

On behalf of Citizens Coordinate for Century 3 (C-3), I am submitting the comments below and in the attachment regarding the Draft Environmental Impact Report for the SDSU Mission Valley project. C-3 is a non-profit San Diego organization dedicated since 1961 to preserving and improving this region's natural and built environments.

In preparing these comments, C-3 has consulted with a wide variety of local organizations having knowledge and experience in the land use and design fields. We hope that our comments will result in an improved project and an improved DEIR.

Our comments on the DEIR are as follows:

### Project Description

- It fails to adequately describe the pending transfer agreement with the City of San Diego. It merely notes that negotiation of an agreement is in progress, but does not describe any of the possible/actual terms. As a result, the DEIR cannot adequately discuss whether the terms of the agreement will affect either the scope of the project or the potentially significant environmental impacts. This also makes it questionable whether this EIR can be used by the city in connection with approval of a transfer agreement.
- It provides inadequate information on the actual, as opposed to possible, physical elements of the project. It presents numerous illustrations showing possible designs for the stadium, housing, office/research facilities, parks, etc. However, since these are acknowledged to be merely conceptual, they do not provide a sound basis for a meaningful environmental analysis.
- The list of proposed stadium uses (Table 2.4) entirely omits future NFL games. That might require expansion of the stadium, which would then require a supplemental CEQA analysis, but it should be identified and discussed here, as the currently described project is a significant component of any such future development.
- It fails to identify permits required for construction of the river park, including compliance with the MSCP and the city's Climate Action Plan. This project component is all or mostly on land remaining in city ownership and will be subject to city regulations. Also, it fails to address long-term maintenance of the river park, either as a project component or as a mitigation measure.
- It incorrectly describes SDSU's obligation as being to comply with the "framework" of the SDSU Initiative; it should state an obligation to comply with the precise terms of the initiative.

### Cumulative Projects and Methods

- It fails to address cumulative housing impacts or to identify feasible mitigation measures (see below).
- It fails to address cumulative circulation impacts or to identify feasible mitigation measures (see below).

### Biological Resources

- It contains conflicting statements regarding use of Murphy Canyon Creek as a wildlife corridor.
- It incorrectly concludes construction and long-term activity (noise, light) will not impact wildlife in the Murphy Canyon Creek corridor.

- The biological surveys performed to Murphy Canyon Creek were insufficient and decisions based on these surveys will be incomplete.
- It contains inconsistencies as to the extent of light spillage into wildlife areas, and fails to mandate mitigation measures to reduce this impact to a level of insignificance.
- It ignores the city-owned part of the project site being subject to the MSCP.

### Cultural Resources

- It fails to adequately address the existing stadium's historical significance, including recognition by the national AIA.

### Energy

- The project layout does not comply with the model to get LEED ND credit for solar. Also, the north-south orientation does not provide optimal layout for solar efficiency.
- It includes inadequate discussion of possible water reuse to meet state and local water conservation goals. The discussion of LEED v4 water efficiency is only conceptual, without specific plans.
- It fails to address anticipated changes in energy codes during the life of the project, including pending requirements for increased percentage of energy from solar.
- It fails to comply with Governor's Executive Order B-1812 for zero net energy.
- It fails to adhere to the adopted SDSU Climate Action Plan which applies to the rest of SDSU's facilities.
- It fails to address higher energy requirements for stadium demolition and new stadium construction, compared with renovation of the existing stadium.

### Greenhouse Gas Emissions

- It fails to address compliance with the City of San Diego Climate Action Plan, even though the SDSU West initiative called for compliance with city ghg reduction goals. Even the ghg reduction targets in that CAP are insufficient for climate stabilization, particularly as to reduction of motor vehicle travel, but this environmental analysis and proposed mitigations do not even meet that minimal standard.
- It fails to address ghg emissions associated with stadium demolition and trucking away debris.

### Land Use and Planning

- The plan and the environmental analysis are isolated from the goals and underlying principles of the Mission Valley Community Plan, particularly the goals of improving current traffic, recreation, and other conditions in the area. As a result, proposed mitigation measures do not adequately address needs of the area which this project, along with all other projects, is expected to contribute to resolving.
- It is not based on an actual land use plan, but rather only on a conceptual plan. As a result, it does not provide definite locations for many of the proposed land uses, including parks and open space other than the river park. As a result, traffic and other impacts associated with the various land use cannot be analyzed with the required level of specificity or certainty.
- Fails to explain why future stadium expansion is not reasonably foreseeable, when this has been part of planning discussion all along.

## Population and Housing

- It fails to consider mitigation measures for cumulative housing impacts, e.g., limiting on-site housing occupancies to students, faculty, and households earning no more than 120% of area median income.

## Public Services and Recreation

- Fails to make clear how the project's park requirements will be met, relative to or in addition to the river park.

## Transportation

- It analyses traffic impacts in isolation, apart from existing traffic levels in the surrounding community and from other projects anticipated in the foreseeable future.
- It fails to address traffic between the project site and the main SDSU campus, or to discuss plans for transportation improvements (other than use of the trolley).
- It fails to address the need for multi-agency agreements, e.g., with MTS and SANDAG, for expansion and coordination of transit services. It also identifies mitigation measures that rely on funding and implementation actions by the State Legislature and the City of San Diego, over which SDSU has no control.
- It fails to address (or perhaps is incapable of addressing) fair share traffic mitigation requirements under the terms of the transfer agreement with the city.
- It fails to address the Fenton Parkway bridge as a possible project element remaining to be resolved.
- It fails to identify traffic-calming measures to be included in the project.
- It is unclear as to whether streets will be constructed to city standards.
- It ignores previous recommendations for added bus service to the site, reorientation of major streets, and other circulation improvements.
- It fails to discuss how location of the Purple Line trolley through portion of site would impact the project and create impacts needing analysis.
- It contains an insufficient discussion of overflow parking impacts on the surrounding area from use of the stadium and other special events on site.
- It lacks adequate discussion of connections to adjacent/nearby existing uses, e.g., Fenton Marketplace and major nearby streets.
- It fails to adequately discuss active transportation modes (walking, cycling, other mobility devices) or to provide sufficiently for them as project elements or mitigation measures.
- It fails to integrate circulation improvements with those called for in the Mission Valley Community Plan.
- It fails to consider reconfiguration of circulation improvements in the project vicinity, e.g., reducing traffic lanes on Friars Road and replacement with bicycle lanes, as mitigation measures for traffic impacts.
- It fails to consider transit connections, other than trolleys, or additional bus transit lines, as mitigation measures for traffic impacts. It also fails to address alternatives if provision of parking near the trolley station does not induce significant increase in trolley ridership.
- It fails to consider dividend account parking or other methods of inducing less reliance on motor vehicle use as mitigation measures for traffic impacts.
- It fails to address circulation needs of mobility-challenged travelers, e.g., wheelchair or scooter users, to reach transit connections or in the surrounding area impacted by the project.

## Other Environmental Considerations

- Certain graphics are not clear on line and not reproducible.
- The conclusion of SDSU being exempt from local school fees conflicts with terms of the SDSU West Initiative.
- It fails to address hauling and landfill impacts of demolition and removal of the existing stadium.
- It fails to address the need for the project to provide employment opportunities which pay well enough to allow workers, whether employed by the university or other entities, to afford housing costs within close proximity to the project site. This would reduce vehicular traffic and thereby reduce greenhouse gas generation.

### Alternatives

- Fails to consider highly plausible alternatives such as a higher-density development, construction of the stadium at a different location (e.g., Balboa Stadium), construction of a larger stadium, and 100% park use of the site.
- Improperly dismisses the stadium reuse alternative without adequate explanation, and ignores historical/cultural bases for retaining and reconstructing it.
- The Stadium Reuse Alternative appears to be Environmentally Superior, because it restores the architecturally significant stadium, restores much of the San Diego River wetlands and provides recreational open space for residents of Mission Valley, while accommodating growth.
- Because it retains the large parking area on historic wetlands, the No Project Alternative is not Environmentally Superior, even though it retains the historic stadium.

We look forward to SDSU's responses to our comments. Thank you.

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Chair of C-3 Mission Valley Committee