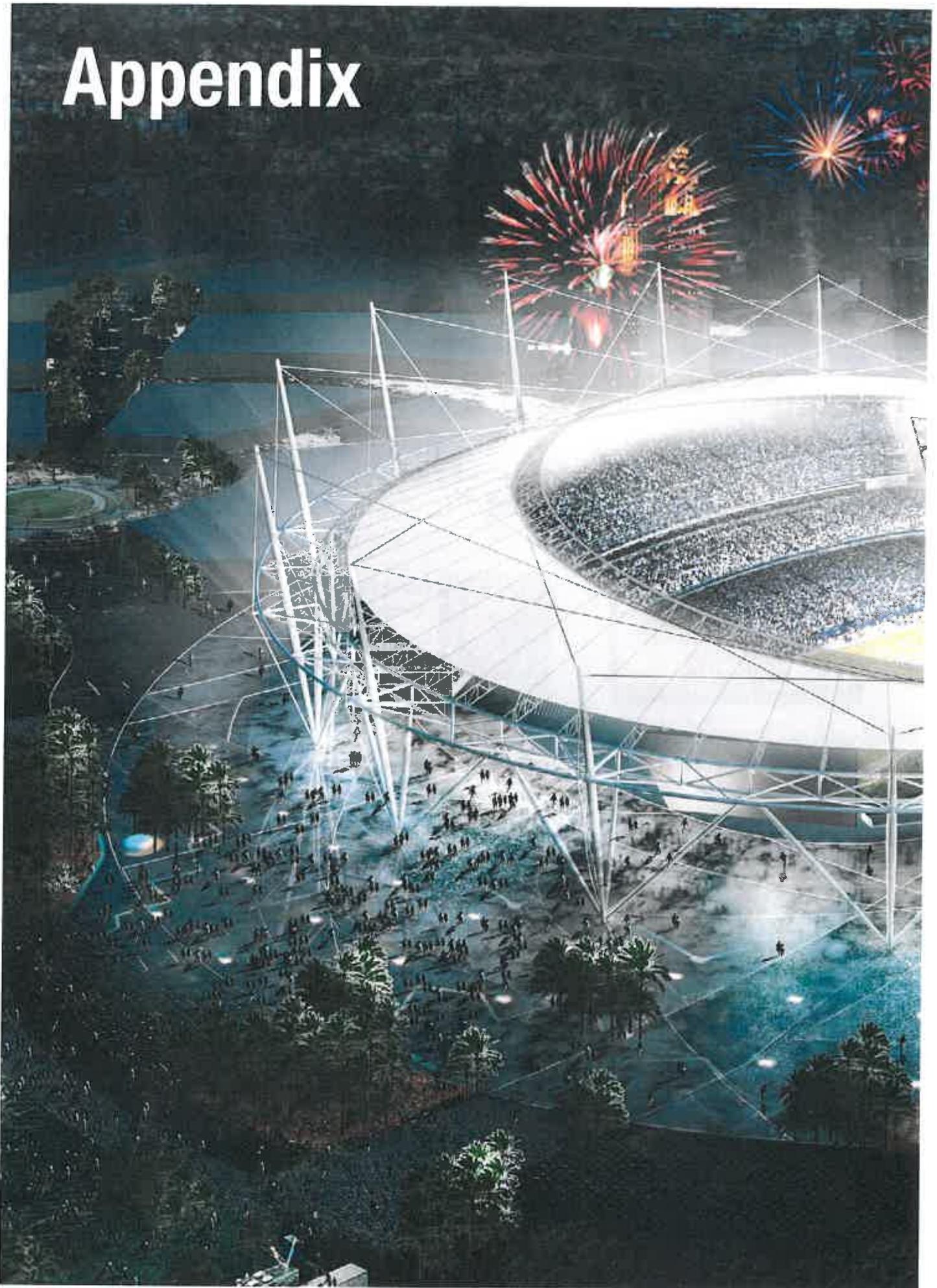
# Endnotes

Links are active when viewed in Adobe Acrobat.

1. Mayor Kevin Faulconer. "Faulconer taps civic leaders, stadium and financial experts to develop plan to keep Chargers in San Diego." Press Release. 30 January, 2015. <<http://www.apexstrat.com/assets/files/FaulconerTapsCivicLeaders.pdf>>.
2. Fabiani, Mark. "Remarks to the Mayor's Stadium Task Force." 16 February, 2015. <[http://www.apexstrat.com/assets/files/Chargers%27%20Remarks%20to%20Stadium%20Task%20Force%20%28Extended%20Version%29%20\\_%20San%20Diego%20Chargers.pdf](http://www.apexstrat.com/assets/files/Chargers%27%20Remarks%20to%20Stadium%20Task%20Force%20%28Extended%20Version%29%20_%20San%20Diego%20Chargers.pdf)>.
3. Canepa, Nick. "Qualcomm site still a new stadium option." U-T San Diego. 16 October, 2013. <<http://www.utsandiego.com/news/2013/oct/16/nick-canepa-qualcomm-stadium/2/?#article-copy>>.
4. Canepa, Nick. "Qualcomm site still a new stadium option." U-T San Diego. 16 October, 2013. <<http://www.utsandiego.com/news/2013/oct/16/nick-canepa-qualcomm-stadium/2/?#article-copy>>.
5. Fabiani, Mark. Interview by Scott Kaplan and Billy Ray Smith of the Mighty 1090 AM radio. "Mark Fabiani: we are eager to see CSAG's Plan... We've been cooperative" Mighty 1090. Web. 17 April, 2015. <<http://www.mighty1090.com/episode/mark-fabiani-we-are-eager-to-see-csags-plan-weve-been-cooperative/>>.
6. Fabiani, Mark. "Chat with Mark Fabiani." San Diego Stadium Coalition. Web. 9 October, 2009. <<http://sdstadium.org/chat-with-mark-fabiani-10-9-2009/>>.
7. Jablonki, Paul C. Metropolitan Transit System letter to Adam Day. 20 February, 2015. <<http://www.apexstrat.com/assets/files/MTS%20Letter.pdf>>.
8. JMI Real Estate. Presentation to CSAG. 3 March. 2015. <<http://www.apexstrat.com/assets/files/JMI-SummaryOfCostsSheet.pdf>>.
9. Bauder, Don. "Poll: San Diegans do not want to subsidize a stadium." The San Diego Reader. 1 September, 2014. <<http://www.sandiegoreader.com/news/2014/sep/01/ticker-poll-san-diegans-dont-subsidize-stadium/>>.
10. Walker, Mark. "Stadium proposal by year-end sought." U-T San Diego. Web. 1 May, 2014. <<http://www.utsandiego.com/news/2014/may/01/chargers-stadium-fabiani-proposal/>>.
11. SurveyUSA. Results of SurveyUSA news poll #22085. Web. 30 January, 2015. <<http://www.surveyusa.com/client/PollReport.aspx?g=b3fc2ba9-d23b-4b32-acd4-7441140f1f40>>.
12. Walker, Mark. "Chargers eye 2016 ballot measure." U-T San Diego. 19 April, 2014. <<http://www.utsandiego.com/news/2014/apr/19/chargers-eye-2016-stadium-ballot-measure/>>.
13. Walker, Mark. "Chargers eye 2016 ballot measure." U-T San Diego. 19 April, 2014. <<http://www.utsandiego.com/news/2014/apr/19/chargers-eye-2016-stadium-ballot-measure/>>.
14. Walker, Mark. "Chargers eye 2016 ballot measure." U-T San Diego. 19 April, 2014. <<http://www.utsandiego.com/news/2014/apr/19/chargers-eye-2016-stadium-ballot-measure/>>.
15. Kaplan, Daniel. "Ticket Sales Mixed for NFL Teams Looking at LA Market." St. Louis Business Journal. Web. 5 May, 2015. <<http://www.bizjournals.com/stlouis/news/2015/05/05/ticket-sales-mixed-for-nfl-teams-looking-at-la.html>>.
16. "Pension troubles: A timeline." U-T San Diego. Web. 2009. <<http://legacy.utsandiego.com/news/metro/pension/pensiontimeline.html>>.
17. Togerson, Derek. "Carson Mayor on Chargers Stadium Site: 'It's Contaminated Land.'" NBC San Diego. Web. 5 May, 2015. <<http://www.nbcsandiego.com/news/local/Carson-Mayor-On-Chargers-Stadium-Site-Its-Contaminated-Land-302480301.html>>.
18. "Constitution and Bylaws." National Football League. 1 February, 1970 (2006 Rev.). <<http://www.apexstrat.com/assets/files/NFL%20Bylaws.pdf>>.
19. Fabiani, Mark. Interview with Fox Sports San Diego. "Fabiani: You can survive (in San Diego) if you had a modern stadium deal." Fox Sports San Diego. Web. 23 April, 2015. <<http://www.foxsports.com/san-diego/video?vid=432948803856>>.
20. M. Cavanaugh, et al. "Fabiani says Chargers not optimistic about Mission Valley." KPBS. 16 March, 2015. Web. <<http://www.kpbs.org/news/2015/mar/16/future-san-diego-chargers-mark-fabiani/>>.
21. Page, Tom. "San Diego has momentum for new stadium." U-T San Diego. 11 April, 2015. <<http://www.utsandiego.com/news/2015/apr/11/san-diego-nfl-stadium-chargers/>>.
22. City News Service. "San Diego County Population Grows to 3.3 Million Residents." KPBS. Web. 26 March, 2015. <[http://www.kpbs.org/news/2015/mar/26/san-diego-county-population-grows-33-million-resid/?utm\\_source=Voice+of+San+Diego+Master+List&utm\\_campaign=cdd0d9e136-Morning\\_Report\\_format\\_updated\\_3\\_24\\_14\\_new\\_replicat&utm\\_medium=email&utm\\_term=0\\_c2357fd0a3-cdd0d9e136-84042001&goal=0\\_c2357fd0a3-cdd0d9e136-84042001](http://www.kpbs.org/news/2015/mar/26/san-diego-county-population-grows-33-million-resid/?utm_source=Voice+of+San+Diego+Master+List&utm_campaign=cdd0d9e136-Morning_Report_format_updated_3_24_14_new_replicat&utm_medium=email&utm_term=0_c2357fd0a3-cdd0d9e136-84042001&goal=0_c2357fd0a3-cdd0d9e136-84042001)>.
23. Black, Charles. "San Diego Convention Center Phase III expansion report on development options." CB Urban Development. <[http://www.apexstrat.com/assets/files/SDCC\\_Expansion\\_Options\\_3.10.15.pptx](http://www.apexstrat.com/assets/files/SDCC_Expansion_Options_3.10.15.pptx)>.

24. News and Notes: New Chargers Stadium likely to Cost More Than \$700 Million." National University System for Policy Research. 7 April, 2015. <[http://www.apexstrat.com/assets/files/NewsNotes\\_Chargers\\_Stadium\\_Election\\_Final.pdf](http://www.apexstrat.com/assets/files/NewsNotes_Chargers_Stadium_Election_Final.pdf)>.
25. Rice, Jeff. San Diego Stadium Cooperative Coalition. Presentation to CSAG. 21 April, 2015. <<http://www.apexstrat.com/assets/files/San%20Diego%20Stadium%20Financing%20Recommendations%204-21.pdf>>.
26. A collaborative team from Urban Land Institute San Diego-Tijuana District Council and the American Institute of Architects San Diego Chapter. Report to CSAG. 21 April, 2015. <[http://www.apexstrat.com/assets/files/ULI\\_AIARepor.pdf](http://www.apexstrat.com/assets/files/ULI_AIARepor.pdf)>. and <<http://www.apexstrat.com/assets/files/Stadium%20Redevelopment%20Principles%204.20.15.pdf>>.
27. Lewis, Mary. Electronic Communication to Stephen Puetz. 23 January, 2015. San Diego Real Estate Assets. Web. <<http://www.sandiego.gov/real-estate-assets/pdf/stadium/cityexpensesanddeferredmaintenance.pdf>>.
28. "News and Notes: New Chargers Stadium likely to Cost More Than \$700 Million." National University System for Policy Research. 7 April, 2015. <[http://www.apexstrat.com/assets/files/NewsNotes\\_Chargers\\_Stadium\\_Election\\_Final.pdf](http://www.apexstrat.com/assets/files/NewsNotes_Chargers_Stadium_Election_Final.pdf)>.
29. Vikings.com, New Stadium Q&A, January 2015. <<http://www.vikings.com/stadium/new-stadium/faq.html#sbl>>
30. "1.5(b)(i) Payments to the City - Regular Football Season." Supplement Number Eight to the 1995 Agreement for Partial Use and Occupancy of San Diego Jack Murphy Stadium between Chargers Football Company, LLC And The City of San Diego. P.19 <<http://www.apexstrat.com/assets/files/chargers-lease.pdf>>.
31. Dillon, Liam. "Fact Check: The City Pays the Chargers to Play at Qualcomm Stadium." Voice of San Diego. February 20, 2015. <<http://www.voiceofsandiego.org/must-reads/fact-check-city-pays-chargers-play-qualcomm-stadium/>>.
32. "Team lease details." San Diego Real Estate Assets. Web. <<http://www.sandiego.gov/real-estate-assets/pdf/stadium/nflstadiumrents.pdf>>.
33. "8 Details you need to know about the new Vikings stadium agreement." Minnesota Vikings. Web. 8 October, 2013. <<http://www.vikings.com/news/article-1/8-Details-You-Need-To-Know-About-The-New-Vikings-Stadium-Agreement/08cc31bc-3b4e-4955-8a26-e612d80f9b7f>>.
34. Winckel, Borre. Building Industry Association of San Diego County letter to Whom It May Concern. 4 May, 2015. <<http://www.apexstrat.com/assets/files/BIA%20Qualcomm%20Site%20Conclusion%205.4.15.pdf>>.
35. Brennan, Matthew. Crowdfunding a loan for the new San Diego stadium. 12 May, 2015. <<http://www.apexstrat.com/assets/files/Crowdfunding.pdf>>.
36. Rice, Jeff. San Diego Stadium Cooperative Coalition. Presentation to CSAG. 21 April, 2015. <<http://www.apexstrat.com/assets/files/San%20Diego%20Stadium%20Financing%20Recommendations%204-21.pdf>>.

# Appendix



# Citizens' Stadium Advisory Group – Bios

The Citizens' Stadium Advisory Group includes a Fortune 500 executive, a revered local government leader, a California State University Trustee, a former NFL and Chargers senior executive, and experts in the areas of finance, land use, real estate and construction of municipal stadiums. Meet the members of this well-rounded group:



## **Doug Barnhart**

*Chairman of Barnhart-Reese Construction*

Douglas E. Barnhart is a long-time resident of San Diego and civic and business leader. He is a San Diego County Planning Commissioner and a past member of the Qualcomm Stadium Advisory Board. He has served as a board member for the Greater San Diego Chamber of Commerce, San Diego International Sports Council and past San Diego Super Bowl Committees. Mr. Barnhart's construction companies built, or helped build, many San Diego landmarks, including Petco Park, San Diego Lindbergh Field Terminal 2, the Douglas and Nancy Barnhart Cancer Center at Sharp Chula Vista, Tony Gwynn Stadium at San Diego State University, the SDSU Gateway/KPBS, dozens of K-12 schools, and the San Diego Chargers Training Facility and Offices.



## **Rod Dammeyer**

*Private Equity Investor*

Rod Dammeyer is chairman of CAC, a private company offering capital investment and management advisory services. He is a member of the boards of directors of Stericycle, Inc., and Quidel Corporation, in addition to being a trustee of Invesco Funds. A graduate of Kent State University, Mr. Dammeyer began his business career with Arthur Andersen & Co. where he became partner and chairman of its advisory council. He subsequently served as executive vice president and chief financial officer of two multi-billion dollar conglomerates, Northwest Industries, Inc. and Household International, Inc. From 1985 to 1995, he was CEO of Intel Corporation, which merged into Anixter International, a multi-billion dollar wiring products value added reseller, in addition to serving as managing partner of Equity Group Corporate Investments until 2000.



**Adam Day**  
*California State University Trustee  
& Assistant Tribal Manager of Sycuan*

Adam Day is a veteran public administration executive with extensive experience managing the efficient delivery of municipal services, government relations, community outreach, coalition development, and multi-million dollar charitable and media campaigns. Mr. Day is a California State University Trustee and directs government, public and community relations on behalf of the Sycuan Tribe and their affiliated business entities. Mr. Day brings nearly 12 years of experience at the County of San Diego as chief of staff and deputy chief of staff to various members of the Board of Supervisors. He played a significant role in shaping public policy at the local, state and federal levels on matters such as welfare reform, criminal justice, regional transportation planning and land use. He has served on dozens of boards and committees, including the Del Mar Fair Board appointed by Governors Arnold Schwarzenegger and Jerry Brown, the San Diego County Planning Commission and Century Club of San Diego.



**Walt Ekard**  
*Former San Diego County CAO & former  
City of San Diego COO*

Walter F. Ekard is the former Chief Administrative Officer for the County of San Diego and former Chief Operating Officer for the City of San Diego. As the chief executive for the fifth largest county in the United States, Mr. Ekard managed a workforce of over 16,000 employees and an annual budget of \$5 billion. Mr. Ekard was the Board of Supervisors' "first and only choice" for the job because of his experience and strong leadership skills. A native of San Diego County, Mr. Ekard received his Bachelor of Arts degree from San Diego State University and a Juris Doctor degree from the University of San Diego School of Law.



**Aimee Faucett**  
*COO of the San Diego Regional Chamber*

Aimee Faucett has served the communities of San Diego for 18 years while working in the legislative and executive branches of the City of San Diego and voluntarily serves on several nonprofit boards. Today she holds the position of Executive Vice President/Chief Operating Officer for the San Diego Regional Chamber. Prior to joining the San Diego Regional Chamber, Mrs. Faucett was the Deputy Chief of Staff to former Mayor Jerry Sanders and also served as Chief of Staff to former San Diego City

Councilmembers Kevin L. Faulconer and Jim Madaffer. Mrs. Faucett's community service includes serving on the board of directors for the Jacobs Cushman San Diego Food Bank, the American Red Cross San Diego/Imperial Counties Chapter and San Diego State Alumni Association. She is a graduate of San Diego State University and holds a bachelor's degree in Public Administration and is a recipient of the San Diego Business Journal's 2014 "Women Who Mean Business" Award.



**Jason Hughes**  
*President and CEO of Hughes Marino*

Jason Hughes is President and CEO of the largest tenant representation company in San Diego and one of the premier commercial real estate companies in Southern California. Mr. Hughes has been a fixture in San Diego's commercial real estate industry for 26 years, and was appointed as Special Assistant for Real Estate Services to the City of San Diego in 2013. Mr. Hughes represents approximately three quarters of all corporate tenants downtown, and has negotiated some of the largest tenant lease, purchase and development transactions in the region. Over the years, Mr. Hughes has transacted leases and purchases for tens of millions of square feet, including a dozen downtown high-rise office building purchase and sale transactions, two downtown high-rise residential tower purchases, a development of a new office tower and one large hotel transaction.



**Jessie Knight**  
*Executive Vice President of Sempra Energy,  
Chairman of the Board of SDG&E*

Jessie J. Knight is board chairman of San Diego Gas & Electric Co. (SDG&E); chairman of Southern California Gas Co. (SoCalGas), an affiliate of SDG&E; and executive vice president of external affairs for Sempra Energy. Before joining Sempra Energy in 2006, Mr. Knight served for seven years as president and chief executive officer of the San Diego Regional Chamber of Commerce.



**Mary Lydon**  
*Executive Director of the Urban Land Institute  
- San Diego-Tijuana*

Mary Lydon is an expert in smart growth, land-use planning, real estate markets, community and stakeholder participation and economic development strategies. She has worked with private-sector developers, public-sector agencies and nonprofit organizations. Ms. Lydon is a former Planning Commissioner for the City of San Diego and has held other

leadership roles on several nonprofit boards over her career. Ms. Lydon attended Harvard University’s Kennedy School of Government and completed the Executive Leadership Program in 2010. She also holds a bachelor’s degree from the University of Wisconsin, Madison. ULI is an international nonprofit organization focused on research and education. ULI’s focus is in developing leaders in the responsible use of land and promoting the creation of sustainable thriving communities worldwide. ULI is a member-based organization with 35,000 members globally.



**Jim Steeg**  
*Former NFL Executive and Chargers Executive Vice President*

Jim Steeg is a former National Football League executive and Chargers Executive Vice President who is credited with growing the Super Bowl from a championship football game into a four-day extravaganza. He has 36 years of experience with the NFL, 26 of those in charge of Super Bowls, where he worked in 70 major stadiums in the United States and around the world. Mr. Steeg’s unique experience is marked by working successfully with the multiple constituencies involved in special events and sports management. He has developed a broad range of expertise in dealing with civic, financial and real estate leaders; business, government, college and professional sports, and entertainment; stadium architects; urban planners; traffic and transportation; police; security; and the media.



**Tony Manolatos**  
*CSAG’s Spokesman*

Tony Manolatos is an experienced strategist specializing in media relations, crisis communications, community engagement, coalition building, government affairs and public policy. Manolatos has more than 15 years’ experience, including a unique blend of public policy, politics and journalism, which shapes the planning of effective and creative strategies. Manolatos owns and operates Apex Strategies, a San Diego-based public affairs firm that services public agencies and officials, businesses, non-profits, and others. Prior to starting Apex Strategies, Manolatos served as a deputy chief of staff and communications director to Councilman Kevin Faulconer. Before that he worked as an investigative reporter at the *San Diego Union-Tribune*, capping an award winning journalism career that spanned more than a decade.

# Key Dates

## **December 14, 2014:**

San Diego Mayor Kevin L. Faulconer writes NFL Commissioner Roger Goodell, requesting an opportunity to discuss the stadium issue in San Diego.

## **January 14, 2015:**

During State of the City, Mayor Faulconer announces stadium issue will be resolved on his watch.

## **January 30, 2015:**

Mayor Faulconer announces formation of Citizens' Stadium Advisory Group (CSAG).

## **February 22, 2015:**

Chargers owner Dean Spanos and Mayor Faulconer meet and agree to move up CSAG's deadline to 90 days.



## **March 2, 2015:**

CSAG holds public forum at Qualcomm Stadium that draws about 3,000 people.

## **March 12, 2015:**

CSAG selects Mission Valley site over Downtown.

## **March 19, 2015:**

CSAG chair Adam Day and member Aimee Faucett testify to the City Council's

Economic Development Committee about the committee's progress and next steps.

## **March 2015:**

Members of CSAG meet with the architects who designed AT&T stadium, Lucas Oil stadium, and are designing the stadium under construction in Minneapolis, as well as the one planned for Inglewood. CSAG members also meet with builder who built Levi's Stadium, and investors interested in funding a new stadium in San Diego.

## **March 2015:**

CSAG members Mary Lydon, Jim Steeg and Jessie Knight assemble a team of designers and land use experts to look deeper into the development of Mission Valley and a new Chargers Stadium. Representatives with the San Diego River Park Foundation and Mission Valley Planning Group are a part of this team.

## **March 2015 – April 2015:**

CSAG meets with fan groups, including Save Our Bolts and Bolt Pride, Chargers alumni, and other stakeholders, including representatives with the County of San Diego and San Diego State University. The committee also meets with developers interested in the 166-acre Mission Valley site.

## **March 26, 2015:**

Mayor Faulconer, City Attorney Jan Goldsmith, San Diego County Supervisors Dianne Jacob and Ron Roberts, and City Councilmembers Myrtle Cole and Scott Sherman announce a partnership between the City and County to work collaboratively and share consultant costs (up to \$500,000) for a potential new stadium for the Chargers. The County Board of Supervisors and City Council each have since unanimously approved this expense.

## **April 6, 2015:**

CSAG speaks with NFL Executive Vice President Eric Grubman in advance of his visit to San Diego on April 14.

## **April 14, 2015:**

Mr. Grubman and Mark Fabiani met with CSAG's Adam Day, Jason Hughes, Jessie Knight, Walt Ekard, and Tony Manolatos in downtown San Diego. Mr. Grubman said CSAG and/or the City will be given the opportunity to present to the "Committee on Los Angeles Opportunities" made up of six NFL owners. That meeting will likely occur sometime this summer.

## **April 20, 2015:**

City and County finalize contracts with investment firm, outside attorneys, and financial advisor to represent City/County during negotiations with Chargers.

# Design Narrative

## Stadium has a ‘California convertible’ feel



MEIS renderings.

By Dan Meis

San Diego’s sunny and mild climate provided us with the opportunity to design a multi-purpose, state-of-the-art stadium that would be both unique in the NFL and a home field to the San Diego Chargers unmatched by any other stadium on the planet in its ability to be completely evocative of the environment of which it is born.

The temperate climate allowed us to design a building that is far more open in nature. Concourses, club areas, lobbies—areas that are traditionally enclosed and electronically heated or cooled—can in this climate often be open air, or significantly less weather protected than in a northern climate.

The ability to forego the facade wrapping that most stadiums of this size require reduces both the capital and operating cost of the venue, while enhancing the fan experience by providing a truly unique-to-San Diego venue.

The natural landscape of San Diego became a critical part of the architecture with the integration of native species of trees and flowers providing a natural tie to the site.

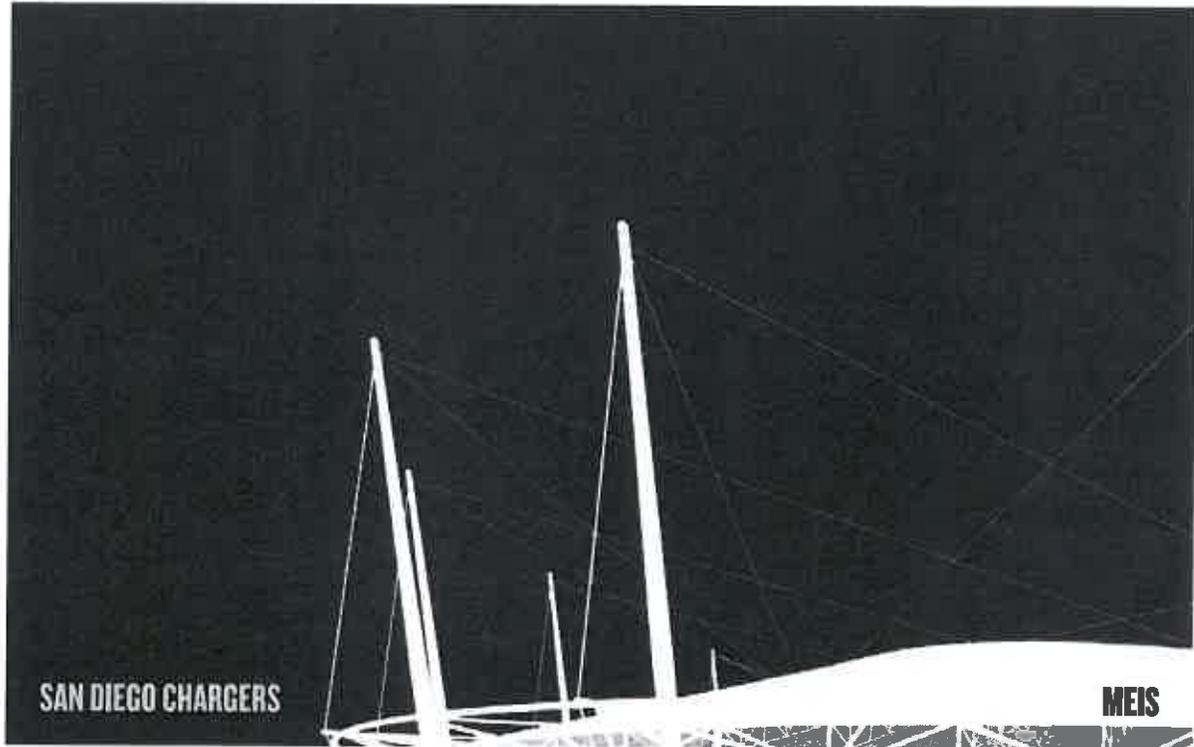
The defining design feature of the proposed stadium is a sun canopy we have dubbed “the Helios”. Helios, the personification of the sun in Greek mythology, here is a fabric canopy employed specifically to shade the seating bowl from the San Diego sun while maintaining an open-to-the-sky, “California convertible” feel. The form of the canopy is derived from a sophisticated computer simulation of the sun angles throughout the seasons at this specific geographic location. The canopy provides an added benefit in acoustical enhancement, capturing crowd noise, and allowing for sound and lighting distribution, ensuring a raucous home-field advantage and state-of-the-art broadcast conditions.

The steel, fabric, and cable structure MEIS designed are instantly evocative of the masts and rigging of the sailboats so identified with the San Diego lifestyle. The design is at once simple and instantly iconic. The shape of the seating bowl reflects the desired sideline orientation of the majority of seating and the best site lines in the NFL. Regular capacity of 65,000 seats is easily expanded to 72,000 for Super Bowls and other major events through the addition of temporary end zone seating sections.

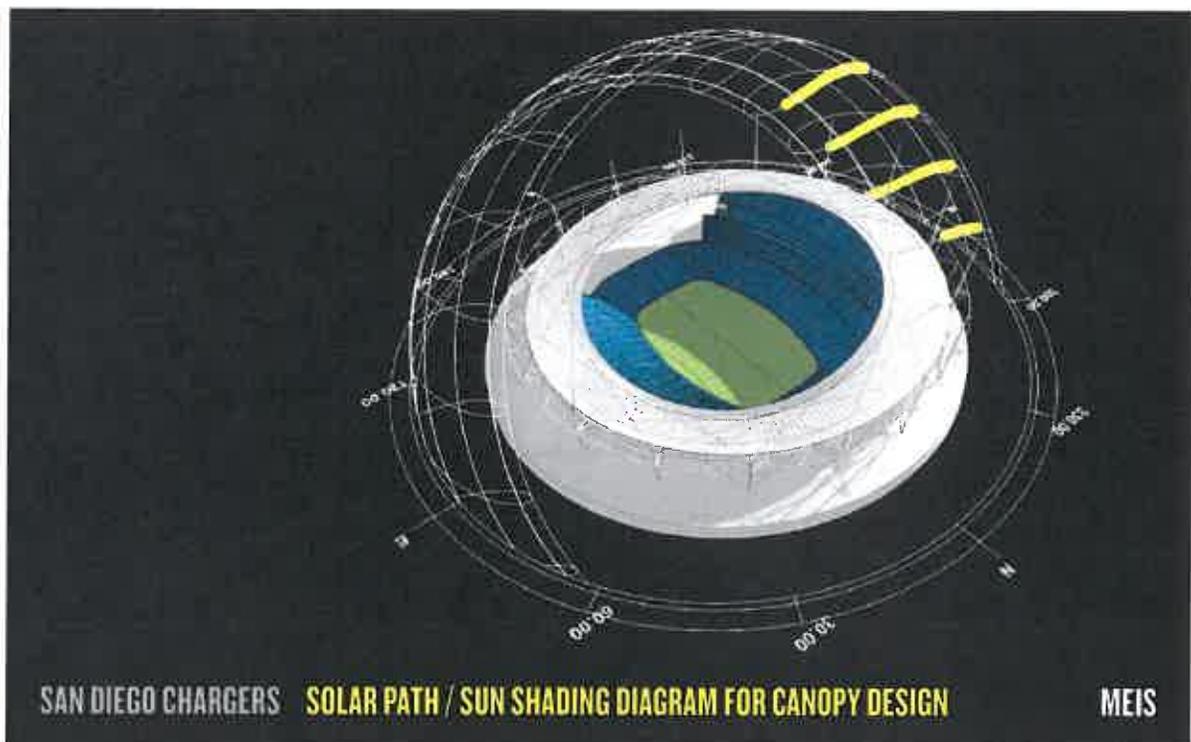
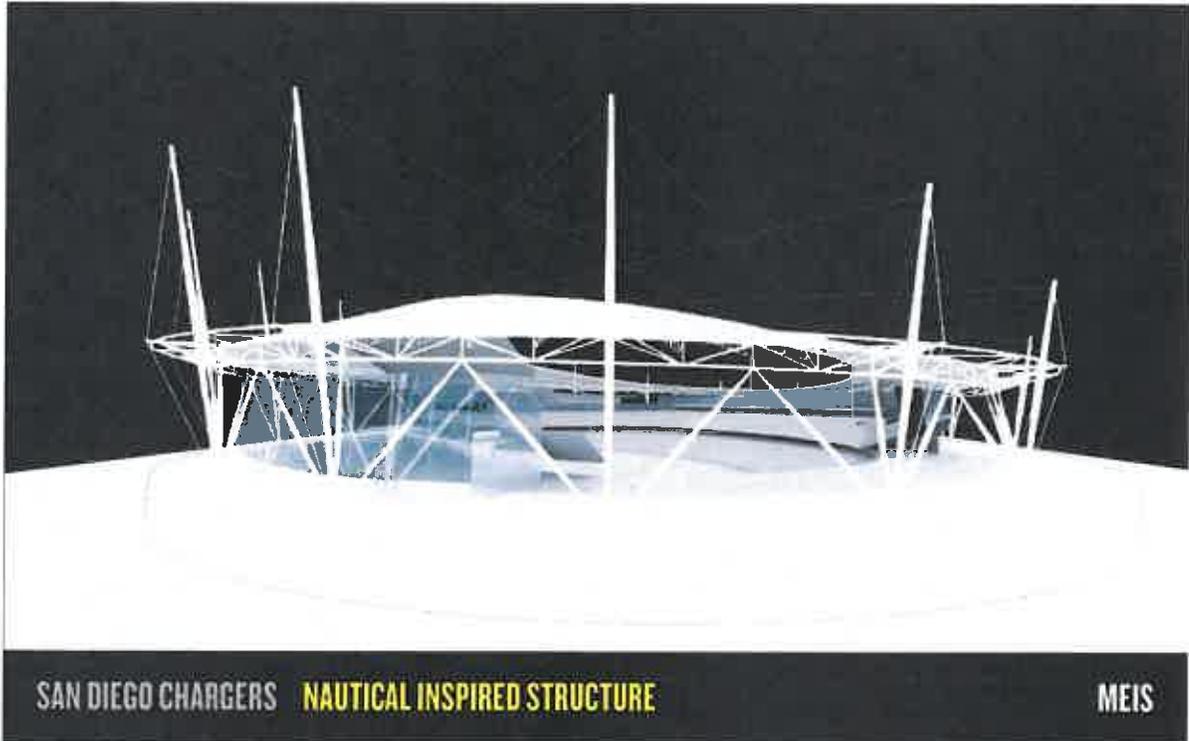
This design allows for one of the most cost-effective stadiums of its size in the world while providing a uniquely San Diego experience and an instantly recognizable, iconic addition to the region.

*Dan Meis is the founder and managing principal at MEIS, a New York-based stadium architecture and design firm.*

**PAGES FROM MEIS  
REFERENCE PRESENTATION:**



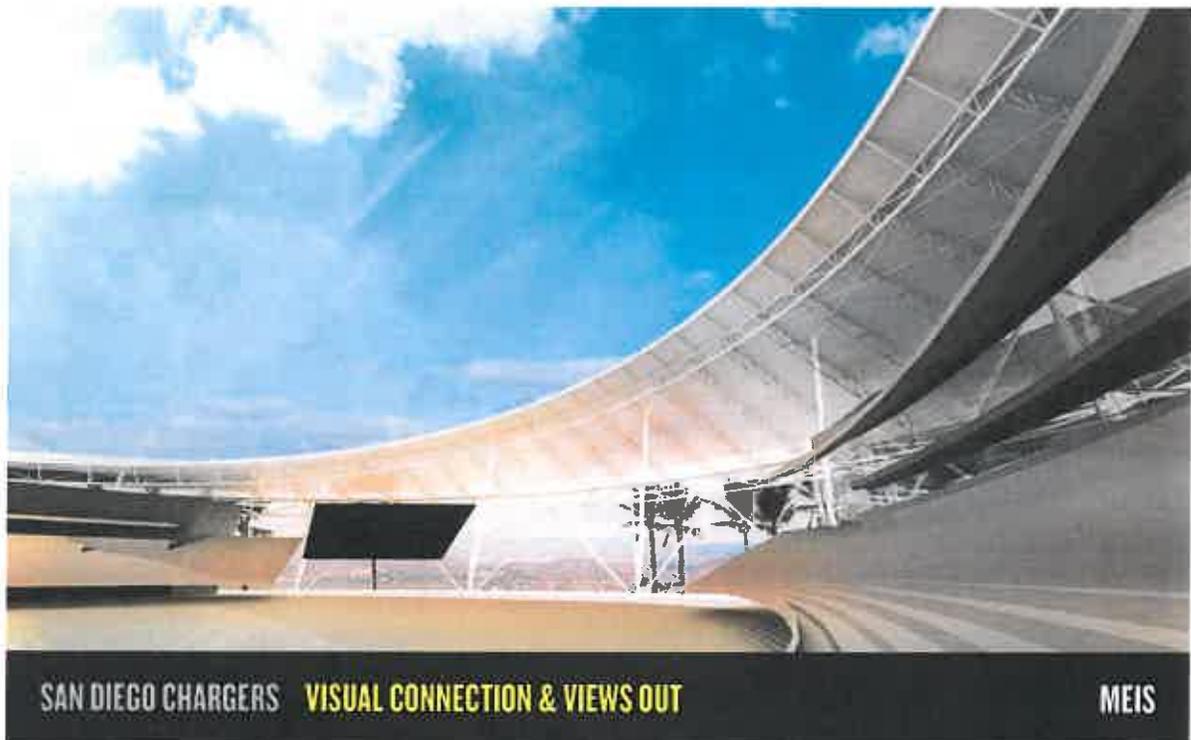
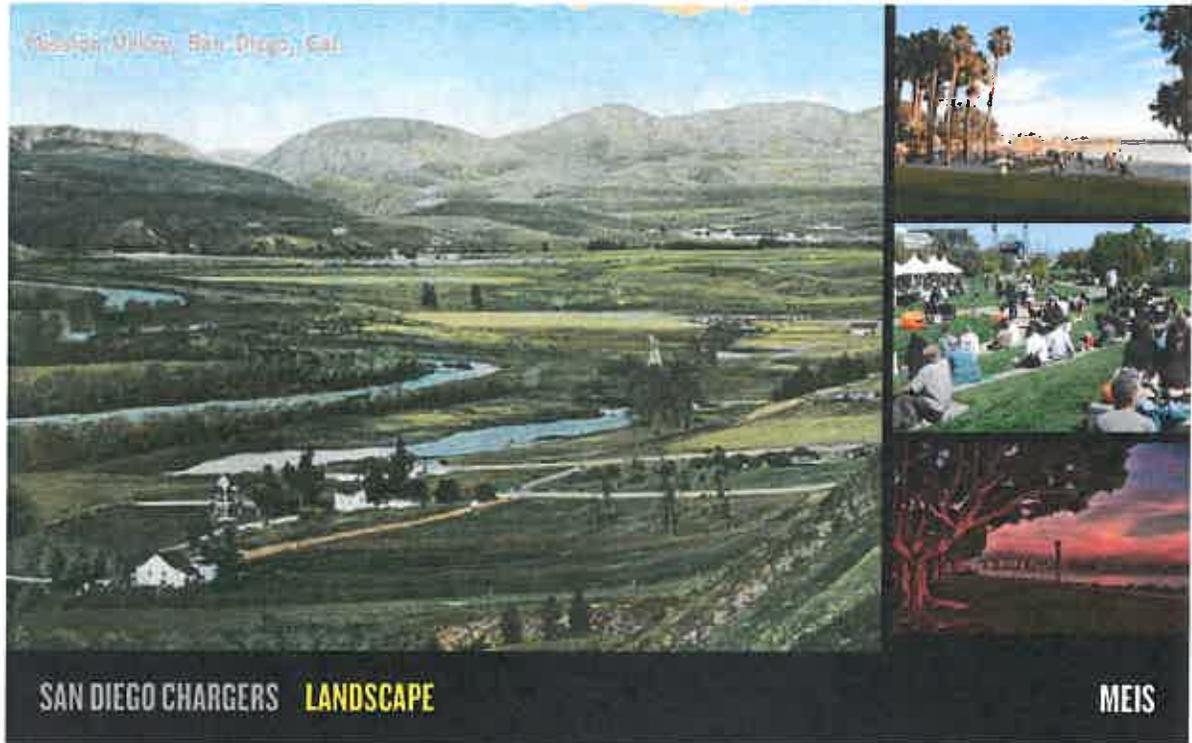
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REFERENCE PRESENTATION:**



# National Stadium Assessment

In developing a fair and workable financing plan to jump-start negotiations between the City, County and Chargers, CSAG examined financing plans for several NFL stadiums, zeroing in on seven projects for the purposes of this report.

Four of the seven stadiums opened within the last 10 years – Lucas Oil Stadium in Indianapolis, AT&T Stadium in Dallas, MetLife Stadium in New York, and Levi’s Stadium in Santa Clara. Two others are under construction, one in Minnesota and the other in Atlanta. And one, in St. Louis, was recently proposed.

CSAG received cost assessments from the NFL in April 2015<sup>1</sup> for six of the stadiums, and relied on a recent news report<sup>2</sup> highlighting the proposed stadium in St. Louis.

Stadium	Year Opened	Total Cost (Stadium and Supporting Infrastructure)
Atlanta Proposed	Proposed: 2017	Estimated - \$1.4 Billion
Minnesota Stadium	Proposed: 2016	Estimated - \$1.07 Billion
Levi’s Stadium	2014	\$1.3 Billion
MetLife Stadium	2010	\$1.6 Billion
AT&T Stadium	2009	\$1.3 Billion
Lucas Oil Stadium	2008	\$720 Million
St. Louis Proposed	n/a	Estimated - \$1 Billion

The financing models used to pay for the stadiums relied on a mix of public and privately financed bonds, paid back through revenue accrued from PSLs, tenant rental agreements, concessions, TOT, and naming rights, among other location-specific sources of revenue.

1 “Publicly-available news articles.”

2 Young, Virginia. “Study: State would see payoff from building stadium for Rams.” St. Louis Today Web. March 9, 2015. <[http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article\\_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html](http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html)>.

## MINNESOTA

The Minnesota Vikings stadium will require a public contribution of approximately “\$498 million in State appropriation bonds backed by proceeds from State authorized non-sports charitable gaming (\$348 million) and City of Minneapolis Convention Center taxes (\$150 million).”<sup>3</sup> Private contribution is estimated to be approximately \$574 million.<sup>4</sup> Bonds are expected to be paid through PSLs, the license which entitles a season ticket holder to maintain exclusive rights over their seat(s), to average \$2,500.<sup>5</sup>

While the “Vikings will have the exclusive right to sell and profit from a pair of naming-rights deals for the new stadium and adjacent fan plaza,”<sup>6</sup> as well as revenue accrued from advertising and concessions, the team will be asked to pay rent starting at \$8.5 million. The team’s annual rent is expected to grow at a rate of “three percent a year until reaching \$20 million in the Year 30. Additionally, the team must put \$1.5 million into a capital improvement account in Year One; that gradually rises to \$3.5 million by the 30th year.”<sup>7</sup> During non-football days, the stadium is expected to be used for concerts, political conventions, fantasy football events and amateur sports games.

## ATLANTA

Atlanta’s stadium is expected to be backed by a public contribution of “\$200 million in City of Atlanta bonds backed by a 2.75% County hotel tax,”<sup>8</sup> and a private contribution of \$835 million.<sup>9</sup> “Additional hotel-motel tax money will go to the Falcons to help offset costs of maintaining and operating the stadium.”<sup>10</sup> The remaining \$1 billion will be paid through a combination of the team (\$800 million), the NFL (\$200 million) and PSLs. “The Falcons also intend to recoup some of their contribution through naming rights and other sponsorships.” All stadium revenue will be retained by the Falcons; however, the team must “pay the Georgia World Congress Center Authority \$2.5 million in annual rent, escalating 3 percent per year,” for 25 years.<sup>12</sup> It is important to note that the team must cover all operational costs and capital maintenance expenses, which can be offset by excess TOT revenue.

3 “Publicly-available news articles.”

4 “Publicly-available news articles.”

5 “8 Details You Need to Know About the New Vikings Stadium Agreement.” Associated Press. October 8, 2013. <<http://www.vikings.com/news/article-1/8-Details-You-Need-To-Know-About-The-New-Vikings-Stadium-Agreement/08cc31bc-3b4e-4955-8a26-e612d80f9b7f>>.

6 “8 Details You Need to Know About the New Vikings Stadium Agreement.” Associated Press. October 8, 2013. <<http://www.vikings.com/news/article-1/8-Details-You-Need-To-Know-About-The-New-Vikings-Stadium-Agreement/08cc31bc-3b4e-4955-8a26-e612d80f9b7f>>.

7 “8 Details You Need to Know About the New Vikings Stadium Agreement.” Associated Press. October 8, 2013. <<http://www.vikings.com/news/article-1/8-Details-You-Need-To-Know-About-The-New-Vikings-Stadium-Agreement/08cc31bc-3b4e-4955-8a26-e612d80f9b7f>>.

8 “Publicly-available news articles.”

9 “Publicly-available news articles.”

10 Tucker, Tim. “Comparing Braves, Falcons stadium deals.” The Atlanta Journal-Constitution. November 14, 2013. <<http://www.ajc.com/news/news/comparing-braves-falcons-stadium-deals/nbsX6/>>.

11 Tucker, Tim. “Comparing Braves, Falcons stadium deals.” The Atlanta Journal-Constitution. November 14, 2013. <<http://www.ajc.com/news/news/comparing-braves-falcons-stadium-deals/nbsX6/>>.

12 Tucker, Tim. “Comparing Braves, Falcons stadium deals.” The Atlanta Journal-Constitution. November 14, 2013. <<http://www.ajc.com/news/news/comparing-braves-falcons-stadium-deals/nbsX6/>>.

## DALLAS

AT&T Stadium, located in Arlington, a suburb approximately 20 miles outside of Dallas, incorporates a public contribution of \$465 million, \$325 million of which stems from “City of Arlington bonds; annual debt service backed by a 0.5% sales tax increase, 2% hotel tax increase, and 5% car rental tax increase.”<sup>13</sup> Admission and parking taxes will make up \$115 million with an additional \$25 million County contribution. A private contribution from the Cowboys of \$835 million paid for the majority of the project.

## INDIANAPOLIS

Lucas Oil Stadium received a public contribution of “620 million in State bonds; annual debt service backed by increase in restaurant tax (1% to 2%), and other possible sources including hotel tax, car rental tax, admission tax, and ticket tax.”<sup>14</sup> Private funding was provided at \$100 million.

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HKS Architects designed Lucas Oil stadium and met with CSAG members, sharing with the committee that among the NFL’s 32 teams, the Indianapolis Colts ranked 27<sup>th</sup> in league-wide revenues prior to the construction of the new stadium. Following the construction of Lucas Oil Stadium, according to HKS, the team rose to 11<sup>th</sup>.

## NEW YORK

MetLife stadium is unique in that it is 100% privately financed, however some public funds were spent on infrastructure upgrades totaling \$250 million.<sup>15</sup> The Jets and Giants shared the \$1.6 billion stadium price tag<sup>16</sup>, and split the naming rights revenue for 25 years, worth \$17 million to \$20 million annually.<sup>17</sup>

## SANTA CLARA

Levi’s Stadium, home to the San Francisco 49ers, was constructed with a public contribution of \$114 million, and private contribution of \$1.2 billion. Public funding came from a \$40 million Redevelopment Authority investment, \$35 million from a City of Santa Clara Community Facilities District (CFD) hotel tax, and \$37 million City of Santa Clara offsite project funding.<sup>18</sup> The 49ers will receive “\$220 million over 11 years for the naming rights to Levi’s Stadium.”<sup>19</sup>

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13 “Publicly-available news articles.”

14 “Publicly-available news articles.”

15 “Publicly-available news articles.”

16 “NFL Teams Sold an Average of 48,200 Personal Seat Licenses Last Season.” *Sports Business Daily*, September 8, 2011. <<http://www.sportsbusinessdaily.com/Daily/Issues/2011/09/08/NFL-Season-Preview/PSLs.aspx>>.

17 Sandomir, Richard. “Giants-Jets Home Now MetLife Stadium.” *The New York Times*, August 23, 2011. <[http://www.nytimes.com/2011/08/24/sports/football/metlife-signs-naming-rights-deal-with-jets-and-giants.html?\\_r=0](http://www.nytimes.com/2011/08/24/sports/football/metlife-signs-naming-rights-deal-with-jets-and-giants.html?_r=0)>.

18 “Publicly-available news articles.”

19 Bien, Louis. “49ers’ Levi Stadium the 3rd-biggest naming rights deal in American sports.” *SB Nation*, May 8, 2013. <<http://www.sbnation.com/nfl/2013/5/8/4313344/49ers-levis-stadium-biggest-naming-rights-contracts>>.

## ST. LOUIS (PROPOSED STADIUM)

With efforts to move the Rams to Los Angeles, the St. Louis Stadium Task Force has proposed a 90-acre, 64,000-seat stadium, without a roof. While few details have been released, it is estimated that “the new stadium would cost nearly \$1 billion, with as much as \$405 million paid by taxpayers.”<sup>20</sup> These costs would largely “come from extending payments that now go to pay off debt on the Edward Jones Dome. Of that, the state pays \$12 million a year.”<sup>21</sup> Some expect the stadium to bring in approximately “\$50 million in tax credits from the Missouri Development Finance Board and the state’s Brownfield program, which covers the cost of cleaning up contaminated sites.”<sup>22</sup>

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20 Young, Virginia. “Study: State would see payoff from building stadium for Rams.” *St. Louis Today*. Web. March 9, 2015. <[http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article\\_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html](http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html)>.

21 Young, Virginia. “Study: State would see payoff from building stadium for Rams.” *St. Louis Today*. Web. March 9, 2015. <[http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article\\_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html](http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html)>.

22 Young, Virginia. “Study: State would see payoff from building stadium for Rams.” *St. Louis Today*. Web. March 9, 2015. <[http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article\\_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html](http://www.stltoday.com/news/local/govt-and-politics/study-state-would-see-payoff-from-building-stadium-for-rams/article_2edfa1b8-7025-5b4e-9078-bb1ddb554da1.html)>.

# Farmers Field DEIR

## Summary of Significant Air Quality, Noise and Transportation Impacts

### AIR QUALITY

SIGNIFICANT IMPACTS	CONSTRUCTION EMISSIONS IMPACT DESCRIPTION	OPERATIONAL EMISSIONS IMPACT DESCRIPTION
<i>Regional Daily Construction Emissions</i>		
VOC	<ul style="list-style-type: none"> <li>Project will exceed the SCAQMD daily significance threshold of <u>75 pounds per day</u> during architectural coatings applications.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
CO	<ul style="list-style-type: none"> <li>Project will exceed the SCAQMD daily significance threshold of <u>550 pounds per day</u> during heavy construction equipment use.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
NO <sub>x</sub>	<ul style="list-style-type: none"> <li>Project will exceed the SCAQMD daily significance threshold of <u>100 pounds per day</u> during heavy construction equipment use.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
<i>Localized Construction Emissions Daily Overlapping Construction Activities</i>		
NO <sub>x</sub>	<ul style="list-style-type: none"> <li>Project will exceed the applicable screening-level LST of <u>66 pounds per day</u>.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
PM <sub>10</sub>	<ul style="list-style-type: none"> <li>Project will exceed the applicable screening-level LST of <u>53 pounds per day</u>.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>
PM <sub>2.5</sub>	<ul style="list-style-type: none"> <li>Project will exceed the applicable screening-level LST of <u>15 pounds per day</u>.</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCT EMISSIONS IMPACT DESCRIPTION	OPERATIONAL EMISSIONS IMPACT DESCRIPTION
<i>Regional Daily Operational Emissions</i>		
NO <sub>x</sub>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project will exceed the SCAQMD daily significance threshold of <u>55 pounds per day</u>.</li> </ul>
VOC	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project will exceed the SCAQMD daily significance threshold of <u>55 pounds per day</u>.</li> </ul>
CO	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project will exceed the SCAQMD daily significance threshold of <u>550 pounds per day</u>.</li> </ul>
PM <sub>10</sub>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project will exceed the SCAQMD daily significance threshold of <u>150 pounds per day</u>.</li> </ul>
PM <sub>2.5</sub>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project will exceed the SCAQMD daily significance threshold of <u>55 pounds per day</u>.</li> </ul>
<i>Localized Emissions from Operational Activities: Ambient Operation NO<sub>2</sub> Impacts</i>		
NO <sub>2</sub> – State Hourly Threshold	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project's maximum hourly state NO<sub>2</sub> incremental concentration of 245.6 µg /m<sup>3</sup> exceeds state hourly threshold.</li> </ul>
NO <sub>2</sub> – Federal Hourly Threshold	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Project's maximum hourly federal NO<sub>2</sub> incremental concentration of 205.8 µg /m<sup>3</sup> exceeds federal hourly threshold.</li> </ul>

**Event Day:** An event with an attendance level of 72,000 at the Event Center combined with an attendance level of 19,500 at the Los Angeles Convention Center, which may occur up to 37 times per year.

NOISE

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<i>Construction Noise and Vibration Impacts: On-Site Construction Noise Sources</i>		
<p><b>New Hall Construction</b></p>	<ul style="list-style-type: none"> <li>• Receptor R6               <ul style="list-style-type: none"> <li>○ 625 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 1.5 dBA (during the interior/exterior phase).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 1.7 dBA (during the interior/exterior phase).</li> </ul> </li> <li>• Receptor R26               <ul style="list-style-type: none"> <li>○ 690 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 6.7 dBA (during the interior/exterior phase).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 3.2 dBA (during the interior/exterior phase).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
<p><b>L.A. Live Way Garage</b></p>	<ul style="list-style-type: none"> <li>• Receptor R6               <ul style="list-style-type: none"> <li>○ 275 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 1.5 dBA.</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 5.4 dBA (during the concrete/steel/precast frame phase).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
Event Center	<ul style="list-style-type: none"> <li>• Receptor R1               <ul style="list-style-type: none"> <li>○ 465 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 7.9 dBA (during the foundation phase).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 6.4 dBA (during the interior/exterior phase).</li> </ul> </li> <li>• Receptor R6               <ul style="list-style-type: none"> <li>○ 610 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 1.7 dBA (during the foundation phase).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 1.7 dBA (during the interior/exterior phase).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
Overlapping Construction Activities	<ul style="list-style-type: none"> <li>• Receptors R1, R3, R4, R5, R6, R7, and R26               <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold from 0.2 dBA (at R4) to 10.3 dBA (at R1).</li> </ul> </li> <li>• Receptors R1, R4, R5, R6, R7, R23, and R26               <ul style="list-style-type: none"> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold from 1.9 dBA (at R23) to 9.6 dBA (at R1).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
<p><i>Construction Noise and Vibration Impacts: Off-Site Construction Noise Sources</i></p>		

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Pico Station Second Platform</b></p>	<ul style="list-style-type: none"> <li>• Receptor R2               <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 3.7 dBA (<math>L_{eq}</math>).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 10.5 dBA (<math>L_{eq}</math>).</li> </ul> </li> <li>• Receptor R3               <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 1.4 dBA (<math>L_{eq}</math>).</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 3.4 dBA.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
<p><i>Construction Noise and Vibration Impacts: Composite Noise Levels from Project Construction</i></p>		
<p><b>Bond Street Garage</b></p>	<ul style="list-style-type: none"> <li>• Receptor R26               <ul style="list-style-type: none"> <li>○ 640 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 5.6 dBA (<math>L_{eq}</math>).</li> </ul> </li> <li>• Receptors R4, R5, R6, and R26               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 525 ft., 900 ft., 590 ft., and 640 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold from 3.4 dBA (at R4) to 5.6 dBA (at R6).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
New Hall	<ul style="list-style-type: none"> <li>• Receptors R1, R3, R5, R6, and R26               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 1247 ft., 880 ft., 1090 ft., 625 ft., and 690 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will increase ambient noise levels by 5.2 dBA and 12.0 dBA, which will exceed the 5 dBA significance threshold.</li> </ul> </li> <li>• Receptors R1, R3, R4, R5, R6, R7, R21, R23, R25, and R26               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 1247 ft., 880 ft., 755 ft., 1090 ft., 625 ft., 1065 ft., 2595 ft., 1720 ft., 1590 ft., and 690 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> - Project will increase ambient noise levels by 3.4 dBA (at R25) to 10.4 dBA (at R26), which will exceed the 3 dBA significance threshold.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
L.A. Live Way Garage	<ul style="list-style-type: none"> <li>• Receptor R6               <ul style="list-style-type: none"> <li>○ 275 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will increase ambient noise levels by a maximum of 7.7 dBA (<math>L_{eq}</math>), which will exceed the 5 dBA significance threshold.</li> </ul> </li> <li>• Receptors R5, R6, R7               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 810 ft., 275 ft., and 250 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> - Project will increase ambient noise levels by 4.3 to 9.4 dBA (<math>L_{eq}</math>), which will exceed the 3 dBA significance threshold.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
Event Center	<ul style="list-style-type: none"> <li>• Receptors R1, R5, R6, and R7               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 610 ft., and 420 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> - Project will increase ambient noise levels by 5.0 to 13.1 dBA (<math>L_{eq}</math>), which will exceed the 5 dBA (<math>L_{eq}</math>) significance threshold.</li> </ul> </li> <li>• Receptors R1, R3 through R8, R21, R23, and R25               <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 1220 ft., 1251 ft., 610 ft., 420 ft., 1385 ft., 3155 ft., 1905 ft., and 1530 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> - Project will increase ambient noise levels by 3.1 to 13.5 dBA (<math>L_{eq}</math>), which will exceed the 3 dBA (<math>L_{eq}</math>) significance threshold.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
Overlapping Construction Activities	<ul style="list-style-type: none"> <li>• Receptors R1, R3, R4, R5, R6, R7, R9, and R26               <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will increase ambient noise levels by 0.3 dBA (at R9) to 10.4 dBA (R1), which will exceed the 5 dBA (<math>L_{eq}</math>) significance threshold.</li> </ul> </li> <li>• Receptors R1 through R8, R16, R20, R21, R22, R23, R25, and R26               <ul style="list-style-type: none"> <li>○ <u>Late Evening Hours</u> - Project will increase ambient noise levels by 0.5 dBA (at R20) to 11.3 dBA (at R6), which will exceed the 3 dBA (<math>L_{eq}</math>) significance threshold.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
<i>Construction Noise and Vibration Impacts: Construction Vibration</i>		
Impact Pile Driver Nokia Theater	<ul style="list-style-type: none"> <li>• <u>Impact Pile Driver Vibration</u>- Project will generate vibration levels from 74 VdB (at L.A. Live Garage 250 ft. away) to 86 VdB (at Event Center 100 ft. away), which will exceed the 72 VdB significance threshold.</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><i>Operation Impacts: On-Site Noise Sources</i></p>		
<p><b>Parking Garages</b> <i>(Bond Street Garage &amp; L.A. Live Way Garage)</i></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Receptor R5 <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 1.8 dBA.</li> </ul> </li> <li>• Receptor R6 <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 6.7 dBA.</li> </ul> </li> <li>• Receptors R4, R5, R6, R7, R23, and R25 <ul style="list-style-type: none"> <li>○ <u>Late Evening Hours</u> - Project will exceed the significance threshold by 1.3 dBA to 8.6 dBA.</li> </ul> </li> </ul>
<p><b>Outdoor Plazas</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Receptors R1, R2, R3, and R13 <ul style="list-style-type: none"> <li>○ <u>Daytime Hours</u> - Project will exceed the significance threshold by 7.4 dBA (at R13) to 13.7 dBA (at R1).</li> </ul> </li> <li>• Receptors R1, R2, R3, R13, and R14 <ul style="list-style-type: none"> <li>○ <u>Nighttime Hours</u> - Project will exceed the significance threshold by 6.5 dBA (at R14) to 16.1 dBA (at R2).</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
Event Center – Sport Event	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<p><b><i>In-House Sound System</i></b></p> <ul style="list-style-type: none"> <li>• Receptors R1, R3, R5, and R6 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1125 ft., 1215 ft., and 610 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> – Project will exceed significance thresholds by up to 3.2 dBA (<math>L_{max}</math>).</li> </ul> </li> <li>• Receptors R1, R3, R5 through R9, R14, R21, R23, and R25 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1125 ft., 1215 ft., 610 ft., 420 ft., 1385 ft., 1270 ft., 1730 ft., 3155 ft., 1905 ft., and 1530 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> – Project will exceed significance thresholds by up to 6.9 dBA (<math>L_{max}</math>).</li> </ul> </li> </ul> <p><b><i>Crowd Cheering:</i></b></p> <ul style="list-style-type: none"> <li>• Receptors R1, R5, R6, R7, and R8 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 610 ft., 420 ft., and 1385 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> – Project will exceed significance thresholds by up to 7.7 dBA (<math>L_{max}</math>).</li> </ul> </li> <li>• Receptors R1, R5 through R9, R13, R23, R24, and R25 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 610 ft., 420 ft., 1385 ft., 1270 ft., 1245 ft., 1905 ft., 1590 ft., and 1530 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> – Project will exceed significance thresholds by up to 8.1 dBA (<math>L_{max}</math>).</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
Event Center – Concert Event	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<p><b>Concert Touring Sound System</b></p> <ul style="list-style-type: none"> <li>• Receptors R1, R3 through R9, R17, R21, R23, R25, and R26 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1125 ft., 1220 ft., 1215 ft., 610 ft., 420 ft., 1385 ft., 1270 ft., 2965 ft., 3155 ft., 1905 ft., 1630 ft., and 1250 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> – Project will exceed significance thresholds by 0.4 dBA (at R22) to 10.5 dBA (at R9).</li> </ul> </li> <li>• Receptors R1 through R10, R14, R15, R17, and R21 through R26 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 680 ft., 1125 ft., 1220 ft., 1215 ft., 610 ft., 420 ft., 1385 ft., 1270 ft., 1300 ft., 1730 ft., 1575 ft., 2965 ft., 3155 ft., 2555 ft., 1905 ft., 1590 ft., 1530 ft., and 1250 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> – Project will exceed significance thresholds by 0.5 dBA (at R25 and R25) to 13.0 dBA (at R9).</li> </ul> </li> </ul> <p><b>Crowd Cheering:</b></p> <ul style="list-style-type: none"> <li>• Receptors R1, R5, R6, R7, and R8 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 610 ft., 420 ft., and 1385 ft. to the nearest construction site boundary.</li> <li>○ <u>Daytime Hours</u> – Project will exceed significance thresholds by up to 7.7 dBA (<math>L_{max}</math>).</li> </ul> </li> <li>• Receptors R1, R5 through R9, R13, R23, R24, and R25 <ul style="list-style-type: none"> <li>○ The receptors are, respectively, 465 ft., 1215 ft., 610 ft., 420 ft., 1385 ft., 1270 ft., 1245 ft., 1905 ft., 1590 ft., and 1530 ft. to the nearest construction site boundary.</li> <li>○ <u>Late Evening Hours</u> – Project will exceed significance thresholds by up to 8.1 dBA (<math>L_{max}</math>).</li> <li>○</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
Event Center - Fireworks	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>All Receptors               <ul style="list-style-type: none"> <li>Project will exceed the significance threshold by 8.9 dBA (at R12) to 45.4 dBA (at R5).</li> </ul> </li> <li><u>Note:</u> Fireworks will be 15 ft. to 200 ft. high.</li> </ul>
<i>Operation Impacts: Off-Site Mobile Noise Sources</i>		
<b>Motor Vehicle Travel</b>  <i>Grand Avenue – between 17<sup>th</sup> St. and Washington Ave.</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Sunday Event Day (Post-Event Hour)</u> –Project and Project with Convention Center Dark will cause up to 5.0 dBA increase.</li> <li><u>Weekday Event Day (Post-Event Day)</u> –Project and Project with Convention Center Dark will cause up to 5.8 dBA increase.</li> </ul>
<b>Motor Vehicle Travel</b>  <i>West 11<sup>th</sup> St. – between Blaine St. and L.A. Live Way</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Weekday Event Day (Post-Event Day)</u> –Project and Project with Convention Center Dark will cause up to 6.1 dBA increase.</li> </ul>
<b>Motor Vehicle Travel</b>  <i>West 18<sup>th</sup> St. – West of Flower St.</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Sunday Event Day (Post-Event Hour)</u> –Project will cause up to 6.8 dBA increase and Project with Convention Center Dark will cause up to 7.6 dBA increase.</li> </ul>
<b>Motor Vehicle Travel</b>  <i>West 18<sup>th</sup> St. – West of Grand Ave.</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Sunday Event Day (Post-Event Hour)</u> –Project and Project with Convention Center Dark will cause up to 7.0 dBA increase.</li> </ul>
<b>Motor Vehicle Travel</b>  <i>West 39<sup>th</sup> St. – East of I-110 Freeway.</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Weekday Event Day (Post-Event Day)</u> –Project and Project with Convention Center Dark will cause up to 5.5 dBA increase.</li> </ul>
<b>Public Transit</b>  <i>Blue Line</i>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>Project will result in of 6.0 dBA (hourly <math>L_{eq}</math>) and exceed the significance threshold.</li> </ul>
<b>Helicopters</b>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>Project’s ambient noise will exceed significance threshold by 5.0 dBA (<math>L_{90}</math>).</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<i>Operation Impacts: Composite Noise Level Impacts</i>		
<b>Typical Event Days without Fireworks</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Receptor R1               <ul style="list-style-type: none"> <li>○ Project will result in an increase of 8.1 dBA CNEL, which exceeds the 3 dBA CNEL significance threshold.</li> </ul> </li> <li>• Receptor R2               <ul style="list-style-type: none"> <li>○ Project will result in an increase of 8.2 dBA CNEL, which exceeds the 3 dBA CNEL significance threshold.</li> </ul> </li> <li>• Receptor R3               <ul style="list-style-type: none"> <li>○ Project will result in an increase of 7.8 dBA CNEL, which exceeds the 3 dBA CNEL significance threshold.</li> </ul> </li> <li>• Receptor R13               <ul style="list-style-type: none"> <li>○ Project will result in an increase of 4.0 dBA CNEL, which exceeds the 3 dBA CNEL significance threshold.</li> </ul> </li> </ul>
<b>Typical Event Days with Fireworks</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Receptor R1 through R9, R11, R13, R14, R16, R17, and R19 through R26               <ul style="list-style-type: none"> <li>○ Project's ambient noise will range from 4.5 dBA CNEL (at R11) to 17.9 dBA CNEL (at R3).</li> </ul> </li> </ul>
<i>Cumulative Impacts</i>		
<b>Construction Noise</b>	<ul style="list-style-type: none"> <li>• Project together with the related projects could increase ambient noise levels at receptors that are located within 500 feet from the construction sites by 5 dBA or more.</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Operation Noise</b></p>	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><u>Sunday scenario</u> - At 11 analyzed roadway segments, the Project may produce a maximum increase of up to 9.9 dBA along 18th Street (west of Grand Avenue).</li> <li><u>Sunday scenario</u> - At 8 analyzed roadway segments, the Project may produce a maximum increase of up to 8.5 dBA along 11th Street (west of Grand Avenue).</li> <li><u>Sunday scenario</u> - At 12 analyzed roadway segments, the Project may produce a maximum increase of up to 8.8 dBA along Grand Avenue (between 17th Street and Washington Avenue).</li> </ul>

TRANSPORTATION

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<i>Roadway Intersections</i>		
<p><b>Sunday Day Event</b>  <b>Pre-Event Hour (12:00-1:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections:               <ul style="list-style-type: none"> <li>○ Blaine St. &amp; 11<sup>th</sup> St.; Figueroa St. &amp; 8<sup>th</sup> St.; Vermont Ave. &amp; Pico Blvd.; Vermont Ave. &amp; I-10 EB; Hill St. &amp; 17<sup>th</sup> St.; Broadway &amp; 17<sup>th</sup> St.; Main St. &amp; 17<sup>th</sup> St.; Los Angeles St. &amp; 17<sup>th</sup> St.; Alvarado St. &amp; Pico Blvd.; Olive St. &amp; 17 St.; Vermont Ave. &amp; Olympic Blvd.                   <ul style="list-style-type: none"> <li>▪ Of the 11 impacted intersection, 9 will continue to operate at level of service (“LOS”) D or better, and 2 will operate at LOS E.</li> </ul> </li> </ul> </li> </ul>
<p><b>Sunday Day Event</b>  <b>Post-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections:               <ul style="list-style-type: none"> <li>○ Broadway &amp; 18<sup>th</sup> St.; Figueroa St. &amp; Martin Luther King Jr. Blvd.; I-110 SB &amp; Martin Luther King Jr. Blvd.; Grand Ave. &amp; 1<sup>st</sup> St.; Vermont Ave. &amp; Pico Blvd.; Hoover St. &amp; Venice Blvd.; I-10 WB &amp; 20<sup>th</sup> St.; Main St. &amp; 18<sup>th</sup> St.; Grand Ave. &amp; US-101 NB; Western Ave. &amp; Olympic Blvd.; Union Ave. &amp; Pico Blvd.; Hill St. &amp; 17<sup>th</sup> St.; Hill St. &amp; 16<sup>th</sup> St.; Blaine St. &amp; 11<sup>th</sup> St.; Hill St. &amp; 18<sup>th</sup> St.; Los Angeles St. &amp; 18<sup>th</sup> St.                   <ul style="list-style-type: none"> <li>▪ Of the 18 impacted intersection, 13 will continue to operate at LOS D or better, 2 will operate at LOS E, and 3 will operate at LOS F.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Saturday Day Event</b> <b>Pre-Event Hour (12:00-1:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections: <ul style="list-style-type: none"> <li>○ Olive Ave. &amp; Olympic Blvd.; Blaine St. &amp; 11th St.; Hill St. &amp; Adams Blvd.; Flower St. &amp; 8th St.; Lucas Ave. &amp; 6th St.; Spring St. &amp; Cesar Chavez Ave.; Glendale Blvd. &amp; Temple St.; Western Ave. &amp; Wilshire Blvd.; Union Ave. &amp; Olympic Blvd.; Vermont Ave. &amp; Pico Blvd.; Vermont Ave. &amp; Venice Blvd.; Hoover St. &amp; Venice Blvd.; Hoover St. &amp; Washington Blvd.; Hill St. &amp; 16th St.; Figueroa St. &amp; Olympic Blvd.; I-110 NB Off-Ramp &amp; Adams Blvd.; Alvarado St. &amp; Olympic Blvd.; Vermont Ave. &amp; Washington Blvd.; Hoover St. &amp; I-10 EB ; San Pedro St. &amp; 16th St.; Flower St. &amp; Olympic Blvd.; Blaine St. &amp; Olympic Blvd.; Figueroa St. &amp; 8th St.; Alvarado St. &amp; Pico Blvd.; Vermont Ave. &amp; I-10 EB Ramps; Olive St. &amp; 17th St.; Hill St. &amp; 17th St.; Broadway &amp; 17th St.; Main St. &amp; 17th St.; Los Angeles St. &amp; 17th St.; Vermont Ave. &amp; Olympic Blvd. <ul style="list-style-type: none"> <li>▪ Of the 31 impacted intersections, 20 will operate at LOS D, 5 will operate at LOS E, and 6 will operate at LOS F.</li> </ul> </li> </ul> </li> </ul>
<p><b>Saturday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections: <ul style="list-style-type: none"> <li>○ Hill St. &amp; Pico Blvd.; Flower St. &amp; Venice Blvd.; Grand Ave. &amp; 17<sup>th</sup> St.; Figueroa St. &amp; Washington Blvd.; Figueroa St. &amp; Martin Luther King Jr. Blvd.; I-110 SB Ramp &amp; Martin Luther King Jr. Blvd.; Georgia St. &amp; 9<sup>th</sup> St.; Figueroa St. &amp; 8<sup>th</sup> St.; Hill St. &amp; College Ave.; Western Ave. &amp; Olympic Blvd. Vermont Ave. &amp; Pico Blvd.; Union Ave. &amp; Pico Blvd.; San Pedro St. &amp; 16<sup>th</sup> St.; Arlington Ave. &amp; Venice Blvd.; Georgia St. &amp; Olympic Blvd.; Figueroa St. &amp; Olympic Blvd.; Flower St. &amp; Olympic Blvd.; Blaine St. &amp; Olympic Blvd.; Figueroa St. &amp; Wilshire Blvd.; Grand Ave. &amp; 1<sup>st</sup> St.; Glendale Blvd. &amp; Temple St.; Alvarado St. &amp; Olympic Blvd.; Hoover St. &amp; Venice Blvd.; Hoover St. &amp; Washington Blvd.; I-10 WB Ramps &amp; 20<sup>th</sup> St.; Figueroa St. &amp; Venice Blvd.; Alvarado St. &amp; Pico Blvd.; Blaine St. &amp; 11<sup>th</sup> St.; Hill St. &amp; 17<sup>th</sup> St.; Hill St. &amp; 18<sup>th</sup> St.; Broadway &amp; 18<sup>th</sup> St.; Main St. &amp; 18<sup>th</sup> St.; Los Angeles St. &amp; 18<sup>th</sup> St.; Grand Ave. &amp; US-101 NB Ramps; Hill St. &amp; 16<sup>th</sup> St. <ul style="list-style-type: none"> <li>▪ Of the 36 impacted intersection, 25 will operate at LOS D or better, 3 will operate at LOS E, and 8 will operate at LOS F.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Weekday Evening Event</b>  <b>Pre-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections: <ul style="list-style-type: none"> <li>○ Georgia St. &amp; Olympic Blvd.; Olive St. &amp; Olympic Blvd.; Grand Ave. &amp; 11th St.; Flower St. &amp; Pico Blvd.; Hill St. &amp; Pico Blvd.; Grand Ave. &amp; Washington Blvd.; Olive St. &amp; Washington Blvd.; Hill St. &amp; Washington Blvd.; Georgia St. &amp; 9th St.; Figueroa St. &amp; 9<sup>th</sup> St.; Olive St. &amp; 5th St.; Normandie Ave. &amp; Olympic Blvd.; Western Ave. &amp; Venice Blvd.; Normandie Ave. &amp; Venice Blvd.; Hill St. &amp; 16th St.; Arlington Ave. &amp; Olympic Blvd.; Arlington Ave. &amp; Washington Blvd.; Flower St. &amp; Olympic Blvd.; Broadway &amp; Olympic Blvd.; Blaine St. &amp; Olympic Blvd.; Blaine St. &amp; SR-110 SB; Grand Ave. &amp; 17th St.; Figueroa St. &amp; Washington Blvd.; Broadway &amp; Washington Blvd.; Grand Ave. &amp; Adams Blvd.; I-110 NB Ramps &amp; Martin Luther King Jr. Blvd.; Bixel St. &amp; 6th St.; Hope St. &amp; 1st St.; Hope St. &amp; Temple St.; Western Ave. &amp; Wilshire Blvd.; Union Ave. &amp; Olympic Blvd.; Vermont Ave. &amp; Pico Blvd.; Union Ave. &amp; Pico Blvd.; Vermont Ave. &amp; Venice Blvd.; Vermont Ave. &amp; I-10 EB; Hoover St. &amp; I-10 EB; San Pedro St. &amp; 16th St.; Central Ave. &amp; Washington Blvd.; La Brea Ave. &amp; Olympic Blvd.; Figueroa St. &amp; Pico Blvd.; Figueroa St. &amp; Venice Blvd.; Olive Street &amp; 17th St.; Flower St. &amp; Adams Blvd.; I-110 NB Off-Ramp &amp; Adams Blvd.; Hill St. &amp; Blvd.; Spring St. &amp; Cesar Chavez Ave.; Normandie Ave. &amp; Wilshire Blvd.; Alvarado Str. &amp; Wilshire Blvd.; Alvarado St. &amp; Olympic Blvd.; Alvarado St. &amp; Pico Blvd.; Hoover St. &amp; Venice Blvd.; Hoover St. &amp; Blvd.; Main St. &amp; 16th St.; Arlington Ave. &amp; Venice Blvd.; Crenshaw Blvd. &amp; Olympic Blvd.; Crenshaw Blvd. &amp; Venice Blvd.; Crenshaw Blvd. &amp; Washington Blvd.; Figueroa St. &amp; Olympic Blvd.; Main St. &amp; Olympic Blvd.; Main St. &amp; Pico Blvd.; Blaine St. &amp; 11th St.; Hill St. &amp; 17th St.; Broadway &amp; 17th St.; Main St. &amp; 17th St.; Los Angeles St. &amp; 17th St.; Figueroa St. &amp; Adams Blvd.; Bixel St. &amp; 8th St.; Figueroa St. &amp; 8th St.; Figueroa St. &amp; Wilshire Blvd.; Lucas Ave. &amp; 6th St.; Figueroa St. &amp; 6th St.; Figueroa St. &amp; 5th St.; Grand Ave. &amp; 1st St.; Vermont Ave. &amp; Wilshire Blvd.; Western Ave. &amp; Olympic Blvd.; Vermont Ave. &amp; Olympic Blvd.; Vermont Ave. &amp; Washington Blvd.</li> <li>▪ Of the 77 impacted intersections, 39 will operate at LOS D or better, 18 will operate at LOS E, and 20 will operate at LOS F.</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<b>Weekday Evening Event</b> <b>Post-Event Hour (9:00-10:00 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at Intersections:               <ul style="list-style-type: none"> <li>○ Hill St. &amp; 17<sup>th</sup> St.; Vermont Ave. &amp; Olympic Blvd.;</li> <li>○ Broadway &amp; 18<sup>th</sup> St.; Main &amp; 18<sup>th</sup> St.; Grand Ave. &amp; US-101 NB;</li> <li>○ Hill St. &amp; 16<sup>th</sup> St.; Blaine St. &amp; 11<sup>th</sup> St.; Hill St. &amp; 18<sup>th</sup> St.;</li> <li>○ Los Angeles St. &amp; 18<sup>th</sup> St.                   <ul style="list-style-type: none"> <li>▪ Of the 9 impacted intersections, 4 will operate at LOS D or better, 2 will operate at LOS E, and 3 will operate at LOS F.</li> </ul> </li> </ul> </li> </ul>
<i>Transit Facilities</i>		
<b>Sunday Day Event</b> <b>Pre-Event Hour (12:00-1:00 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Policy Load Capacities Exceeded at:               <ul style="list-style-type: none"> <li>○ Metro Blue Line</li> <li>○ Metrolink</li> <li>○ Metro Silver Line (South &amp; North)</li> <li>○ Express Buses</li> </ul> </li> </ul>
<b>Sunday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Policy Load Capacities Exceeded at:               <ul style="list-style-type: none"> <li>○ Metro Red Line</li> <li>○ Metro Blue Line</li> <li>○ Expo Line</li> <li>○ Metrolink</li> <li>○ Metro Silver Line (South &amp; North)</li> <li>○ Rapid Bus</li> <li>○ Express Buses</li> </ul> </li> </ul>
<b>Saturday Day Event</b> <b>Pre-Event Hour (12:00-1:00 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Policy Load Capacities Exceeded at:               <ul style="list-style-type: none"> <li>○ Metro Red Line</li> <li>○ Metro Blue Line</li> <li>○ Metro Silver Line (South &amp; North)</li> <li>○ Rapid Bus</li> <li>○ Express Buses</li> </ul> </li> </ul>
<b>Saturday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Policy Load Capacities Exceeded at:               <ul style="list-style-type: none"> <li>○ Metro Red Line</li> <li>○ Metro Blue Line</li> <li>○ Expo Line</li> <li>○ Metrolink</li> <li>○ Metro Silver Line (South &amp; North)</li> <li>○ Express Buses</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Weekday Evening Event</b> <b>Post-Event Hour (9:00-10:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Overall ridership will exceed available capacity. <ul style="list-style-type: none"> <li>○ Passenger-carrying capacity: 9,225 riders</li> <li>○ Total projected ridership at this time: 14,992 riders</li> </ul> </li> <li>• Policy Load Capacities Exceeded at: <ul style="list-style-type: none"> <li>○ Metro Red Line</li> <li>○ Metro Red/Purple Line</li> <li>○ Metro Blue Line</li> <li>○ Green Line (East &amp; west)</li> <li>○ Gold Line (Pasadena &amp; East L.A.)</li> <li>○ Metro Silver Line (South &amp; North)</li> <li>○ Rapid Bus</li> <li>○ Express Buses</li> </ul> </li> </ul>
<i>Freeway Segments</i>		
<p><b>Sunday Day Event</b> <b>Pre-Event Hour (12:00-1:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ SR-110 N of Alpine St.; I-5 S of Stadium Way; US-101 at Glendale Blvd.; US-101 S of Vermont Ave. <ul style="list-style-type: none"> <li>▪ The demand/capacity (“D/C”) ratio would be less than 1.10 at 3 of the 4 impacted freeway locations, and would be between 1.10 and 1.20 at the other location.</li> </ul> </li> </ul> </li> </ul>
<p><b>Sunday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-110 at Vernon Ave.; I-5 South of Stadium Way; SR-110 Between James M. Wood Blvd. &amp; Olympic Blvd.; I-10 West of Vermont Ave.; US-101 South of Vermont Ave.; US-101 North of Vignes St.; I-5 West of Indiana St.; US-101 at Glendale Blvd.; SR-110 South of US-101. <ul style="list-style-type: none"> <li>▪ The D/C ratio would be less than 1.10 at 6 impacted freeway locations, between 1.10 and 1.20 at 2 locations, and greater than 1.2 at 1 location.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Saturday Day Event</b>  <b>Pre-Event Hour (12:00-1:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-5 S of Stadium Way; I-110 North of Martin Luther King Jr. Blvd.; US-101 at Glendale Blvd.; US-101 North of Vignes St.; US-101 S of Vermont Ave.; I-110 at Slauson Ave. <ul style="list-style-type: none"> <li>▪ 8 freeway segments would operate at LOS D or better, 6 locations would operate at LOS E, 5 locations would operate at LOS F(0), and 1 would operate at LOS F(1).</li> <li>▪ The majority of D/C ratios at LOS F locations would be less than 1.10. At 1 location, the D/C ratio would be between 1.10 and 1.20, and at 1 location it would be greater than 1.20.</li> </ul> </li> </ul> </li> </ul>
<p><b>Saturday Day Event</b>  <b>Post-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-10 West of Vermont Ave.; I-5 South of Stadium Way; US-101 South of Vermont Ave.; I-10 East of San Pedro St.; I-110 at Vernon Ave.; I-110 North of Martin Luther King Jr. Blvd.; I-5 West of Indiana St.; I-110 at Slauson Ave.; SR-110 North of Alpine St.; US-101 at Glendale Blvd.; SR-110 Between James Wood Blvd. &amp; Olympic Blvd.; US-101 North of Vignes St.; SR-110 South of US-101. <ul style="list-style-type: none"> <li>▪ 7 of the freeway segments would operate at LOS D or better and 13 would operate at LOS F(0).</li> <li>▪ The D/C ratio would be less than 1.10 at 6 of the impacted locations, between 1.10 and 1.20 at 6 locations, and greater than 1.20 at the 1 location.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<p><b>Weekday Evening Event Pre-Event Hour (4:30-5:30 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-110 South of Martin Luther King Jr. Blvd.; I-5 South of Stadium Way; SR-110 Between James Wood Blvd. and Olympic Blvd.; US-101 at Glendale Blvd.; I-5 West of Indiana St.; I-110 at Vernon Ave.; US-101 North of Vignes St.; US-101 South of Vermont Ave.; SR-110 North of Alpine St.; I-10 East of San Pedro St.; I-10 West of Vermont Ave.; SR-110 South of US-101; I-10 East of Crenshaw Blvd. <ul style="list-style-type: none"> <li>▪ 6 locations will operate at LOS D or better 14 will operate at LOS F.</li> <li>▪ The D/C ratio will be less than 1.10 at 2 locations, between 1.10 and 1.20 at 5 locations, between 1.20 and 1.30 at 3 locations and greater than 1.30 at the 3 location. D/C ratio increase would be less than 10% at 6 locations, and in the 15-25% range at 4 locations.</li> </ul> </li> </ul> </li> </ul>
<p><b>Weekday Evening Event Post-Event Hour (9:00-10:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ US-101 at Glendale Blvd.; SR-110 South of US-101; I-5 West of Indiana St. <ul style="list-style-type: none"> <li>▪ 3 locations would operate at LOS F(0).</li> <li>▪ All 3 locations will have a D/C ratio less than 1.02.</li> </ul> </li> </ul> </li> </ul>
<i>Freeway Ramps</i>		
<p><b>Freeway Off-Ramps Sunday Day Event Pre-Event Hour (12:00-1:00 PM)</b></p>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-10: Los Angeles St. WB Off-Ramp</li> <li>○ US 101: Grand Ave. NB Off-Ramp</li> <li>○ SR 110: 9<sup>th</sup> St. NB Off-Ramp</li> <li>○ I-10: Hoover St. EB Off-Ramp <ul style="list-style-type: none"> <li>▪ At 3 locations, the 85th percentile queue would exceed the storage capacity of an individual lane and at 1 location it would exceed the overall ramp capacity.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<b>Freeway On-Ramps</b> <b>Sunday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-10: Los Angeles St. EB On-Ramp</li> <li>○ I-10: Washington Blvd. SB On-Ramp</li> <li>○ SR 110: Blaine St. SB On-Ramp</li> <li>○ SR 110: 8<sup>th</sup> St. SB On-Ramp</li> <li>○ SR 110: 5<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 8<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 11<sup>th</sup> St. NB On-Ramp <ul style="list-style-type: none"> <li>▪ At 3 locations, volumes would exceed ramp capacities by less than 10%.</li> </ul> </li> </ul> </li> </ul>
<b>Freeway Off-Ramps</b> <b>Saturday Day Event</b> <b>Pre-Event Hour (12:00-1:00 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-10: Los Angeles St. WB Off-Ramp</li> <li>○ I-10: Hoover St. EB Off-Ramp</li> <li>○ US 101: Grand Ave. NB Off-Ramp</li> <li>○ I-110: Adams Blvd. NB Off-Ramp</li> <li>○ SR 110: 9<sup>th</sup> St. NB Off-Ramp</li> </ul> </li> </ul>
<b>Freeway On-Ramps</b> <b>Saturday Day Event</b> <b>Post-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ US 101: Los Angeles St. EB On-Ramp</li> <li>○ I-10: Los Angeles St. EB On-Ramp</li> <li>○ I-10: Washington Blvd. SB On-Ramp</li> <li>○ SR 110: Blaine St. SB On-Ramp</li> <li>○ SR 110: 8<sup>th</sup> St. SB On-Ramp</li> <li>○ I-10: Grand Ave. WB On-Ramp</li> <li>○ US 101: Glendale Blvd. On-Ramp</li> <li>○ SR 110: 5<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 8<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 9<sup>th</sup> Street NB On-Ramp</li> <li>○ SR 110: 11<sup>th</sup> St. NB On-Ramp <ul style="list-style-type: none"> <li>▪ At 3 of these locations volumes would exceed ramp capacities by less than 10%.</li> </ul> </li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<b>Freeway Off-Ramps</b> <b>Weekday Evening Event</b> <b>Pre-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ US 101: Grand Ave. NB Off-Ramp</li> <li>○ I-10: Los Angeles St. WB Off-Ramp</li> <li>○ SR 110: 9<sup>th</sup> St. NB Off-Ramp</li> <li>○ I-10: Hoover St. EB Off-Ramp</li> <li>○ SR 110: 6<sup>th</sup> St. SB Off-Ramp</li> <li>○ SR 110: Olympic Blvd. SB Off-Ramp</li> <li>○ I-110: Martin Luther King Jr. Blvd. NB Off-Ramp</li> <li>○ I-110: Adams Blvd. NB Off-Ramp <ul style="list-style-type: none"> <li>▪ At 2 locations it will only be lane impacts, and at 6 locations it will be overall ramp impacts.</li> </ul> </li> </ul> </li> </ul>
<b>Freeway On-Ramps</b> <b>Weekday Evening Event</b> <b>Post-Event Hour (9:00-10:00 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant Traffic Impact at: <ul style="list-style-type: none"> <li>○ I-10: Los Angeles St. EB On-Ramp</li> <li>○ SR 110: Blaine St. SB On-Ramp</li> <li>○ SR 110: 5<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 8<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 9<sup>th</sup> St. NB On-Ramp</li> <li>○ SR 110: 11 St. NB On-Ramp</li> </ul> </li> </ul>
<i>Congestion Management Plan</i>		
<b>Freeway Analysis</b> <b>Weekday Evening Event</b> <b>Pre-Event Hour (4:30-5:30 PM)</b>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>	<ul style="list-style-type: none"> <li>• Significant impact at the following CMP freeway monitoring locations that would exceed eh 150 trip threshold: <ul style="list-style-type: none"> <li>○ I-5 at Lemoran Ave. (NB); I-5 at Ferris Ave. (NB); I-5 at Stadium Way (SB); I-5 south of Colorado Blvd. (SB); I-5 at Burbank Blvd. (SB); I-10 east of Overland Ave. (EB); I-10 east of La Brea Ave. (EB); I-10 at Budlong Ave. (EB); I-10 east of Puente Ave. (WB); I-10 at Grand Ave. (WB); US-101 North of Vignes St. (NB); US-101 south of Santa Monica Blvd. (SB); US-101 at Coldwater Canyon Ave. (SB); US-101 at Winnetka Ave. (SB); I-110 at Manchester Blvd. (NB); I-110 at Slauson Ave. (NB); SR-110 south of US-101 (SB); SR-110 north of Alpine St. (SB); I-405 south of I-110 at Carson Scales.</li> </ul> </li> </ul>

SIGNIFICANT IMPACTS	CONSTRUCTION IMPACT DESCRIPTION	OPERATIONAL IMPACT DESCRIPTION
<i>Roadway Lane Closures:</i>		
<p><b>Pico Blvd. Closure Traffic Impact</b></p> <p><i>(Where 3 Northerly/Southerly Lanes Closed)</i></p>	<ul style="list-style-type: none"> <li>• Reduces overall capacity of Pico, which may result in increased travel time and delays or decreased level of service that is significant               <ul style="list-style-type: none"> <li>○ May lead to traffic shifting to East-West roadways (Olympic Blvd., Venice Blvd., Washington Blvd. 9<sup>th</sup> St., or 8<sup>th</sup> St.)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
<p><b>Pico-Union Neighborhood Impact</b></p> <p><i>(Between L.A. Live &amp; Concourse Hall Bridge)</i></p>	<ul style="list-style-type: none"> <li>• Reduced roadway capacity could lead to some traffic diverting to east-west arterial roadways and substantial diversions in Pico-Union to reach parallel arterials which may cause significant impacts.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

\*LADOT guidelines indicate that local residential streets can potentially be impacted through increased vehicle trips if traffic is diverted to local residential streets as cut-through routes to bypass congested arterial roads. LOS E and F are considered congested arterial conditions.





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## Qualcomm Stadium



San Diego Stadium, (the original name) is one of the few remaining mid-century designed multi-purpose stadiums left in the United States. It was opened in 1967 as home to the San Diego Chargers, the San Diego Padres and the San Diego State University Aztecs football team. Frank L. Hope Associates architect Gary Allen, who spent his formative years in the office of Philip Johnson, designed the stadium for the city.

With its innovative design features which included pre-cast concrete, pre-wired light towers, and spiral concrete pedestrian ramps, the stadium received an American Institute of Architects Honor award in 1989 for outstanding design, the first time an architecture firm in San Diego had received a national honor award. The City of San Diego must find a way to preserve this modern monument.

### LISTS FROM PAST YEARS

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[2010](#) | [2009](#) | [2008](#)

[2007](#)

### Newly Added

- Rancho Guejito
- Salk Institute
- Serra Cross
- Casa de Carrillo
- Whalen Ranch
- Tijuana Bullring

### Remaining from past years

- Villa Montezuma
- San Pasqual Valley Old Adobe School House & the Clevenger House/Homestead
- Warner-Carrillo Ranch House
- Border Field State Park
- Qualcomm Stadium
- Red Roost and Red Rest cottages

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# My project San Diego County, California

OVERVIEW

RESOURCES

IMPACT ANALYSIS

REGULATORY DOCUMENTS



This project potentially impacts **50 resources** managed or regulated by the U.S. Fish & Wildlife Service

## Tasks



**Review** potentially impacted resources

To see endangered species, migratory birds, wetlands or refuges which may be impacted by this project

This project could impact:

- 20 endangered species
- 29 migratory birds
- 90 acres of wetland

View the complete [resource list](#) to see more

## Local office

Carlsbad Fish And Wildlife Office

☎ (760) 431-9440

🔗 <http://www.fws.gov/>

information.



**Request an official species list**

To receive an official document from the Carlsbad Fish  
And Wildlife Office

An official species list obtained from IPaC is  
considered a U.S. Fish & Wildlife Service official  
response.

An official species list has not been requested  
for this project.



**Analyze the impacts of your project**

Provide additional details and get recommended  
conservation measures for your project

There are no species in your project area with  
conservation measure recommendations  
available. Please contact the local U.S. Fish &  
Wildlife office to review impacts for this project.

# My project San Diego County, California

OVERVIEW

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IMPACT ANALYSIS

REGULATORY DOCUMENTS

This project potentially impacts **50 resources** managed or regulated by the U.S. Fish & Wildlife Service

## Endangered species

Proposed, candidate, threatened, and endangered species that are managed by the Endangered Species Program and should be considered as part of an effect analysis for this project.

### Birds



**California Least Tern** *Sterna antillarum browni*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**Coastal California Gnatcatcher** *Polioptila californica californica*

Threatened (A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range)



**Least Bell's Vireo** *Vireo bellii pusillus*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**Light-footed Clapper Rail** *Rallus longirostris levipes*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**Southwestern Willow Flycatcher** *Empidonax traillii extimus*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)

**Western Snowy Plover** *Charadrius alexandrinus nivosus*

Threatened (A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range)

## Crustaceans



**Riverside Fairy Shrimp** *Streptocephalus woottoni*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**San Diego Fairy Shrimp** *Branchinecta sandiegonensis*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)

## Flowering Plants



**California Orcutt Grass** *Orcuttia californica*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**Del Mar Manzanita** *Arctostaphylos glandulosa* ssp. *crassifolia*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**Salt Marsh Bird's-beak** *Cordylanthus maritimus* ssp. *maritimus*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**San Diego Ambrosia** *Ambrosia pumila*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**San Diego Button-celery** *Eryngium aristulatum* var. *parishii*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**San Diego Mesa-mint** *Pogogyne abramsii*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)



**San Diego Thornmint** *Acanthomintha ilicifolia*

Threatened (A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range)



**Spreading Navarretia** *Navarretia fossalis*

Threatened (A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range)



**Thread-leaved Brodiaea** *Brodiaea filifolia*

Threatened (A species likely to become endangered within the foreseeable future throughout all or a significant portion of its range)



**Willowy Monardella** *Monardella viminea*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)

## Insects



**Quino Checkerspot Butterfly** *Euphydryas editha quino* (=E. e. wrighti)

Endangered (A species in danger of extinction throughout all or a significant portion of its range)

## Mammals



**Pacific Pocket Mouse** *Perognathus longimembris pacificus*

Endangered (A species in danger of extinction throughout all or a significant portion of its range)

## Critical habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

THERE IS NO CRITICAL HABITAT WITHIN THIS PROJECT AREA

## Migratory birds

Birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

Any activity which results in the take (to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct) of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1).

There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

**Bald Eagle** *Haliaeetus leucocephalus*

Season: Wintering

**Bell's Sparrow** *Amphispiza belli*

Year-round



**Black Oystercatcher** *Haematopus bachmani*

Year-round



**Black-chinned Sparrow** *Spizella atrogularis*

Season: Breeding

**Brewer's Sparrow** *Spizella breweri*

Year-round



**Burrowing Owl** *Athene cunicularia*  
Year-round

**Cactus Wren** *Campylorhynchus brunneicapillus*  
Year-round



**Costa's Hummingbird** *Calypte costae*  
Season: Breeding



**Fox Sparrow** *Passerella iliaca*  
Season: Wintering



**Green-tailed Towhee** *Pipilo chlorurus*  
Season: Breeding



**Gull-billed Tern** *Gelochelidon nilotica*  
Season: Breeding



**Lawrence's Goldfinch** *Carduelis lawrencei*  
Year-round



**Least Bittern** *Ixobrychus exilis*  
Year-round



**Lesser Yellowlegs** *Tringa flavipes*

Season: Wintering



**Lewis's Woodpecker** *Melanerpes lewis*

Season: Wintering



**Loggerhead Shrike** *Lanius ludovicianus*

Season: Wintering

**Long-billed Curlew** *Numenius americanus*

Season: Wintering



**Marbled Godwit** *Limosa fedoa*

Season: Wintering

**Mountain Plover** *Charadrius montanus*

Season: Wintering



**Nuttall's Woodpecker** *Picoides nuttallii*

Year-round



**Oak Titmouse** *Baeolophus inornatus*

Year-round

**Peregrine Falcon** *Falco peregrinus*

Season: Wintering



**Red-crowned Parrot** *Amazona viridigenalis*

Year-round



**Short-billed Dowitcher** *Limnodromus griseus*

Season: Wintering

**Short-eared Owl** *Asio flammeus*

Season: Wintering

**Tricolored Blackbird** *Agelaius tricolor*

Year-round



**Whimbrel** *Numenius phaeopus*

Season: Wintering



**Yellow Warbler** *dendroica petechia* ssp. *brewsteri*

Season: Breeding

**Red Knot** *Calidris canutus* ssp. *roselaari*

Season: Wintering

# Wildlife refuges

Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

THERE ARE NO REFUGES WITHIN THIS PROJECT AREA

# Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate U.S. Army Corps of Engineers District.

## Freshwater Forested/shrub Wetland

PFO/SSC	90.1 acres
PSSAx	0.131 acre





# Mission Valley Keeps Getting More Roads – and More Traffic

[Matthew Hose](#) | December 15, 2014





The intersection of Friars Road and Frazee Road.

Any San Diegan knows Mission Valley at rush hour is a gridlocked mess.

At the intersection of Friars Road and Frazee Road, eight lanes of cars wait at red lights, backed up hundreds of feet waiting to get on the freeway.

Bicyclists make the choice to either merge into the gridlock or hop onto a sidewalk as the bike lane disappears and cars zip from SR-163 onto local streets. The few pedestrians who cross the street must scamper to make it to the other side before the light turns red.

For decades, Mission Valley infrastructure has mainly been developed to keep traffic moving. This has meant one thing: roads, roads and more roads.

Mission Valley becomes synonymous with massive residential development and people begin to call it home, it faces a crossroads: Will it become a livable neighborhood and another piece to San Diego's City of Villages puzzle, or will it continue to be a throughway between the

sprawled-out areas in San Diego?

Right now, it is firmly planted in the latter.



With a huge influx of residential development coming in the near future, Mission Valley is going road-crazy.

Like many other neighborhoods in San Diego, Mission Valley has a wish-list for community projects that need funding.

[The plan](#) details over 30 of the community planning group's top-priority transportation projects for the area. All but one of the projects improves roadway conditions for cars. Projects range from restriping areas of Hotel Circle, creating new lanes on Friars Road and creating entirely new stretches of road on Camino de la Reina.

The one project that didn't involve cars: a proposed pedestrian crossing that would go over the traffic-frenzied, eight-lane Friars Road at the intersection of Frazee Road.

But that had to be deleted from the plans. It conflicted with a project to improve the vehicle intersection of the 163 and Friars Road.



Pedestrians cross near the intersection of Friars Road and Frazee Road.

This presents a problem. Research now shows that building new roads isn't the answer to traffic – in fact, it's the *cause* of increased traffic.

Expanding the capacity of roadways leads to something called “induced demand.” That means it isn't demand that ends up driving the supply, but the **supply that ends up bringing more demand for the roadways.**

So more lanes on a road actually incentivizes more people to drive down that road, and it ends up having the same or worse traffic after improvements. Compounding the problem: building and widening roads also discourages bikers and pedestrians from using the roads and makes it difficult to implement good transit systems.

For Mission Valley, the logic of extending roads comes from the huge influx in residential development that's happened for the past several decades. There's the Civita development of **over 5,000 new homes** on the northern side of Friars Road. There's Doug Manchester's **planned development** of 200 more apartments at the U-T headquarters. And there's a long-idling plan to redevelop the Riverwalk Golf Course into **4,000 homes.**

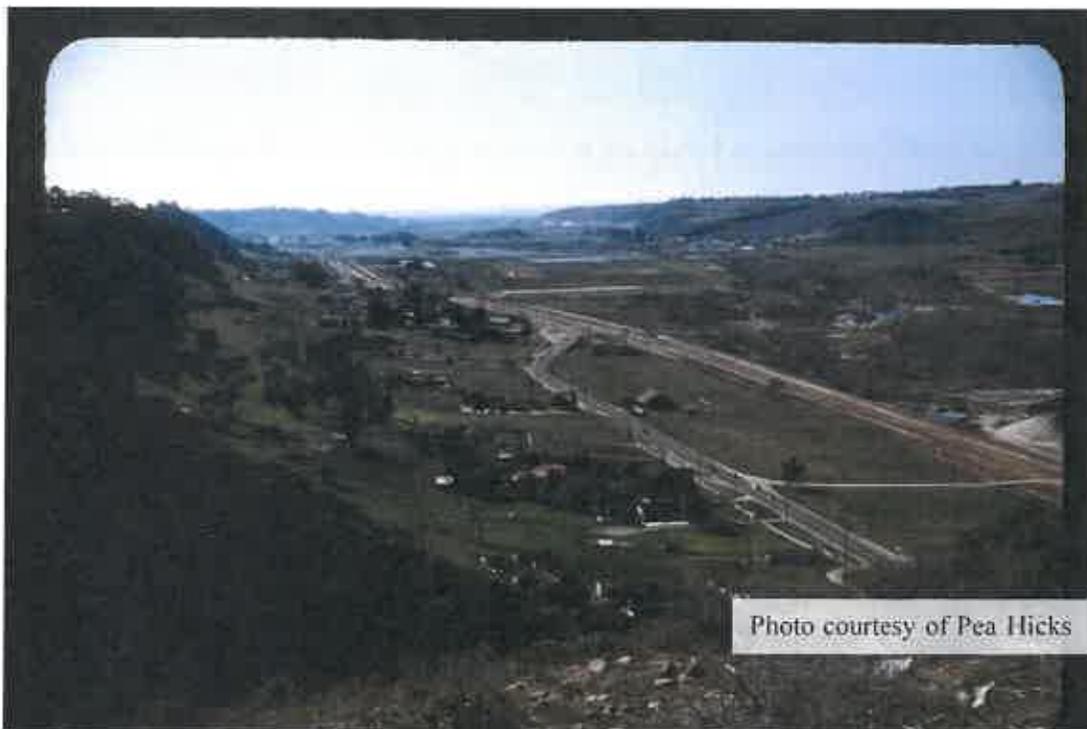
The idea is that the throng of new residents in Mission Valley will bring more demand for road

use, which means that the city needs to increase the supply of roads in order to match the demand. But if the research holds true, that means more roads in Mission Valley will just mean more traffic in Mission Valley.

## Level of Service

In San Diego and in cities across the country, traffic engineers in the 1960s began using a concept known as “level of service” to measure roadway success and to decide when to improve streets.

It’s a standard operating procedure among traffic engineers and planners that gives a report card-style letter grade to a section of road based on how long cars are delayed due to congestion. Typically, if cars are waiting anywhere above a minute to get through a red light or a section of highway, then that road needs improvements.



The arrival of highways and interstates in the 1960s helped turn Mission Valley car-centric.

It was a concept that led to bigger and bigger streets and helped to shape the interstate system.

But as cities grow, and more people move in, level of service on streets tends to keep getting worse unless planners add lanes of traffic to the streets.

There's a domino effect at work here: The more lanes of road, the harder it is to put in bike lanes. The more lanes of road, the faster cars can drive down city roads, which makes the roads re dangerous for pedestrians. And the faster cars can go, the farther people can drive to get to work, which creates more sprawl.

Further complicating things, the concept of level of service is couched within California's Environmental Quality Act, or CEQA, the state's landmark environmental law. Among other things, the law can hold developers liable if a project increases traffic on a certain road.

If a developer or community planner doesn't want to be sued for increasing traffic, the easiest thing to do is build more lanes.

But Joe LaCava, chair of San Diego's Community Planners Committee, said that won't help.

"You can't physically do anything about the traffic anymore," LaCava said. "The road system is the road system."

## A Mindset Shift

Mission Valley is at the middle of a major culture shift, said Brian Schoenfisch, a senior planner for the city.

It's a change in mindset happening in neighborhoods, cities, the county and the state all at once.

In the next three years, Mission Valley planners and engineers will be drafting the first major update to its 1985 community plan. Schoenfisch said he expects public transportation, parks and alternative forms of transportation will be vital pieces of the plan.

He also expects full implementation of the San Diego River Park Master Plan, a project to create a continuous, 17-mile-long park along the banks of the San Diego River. The park would include pedestrian and bike paths from Ocean Beach through Mission Valley and up to Santee.

Schoenfisch's vision falls under the city's established plan for how it should grow and absorb

more residents, called its general plan. The general plan envisions San Diego as a “city of villages” that emphasizes dense housing near transit centers, with walkable streets and stores nearby. It’s a concept that goes against the roads-first mindset.

Changes to state law could also facilitate that shift.

This year, lawmakers passed a bill that will change the way CEQA measures environmental impacts on traffic, shying away from the level of service metric. Under the new bill, the Office of Planning and Research is drafting revisions to CEQA which will not allow developers to use “traffic congestion” as a basis for an environmental impact.

State officials will likely swap in a new measure called “vehicle miles traveled.” This looks at how many extra miles cars will drive as a result of the road changes, instead of congestion. It gives points to public transit, biking and walking, and it eschews more cars on the road.

Kip Lipper, a state staffer who helped draft the new legislation, said the switch is going to have a profound impact on development and traffic in California.

“This change gets away from the giant thoroughfares that you see all over Southern California,” Lipper said.

LaCava also said that the change will give planners in neighborhoods like Mission Valley more leeway to implement crosswalks, bike lanes and bus lanes.

## Too Far Gone?

The concept of building out roads through Mission Valley worked when it was just a waypoint to get from outlying neighborhoods to the center of San Diego, or to get to the beach from the east.

But now, Mission Valley is quickly becoming a bustling neighborhood in itself.

Mission Valley is in a tough spot geographically though, Schoenfisch said, because it serves a dual role: It’s both a neighborhood with a rapidly booming residential sector, and the geographic

center of the city that serves as a vital connection to other areas.

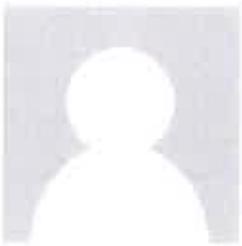
“It’s a big challenge because many of the major freeways that are in the San Diego region cross through Mission Valley ... but at the same time, it has that neighborhood component. This is where people live, this is where people shop and this is where people work,” Schoenfisch said.

But if history is any example, residents have reason to be skeptical. The valley has been noted for its haphazard planning, with the community not adopting a development blueprint until 1985 despite big hotel developments there since the 1950s. It doesn’t have any schools, was slow to bring in a library, and doesn’t have any big parks.

And, despite all of the big ideas, the roads keep getting built.

This article relates to: [Community Plans](#), [Growth and Housing](#), [Infrastructure](#), [Land Use](#), [Neighborhood Growth](#), [News](#), [Public Transportation](#), [Share](#)

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Written by Matthew Hose

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PARTNER VOICES





*City of San Diego*  
**SEISMIC SAFETY STUDY**  
*Geologic Hazards and Faults*

Updated 2008



**Development Services Department**

**Disclaimer**

The information presented on these maps is primarily intended for planning purposes and should not be construed as definitive data for a specific site. The information presented is a collection of the most readily available data at the time of compilation. As much of the information was transferred from maps of differing scales, the accuracy is limited.

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# SAN DIEGO SEISMIC SAFETY STUDY

## Introduction

The first edition of the San Diego Seismic Safety Study (SDSSS) was completed and adopted by City Council (Resolution 211594) on September 19, 1974 to comply with California regulations requiring cities to adopt a Seismic Safety Element within their General Plan.

The original maps, issued in 1974 and updated in 1983, have been revised and upgraded to reflect the latest interpretation of the geologic features and to streamline the site review process. The new maps are produced at a larger scale (1 inch = 800 ft.) and in full color, incorporating the most advanced GIS computer mapping capabilities. The GIS computer-based system provides easy public access to the latest version of the maps, quick evaluation for permit processing, and timely maintenance and upgrading of data.

The SDSSS can be used to determine what geologic conditions are likely to underlie your site. The study consists of a series of maps showing locations of faults and other geologic hazards which are suspected or known to exist within the city of San Diego. This information is necessary for determining which level of geotechnical review will be required by the city when applying for planning, development or building permits.

The new edition contains several important changes that will shorten the review process. Geologic Hazard Categories and Fault Zones are now shown on a single sheet instead of two separate sheets, and the Geotechnical Land-Use Capability sheet has been eliminated. A revision and expansion of the Geologic Hazard Categories, a larger map format and scale, and the precision of GIS computer software has allowed the elimination of two-thirds of the old maps. This edition simplifies and consolidates the review process for all city departments by utilizing the same criteria (Geologic Hazard Categories) for site evaluation.

## How To Use the SDSSS

The procedure for determining which level of geotechnical study is required by the various city departments for planning, development or building permits differs slightly, based upon the type of permit sought. For permits dealing with land-planning and land-development (i.e., grading, public improvements), refer to the procedure described in "PLANNING AND DEVELOPMENT PERMITS" on sheet 2. For building permits, refer to the procedure described in "BUILDING PERMITS" on sheet 3.

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## Legend

### FAULT ZONES

-  11 Active, Alquist-Prilo Earthquake Fault Zone
-  12 Potentially Active, Inactive, Presumed Inactive, or Activity Unknown
-  13 Downtown special fault zone

### FAULTS

-  Fault
-  Inferred Fault
-  Concealed Fault
-  Shear Zone
-  Relative vertical fault movement

Fault Zones represent possible limits within which faults could be located. Area concept required due to possible plotting error from different scale of source maps and accuracy of plots and overlay.

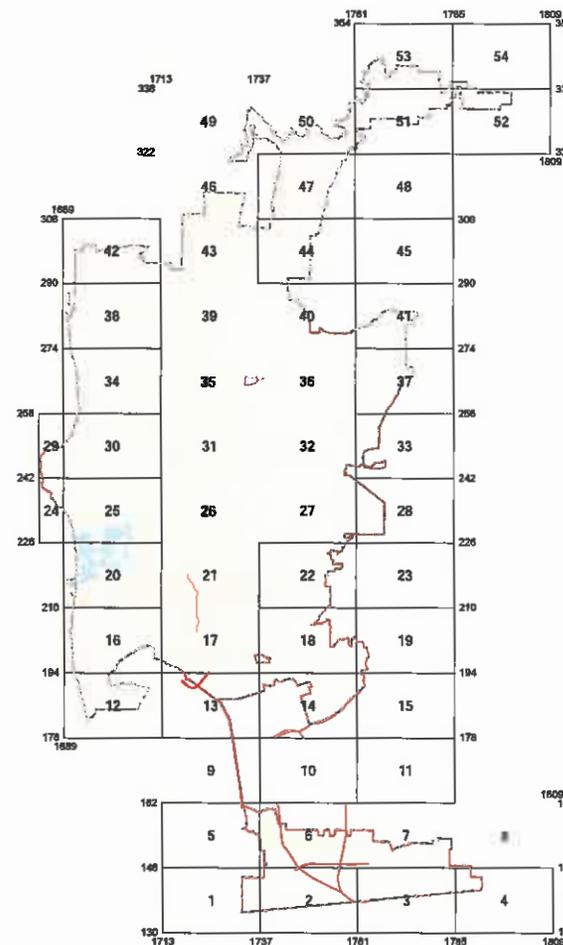
All fault locations are based on the best interpretation of available data at the time of compilation. Often, due to the extreme differences in scale between the data source and this map, interpretation of the fault, inferred fault, and concealed fault was required.

NOTE: There is a high degree of probability that the fault location will lie within the limits shown. Limits are included to indicate suggested areas for exploration in order to accurately locate the fault.



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## Index Map (NAD 27)



# SAN DIEGO SEISMIC SAFETY STUDY: PLANNING & DEVELOPMENT PERMITS

**Table 2-A**

Type of Hazard	Geologic Hazard Categories	Relative Risk			
		Nominal	Low	Moderate	High
Ground Rupture	11 Active, Alquist-Priolo Earthquake Fault Zone				●
	12 Potentially Active Inactive, Presumed Inactive, or Activity Unknown		●	●	
	13 Downstream special fault zone			●	●
Potential Slope Instability	21 Confirmed, known, or highly suspected				●
	22 Possible or conjectured			●	
	23 Friers: neutral or favorable geologic structure		●	●	
	24 Friers: unfavorable geologic structure			●	
	25 Aridetic neutral or favorable geologic structure		●	●	
	25 Aridetic unfavorable geologic structure			●	
	27 Dry, Swastener, and others		●	●	
Potential Ground Failure	31 High Potential – shallow groundwater major drainages, hydraulic fills			●	●
	32 Low Potential – fluctuating groundwater minor drainages		●		
Coastal Bluff Stability	41 Generally unstable; Numerous landslides, high steep bluff, severe erosion, unfavorable geologic structure				●
	42 Generally unstable; Unfavorable bedding planes, high erosion			●	●
	43 Generally unstable; Unfavorable jointing, local high erosion			●	
	44 Moderately stable; Mostly stable formations, local high erosion		●	●	
	45 Moderately stable; Some minor landslides, minor erosion		●		
	46 Moderately stable; Some unfavorable geologic structure, minor or no erosion		●		
	47 Generally stable; Favorable geologic structure, minor or no erosion, no landslides		●		
	48 Generally stable; Broad beach areas, developed harbor	●	●		
All Other Conditions	51 Level areas – underlain by terrace deposits and bedrock nominal risk	●			
	52 Other level areas, gently sloping to steep terrain, favorable geologic structure, Low risk		●		
	53 Level or sloping terrain, unfavorable geologic structure, Low to moderate risk		●	●	
	54 Steeply sloping terrain, unfavorable or fault controlled geologic structure, Moderate risk			●	
	55 Modified terrain (graded sites) Nominal risk	●			

**Table 2-B**

Building Type/Land Use Group	
Group I	Nuclear Facilities, Large Dams and Regional Electrical Power Generation Plants
II	Hospitals; Fire, Police, Emergency Communication Facilities; Critical Transportation Elements, such as Bridges, Overpasses; Smaller Dams; Important Utility Centers
III	Schools, Churches, Large or Highrise Buildings, or Other Places Normally Attracting Large Concentrations of People, such as Civic Buildings, Large Commercial Structures, Most Roads, Other Utilities, Grading
IV	Residential (Single-Family Residences, Apartments, etc.) Most Commercial and Minor Public Structures
V	Most Industrial, Other Minor Commercial (Warehouses, Wharves, Docks, Marinas)
VI	Agriculture, Parks, Open Space

Follow this procedure to determine which level of geotechnical study is required by the City for Land-Planning and Land-Development permits:

1. Referring to the Index (Sheet 1), find the map sheet number containing your site. Turn to the proper map sheet and locate your site.
2. From the map, determine the Hazard Category for your site. The Hazard Category is identified by a specific number (11 thru 55) and color code. Refer to Table 2-A for a description of the Hazard Category and the relative risk assigned to the suspected type of Hazard.
3. Determine the Building Type/Land Use Group for your project per Table 2-B.
4. Referring to Table 2-C, determine the required geotechnical study for the Building Type/Land Use Group and Hazard Category at your site.

**Table 2-C Required Geotechnical Study**

RELATIVE RISK	HAZARD CATEGORY	SOIL INVESTIGATION	GEOLOGIC RECONNAISSANCE	GEOLOGIC INVESTIGATION
MODERATE TO HIGH	11, 13, 21, 31, 41	I-V	-	I-VI
LOW TO MODERATE	12, 22-27, 32, 42-48, 53, 54	I-V	VI	I-V
NOMINAL TO LOW	51, 52, 55	I-V	IV	I-III



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# SAN DIEGO SEISMIC SAFETY STUDY: BUILDING PERMITS

## FOOTNOTES TO TABLE 145.1802

1. Hazard Category. The Hazard Category describes the geologic feature or condition suspected at the site. The Hazard Category is determined by reference to the current City of San Diego Seismic Safety Study (SDSSS) maps.

2. Building, structure, and facility classes A, B, C, and D.

A. Class A includes the following:

- 1) Essential Facilities as defined in Section 1604.5 of the California Building Code.
- 2) Any building, structure, or facility where, in the opinion of the Building Official, significant generations or storage of toxic, hazardous, or flammable materials will occur. Quantities of these materials will be assessed in accordance with the risks they present.

B. Class B includes the following developments, occupancy groups, and structures provided they are not included in Class A:

- 1) All developments consisting of four or more structures.
- 2) All new structures requiring deep foundations (piers or pilings).
- 3) All buildings over three stories in height.
- 4) All buildings containing the following occupancies (Refer to 2007 California Building Code, Chapter 3):
  - a. Group A, Divisions 1, 2, 3 and 4.
  - b. Group E.
  - c. Group H, Divisions 1, 2 and 3.
  - d. Group I, Divisions 1, 2 and 3.
- 5) All buildings with an occupant load of more than three hundred (300) persons as determined by Table 10-A of the California Building Code.
- 6) Tanks, bins, hoppers, silos, and other storage structures of more than twenty thousand (20,000) gallons capacity intended to store toxic, hazardous, or flammable contents that are not associated with a building, structure, or facility in Class A.
- 7) Tanks, bins, hoppers, silos, and similar structures over thirty-five (35) feet high.
- 8) Towers over thirty-five (35) feet high.
- 9) Retaining walls (height is measured from the top of the footing to the top of the wall):
  - a. Retaining walls over 12 feet in height.
  - b. Retaining walls over 8 feet in height supporting a surcharge or retaining toxic, hazardous, or flammable contents.
  - c. Retaining walls associated with structures included in footnotes 1.B.A.

C. Class C includes the following occupancy groups and structures provided they are not included in Classes A or B:

- 1) All buildings containing the following occupancies (Refer to California Building Code, Chapter 3):
    - a. Group A, Divisions 2, 3 and 5.
    - b. Group B.
    - c. Group E.
    - d. Group F, Divisions 1 and 2.
    - e. Group H, Divisions 4 and 5.
    - f. Group I, Division 1.
    - g. Group M.
    - h. Group R, Divisions 1 and 2.
    - i. Group S, Division 1.
  - 2) Retaining walls (height is measured from the top of the footing to the top of the wall):
    - a. Retaining walls over 8 feet in height.
    - b. Retaining walls of any height supporting a surcharge or retaining toxic, hazardous, or flammable contents.
    - 3) Tanks, bins, hoppers, silos, and other storage structures intended to store toxic, hazardous, or flammable contents.
    - 4) Tanks, bins, hoppers, silos, and similar structures over twenty (20) feet high.
    - 5) Towers over 25 feet high.
- D. Class D includes the following occupancy groups and structures provided they are not included in Classes A, B, or C:
- 1) All buildings containing the following occupancies (Refer to California Building Code, Chapter 3):
    - a. Group R, Divisions 3 and 4.

Note: No geologic investigations are required for occupancy Group U or any other structure of a similar minor nature.

3. Faults and Fault Zones – Hazard Category 11, 12, and 13.

Active and potentially active faults are defined in the most recent edition of "Fault-Rupture Hazard Zones in California," Special Publication 42, California Department of Conservation, Division of Mines and Geology, a copy of which is on file at the office of the City Clerk as Document No. 06-17773-4.

Fault zones define the limits within which faults are suspected. Fault zones include the Algebit-Picoto Earthquake Fault Zones, The Downtown Special Fault Zone, as well as the area 100 feet on both sides of the fault lines indicated on the current San Diego Seismic Safety Study (SDSSS) maps. Refer to SDSSS maps for location of faults and fault zones.

The Downtown Special Fault Zone consists of an area beginning at the intersection of the centerline of Laurel Street and the centerline of Highway 163, thence in a general westerly and southeasterly direction along the centerline of Laurel Street to the intersection of the centerline of Harbor Drive, thence westerly to the intersection of the U S Bulwark line of San Diego Bay, thence in a general southerly and southeasterly direction along said Bulwark line to an intersection of the southeasterly prolongation of the centerline of 26th Street, thence northerly along the centerline of 26th Street to the intersection of the centerline of Ocean View Boulevard, thence northeasterly along the centerline of Ocean View Boulevard to the intersection of the centerline of 25th Street to the intersection of the centerline of Ross Boulevard, thence westerly along the prolongation of the centerline of Ross Boulevard to the intersection of the centerline of Highway I-5, thence in a general northerly and westerly direction along the centerline of Highway I-5 to the intersection of the centerline of Highway 163, thence generally northerly along the centerline of Highway 163 to the point of place of beginning.

4. Liquefaction Potential – Hazard Category 31 and 32.

When an investigation is required, adhere to Section 1802 of the 2007 California Building Code for minimum requirements.

5. Geotechnical Report. A report of the geotechnical condition is required for sites where geologic hazards are suspected, prior to obtaining a Building Permit. The report will either consist of a preliminary study, a geologic reconnaissance, or an in-depth study including field work and analysis, a geologic investigation. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official. All reports shall be prepared in accordance with the most recent edition of the City of San Diego "Technical Guidelines for Geotechnical Reports," on file with the City Clerk as Document No. 06-17773-5. These minimum requirements shall be augmented by geologic evaluations pertinent to the type of proposed project and anticipated method of construction, which should be described in the report. For buildings located in both a fault zone and a hazard category zone, the most restrictive requirement shall govern.

Regardless of the requirements of Table 145.1802, the Building Official may require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site.

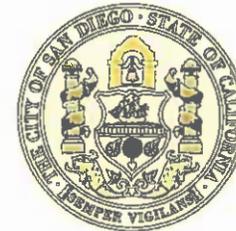
Follow this procedure to determine which level of geotechnical study is required by the City for building permits:

1. Referring to the Index (Sheet 1), find the map sheet number containing your site. Turn to the proper map sheet and locate your site.
2. From the map, determine the Hazard Category for your site. The Hazard Category is identified by a specific number (11 thru 55) and is color coded.
3. Referring to Table 145.1802, determine the required geologic study for the Hazard Category and the proposed Building, Structure, or Facility Class (A, B, C, or D). The footnotes to the table are provided to further clarify the procedure.

Table 145.1802 Required Geotechnical Investigation<sup>5</sup>

Hazard Category <sup>1</sup>	Building, Structure, and Facility Class <sup>2</sup>
11 <sup>3</sup> , 13 <sup>3</sup> , 21, 31 <sup>4</sup> , 41	A, B, C, D
12 <sup>4</sup> , 22, 42-48, 54	A, B, C, D
23-27, 32 <sup>4</sup>	A, B, C
51, 52, 53, 55	A, B

NOTE: Refer to Municipal Code section 145.1802 for complete foundation investigation requirements.









Law Offices of  
Julie M. Hamilton

July 22, 2015

Martha Blake  
Senior Planner  
City of San Diego Development Services Center  
1222 First Avenue  
MS 501  
San Diego, CA 92101

**Re: Comments on Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Stadium Reconstruction Project**

Dear Ms. Blake:

I am submitting the following comments on behalf of several San Diego residents. I have reviewed the Notice of Preparation (“NOP”) dated June 22, 2015 for the proposed Stadium Reconstruction Project and am concerned the NOP does not comply with the requirements of the California Environmental Quality Act (“CEQA”). The issues outlined below should be fully analyzed during the environmental review of the Stadium Reconstruction Project in order to move forward with the project as expeditiously as possible and to avoid using public funds for an Environmental Impact Report (“EIR”) that will not survive if challenged.

“The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account.” (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-450.) To achieve these goals, the EIR must present information so the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment before the decision to go forward is made. *Ibid.*

As an initial matter, we can find no evidence the NOP was posted with the County Clerk as required. (Pub. Res. Code § 21092.3.) The NOP must be posted in the office of the county clerk of each county in which the project will be located and must remain posted for a period of 30 days. *Ibid.*

### **Project Description**

The NOP must provide the responsible and trustee agencies with sufficient information concerning the project and its potential environmental effects to enable them to make a “meaningful response.” (CEQA Guidelines § 15082(a)(1).) The EIR must provide a project description with enough information to allow the decision-makers to take into account the environmental consequences of the project. The project description must include the project’s technical, economic, and environmental characteristics. (CEQA Guidelines § 15124).

The NOP includes “project elements,” but fails to fully disclose the entirety of the project. For example, the project will presumably require excavation, but the NOP does not describe the extent or location of this excavation. The project description needs to include a description of the excavation, to allow the public and decision-makers to comment on potential environmental impacts.

A Stadium Replacement Project Location<sup>1</sup> map is attached to the NOP, but the map is not detailed (the San Diego River – an area where there could be environmental impacts – is almost impossible to see). This map does not show where the current stadium is, or where the proposed new stadium will be. The EIR must contain a detailed map, preferably topographic, in addition to a regional map. (CEQA Guidelines § 15124(a).) There are also no conceptual drawings attached to the NOP, making it difficult to comment on potential impacts. The EIR must include conceptual drawings of the proposed project, including a thorough description of ingress and egress for both the stadium itself and the parking lots.

The NOP fails to describe the number of parking spaces the proposed project will have, making it difficult to comment on the potential impacts of traffic/circulation. The EIR must include a detailed description of the number and location of parking spaces.

Additionally, CEQA forbids “piecemeal review of the significant environmental impacts of a project.” (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1358.) The NOP does not state where the funds to pay for this project will come from. However, on July 14, 2015, Mayor Faulconer asked the San Diego City Council to adopt a resolution that would use \$2.1 million from the City’s General Fund to pay AECOM Technical Services, Inc. to prepare the EIR for the project, which the City Council did.

It had been previously reported that building condos, offices, or hotels alongside the stadium would be a part of the financial plan to pay an estimated \$225 million for the new stadium. Based on the NOP, this additional development is no longer part of the project and any revenue from such development is off the table. Yet, if it later turns out the City of San Diego

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<sup>1</sup> This map should be titled “Stadium Reconstruction Project Location,” as that is the name of the project described in the NOP, not “Stadium Relocation Project Location.”

cannot fund the project, the City cannot then decide to build this additional development because that is not part of the project described in the NOP. A new EIR, along with the expense of a new environmental review, will be required if the City of San Diego later decides to build this additional development alongside the stadium – that type of project does not fall under the purview of this NOP or the proposed EIR and will require its own environmental review.

Analyzing just the demolition of the current stadium and the construction of a new stadium, and then later deciding to build additional development alongside the stadium is considered “piecemealing” the project, and is forbidden under CEQA. The City of San Diego cannot break this project into two smaller projects in order to increase the likelihood of project approval. If there is a chance the City of San Diego will later decide to build condos and offices at this project site in order to fund the new stadium project, that additional development must be analyzed in this EIR at this time. It is unlikely the citizens of San Diego will approve public funds being used to build a new stadium, and without a tax increase or the commercial development money previously discussed, it follows that the City of San Diego will need to build the condos, offices, and hotels to get the revenue required to build a new stadium. The additional development, the demolition of the old stadium, and the construction of a new stadium need to be analyzed as one project in order to survive a “piecemeal” challenge to the EIR.

### **Environmental Setting/Baseline Conditions**

The environmental conditions of the project site and the vicinity must be described as they exist at the time the NOP was published. (CEQA Guidelines § 15125(a).) The setting must be sufficiently comprehensive to allow the project’s significant impacts to be considered in the full environmental context. “Establishing a baseline at the beginning of the CEQA process is a fundamental requirement so that changes brought about by a project can be seen in context and significant effects can be accurately identified.” (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89.) Without the environmental setting/baseline being described in the NOP, it is difficult for the public or agencies to make informed assessments and comments on the NOP as to what should be evaluated in the EIR.

The environmental setting should fully describe the proximity of the project site to the San Diego River. The NOP does not mention the San Diego River, and the river is not clear on the attached map of the project site. The environmental setting should include detailed information on the project’s proximity to the San Diego River along with a description of potential impacts to biological resources. The NOP fails to list biological resources as an issue area for additional study.

As the City of San Diego knows, one of the state’s largest gasoline plumes is beneath Qualcomm Stadium and its parking lots. The NOP does not mention this plume, and does not mention the clean-up efforts that have been made at this location. The environmental setting should include a detailed description of this gasoline plume.

The environmental setting should also provide an accurate description of surrounding development. The NOP fails to include a description of the surrounding development. The proximity of adjacent development should be described in enough detail to compare the proposed project to the existing environmental setting in order to assess the significance of any impacts.

### **Identification of Significant Environmental Effects**

The EIR must analyze and describe both direct and indirect effects on the environment that will result from the project. (CEQA Guidelines § 15123.2(a).) The EIR must consider the impacts on the entire area in which the project will cause significant effects either directly or indirectly. A detailed description of potential environmental impacts that will be evaluated (as well as those that will not) allows the scope and contents of the EIR to be uncovered early in the process. Early discovery allows the draft EIR to identify and address key issues so they will not be raised for the first time in comments on the draft EIR. (Kostka & Zischke, Practice Under the Cal. Environmental Quality Act (March 2015 Update), § 8.16).

The NOP does not include biology or biological resources as an issue area for additional study. The EIR must consider the impacts on biology/biological resources that could result due to the project's proximity to the San Diego River. The EIR must include mitigation measures and alternatives that reduce or eliminate these impacts.

An EIR must address not only the immediate environmental consequences of a project, but also all "reasonably foreseeable consequences of the project." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.) The NOP states a goal of the project is to host events such as the Super Bowl.<sup>2</sup> The EIR must analyze any significant environmental effects the project might cause by bringing people into the area affected. (CEQA Guidelines § 15123.2(a).) Events like the Super Bowl could have an impact on noise, traffic/circulation, public safety, parking, and public services. These potential impacts must be

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<sup>2</sup> There are questions as to whether the new stadium as proposed would be eligible to host a Super Bowl based on the NFL's Host City Bid Specifications & Requirements. (National Football League Super Bowl LII Host City Bid Specifications & Requirements, November 2013, available at <http://s3.documentcloud.org/documents/1184220/20140605190910.pdf>.) For example, the minimum seating capacity for a Super Bowl is 70,000 seats – the proposed stadium would have only 72,000 seats (just barely above the minimum requirement) when the usual 68,000 seats are expanded for special events. The NFL requires at least 35,000 parking spaces within a mile of the stadium grounds. Qualcomm stadium currently has around 19,000 parking spaces, and the NOP does not specify the number of parking spaces the new stadium would have. How will the City make up for the lack of parking for the Super Bowl, which it lists as a goal of the project? There are also NFL requirements for events during Super Bowl week aside from the game. The NFL Experience, which attracts upwards of 150,000 fans in the week leading up to the Super Bowl, requires a minimum of 850,000 square feet of indoor space and 10,000 parking spaces. The NFL Tailgate Party requires at least 400,000 square feet of indoor space within walking distance of the stadium. The demands of the Super Bowl may go beyond what this proposed stadium could handle. Because hosting the Super Bowl is listed as a goal of this project, the impacts of the Super Bowl must be examined in the EIR.

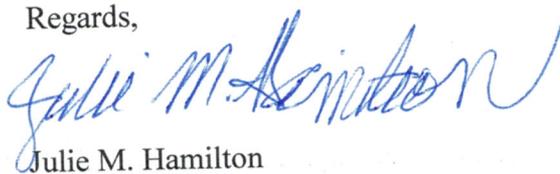
Martha Blake  
City of San Diego  
July 22, 2015  
Page 5

evaluated in light of major events listed in the NOP as a goal of the project in addition to analyzing the impacts of the "usual" use of the new stadium.

The NOP does not state whether the EIR will evaluate how the construction of the new stadium will impact the environment due to the gasoline plume located beneath the project site. The EIR should evaluate any potentially significant impacts of locating development in an area susceptible to hazardous conditions. (CEQA Guidelines § 15123.2(a).) Presumably, there will be excavation for the new project. Any excavation has the potential to have an impact on human health, geology/soils, and water quality. The EIR must include a detailed analysis of the unique impacts this project could have due to its location above a gasoline plume.

Thank you for the opportunity to comment. The NOP must be posted with the County Clerk and must be revised to comply with CEQA. Please revise the NOP, post it with the County Clerk, and extend the comment period by 30 days. Please keep my office informed of any opportunity for public input on this project, and of any further CEQA (or other) notices. Feel free to contact me if you have any questions or need additional information.

Regards,



Julie M. Hamilton  
Attorney



**Leighton, Lynette**

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**Subject:** FW: Stadium Reconstruction Project: Contaminated Dirt

**From:** Dan McLellan [<mailto:danmclellansports@gmail.com>]  
**Sent:** Wednesday, July 15, 2015 10:38 PM  
**To:** DSD EAS; Blake, Martha; Tomlinson, Tom; Bragado, Nancy  
**Subject:** Stadium Reconstruction Project: Contaminated Dirt

Dear San Diego City Officials:

I recently had a conversation with Troy W. Salazar, the owner of Troy Dirt ([http://troydirtinc.com/Home\\_Page.php](http://troydirtinc.com/Home_Page.php)). It was one of several conversations I have had with contractors to better understand the obstacles that would face a new stadium in Mission Valley.

Mr. Salazar revealed that he had already conducted several core dirt samples on the Mission Valley stadium site. He said, those samples revealed tens of thousands of cubic yards of contaminated dirt.

Mr. Salazar was aware that there had been a clean up effort with regards to the known gas plume. However, he led me to believe that the dirt he had tested had not been cleaned up. He also made me feel that this would be a serious obstacle to construction.

I talked with him about the expense of removing the dirt which I believe he estimated at over \$500 per 16 cubic yards. Salazar arrived at this estimate based on the fact that closest location to deposit contaminated dirt is in Arizona. It would take at least 4 hours of driving time per trip, and there would be an additional disposal fee.

I am requesting that this be fully investigated in the process of completing an EIR on the site. This should include obtaining the records that Troy Dirt has from the samples they took.

The completed EIR should include full disclosure of all contaminated dirt for the entire site which includes over 167 acres. It should also include a realistic estimate of what it will cost to clean up the contamination, and the time frame for completion.

Thank you for your hard work on this matter.

Sincerely,

Dan McLellan  
(619) 341-1778

## Leighton, Lynette

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**From:** Dan McLellan [<mailto:danmclellansports@gmail.com>]  
**Sent:** Thursday, July 16, 2015 10:22 PM  
**To:** DSD EAS; Blake, Martha; Tomlinson, Tom; Bragado, Nancy  
**Subject:** Stadium Reconstruction Project: Road Infrastructure Improvements

Dear San Diego City Officials:

I have several environmental concerns regarding the EIR for a possible new stadium in Mission Valley. Previously I disclosed concerns about the high likelihood of the existence of contaminated dirt on the site. This letter is to inform you of my environmental concerns regarding road infrastructure improvements.

As a sports writer and stadium advocate, the Chargers granted me access to their secure website they setup to help guide CSAG to a successful plan. Through that website, I discovered that the team identified 16 road related infrastructure needs for Mission Valley in their first stadium proposal in 2003.

None of the known infrastructure needs were identified or specifically funded in the CSAG report.

16 known road infrastructure needs:

1. Friars Road/SR 163 Interchange Roadway & Ramp Improvements including improvements at Friars Road and Frazee Road Intersection
2. Friars Road/Interstate 15 Exchange, Roadway and Ramp Improvements
3. Friars Road/Qualcomm Way, Ramps and Intersection Improvements
4. Texas Street/Camino Del Rio South Intersection Improvements
5. Camino Del Rio South/Interstate 15 North bound improvements
6. Friars Road/Mission Center Road, Ramp and Intersection improvements
7. Rancho San Diego Road/ Ward Road, Intersection Signalization
8. Friars Road/Mission Center Drive, Interchange Improvements
9. Interstate 8 Hook Ramps Westbound from Camino Del Rio South to near Interstate 805
10. Camino Del Rio South to 4 lanes from Fenton Parkway/Mission Center Parkway to Interstate 805
11. Camino Del Rio North to 4 lanes, from Fenton Parkway/Mission Center Parkway to Interstate 15
12. Mission Center Parkway Bridge over Interstate 8, widen to 4 lanes
13. Bridge over San Diego River at Fenton Parkway

14. South Development Road Connection offsite, west to Fenton Parkway

15. Western Development Road Connection, offsite to Northside Drive

16. Extend Murphy Canyon Road South to development area

Several environmental concerns are presented with these known infrastructure needs. The EIR should address all of the following concerns:

- How will traffic on a daily bases be impacted during infrastructure improvements?
- Will infrastructure construction occur during game days while the stadium is being built? If so, how will that affect getting in and out of the stadium?
- Will infrastructure improvements be made during the construction of a new stadium? If so, what impact will that have on the surrounding area?
- How will the San Diego River be impacted by the construction of the bridge over it at Fenton Parkway?
  - This bridge has been planned for several years, but never completed due to environmental concerns. Do those same environmental concerns persist today and would prohibit the construction of this needed infrastructure?
- Would construction of so much infrastructure create noise pollution that would disrupt the quality of life for homes and businesses in the community?
- Would the construction of the infrastructure damage the air quality in the surrounding area?
- Are there any other needed road infrastructure projects?
  - These 16 needed projects were identified over a decade ago. Since then, there has been a great deal of additional development in the surrounding area. Community leaders have voiced that development did not come with appropriate infrastructure improvements. Has development created other infrastructure needs?
- Would the 8 and 15 freeways need to be expanded?
  - In an increase in population density in Mission Valley may have led to the need to expand the freeways. If expansion is needed, is it even possible based on existing available land?
- What would be the total cost of all infrastructure improvements?
- How would infrastructure costs be paid for?
- What would be time frame for completion of all infrastructure projects?
- What would the total environmental impact be for infrastructure improvements in Mission Valley versus the Chargers preferred site in the East Village of Downtown?

Thank you again for your time.

Sincerely,  
Dan McLellan

(619) 341-1778

## Leighton, Lynette

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**Subject:** FW: Stadium Reconstruction Project: Fill Dirt

**From:** Dan McLellan [<mailto:danmclellansports@gmail.com>]  
**Sent:** Friday, July 17, 2015 2:05 PM  
**To:** DSD EAS; Blake, Martha; Tomlinson, Tom; Bragado, Nancy  
**Subject:** Stadium Reconstruction Project: Fill Dirt

Dear San Diego City Officials:

I have several environmental concerns regarding the EIR for a possible new stadium in Mission Valley. Previously I disclosed concerns about the high likelihood of the existence of contaminated dirt on the site, and environmental concerns regarding road infrastructure improvements. This letter is to inform you of my environmental concerns regarding the excessive amount of fill dirt needed at the Mission Valley site.

It has been widely reported that enough fill dirt would need to be brought into Mission Valley to level the entire 167 acres off at Friars Road. This has been illustrated in not only the artwork the Chargers have provided for possible development, but also by the mock-ups Councilman Sherman released for his plan for developing Mission Valley that he shared with CSAG.

Due to this public information, it is not reasonable to complete an EIR on the Mission Valley site that does not include the impact of bringing in such a massive amount of fill dirt.

I am not a mathematician, but some rough estimates make me believe this could be in the millions of cubic yards of dirt. Fill dirt is delivered in trucks that haul 16 cubic yards at a time. If only one million cubic yards of fill dirt are required, that would mean 62,500 truckloads of dirt would be needed to complete the project.

There are unknown variables when it comes to fill dirt because the quality of the dirt and where the dirt is being obtained is difficult to predict for such a large project.

Water is needed to compact fill dirt for construction. The amount of water needed varies depending on the quality of dirt. California is currently suffering the impacts of one of the worst droughts in our state's history, so it is imperative that water is used wisely. Residents and businesses have already been asked to make drastic cutbacks. It does not make sense to engage in a stadium construction project in Mission Valley that

would require so much fill dirt if the Chargers preferred site in East Village of Downtown would demand far less water in the construction process.

The following questions must be answered with regards to the use of fill dirt for the stadium project in Mission Valley:

- How much fill dirt is needed to raise the entire property of to Friars Road level?
- Where will the dirt be obtained?
- What will the quality of the dirt be that will be used?
- How much water will be needed to compact the soil?
  - How many truckloads of water is required to disperse the water?
  - What will be environmental impact of using so many individual truckloads of water?
  - How much traffic congestion with these water trucks create?
- How many truck loads of dirt will be required?
  - What will be environmental impact of using so many individual truckloads?
  - How much traffic congestion would the dirt trucks create?
- How will bringing in so much dirt affect the air quality for the surrounding area?
- Will the numerous truckloads of dirt and water damage any roads due to the heavy nature of the vehicles?
  - If so, who is responsible for fixing the roads?
- Can fill dirt be brought in stages of construction, or does the whole site need to be filled before construction can begin?
  - If the whole site needs to be filled before construction can begin, how can the Chargers use the existing stadium to play while the new stadium is being built?
  - If it can be done in stages, how will that impact parking?
- What would the environmental impact be of relocating game day parking to an offsite location during construction to accommodate the need for fill dirt?
- What would be total cost of the fill dirt and prepping it for construction?
- How much fill dirt is needed at the Mission Valley site compared to the Chargers preferred site in the East Village of Downtown?
  - Would construction at the East Village site be more environmentally friendly because of the demand for significantly less fill dirt?

I continue to appreciate your assistance.

Sincerely,

Dan McLellan  
(619) 341-1778

## Leighton, Lynette

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**Subject:** FW: Stadium Reconstruction Project: Parking Structure

**From:** Dan McLellan [mailto:danmclellansports@gmail.com]  
**Sent:** Friday, July 17, 2015 10:42 PM  
**To:** DSD EAS; Blake, Martha; Tomlinson, Tom; Bragado, Nancy  
**Subject:** Stadium Reconstruction Project: Parking Structure

Dear San Diego City Officials:

This is my fourth letter addressing environmental concerns regarding the EIR for a possible new stadium in Mission Valley. Previously I discussed concerns about the high likelihood of the existence of contaminated dirt on the site, needed road infrastructure improvements, and environmental concerns with regards to fill dirt. This letter is to inform you of my environmental concerns regarding the 12,000 space parking structure CSAG proposed for the site.

While not specifically environmentally related, it is important to start by addressing how underfunded this project was in the CSAG report. CSAG allocated only \$144 million for what would be the largest parking structure in North America by 1,000 spaces. Currently the largest parking structure in North America is at the Detroit Airport and can service 11,000 cars at max capacity.

Mr. Tomczak was the Assistant Construction Manager for Walker Parking Consultants on the Mickey and Friends garage at Disneyland. He stated after two years of construction in 2001, the 10,250 space structure came in ahead of time and under budget in the neighborhood of \$240 million (<http://matarchitecture.com/parking-facilities/>).

A 1994 Los Angeles Times article, written six years before construction began, established the accuracy of this number by saying the Disneyland garage was projected to cost \$223 million ([http://articles.latimes.com/1994-07-16/news/mn-16255\\_1\\_parking-garage](http://articles.latimes.com/1994-07-16/news/mn-16255_1_parking-garage)). Keep in mind this article is over two decades old and costs tend to rise overtime.

CSAG proposed a 12,000 space parking garage, because they chose Mission Valley for a new stadium over the Chargers preferred site of the East Village in Downtown where several private parking structures already exist, and public transit is more available and readily services a wider geographic area of San Diego.

The Chargers and JMI Realty have put forth a multi-purpose venue that would include an expansion of the convention center. That proposal also includes additional parking. By not embracing that project for a new stadium, it means the stadium and convention center would be divided into separate projects.

Financially it makes no sense to spend hundreds of millions on a parking garage in Mission Valley for a stadium, and then turn around and spend it again downtown to expand the convention center, when both facilities if built together would share parking. Loading zones, back of the house, and kitchens, are a few other areas where construction cost would not need to be duplicated in a joint use facility. This would add millions more in savings while diminishing a negative impact on the environment.

When speaking with experts, I learned that the cost for the proposed garage in Mission Valley would be higher than Mickey and Friends because of poor access to Friars Road and the need for additional exit ramps to accommodate most drivers leaving at the same time.

It also doesn't make sense from an environmental perspective to separate the stadium from the convention center. Two major projects must have a much more significant environmental impact than one.

Even if built, the 12,000 space parking garage that would be the largest in North America would still under serve a new stadium when considering Qualcomm currently has over 19,000 spots and is virtually land locked to pedestrian traffic. The trolley only serviced on average 15,202 patrons per Chargers game last season. If more than 7,000 parking spaces were taken away, additional mass transit to service the new stadium would need to be added and would take years to build and would be costly.

The EIR for a new stadium in Mission Valley must answer all of the following questions with regards to the proposed parking garage:

- How will a 12,000 space parking garage, the largest in North America, change the landscape?
- Where would the parking structure be located on the site?
- Is there any concerns that the close proximity to the San Diego River could flood the parking structure?
  - If flooding did occur, what would be the environmental impact of water running back into the river?
- How long will it take to build?
  - The Mickey and Friends garage took over 8 years to plan and construct.
- Where will fans park while the parking garage is being built?

- What would the environmental impact be if a substantial amount of fans had to park offsite?
- What additional mass transit infrastructure will be provided to accommodate the loss of 7,000 parking spaces?
  - When will this additional mass transit be completed?
  - What will the cost be to adding additional mass transit?
- How will nearly 12,000 vehicles leaving the same parking structure at roughly the same time affect traffic patterns?
- What would be the health risks to having the engines of nearly 12,000 vehicles running at the same time in a parking structure?
- How many levels will the parking structure have?
- How many levels will be below ground and how many will be above ground?
  - It should be noted that below ground parking is more expensive to construct.
  - If there is below ground parking, what will the environmental impact caused by below ground construction?
- What will the total cost of the parking garage be including getting through the entitlement phase and architecture design?
- What additional infrastructure would be needed to accommodate poor access to Friars Road?
- What would the environmental benefits be of building the stadium at the Chargers preferred site in the East Village of Downtown where there is more available public transit and several public parking garages already exist?

Thank you again for your help.

Sincerely,

Dan McLellan

(619) 341-1778

## Leighton, Lynette

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**Subject:** FW: Stadium Reconstruction Plan: Comparing alternatives is needed and beneficial

**From:** Dan McLellan [<mailto:danmclellansports@gmail.com>]

**Sent:** Saturday, July 18, 2015 12:13 AM

**To:** DSD EAS; Blake, Martha; Tomlinson, Tom; Bragado, Nancy

**Subject:** Stadium Reconstruction Plan: Comparing alternatives is needed and beneficial

Dear San Diego City Officials:

My four previous letters addressed environmental concerns regarding the EIR for a possible new stadium in Mission Valley discussed the high likelihood of the existence of contaminated dirt on the site, needed road infrastructure improvements, fill dirt, and CSAG's proposal for a 12,000 space parking garage.

This letter will discuss how important it is for the EIR to show alternatives to the stadium plan in Mission Valley. And how examining alternatives can be highly beneficial with regards to our effort to keep the Chargers.

A new stadium at the Mission Valley site is not the best use of the property. Multiple alternative ideas have been publicly discussed. Community leaders have proposed a large central park. My personal belief is the best use of the land would be an SDSU campus expansion. It's my understanding that currently the political backing at the State level exists to make a campus expansion a reality.

I fully support a new stadium being built that would keep the Chargers in San Diego, and consider myself an activist for that cause. In 2009, I broke the story for SanDiego.com that the Chargers had re-engaged city officials and the focus for a new stadium had turned to downtown. Since then, I have built a strong relationship with the team and spent three seasons (2010-12) as the Chargers beat writer for CBSsports.com.

However, I believe the superior stadium plan is the one that the Chargers and JMI Realty proposed which would include a multi-use stadium and an expansion of the Convention Center in the East Village of Downtown.

That plan solves three problems:

- It builds a state-of-the-art stadium that would attract numerous other events to San Diego while locking the Chargers into staying in America's Finest City.
- It adds roughly 240,000 square feet of elegant convention space that would secure Comic-Con to San Diego, and in the future invite many other large conventions that would bolster our economy.
- It would free up the Mission Valley land for a much needed SDSU expansion. SDSU is currently built to capacity and has nowhere else to expand. A campus expansion would have a huge residual positive cultural and economic impact for San Diego.

The CSAG plan, which fell significantly short, only attempted to deal with the stadium issue. It is time that San Diego's leadership think on a bigger scale. A downtown multi-use stadium and convention center expansion provides the best vision forward for San Diego while also being more environmentally friendly than building two needed facilities separately.

An EIR for the proposed stadium in Mission Valley must look at the environmental impact of all visions that have been publicly put forward for the land.

I'm among many who are on-record stating this quickened EIR is a waste of money because it will not be legally defensible and bring the Chargers back to the negotiating table.

There is away to prove myself and other critics wrong. This EIR will not be a waste of money if it determines it is more economical and better for the environment to go with the Chargers preferred location of downtown where two major projects can be combined into one.

That conclusion would provide a reason to turn the focus to downtown for a new stadium and would likely buy more time with the NFL. This is because the city can go back to the NFL and say they did there due diligence with an expedited EIR and discovered the Chargers preferred site is in fact more advantageous for environmental and financial reasons.

It would then be reasonable to ask for more time to engage the team in their preferred site.

If that were to occur, I believe based on my discussions with the team that the NFL would be forced to grant San Diego additional time to resolve this critical issue.

Sincerely,

Dan McLellan

(619) 341-1778

## Leighton, Lynette

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**From:** faucher\_ak@yahoo.com  
**Sent:** Wednesday, July 08, 2015 12:13 PM  
**To:** DSD EAS

Let the Chargers go. I will not foot even part of the bill for a new stadium. They don't sell all of their tickets and they have NEVER won a superbowl. Stop wasting money for all of these "experts" and their opinion. The Chargers can have a new stadium when they win a super bowl, plain and simple. Make them earn it. NE Patriots had to earn theirs. The Chargers complained that they had to share Qualcomm with the Padres. So, the Pardres moved and got their own stadium. The Chargers complained how that was unfair. REALLY??? Win a super bowl and earn your stadium!

[Sent from Yahoo Mail on Android](#)

**Leighton, Lynette**

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**Subject:** FW: Oppose EIR \$2.1 million cost

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**From:** Smith Family [<mailto:majsmith@pacbell.net>]

**Sent:** Wednesday, July 08, 2015 9:35 AM

**To:** DSD EAS

**Subject:** Oppose EIR \$2.1 million cost

To City of San Diego Officials: We object to this rushed move for EIR for the football stadium. This is far too much money to spend on a rushed project and it looks like you are playing politics with our taxpayer money. We need a lot of things for this city first like repairing the water pipes which keep breaking and our streets. Thank you. John and Sally Smith 3551 Lord St San Diego CA 92123

**Leighton, Lynette**

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**Subject:** FW: STADIUM

**From:** Kantilal K Desai [<mailto:desco1943@gmail.com>]

**Sent:** Wednesday, July 08, 2015 4:44 PM

**To:** DSD EAS

**Subject:** STADIUM

Dear Sir

UT today on The Stadium consultant to speed up process.

We should go ahead with or without chargers.

San Diego needs modern facilities built.

Yes, it will give the City a leg up. Let us not give up because of Chargers dilly willy.

Thank you.

**K. K. Desai**

**RAMADA SAN DIEGO AIRPORT**

**1403 Rosecrans Street**

**SAN DIEGO CA 92106**

Skype kundesai6780 Cell +1 619 871 8876

**Leighton, Lynette**

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**Subject:** FW: Stadium Pursuit

-----Original Message-----

From: Ken Faucher [<mailto:kfaucher@cox.net>]

Sent: Wednesday, July 08, 2015 10:44 AM

To: DSD EAS

Subject: Stadium Pursuit

City of San Diego  
DEVELOPMENT SERVICES DEPARTMENT

Dear Agent

Besides a waste of money needed to fix infrastructure, this is a supremo example of getting "the cart before the horse". A tax payer vote for the city to pursuit spending money on a new stadium is absolutely necessary.

I don't know anybody who is in favor of the plan. The Chargers even seem to be against it, according to Fabiana (the Chargers lawyer said so).

Please suggest to the city leaders to let them go and use the money to fix roads, water pipes, side walks, street lights, etc.

--

Ken Faucher <[kfaucher@cox.net](mailto:kfaucher@cox.net)>

**Leighton, Lynette**

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**Subject:** FW: NEW STADIUM EIR FIASCO

-----Original Message-----

From: larry hennessee [<mailto:hennessee@roadrunner.com>]

Sent: Wednesday, July 08, 2015 5:17 PM

To: DSD EAS; zuniontribune

Cc: larry hennessee

Subject: NEW STADIUM EIR FIASCO

Are you city "leaders" tone deaf? Read the Union-Tribune Letters to the Editor! Nine out of ten letters are against giving the greedy Chargers family hundreds of millions of tax dollars and public land to keep their mediocre NFL team here.

The sooner they leave, the better for San Diego. We don't need an NFL team to be a great city. We already are.

I can't believe the current city plan is to waste 2.1 million more dollars on a "quicky" EIR that Fabriani has said, as late as Tuesday, that the Chargers will not accept as valid.

Kevin Acee and especially Nick Canepa are pathetic in that they are delusional - both are out of touch with reality.

Larry Hennessee

17657 Caminito Hercuba

Rancho Bernardo

San Diego, CA 92128

(858) 485 - 0444

**Leighton, Lynette**

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**Subject:** FW: Charger Stadium EIR - Comment on the Scope

-----Original Message-----

From: Barry Getzel [<mailto:bgetzel@icloud.com>]

Sent: Thursday, July 09, 2015 11:15 AM

To: DSD EAS

Subject: Charger Stadium EIR - Comment on the Scope

The scope of the EIR should include at least one, if not two alternatives that are a rehabilitation(s) of the existing Qualcomm Stadium. There is a good chance that the NFL will not approve the Charger application to move to Carson. In that event, the city should have a study ready that is a lower cost alternative for the Chargers continuing to play in San Diego.

Thank you.

Barry Getzel

**Leighton, Lynette**

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**Subject:** FW: The Chargers and the San Diego stadium

**From:** Armando Gallegos [<mailto:armando.gallegos2@outlook.com>]

**Sent:** Friday, July 10, 2015 9:53 PM

**To:** DSD EAS

**Subject:** The Chargers and the San Diego stadium

To the representatives of the stadium planning for the Chargers,

Thank you for your effort to keep the Chargers here in San Diego. Your work has brought hope to many fans across the county and possibly throughout the country. I ask that stadium planners continue to put their best efforts to create the best stadium possible and continue with designs to spark interest for all San Diegans. Do not create a rehash of Qualcomm Stadium or a simple substitute for it. Rather, imagine a stadium that will create likeness to design and enormity, evoke passion for the Chargers and San Diego cutlure. Thank you again for your hard work and please keep at it!

Best regards,  
Armando

## Leighton, Lynette

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**Subject:** FW: Vote No on Chargers' EIR: Don't Waste Preciou Funds

**From:** btjohnson [<mailto:btjohnson@outlook.com>]  
**Sent:** Monday, July 13, 2015 8:31 PM  
**To:** Councilmember Mark Kersey  
**Cc:** DSD EAS; Mayor Kevin Faulconer  
**Subject:** Vote No on Chargers' EIR: Don't Waste Preciou Funds

Dear Councilman Kersey,

I'm writing to encourage you to vote against pursuing the Chargers EIR.

It's a rushed process that will waste San Diego funds, precisely at a time when San Diego needs them most for infrastructure and public services.

It's a waste pure and simple, so I'm not going to run through all the analysis, UT articles, and soundbytes that explain why it's a bad deal for San Diegans. As a leader in District 5, you're aware of them... If not, Google.. "Chargers, rushed, ill-conceived" for starters.

As a member of the Lincoln Club, I assume you imagine you see yourself as a leader who believes in low taxes, small government, free market principles, and accountability.

So I've got to ask, what about peeling off \$2.1M for an EIR even the Chargers legal counsel doesn't believe in meets any of these criteria? Let's review:

- 1) Low taxes: This project commits San Diego to a Stadium project financed by public funds, generated via taxes and government funds.
- 2) Small government: Instead of dealing with difficult, boring city issues, like roads, water, and public safety the city wastes precious public time and resources playing high-finance footsie with environmental consultants, developers, and professional sports teams. Then, foists the costs on taxpayers.
- 3) Free Market Principles: This one is too funny. Free markets are just that. Why are San Diego citizens bearing costs when the other "side" of this deal is composed of a bunch of rich, connected sports moguls? That isn't the invisible hand of Adam Smith, it's crony capitalism.
- 4) Accountability: Should you vote in favor of the project, the public will hold you accountable for the outcome. The waste, the debt, the opportunity cost... on you. I, for one, will also take the time just to drive downtown and point out on the mic that you voted for a bad deal.

Since we are on the subject of Lincoln, I also wanted to leave you with two quotes, which I hope you'll find instructive:

"Labor is prior to, and independent of, capital. Capital is only the fruit of labor, and could never have existed if labor had not first existed. Labor is the superior of capital, and deserves much the higher consideration."  
Lincoln's First Annual Message to Congress, December 3, 1861.

"Public sentiment is everything. With public sentiment, nothing can fail; without it nothing can succeed."

The Collected Works of Abraham Lincoln edited by Roy P. Basler, Volume III, "Lincoln-Douglas Debate at Ottawa" (August 21, 1858), p. 27.

Sincerely,  
Ben Johnson

**Leighton, Lynette**

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**Subject:** FW: Stadium Reconstruction Project

**From:** Ross Christie [<mailto:metapapipeline2012@gmail.com>]

**Sent:** Tuesday, July 14, 2015 3:11 PM

**To:** DSD EAS

**Subject:** Stadium Reconstruction Project

Please do not waste any more tax dollars on this project. Please do not waste any more city employee time on this project. Please do not hire any contractors for this project at city expense.

Thank you,

Ross Christie  
San Diego

**Leighton, Lynette**

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**Subject:** FW: Chargers

**From:** Howard Kahn [<mailto:hkahn117@gmail.com>]

**Sent:** Wednesday, July 15, 2015 8:56 PM

**To:** DSD EAS

**Subject:** Chargers

Please stop wasting the my tax dollars. Everyone who voted for this environmental study is going to be out of a job the next time they are up for election, as will the mayor. The people of San Diego are not going to pass this stadium scam when it goes to the ballot so please do us all a favor and stop NOW.

Howard Kahn

**Leighton, Lynette**

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**Subject:** FW: Chargers new stadium

**From:** Paul Faucher [<mailto:paul.faucher@sbcglobal.net>]

**Sent:** Wednesday, July 15, 2015 10:45 PM

**To:** DSD EAS

**Subject:** Chargers new stadium

As a SD county resident I do not support the city building a new stadium for the chargers.

Thank you

-Paul

Paul Faucher

[paul.faucher@sbcglobal.net](mailto:paul.faucher@sbcglobal.net)

**Leighton, Lynette**

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**Subject:** FW: Stadium Reconstruction Project

-----Original Message-----

From: Robert Hingtgen [<mailto:tamanhujan@yahoo.com>]

Sent: Wednesday, July 15, 2015 1:50 PM

To: DSD EAS

Subject: Stadium Reconstruction Project

Hi, I just became aware of the NOP for a DEIR and Scoping Meeting for this project (I've seen more detailed project description for a Church requiring a Special Use Permit than for this billion dollar project). Please include me on your public notification/distribution list as I would like to be informed of all public comment periods, meetings, and hearings, and availability of environmental review documents related to this project.

Thank you,  
Robert Hingtgen  
7594 Jennite Drive  
San Diego, CA 92119

**Leighton, Lynette**

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**Subject:** FW: Quick EIR feedback

-----Original Message-----

From: [gitalong@cox.net](mailto:gitalong@cox.net) [<mailto:gitalong@cox.net>]

Sent: Thursday, July 16, 2015 12:30 PM

To: DSD EAS

Subject: Quick EIR feedback

It is really beyond belief that \$2+M is being spent on what is a setup for ongoing litigation when so much else could be accomplished with that money.

AND, if the City of San Diego thinks that its' ignoring that the Chargers are NOT accepting of such an EIR but that the NFL offices will overrule the ownership of the Chargers, the City politicians are truly lacking any integrity as guardians of the public interest !!

Between the County not contributing without a vote (and the vote would reject any monies being used to provide economic subsidies to a private enterprise that brings little employment or revenue to the area) AND that there isn't any indication of what their stadium financing plan is given the obvious rejection of what Citizens Stadium Advisory Group put forth regarding development, I COMPLETELY fail to see what the hell the City is doing that makes any economic sense.

Bruce Sims  
San Diego, CA

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{{-\_-}}

First Principle of reflection is you must not fool yourself and you are the easiest person to fool.-  
Richard Feynman

"Funny isn't it? People must know they will all die someday but they live as though they never will.  
Damn funny."

from the Chinese movie "The Good, the Bad, and the Weird"

**Leighton, Lynette**

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**Subject:** FW: Mission Valley

-----Original Message-----

From: John Hoyer [<mailto:fxe79john@icloud.com>]

Sent: Thursday, July 16, 2015 10:09 PM

To: DSD EAS

Subject: Mission Valley

Regarding the stadium process, I don't understand why there would be any difficulties building at this location since a stadium already exists. Even if you tear the old stadium down it reflects nothing but essentially a remodel similar to what happened in Seattle.

Further I really don't understand a downtown multi-use facility. There are enough "events" to make the revenue return viable.

Noteworthy is the loss of the Clippers and the ability to obtain a franchise once one is lost. The Chargers lifeblood is the San Diego public they need a stadium that people enjoy and are proud coming to visit.

Later,  
John

July 18, 2015

Debora Greene

PO Box 7511

San Diego, CA 92167

City of San Diego Development Services

Attn: Martha Blake, Senior Planner

1222 First Ave., MS501

San Diego, CA 92101

RE: Stadium Reconstruction Project in Mission Valley-Comments in response to Notice of Preparation of Draft Environmental Impact Report

Dear Ms. Blake:

I write to you as a concerned resident and taxpayer of San Diego. I am requesting the Draft Environmental Impact Report (DEIR) include an alternatives analysis for a San Diego River Park. The San Diego River is the southern boundary of this 166 acre site. The effects of redevelopment of this site will impact the San Diego River Park.

The alternative analysis will meet the project goals of providing updated recreation facilities to enable San Diego to continue to host recreation events such as family entertainment events, concerts and meeting activities at the San Diego River Park.

Thank you for your compliance.

Sincerely,

*Debora Greene*

**Leighton, Lynette**

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**From:** Don Wood [<mailto:dwood8@cox.net>]

**Sent:** Sunday, July 19, 2015 4:00 PM

**To:** DSD EAS

**Subject:** Initial scoping comments on proposed Qualcomm stadium replacement project EIR

July 19,2015

To: San Diego City planning staff

From: Don Wood

**Subject: Initial scoping comments on proposed Qualcomm stadium replacement project EIR**

I am a long time Chargers fan and hope that the team decides to stay in San Diego. Therefore is very important that the pending environmental impact report (EIR) the city is embarking on comply with the California Environmental Quality Act (CEQA) in all ways, and is not a factor that might slow down progress going forward.

Note that CEQA requires that project EIRs address in detail all the direct and indirect cumulative impacts a clearly defined proposed project might have. What that means that before you can do an EIR on a proposed project, you need a very detailed project description, which covers all actions the city proposes to take to make the project work. It also means that all environmental impacts of all those city actions must be clearly described and all proposed mitigation actions be clearly spelled out. That means that all action the city proposes to take related to the project, including but not limited to the potential sale and development of any city property, including parcels around the existing stadium and the city owned sports arena building, must be clearly described.

It also means that a clear project budget for the proposed project must be provided, showing all costs associated with the project itself and all proposed mitigation actions the city proposes to take related to the project. Without those elements, you don't have a project to do an EIR on under state law.

Please ensure that these initial scoping comments get posted to the project record and

fully addressed in the upcoming EIR.

Thank you,

Don Wood

619-463-9035

[Dwood8@cox.net](mailto:Dwood8@cox.net)

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## Leighton, Lynette

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**From:** Jesse Arroyo [<mailto:jesse@arroyophotos.com>]

**Sent:** Monday, July 20, 2015 5:08 PM

**To:** DSD EAS

**Subject:** Stadium EIR suggestion

Hello,

I served on Charger staff for ten years (200-2009) under the stadium ops manager, creative services director, and marketing department. My duties took me all throughout the stadium grounds and the building itself, inside and out. A big part of my job was fan interaction. I took feedback regarding facilities and relayed them to the stadium ops manager.

I have several suggestions for the new stadium but the one that applies to the EIR would be to study the possibility of opening one or two roadways on the south side of the parking lot to provide access to Camino Del Rio North. Currently there is only access from the north. Camino Del Rio North has businesses that are usually not open on weekends. It will help alleviate the congestion on Friars Road which competes with the IKEA/Lowes/Costco shopping center and the residential traffic. This would be a huge help!

Sincerely,

**Jesse Arroyo**

*Photo - Video - Digital Media*

858-735-7433

[Jesse@ArroyoPhotos.com](mailto:Jesse@ArroyoPhotos.com)

<http://www.facebook.com/ArroyoPhotosPage>

Chargers - Union Tribune - DiscoverSD - N + D

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**Leighton, Lynette**

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**Subject:** FW: Stadium Reconstruction - NOP Comment Letter

**From:** Jose Quinones [<mailto:JQuinones@chirotouch.com>]

**Sent:** Monday, July 20, 2015 3:15 PM

**To:** DSD EAS

**Subject:** EIR

I think the EIR should look into the growth of additional features like the expansion of the trolley station and also focus on the impact of the suggested river park. Other than that I don't see much change if the plan is to indeed just replace a stadium for a stadium. If the stadium does manage to bring back a Super bowl. The impact of that large of crowds should be also be figured in any kind of analysis too. Another thing that might need to be considered is the 100 year flood.

What I would like to see is how a new stadium would be more greener. How technology shows a better use of energy, better use of water, Use of vegetation (if any), use of solar panels. Maybe show how better access for bikes and environmental friendly vehicles reduces emission in the neighborhood. Those are the major concerns that I would like to see in an EIR. Again I have high hopes for this project and hope everything gets done and done correctly so in the end we can enjoy what we put together. Thanks for taking the time to listen as well.

**Jose Quinones Jr.**

Email: [jquinones@chirotouch.com](mailto:jquinones@chirotouch.com)

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## Leighton, Lynette

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**From:** Jose Quinones [<mailto:JQuinones@chirotouch.com>]

**Sent:** Monday, July 20, 2015 3:18 PM

**To:** DSD EAS

**Subject:** EIR questions.

Oh I forgot to include seismic improvements of a new facility to show how much more safer it would be than the current. Thanks.

**Jose Quinones Jr.**

Email: [jquinones@chirotouch.com](mailto:jquinones@chirotouch.com)

## Leighton, Lynette

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**From:** Jose Quinones [<mailto:JQuinones@chirotouch.com>]

**Sent:** Tuesday, July 21, 2015 6:48 AM

**To:** DSD EAS

**Subject:** More EIR topics

I know the deadline was the 20<sup>th</sup> there are a couple of topics I remembered over the night that I hope would be included. A few things I hope an EIR will cover includes the Noise effect of a new stadium and if it will improve and be contained in a new stadium, and also possible issues which affected the building of Petco Park and should be settled early this time around which include the agreed size of the River park (and included amenities) and whether if there is any historical site/ building complications. These two issues were a source of much controversy and should be addressed because they too impact the environment. Anyways those were the three things that I thought of during the night. I hope all of our suggestions are taken into account and I thank you all taking the time to read these.

**Jose Quinones Jr.**

Email: [jquinones@chirotouch.com](mailto:jquinones@chirotouch.com)

**Leighton, Lynette**

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**Subject:** FW: Stadium Reconstruction Project Comments for Draft EIR

**From:** JME <[jody.ebsen@gmail.com](mailto:jody.ebsen@gmail.com)>

**Sent:** Tuesday, July 21, 2015 3:59 PM

**To:** DSD EAS

**Subject:** Stadium Reconstruction Project Comments for Draft EIR

As part of the CEQA process the project needs to consider the potential for flooding over the entire property from Murphy Canyon Creek and the San Diego River. The analysis should demonstrate that the proposed stadium and parking areas where the stadium and parking areas will be placed is relation to the areas that have historically flooded, such as in December 2010. The placement of the structures should ensure that they will be protected from flooding and identify necessary setbacks for development from the creek and river, and space for riparian buffers along the eastern and southern portions of the property. Development setbacks and buffers are critical mitigation measures needed to protect structures in the future development.

The latest in storm water best management practices and low impact development design features need to be included as part of the project. In consideration of climate change and the ongoing drought condition use of recycled water features needs to be incorporated, particularly for toilet flushing and landscape in the project design.

With the growth of residential and commercial uses in Mission Valley, the traffic patterns should be evaluated to ensure that vehicle traffic in and out of the stadium during large events is practical and efficient.

Thank you.

J. Ebsen

