ATTACHMENT A:
CITY OF SAN DIEGO COMMENTS ON THE MISSION VALLEY CAMPUS MASTER PLAN PROJECT (PROJECT) DRAFT ENVIRONMENTAL IMPACT REPORT

The City of San Diego (City) Planning Department has received the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) prepared by the Board of Trustees of the California State University and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft EIR and appreciates this opportunity to provide comments to the Board of Trustees. In response to this request for public comments, the City has the following comments on the Draft EIR for your consideration.

The Mission Valley Community Plan Update (MVCPU) has retained the Fenton Parkway Extension from the currently adopted plan as a needed connection for circulation within Mission Valley. The DEIR should evaluate this connection as feasible partial mitigation for the Project's potential significant impacts to transportation by providing needed connectivity, expanded access to transit, and high-water crossing during flooding events.

In Draft EIR Section 4.15.11 and associated tables, comparisons are made between *2037 No Project with Bridge* and *2037 Project with Bridge.* Since the bridge is not fully funded and programmed to be in place, the analysis should compare *2037 Project with No Bridge (I.e. the Project)* and *2037 Project with Bridge* to appropriately analyze the Fenton Parkway Extension as mitigation.

In Draft EIR Section 4.15.11.2 Traffic Redistribution with Bridge states, "*a new run of the SANDAG Series 13 Year 2035 travel demand model was performed with both a 2-lane and 4-lane Fenton Parkway bridge in place. The results of this new run were then compared to the previous run without the bridge to determine where traffic volumes would shift to with the new connection.*" Please clarify whether the new runs with the connection in place were simply network reassignment runs of the without connection scenario or complete model runs. The redistribution should be based on a full model run with the connection in place, then a reassignment to network without the bridge connection.

With regard to Street 'A' (Mission City Street 'I' in MVCPU), please provide details on how this road will connect to Fenton Parkway including with the planned Fenton Parkway extension across the river. Additionally, in Section 14.4 of the Draft EIR, it appears that this street is used as an access point to the site in the analysis of emergency response times for responding fire stations. The Draft EIR should describe the configuration of the extension of Fenton Parkway and Street 'A' connection including interaction with the existing Green Line trolley and all bike and pedestrian connections, including grade separation alternatives. Please provide information related to California Public Utilities Commission (CPUC) acceptance of proposal.

Although the MVCPU and associated FEIR assumes that a refined circulation network would be defined in a Specific or Master Plan for the Stadium Site, the MVCPU still assumed a direct connection between San Diego Mission Road and Mission Village Drive. The proposed Project and Draft EIR assume a circulation network that removes this connection. It is unclear if or how this project addresses the potential re-routing of traffic with the proposed removal of the connection between San Diego Mission Road and Mission Village Drive. Currently, there is significant traffic during the peak periods that use this connection. Would the traffic now drive through the campus or use Friars Road as an alternate route?

Section 4.15.7.6.2, Bicycle Facilities, states that the proposed project would not conflict with existing or planned bicycle facilities. However, the MVCPU envisions Class IV one-way cycle tracks on Friars Road along the frontage of the proposed project site. The SDSU Mission Valley Campus Master Plan (Project) does not provide for these cycle tracks and the Project proposal of an additional lane on the Friars EB ramp from Mission Village Drive will increase the level of stress for cyclists by having them cross two lanes of traffic. It is recommended that project include a Class IV cycle track as envisioned in the MVCPU for consistency and provide schematics of how a Class IV could be designed to address safety and operational concerns.

The Draft EIR discloses impacts on several freeway segments but due to lack of jurisdiction proposes no mitigation aside from TDM. It is recommended that the Draft EIR look at additional mitigations that may reduce the impacts on these segments. Specifically, the Draft EIR should evaluate:

1. Any identified projects in the San Diego Forward: The Regional Plan, 2015 (RP) such as managed lanes on all impacted freeways segments that may partially mitigate the Project's impacts.
2. Additional mitigation that would alleviate the impacts on the I-15 including the Fenton Parkway Extension and Santo Road connections. These needed local connections would relieve dependence on freeway travel for short distances which creates overcapacity/breakdown conditions substantially reducing freeway capacity.
3. Additional mitigation on the SR 163 that should include Phases 2 & 3 of the SR-163/Friars interchange. These phases are not currently funded.

Trails shown on Figure 2-9D *Concept Design – River Park Plan* and Figure 2-9E *Concept Design – Trails and Open Space Plan* show trails connecting to the Fenton Parkway Station, but do not include a connection to the western most edge of the project boundary. A contiguous SD River Trail is envisioned in the San Diego River Park Master Plan (SDRPMP). Trail connections to the RiverRun development to the west, and as part of a potential Mission City/Fenton Parkway Bridge connection, should be considered as an element of the project description and impacts/mitigation to both sensitive plant and animal species included in the Draft EIR.

Revise the Draft EIR project description and impact analysis to include any necessary improvements to Murphy Canyon Creek to address flood risks or easements associated with

the proposed storm drain system. The Draft EIR should assume that the Murphy Canyon Creek Channel and drainage responsibilities will be conveyed to SDSU as part of the project. The Draft EIR should also assume that all existing storm drain system assets in the Existing Stadium Site and River Park will be conveyed to SDSU, including requiring that SDSU design, permit, construct and maintain all necessary storm drain improvements (pipes, channels, engineered streams, headwalls, storm water treatment facilities, and any other associated structures).

Section 2.3.2 of the Draft EIR references the Purchase and Sale Agreement, but no specifics are provided on improvements in Murphy Canyon Creek. Section 2.3.4.3 references River Park improvements but notes that the design is conceptual and maybe be revised by more precise site planning. Figure 2-10D showing proposed storm water facilities also does not show improvements in Murphy Canyon Creek. Figure 2-10E shows locations for proposed BMPs but does not include possible BMPs and flood control measures that could be necessary to locate in Murphy Canyon Creek.

In the Final EIR please include an analysis of environmental impacts associated with the following potential improvements in Murphy Canyon Creek and associated with the proposed Storm Drain System for the project:

1. Please include an analysis of the necessary improvements/expansions to Murphy Canyon Creek to bring the Creek to a condition that will adequately convey the appropriate flow and not flood the project site in accordance with the City's Drainage Design Manual. Measures that may be necessary to address flood risks could include realigning the creek. See Comments on Hydrology and Water Quality Section for more detail;
2. Address any access that may be necessary to maintain Murphy Canyon Creek as a flood control channel over the long-term;
3. Address the need for a flowage easement to Murphy Canyon Creek;
4. Storm Water Treatment Control Best Management Practices from the proposed project may not be located on City property. Address the relocation of BMPs noted in Figure 2-10E that may currently be proposed on City property in the DEIR;
5. Address easements that may be necessary for City storm drain facilities;
6. Address any other necessary improvements for proper drainage and water quality purposes.

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Planning Department, CEQA and Environmental Policy – Rebecca Malone, Senior Planner – rmalone@sandiego.gov, 619-446-5371

1. In the Mitigation Monitoring and Reporting Program (MMRP) for the Mission Valley Community Plan Update (MVCPU) Program EIR, MM-AQ-2 requires that the specific plan for the stadium site include various measures to reduce construction emissions. The

Planning Department acknowledges that MM-AQ-1 in the SDSU Mission Valley Campus Master Plan Draft EIR includes these measures.

2. In the MMRP for the MVCPU Program EIR, MM-NOS-1 requires that discretionary projects within the CPU area implement various measures to reduce construction noise. The Planning Department acknowledges that MM-NOI-1 through MM-NOI-5 in the SDSU Mission Valley Campus Master Plan Draft EIR include these measures.

3. The project includes athletic fields adjacent to the San Diego River and Murphy Creek. Would the athletic fields be lighted? Were the potential effects to sensitive species from noise or lighting from those fields analyzed?

4. The Draft EIR did not include information on the relocation of existing reoccurring events from SDCCU Stadium to another location. Will these reoccurring or intermittent special events be programmed at the future stadium? If not, where will these event be relocated to and would there be a significant impact related to the relocation or displacement of such events?

5. The Project proposes to address surface hydrology and drainage issues through BMPs onsite within the Project parks and open space areas. While the City's MSCP allows for essential public infrastructure, such as roads and drainage conveyance infrastructure, the use of the proposed parkland or open space areas for surface hydrology (runoff) retention, water quality treatment, and/or detention could expose preserved areas to potential indirect effects related to water quality, trash and contaminants, and non-native species that could impact native plant and animal species known to occur within the San Diego River corridor.

Planning Department, Mobility Planning – Maureen Gardiner, Associate Traffic Engineer – MGardiner@sandiego.gov, 619-236-7065

Consistency with Mission Valley CPU (MVCPU)

1. Please revise Figure 11 of Appendix 4-15-1 Traffic Impact Analysis. Section 10 is shown as the Kinder-Morgan access road on the plan view (pg. 1 of 2) but as the EB Friars On-Ramp in the cross-section detail (pg. 2 of 2). Please provide cross-section of the Kinder-Morgan access road.

2. Mission Village Drive & Friars Road EB Ramps Intersection: The Project should define how this modified intersection functions. Specifically, how the access to the Kinder Morgan site would operate. Would trucks utilize the outside southbound left turn lane of the Friars Road Eastbound Ramps/Mission Village Drive intersection from Mission Village Drive to access the Kinder-Morgan site? Did the EIR evaluate if trucks would block access to the inside left turn lane?

3. It appears that minimal bicycle and pedestrian facilities are proposed on the Mission Village Drive access to the site. As the site will be a significant attractor with events and is planned for two rail stations, substantial pedestrian and bicycle/micro-mobility accommodations should be proposed to access the site.

Impacts & Mitigations

1. Intersection Impacts: For impacted City signals, the DEIR generally recommends either optimizing the signal timing or striping changes based on a trigger of Dwelling Unit Equivalents (DUE). However, the DEIR also states that CSU/SDSU has no jurisdiction over these signals and it cannot guarantee the funding or implementation of the recommended mitigations and therefore, these mitigations are infeasible. It is recommended that CSU/SDSU work with the City to implement these mitigations as the project is developed to the identified DUE trigger for each mitigation. Furthermore, where alternative mitigation is identified they are also deemed infeasible, please recommend feasible alternative mitigations.

    a) MM-TRA-10 Intersection 32 Ward Road & Rancho Mission Road: Why is the signal installation infeasible if the Project's traffic at the defined threshold (3,950 DUEs) would warrant a signal at this location. The Project should ensure that adequate access is provided to its site.

2. I-15 & Friars Intersections (NB & SB): The DEIR identifies recommended mitigations for the I-15 and Friars based on vehicle delay and queuing. The MVCPU Final PEIR also identified impacts at these locations and recommends that a Project Study Report (PSR) be funded to identify the appropriate, more holistic improvements that would address all modes of travel. It is recommended that the DEIR include the PSR and resulting recommended improvements as partial mitigation toward project impacts.

Other DEIR Comments

1. The DEIR and TIS should follow the guidelines of the City *Traffic Impact Study* Manual and the current *City of San Diego Significance Determination* Thresholds for transportation facilities, which includes the evaluation of the 2050 Horizon Year conditions, as requested by the City in its comment letter to the NOP for the Project.

2. Please clarify if the 2037 analysis assumes the Purple Line Phase 1 project in place. This is not currently funded and programmed, therefore analysis that does not include the Purple Line should be provided.

3. DEIR Table 4.15-1: It appears that Commute Trip Reductions are combined with the other trip reductions listed and then applied to all trips as shown in Table 4.15-10. Reductions applicable to commute trips should only be applied to commute trips.

4. DEIR Table 4.15-43 VMT Analysis: Please clarify the methodology used to obtain the VMT values in this table as they appear to be double the San Diego Forward: The Regional Plan, 2015 (RP) FEIR and other SANDAG reports on VMT we have reviewed. The DEIR indicates 158 million VMT in the 2012 Baseline, while in the RP FEIR, that also uses Series 13, indicates a regional VMT of 79 million VMT. Likewise, in 2037, the DEIR reports a VMT of 185 million VMT while the RP FEIR reports 90.5 million VMT (albeit for 2035).

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Planning Department, Cultural Resources – Myra Herrmann, Senior Planner/Archaeologist/Tribal Liaison – mherrmann@sandiego.gov, 619-446-5372

DEIR Comments – Chapter 4.4 – Cultural Resources

1. Page 4.4-3 – Cultural Context. Not all readers of the DEIR will also review the Cultural Resources Technical Report and as such, this very brief paragraph does not provide any real tribal context with respect to the Kumeyaay Nation. This only provides cultural complexes used for the purpose of classifying the archaeological assemblages into chronological timeframes. In order to support the technical analysis and environmental determination the tribal cultural context should be briefly expanded and include reference to the Aboriginal Territory of the Kumeyaay/Diegueño Nation that was adopted by State Assembly Joint Resolution No. 60 in 2001, and that the Kumeyaay are the identified Most Likely Descendants by the NAHC for all Native American human remains found in the City of San Diego's jurisdictional boundaries. This is especially important in the event that human remains are encountered during construction-related activities.
2. Page 4.4-3 – Archaeological Inventory. 1st paragraph, please insert "cultural" before "resources" in line 6.
3. Page 4.4-3, 2nd paragraph, please change "Mission of San Diego" to "Mission San Diego de Alcalá" and insert the village of "Nipawai" before "Nipaguay". Both village names should be italicized and consistently referenced together as noted in the comments provided on the technical report and throughout this EIR chapter (e.g., Page 4.4-15).
4. Please correct the site record reference for the SDCCU Stadium currently shown as P-37-000035; CA-SDI-35. This is incorrect. The correct Primary record number for the SDCCU Stadium is P-37-035171.
5. Page 4.4-13, last paragraph, reference to the City's cultural resources regulations should be changed to read "Historical Resources Regulations".
6. Pages 4.4-14 and 4.4-15, please insert the word "Resources" in the last line of each paragraph describing the City's designation criterion.
7. Page 4.4-16 under "Construction Impacts", please insert "…with the Iipay Nation of Santa Ysabel" after "Clint Linton" and "representative of the" in lines 2 and 3.
8. The City of San Diego concurs with the mitigation measures for archaeological and Native American Kumeyaay monitoring provided in the DEIR to address potential impacts on cultural resources, including sacred sites and human remains (MM-CUL-4 and MM-CUL-5). These measures will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture. In the event that such resources are discovered in proximity to City-owned land, notification to the City of San Diego would be requested to ensure that future efforts in those areas are being appropriately addressed in accordance with CEQA and the City's Historical Resources Regulations and associated Guidelines.

9. With respect to Mitigation Measure MM-CUL-1, although the SDCCU Stadium Site will be transferred to SDSU for future development, the importance of the built-environment resource to the City is non-the-less important. As such, please include the City of San Diego, Historical Resources Section to the list of recipients to receive a copy of the HABS documentation for their records.

10. With respect to Mitigation Measure MM-CUL-2 regarding interpretive displays associated with the SDCCU Stadium. Please clarify whether the request by Clint Linton with the Iipay Nation of Santa Ysabel to commemorate Jack Murphy in some manner would be included in the interpretive displays under this measure, perhaps this can be accomplished as part of consultation with City Historical Resources staff.

DEIR Comments – Chapter 4.6 – Geology and Soil

1. Regarding the discussion of potential impacts to paleontological resources from the project on Page 4.6-18, only the County of San Diego guidance is referenced regarding resource sensitivity. While the City of San Diego does not disagree with the conclusions of the DEIR Chapter, it should be noted that we also provide guidance for analysis and significance determinations in our Paleontological Guidelines (2002), Significance Thresholds (2016) and recently adopted changes to San Diego Municipal Code Section 142.0151 - General Grading Guidelines for Paleontological Resources. These documents provide context for the purpose of analyzing potential impacts to Paleontological fossil resources within the City of San Diego's jurisdictional boundaries and should be incorporated into the Geology and Soils Section and References Cited sections of the DEIR.

2. The City of San Diego concurs with the mitigation measure provided (MM-GEO-3) to reduce potential impacts to paleontological resources during construction-related activities associated with implementation of the proposed project.

DEIR Comments – Chapter 4.16 – Tribal Cultural Resources

1. Page 4.16-2, last paragraph, please capitalize the first letters of the Tribal Historic Preservation Officer in line 1. This is an official title under State and Federal regulations.

2. Page 4.16-6, last paragraph, please revise the first sentence as follows to clarify that this impact statement is not referring to cultural (archaeological) resources: "No California Register of Historical Resources (CRHR) listed or eligible <u>tribal</u> cultural resources were identified through the South Coast<u>al</u> Information <u>Center</u>…". Please also make this same revision to the 1st and 2nd paragraphs on Page 4.16-7.

3. Also in this paragraph on Page 4.16-6, the village of *Nipawai* should be italicized and *Nipaguay* should be added to the sentence. Please also make this same revision to the 3rd and 4th paragraphs on Page 4.16-7.

4. Page 4.16-7 under "Construction Impacts", please insert "…with the Iipay Nation of Santa Ysabel" after "Clint Linton" and "representative of the" and insert the word "the" before "Kumeyaay trail…".

5. Page 4.16-8 under Subsection 4.16.5 – Summary of Impacts Prior to Mitigation, please insert the word "tribal" in the first sentence after "CRHR-eligible" and also in line 3 of the same paragraph.

6. The City of San Diego concurs that the mitigation measures for Native American Kumeyaay monitoring provided in the DEIR to address potential impacts on cultural resources, including sacred sites and human remains (MM-CUL-4 and MM-CUL-5) will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture.

7. Page 4.16-9, please insert "tribal" after "eligible" at the beginning and end of line 2 and in line 5 in the 1st paragraph. Please also revise the sentence for MM-CUL-4 as follows: "MM-CUL-4 outlines procedures for proper treatment of unanticipated archaeological discoveries, which are also often tribal cultural resources as defined in CEQA PRC Section 21074, that comply with the CEQA Guidelines. This edit will provide further consistency with the PRC section noted above.

Draft Cultural Resources Technical Report Comments

1. Several pages in the technical report (e.g., Page iii, Page 31) refer to the South Coastal Information Center (SCIC) site record for the SDCCU Stadium as P-37-000035; CA-SDI-35. This is incorrect. The correct Primary record number for the SDCCU Stadium is P-37-035171. This error should be corrected where noted above in the technical report, as well as in Chapter 4.4 - Cultural Resources of the DEIR, and anywhere else this may be referenced in the DEIR.

2. On Page 13, in the 3rd paragraph under Subsection 2.2 – Field Methods, the second sentence should read "…river, is located "within" the project site…"

3. On Page 19, 1st paragraph, line 1 under the City of San Diego, please revise the Historical Resources Guidelines date reference to 2001. This correction will then be consistent with the date shown in other sections of the technical report and in Chapter 8 – References Cited.

4. In the Cultural Context and Ethnohistoric discussion of the Kumeyaay territory, it should be noted that the Aboriginal Territory of the Kumeyaay/Diegueño Nation was adopted by State Assembly Joint Resolution No. 60 in 2001, and that the Kumeyaay are the identified Most Likely Descendants by the NAHC for all Native American human remains found in the City of San Diego's jurisdictional boundaries. This is especially important in the event that human remains are encountered during construction-related activities. Please include this information in the Draft EIR Chapters 4.4 – Cultural Resources and Chapter 4.16 – Tribal Cultural Resources.

5. The ethnohistoric Kumeyaay village of *Nipawai* is referenced on Page 26, but no other information is provided to understand the relevance, significance, and association of this Native American village to the Mission San Diego de Alcalá. This context is also important when taking into consideration the requests made by representatives of the Kumeyaay Nation for monitoring during all ground disturbing activities. This additional

context also serves to support the impact analysis provided in DEIR Chapters 4.4 – Cultural Resources and Chapter 4.16 – Tribal Cultural Resources. It should also be noted that the spelling of village site is also often shown as *Nipaguay* in historical records and as such, both spellings should be used consistently in the technical report and associated DEIR chapters. Additionally, reference to the village of Kosay should also include the other referenced spellings: *Kosaii/Cosoy/Kosa'aay.*

6. On Page 26, 4th paragraph and Page 28, 1st paragraph, please change "Mission of San Diego" to "Mission San Diego de Alcalá". This change should be made elsewhere in the technical report, Chapter 4.4-Cultural Resources, and in any other applicable chapter of the DEIR for consistency.

7. Page 38. 2nd paragraph, please insert "…with the Iipay Nation of Santa Ysabel" after "Clint Linton" in line 2.

8. On Page 39 under the impact question regarding the project affect to a resource listed or eligible for listing in the California Register of Historical Resources (CRHR), this discussion technically covers all historical resources, and as such should also consider including a brief reference to the NRHP, CRHR and City eligible SDCCU Stadium Site as further described in site form P-37-035171 and the Historical Resources Technical Report prepared for the project.

9. The City of San Diego concurs with the mitigation measures for archaeological and Native American Kumeyaay monitoring provided in the technical report to address potential impacts on cultural resources, including sacred sites and human remains. These measures will serve to reduce potential impacts to unknown and/or unanticipated buried tribal cultural resources and associated material culture. In the event that such resources are discovered in proximity to City-owned land, notification to the City of San Diego would be requested to ensure that future efforts in those areas are being appropriately addressed in accordance with CEQA and the City's Historical Resources Regulations and associated Guidelines.

Paleontological Resources Inventory Report Comments

1. The Paleontological Resources Inventory Report only references the County of San Diego guidance regarding resource sensitivity criteria. The City of San Diego also provides guidance for analysis and significance determinations in our Paleontological Guidelines (2002), Significance Thresholds (2016) and recently adopted changes to San Diego Municipal Code Section 142.0151 - General Grading Guidelines for Paleontological Resources. These documents provide context for the purpose of analyzing potential impacts to Paleontological fossil resources within the City of San Diego's jurisdictional boundaries and should be incorporated into the technical report and References section.

2. The City of San Diego concurs with the mitigation measure provided to reduce potential impacts to paleontological resources during construction-related activities associated with implementation of the proposed project.

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Planning Department, Long-Range Planning Division – Nancy Graham, Development Project Manager III – nhgraham@sandiego.gov, 619-236-6891

1. Executive Summary: The current Mission Valley Community Plan was originally adopted in 1985, not 1984 as stated in the EIR.
2. Chapter 2: Table 2-5. Parks, Recreation, and Open Space table needs to be more clear on what area is available to the public versus what is available only to people affiliated with SDSU (students/faculty and/or event ticket holders).
3. Chapter 2: The project should analyze the inclusion of a Community Rec Center, even if the proponents do not intend to construct the facility.
4. Chapter 2: The EIR should identify the possibility of a primary and or secondary school site (such as a charter school) on the campus as identified in the Mission Valley Community Plan.
5. Chapter 2: It is unclear how the connection to Fenton Parkway will be made from the site recognizing the rail crossing. A permit will likely be required by the CPUC, which is not included in their list of Requested Project Approvals. The illustrations make it look like this connection will be made, but Figure 2-11A shows a gap in the connection where the tracks are located, while also including a traffic signal at that location. These details are also completely missing from the Street Sections, but there is a visual simulation of the connection in Figure 4.1-17.
6. Chapter 3: The project list should include a proposed Community Park and Recreation Center on the pad they have identified in the site plan. These facilities are standardized enough throughout the City that enough information can be inferred on what will be there in the future.
7. Chapter 4.1: The current Mission Valley Community Plan calls for the protection of views of the existing stadium as a recognized landmark. This should be noted specifically in the analysis, along with the mitigation that may be necessary to address any significant impacts that would result with the demolition of this structure.

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Planning Department, Park Planning – Scott Sandel, Parks Planner – ssandel@sandiego.gov, 619-235-5204

1. Figures regarding the ownership of the southwestern area that include the park, are inconsistent within the Draft EIR; see Figures 2-1 and 2-9C. Please revise to be both consistent and reflective of the Initiative and PSA.
2. Section 2.2: More specificity should be given to the context and meaning of "shared parks and open space" as an objective. Does this mean something formal, along the lines of a public access agreement with the City of San Diego for the recreation areas outside of the 34-acre City River Park? Does this include an aquatics facility, as shown on the City's Draft Mission Valley Community Plan Update?

3. Section 2.3: Phasing/River Park: Discuss program for the park and inclusion of a recreation center and an aquatic center, per the City's draft Mission Valley Community Plan Update and the Public Facilities Financing Plan. Per Measure 'G': "8. The People of the COSD also desire the reservation and improvement of an additional minimum of 22 acres within the Existing Stadium Site as publicly-accessible active recreation space." (Note: emphasis added on active recreation.) These 22 acres are also referenced in SDMC 22.098.
4. Section 2.3.4: Community Recreation Center Site: Indicate in further detail this COSD-owned site on Table 2-5, on plan figure 2-9C and in narrative description, including acres, of the pad for the recreation and aquatic center. Describe how the design for this site would or would not be per Council Policy 600-33.
5. Section 4.1: Mission Valley Community Plan Update: Also please discuss the Public Facilities Financing Plan projects P-4 and P-5 that are applicable to this site per the Draft Mission Valley Community Plan Update. (Mistakenly omitted from discussion)
6. Section 4.10: City of San Diego Development Impact Fee program – Mission Valley, 3rd paragraph: It is stated that the Park fee "reflects the limited availability of parks and current shortage of park space in Mission Valley". This is incorrect. The fee does not reflect current shortages. Instead it is based on projected future needs, based on projected residential uses (not current parkland deficits) and current (not future) land and construction costs.
7. Section 4.10: City of San Diego Development Impact Fee program – Mission Valley, 4th paragraph: Required population-based COSD park acreage requirements are based on "useable" land, as defined in the COSD General Plan's Glossary. Please restate both narrative and proposed park acreages in terms of usable park acreages. See 4.14, Parks and Recreation, for language concerning the "useable" park acreage cited from the COSD General Plan Recreation Element.
8. Section 4.13-7: Table compares project parkland acreages in "apples to oranges" methodology. Mission Valley CPU uses "useable" park acreage, while Proposed Project uses gross acreage. (See discussion above in 4.10.) Restate in useable acreage.
9. Section 4.14: Park Development: EIR erroneously omits reporting the Aquatic facility.

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Parks & Recreation Department – Andrew Field, Interim Director – Contact: Jeannette DeAngelis, Deputy Director - JDeAngelis@sandiego.gov, 619-685-1323

Thank you for the opportunity to comment on the Notice of Availability for the Draft EIR for the San Diego State University (SDSU) Mission Valley Campus Master Plan Project (Project). The City of San Diego (City) Parks and Recreation Department (Department) requests that the Draft Environmental Impact Report (DEIR) address the following impacts:

1. Design Guidelines in the SDRPMP include a 35-foot wide River Pathway corridor. The conformance evaluation with the SDRPMP should address conformance with Section 3.1.2 A. (Establish Appropriate Corridors for the River, Wildlife and People); and Section 3.1.3 (Create a Connected Continuum, with a Sequence of Unique Places and Experiences; Recommendation A. Create a continuous multi-use San Diego River Pathway from the Pacific Ocean to the City of Santee). In the DEIR under Land Use and Planning, *Project conformance with the San Diego River Park Master Plan*, Table 4.10- 3, *Key Points for Qualcomm Stadium Site*, the SDRPMP notes this is a "critical location for creating continuity in San Diego River Park and San Diego River Park pathway." The DEIR states, "The proposed project includes a system of trails throughout the River Park" as substantiation for conformance. This conformance statement should be reevaluated given the vision of a contiguous trail corridor along the River pathway if the additional trail linkages to the west are not added to the project description.

2. Discussed in Section 1.6.2, page 1-16, *Development Features Contemplated by San Diego Municipal Code Section 22.0908*: the Draft EIR states, "As part of the purchase of the project site, SDMC Section 22.0908 requires that CSU (on behalf of SDSU) revitalize and restore the 34-acre River Park as identified in SDMC Section 22.0908, which will be retained and owned by the City in fee." Please provide clarification as to which entity is anticipated to provide long-term maintenance and management of the 34- acre River Park. Please include a discussion

    a. If SDSU, include discussion of maintenance standards expected to be used, within the active park areas and San Diego River buffer area.

    b. If City of San Diego, Parks and Recreation Department, consideration may be needed for additional park access points for maintenance, equipment storage facilities and parking for maintenance staff. Please discuss and assess any impacts to the City General Fund, the reduction of park use areas, open space and/or population-based park acreage requirements.

3. The DEIR acknowledges potential impacts to sensitive vegetation and wildlife habitat under the Biological Resources Section 4.3, Page 4.3-21, "An increased human population increases the risk for damage to suitable habitat for wildlife species. In addition, increased human activity can deter wildlife from using habitat areas near the proposed project footprint, particularly if people go into the San Diego River or Murphy Canyon Creek." Please provide mitigation measures to avoid and reduce unintentional edge effects and unwanted human activity in the San Diego River or Murphy Canyon Creek. The stated mitigation measure, *MM-BIO-10 INDIRECT EDGE EFFECTS*: "The proposed project shall be designed so that any sports or recreational fields and courts shall be set back a minimum of 100 feet from the floodway of the San Diego River to reduce noise and lighting impacts" does not address control measures such as fencing and signage to discourage park users from entering sensitive habitat areas.

4. Ensure that the any access required for the Swift Water Rescue team by the San Diego

Fire-Rescue Department to Murphy Creek and the San Diego River from the site is included in the project description and that impacts/mitigation to both sensitive plant and animal species included in the PEIR.

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Fire-Rescue Department, Swiftwater Rescue Team – John Sandmeyer, Marine Safety Captain – Jsandmeyer@sandiego.gov, 619-221-8833

1. Over the past decade, there have been 10 to 15 serious incidents related to the rescue of people in or around the San Diego River and Murphy Creek riparian areas to the east and south of the current stadium parking lot. Incidents ranged from populated encampments that were surrounded by rising flood water to people trapped while searching for pedestrian routes across the river as well as vehicles trapped in the existing parking lot by the inundation of river water that breeched existing dirt or concrete levies.

   The request of the Fire-Rescue Department Swiftwater Rescue Team (SRT) would be to maintain emergency vehicle access to the banks of Murphy Creek and the San Diego River from the area that is currently occupied by the stadium parking lot. It is not required of the SRT and other rescue groups to have hardscaped driveways, lane or ramps to the river edge. Rescue teams can access the river areas within a natural soft-scaped interface. Our preference would be to have acceptable access routes available, spread out at distances of not more than approximately 500 feet, that would enable a typical 4-wheel drive truck to approach the river bank and stage for purposes of coordinating swiftwater and flood rescues in the river plain.

   Impediments to emergency access like fences, wires or walls should be clearly marked to provide directions to locations of best access. Any manmade culverts, pipes, tunnels or drainage collection areas should be constructed without creating added threats to life safety that would create additional hazards during periods of heavy precipitation and flooding. Steep culvert banks and low head dams are two features in urban infrastructure construction that have led to dangerous conditions to people trying to negotiate their way out of moving water drainage areas. We are eager to help provide input to future planning efforts related to river and flooding rescue threats in this area. Please feel free to contact me with any questions on this input.

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Development Services Department – Ann French Gonsalves, Senior Traffic Engineer, Contact: Leo Alo, Associate Traffic Engineer - Lalo@sandiego.gov, 619-446-5033

1. Page ES-3, Section ES.3.1: The DEIR should clearly state how the SDSU Mission Valley Campus Master Plan estimates being able to accommodate 15,000 full-time equivalent students (FTES) at buildout, especially with such a great magnitude of unmitigated traffic impacts.

2. Pages ES-55 to ES-70: Table ES-2 should state whether impacts are "direct" versus "cumulative". All impacts should be mitigated to the extent feasible to the satisfaction of the City Engineer and/or Caltrans.

3. Page ES-55, Table ES-2: Impact TR-1 is shown as Significant and Unavoidable. However, the impact can be mitigated to below a level of significance by limiting the number of events to the same or fewer than the existing SDCCU stadium.

4. Page ES-55, Table ES-2: Impact TR-2/28A is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

5. Pages ES-56 to ES-7, Table ES-2: Impacts TR-3/28C and TR-4/28D are shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego to reduce the impacts to below a level of significance.

6. Pages ES-57 to ES-59, Table ES-2: Impact TR-5/28E is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as adding a second northbound right-turn lane and traffic signal improvements at the intersection of Northside Drive/Friars Road in coordination with the City of San Diego to reduce the impact to below a level of significance.

7. Pages ES-59 to ES-62, Table ES-2: Impacts TR-6/28H and TR-7/28I are shown as Significant and Unavoidable. The proposed mitigation to "support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements…"; SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impacts to below a level of significance.

8. Pages ES-62 to ES-63, Table ES-2: Impact TR-8/28J is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

9. Pages ES-63 to ES-64, Table ES-2: Impacts TR-9/28L and TR-10/28M are shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as restriping and associated traffic signal improvements in coordination with the City of San Diego to reduce the impacts to below a level of significance.

10. Page ES-64, Table ES-2: Impact TR-11/28N is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as installation of a traffic signal at Ward Road/Rancho Mission Road in coordination with the City of San Diego to reduce the impact to below a level of significance.

11. Pages ES-64 to ES-65, Table ES-2: Impact TR-12/28O is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego to reduce the impact to below a level of significance.

12. Pages ES-65 to ES-66, Table ES-2: Impact TR-13/28P is shown as Significant and Unavoidable. The proposed mitigation to "support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements..."; SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

13. Page ES-66, Table ES-2: Impact TR-14/28Q is shown as Significant and Unavoidable. SDSU should implement any feasible mitigations such as traffic signal improvements in coordination with the City of San Diego to reduce the impact to below a level of significance.

14. Pages ES-67 to ES-69: The DEIR should explain why mitigation measures and levels of significance are listed as "N/A" in Table ES-2. SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

15. Pages ES-68 to ES-69, Table ES-2: Impacts TR-25/30B and TR-26/30C are shown as Significant and Unavoidable. The proposed mitigation to "support Caltrans in its effort to obtain the project's proportionate share of funding for the recommended improvements..."; SDSU should implement any feasible mitigations in coordination with the City of San Diego and Caltrans to reduce the impacts to below a level of significance.

16. Page ES-78: The first sentence states that the existing stadium contains 68,000 seats while page 4.15-1 states that the existing capacity is 70,561 seats. This discrepancy should be corrected.

17. Page 4.15-1 to 4.15-2: The DEIR states that "The TDM program would reduce projected traffic volumes and project-generated vehicle miles of travel (VMT) by an estimated 14.4%". According to Table 4.15-1 of the DEIR, 13.08% of the 14.4% projected reduction would be due to "new bicycle facilities" and "pedestrian network". Table 4.15-10 Project-Generated Weekday Trip Generation should not be taking both a 14.4% trip reduction for TDM and an additional 7% Daily, 10% AM/10% PM trip reduction for Transit/Bike/Walk Trips.

18. Page 4.15-3: The DEIR states that "...for those limited events with attendance levels exceeding 25,000 persons or more, off-site parking supplies near trolley stations will be provided to minimize the potential for Stadium patrons to park in adjacent neighborhoods". The DEIR should clearly specify the location of any proposed off-site parking supplies and associated parking agreements.

19. Page 4.15-4: The project proposes to utilize "metered and time-limited on-street parking". SDSU should coordinate with the appropriate City of San Diego departments including the San Diego Police Department and the Transportation and Storm Water Department regarding any proposed metered and/or time-limited parking on City streets.

20. Page 4.15-4, Section 4.15.1.1: The project proposes a TDM Program which "will serve to reduce vehicle traffic and related significant impacts to the extent feasible...". However,

the following paragraph calls the TDM program a "project design feature". If the TDM is being used to reduce traffic impacts, it should be stated as required mitigation as opposed to a design feature.

21. Page 4.15-7, Non-Stadium TDM 3: The DEIR should clarify that unbundled parking is only required for multi-family residential parking in "Parking Standards Transit Priority Areas" and not all "Transit Priority Areas".
22. Page 4.15-7, Non-Stadium TDM 3: The project is proposing a limited parking supply to discourage use of single occupant vehicles. However, the DEIR should clearly demonstrate how providing limited parking will not negatively affect adjacent neighborhoods.
23. Page 4.15-7 to 4.15-8, Non-Stadium TDM 4: The project proposes TDM Program monitoring but should further state the frequency and type of monitoring and who the results of the monitoring will be reported to.
24. Page 4.15-8, Non-Stadium TDM 4: The project should also provide a free shuttle service to students and employees in addition to hotel shuttle services.
25. Page 4.15-14 to 4.15-15, Section 4.15.2 Methodology: The DEIR should address whether the project is consistent with the Mission Valley Community Plan Update.
26. Page 4.15-15, Section 4.15.2.1 Project Study Area: The DEIR incorrectly states that the transportation analysis evaluates operation at "4 existing intersections" instead of 40. This should be corrected.
27. Page 4.15-19, Section 4.15.2.2 Analysis Scenarios: The DEIR fails to analyze the Near-Term Opening Day Scenario which would account for any direct impacts caused by the project and other reasonably foreseeable cumulative projects in the area.
28. Page 4.15-19, Section 4.15.2.2 Analysis Scenarios: The DEIR fails to analyze the impact of the proposed project on Community Buildout Year 2050 Scenario.
29. Page 4.15-23, Section 4.15.2.9 Cumulative Projects: Per previous comment #27, the DEIR fails to account for reasonably foreseeable development projects expected to be open after the existing counts were taken but prior to the project's opening day.
30. Page 4.15-30, Section 4.15.3.5: The DEIR incorrectly states that there are 41 existing study area intersections when there are 40. This should be corrected.
31. Page 4.15-36, Table 4.15-7: The Existing Conditions Freeway Segment Level of Service should include a footnote showing where the counts were obtained and when they were taken.
32. Page 4.15-47, Table 4.15-10: The Project Generated Weekday Trip Generation (Without Stadium Event) table should include information on how the rate of 4.4 daily trips per dwelling unit was developed for "Student Focused Housing".

33. Page 4.15-48, Table 4.15-10: The Project Generated Weekday Trip Generation (Without Stadium Event) table should include information documenting the source of the existing stadium daily trips of 1,089 ADT.

34. Page 4.15-50, Section 4.15.5.1.1: The DEIR should also include projected peak hour trips for a 15,000-student campus in the section that discusses potential long-term lower trip generation if the entire project site were eventually converted to university uses only.

35. Pages 4.15-50 to 4.15-51, Section 4.15.5.1.2 and Table 4.15-11: The DEIR assumes a 10% mixed use reduction in the stadium event trip generation without providing substantial evidence on how this number was determined. The DEIR should provide documentation to support this assumption.

36. Page 4.15-53, Section 4.15.5.3: The DEIR incorrectly states that the total trip generation under a university project scenario is 21% less than the market project scenario analyzed. Per Section 4.15.5.1.1, the university only project scenario would be expected to generate 8% less than a market project scenario. This should be corrected.

37. Page 4.15-53, Section 4.15.5.4: The project proposes to construct a traffic signal at the intersection of Friars Road & Stadium Way (Street A). The DEIR should address whether the proposed traffic signal would meet traffic signal warrants per MUTCD guidelines.

38. Page 4.15-54, Section 4.15.5.4: The DEIR should address whether the project's proposed roadway improvements as shown on Figures 4.15-10A and 4.15-10B are consistent with the Mission Valley Community Plan Update.

39. Page 4.15-54, Section 4.15.5.4: The Project Road Improvements shown on Figure 4.15-10B should be revised to meet current City standards which includes but is not limited to buffered bike lanes, wider parkways, non-contiguous sidewalks, and adequate street lighting.

40. Page 4.15-64, Table 4.15-14: The DEIR should explain why many of the study intersections are shown to experience a decrease in delay with the addition of project traffic to existing conditions.

41. Page 4.15-67, Table 4.15-15: The DEIR should explain why the "Requires Additional Analysis?" column in the Existing Plus Project Conditions Without Event Roadway Segment Level of Service table should not be titled "Significant Impact".

42. Page 4.15-77, Roadway Segments: The DEIR incorrectly states that "project traffic traversing the study area roadway segments was added to existing peak hour roadway volumes" for the results reported in Table 4.15-20. Table 4.15-20 is based on daily volumes (not peak hour volumes). This should be corrected.

43. Page 4.15-100, Table 4.15-27: The Horizon Year (2037) No Project Conditions Ramp Metering Analysis should also include the max observed delays and max observed queues at each metered on-ramp to support the asterisked note to this table.

44. Page 4.15-138, Section 4.15.7.5.1: The Overall Parking Supply is proposed to total approximately 13,192 on-site parking spaces. The DEIR should also discuss what the

parking requirement would be based on all proposed uses on-site using City minimum and maximum requirements.

45. Page 4.15-140, Table 4.15-40: The Projected Share of Stadium Attendees by Mode table needs to be clear which modes go with the percent mode share. Footnotes 2 through 5 are not referred to. This should be corrected.

46. Page 4.15-175, Section 4.15.11: The DEIR incorrectly states that the Fenton Parkway Bridge is not required as mitigation for the proposed project's impacts. The analysis in Section 4.15 shows that project impacts such as the intersection impact at Northside Drive & Friars Road in the Horizon Year 2037 (Table 4.15-47) may be mitigated with construction of the bridge.

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Public Utilities Department – Nicole McGinnis, Principal Water Resources Specialist - NMcGinnis@sandiego.gov, 619-533-4101

Executive Summary

1. In reference to the list of item No. 8, please identify what infrastructure is off-site (Page ES-3).
2. The FEMA Conditional Letter of Map Revision will dictate the elevation of building pads. The County of San Diego Flood Control Department is the start of the process. (Page ES-3, Table ES-1).
3. In reference to the statement, "Authority to connect existing City-owned infrastructure...", please revise to "confirm capacity in existing infrastructure?" The City may not have plans for such density. (Page ES-4, Table ES-1).
4. What impact, if any, might the removal or replacement of soils have on nearby phreatophytic vegetation which may depend on water infiltration and naturally occurring groundwater? (Impacts to Riparian Habitat, page ES-21, Table ES-2).
5. Water wells were installed at the stadium site at the turn of the century. It may be possible that certain project elements may remove the geologic layers, used historically by San Diego citizens. (Table ES-2, page ES-33).
6. Will this lead to groundwater contamination? (Page ES-36, Table ES-2, Impact HAZ-1).
7. Care should be exercised so that the removal of any soils does not interrupt the natural flow of groundwaters. The creation of any water flow discontinuities should be analyzed closely. (Page ES-36, Table ES-2).
8. What is the risk that explosion waves will physically damage the City's two (2) existing monitoring wells or Kinder Morgan's decommissioned and sealed wells? (Page ES-37, Table ES-2, Impact HAZ-2).
9. What is the risk that explosion waves will physically damage Kinder Morgan assets and lead to a subsurface leak? (Page ES-37, Table ES-2, Impact HAZ-2).

10. Will excavation activities affect remaining pollutants? At this time, the site has reached a degree of equilibrium. Moving soils around might cause pollutants to dislodge and migrate. Explain how contamination pollutants will be prevented from spreading into the groundwater basin? (Page ES-37, Table ES-2, Impact HAZ-3).
11. The City does not recommend or support the removal/decommissioning of these monitoring wells. Ongoing monitoring of these wells provides information on the nature of the pollutants remaining on site in the groundwater basin. Additionally, relocation of wells would create a discontinuity in the water quality data. (Page ES-38, Table ES-2, Impact HAZ-4).
12. MM-HAZ-5: "A well decommissioning and destruction plan shall be prepared for the removal or abandonment of on-site environmental wells, groundwater monitoring wells, remediation wells, and associated piping.... The approved plan shall be followed and on-site wells would be removed, transferred, or abandoned prior to construction in accordance with applicable laws and regulations." Please identify what entity will be responsible for this plan. (Page ES-38, Table ES-2, Impact HAZ-4).
13. MM-HAZ 5. How will the project impact wells which have been decommissioned? Per County and State regulation, well casings remain in place, and their holes are slurry-filled. The project has subsurface elements. Will the decommissioned wells be disturbed as part of this project? (Page ES-38, Table ES-2, Impact HAZ-4).
14. What impacts to air quality will be caused by "routing" the toxic vapors around the buildings? (Page ES-40, Table ES-2, MM-HAZ 7).
15. Has the impact of removing the basal gravels on groundwater recharge been analyzed? What about the natural movement of groundwater? The City has Pueblo Rights, and no discussion about the impact of groundwater storage was identified. (Page ES-45, Table ES-2).
16. Would the project conflict with or obstruct implementation of a water quality control plan or future sustainable groundwater management plan? The City may implement groundwater extraction and water treatment projects in the future, once groundwater basin contamination is removed. (Page ES-46, Table ES-2).
17. The analysis and evaluation of sufficient water must occur now. For any new project, refer to Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001 prepared by California Department of Water Resources (DWR), 2003. A completed water supply assessment is required. (Page ES-71, Table ES-2, Impact UTL-1).
18. Please provide a full explanation as to why the relocation of existing wells is less than significant impact. (Page ES-71, Table ES-2).
19. An assessment of the cumulative effect on utilities and/or service system resources cannot be made until the WSA is completed. (Page ES-72, Table ES-2).

Chapter 1 – Introduction and Existing Environmental Setting

1. The site is located in a flood plain and subject to flooding. What measures are being taken to make sure potential floods do not affect the project? (Page 1-6).
2. The runoff to the creek would likely change because the slope and landscaping is changing. These impacts must be evaluated (Page 1-8).
3. "The project does not propose any project facilities, improvements, or features in the existing creek, nor any other change to any aspect of the creek...." Please explain why? (Page 1-9).
4. Documents to add to table 1-3 (page 1-19):
    a. City of San Diego: 2015 City of San Diego Urban Water Management Plan, June 2016. San Diego County Water Authority Final 2015 Urban Water Management Plan, June 2016.
    b. State of California: DWR Bulletin 118 - Update 2003, Oct 01, 2003. DWR Bulletin 118 - Interim Update 2016, Dec 22, 2016. California Water Action Plan, prepared by the California Natural Resources Center, issued at the direction of Governor Brown in January 2014 and updated in 2016."

Chapter 2 – Project Description

1. Section: Mission Valley Terminal Facility. The City doesn't have a plan of "environmental remediation" of the existing site. In 1992, the California Regional Water Quality Control Board, San Diego Region issued a Cleanup and Abatement Order No. 92-01 and subsequently eight addendums to Kinder Morgan Energy Partners for unauthorized discharge of petroleum to the soil and groundwater adjacent to the stadium site. Please revise. (Page 2-6).
2. What water quality standards are referred to when discussing the River Park? (Page 2-17).
3. "There is sufficient capacity in the North Mission Valley Interceptor to accommodate the anticipated sewer flows generated from the proposed project." When will this connection occur? Were the City's planned Pure Water facilities considered with in the analysis for this project? (Page 2-21).

Chapter 4.3 – Biological Resources

1. Temporary impacts to native habitats in the San Diego River are identified in the Biological Resources section. Review of Figure 4.3-3 (Biological Resources – Off-Site Sewer and Storm Drain Connections) shows impacts to wetlands in the San Diego River. These impacts appear to be within a City of San Diego compensatory mitigation site. The Public Utilities Department owns and maintains over 55 acres of the San Diego River in a compensatory wetland mitigation site called the “Stadium Wetland Mitigation Site”. This mitigation area is permitted for preservation and maintenance in perpetuity to support the native riparian habitat along the river. The mitigation site is considered permanently encumbered and no development is permissible within its boundaries. The

credits from this mitigation site are used to satisfy compensatory habitat mitigation requirements for City of San Diego Essential Public Projects. The Stadium mitigation site is currently within year 2 of the 5 year maintenance and monitoring period. The Campus Plan must exclude all areas located within the City's Stadium Mitigation Site.

2. Please clarify the necessity to "Flush special-status species (i.e., avian or other mobile species) from occupied habitat areas immediately prior to brush-clearing activities". If the species are listed under the U.S. or California Endangered Species Act flushing could be considered "harassment" and, therefore, a violation of these laws. Similarly, if an active nest is flushed during the bird nesting season, it could be considered a violation of the U.S. Migratory Bird Treaty Act. (Page 4.3-37)

Chapter 4.6 – Geology and Soils

1. The City disagrees with the inclusion of the proposed groundwater project from under the "land subsidence" section, under section 4.5 "land subsidence" in document 4.6-1 Site Development Geotech Report, and under section 4.6 "land subsidence" in document 4.6-2 Stadium Development Geotechnical Report. Groundwater production would be implemented sustainably, with close, regular monitoring. (Page 4.6-4).
2. Please elaborate on when levels were collected (month, season, rainy years vs dry years, etc.). (Page 4.6-13, Table 4.6-4).
3. Any recharging of dewatered groundwater needs to be permitted and comply with WQ standards for groundwater injection. (Page 4.6-13).
4. Provide locations, depths, excavation dimensions and approximate volumes of soils to be permanently removed from site and describe impacts to aquifer and the City's Pueblo rights. (Page 4.6-13).

Chapter 4.8 – Hazards and Hazardous Materials

1. "As a result of these investigations, more than 100 groundwater monitoring wells, extraction wells, and soil vapor monitoring probes have been installed at the project site." This number is around 400. Please revise. (Page 4.8-2).
2. "A copy of Addendum No. 8 to CAO 92-01 is provided as Appendix 4.8-6...." See CAO Amendment #8, page 2, No. 7: "In accordance with Addendum No. 5, Directive No. 4, ... Continued monitoring of sentinel wells (T-11, R-10, R-43AS-AD, R-79AS-AM-AD, and R-87AS) is necessary to evaluate hydraulic containment effectiveness near the property boundary." Please note that Sentinel well R-87AS was removed and it is not included in the Kinder Morgan Right of Entry Permit for destroying the wells, dated June 27, 2019. Also note that R-79AS-AM-AD is actually 3 different wells. (Page 4.8-3).

Chapter 4.9 – Hydrology and Water Quality

1. City of San Diego has plans to use groundwater from the Mission Valley groundwater basin. Include the City's plans to use groundwater before table 4.9-3. Mission Valley Groundwater Feasibility Study 2018 Summary Report, prepared for the City of San Diego

Public Utilities Department, prepared by Gillingham Water and CH2M, August 2018. concept Study Mission Valley Groundwater Desalting Project, prepared for the City of San Diego Water Department Water Policy and Planning Division, prepared by Dr. Michael Welch, March 2004.

2. Revised TMDL for Indicator Bacteria. What is the source for information in this section? By what standards is indicator bacteria a "common impairment for water bodies in the San Diego Region"? (Page 4.9-8).
3. "The analysis of potential impacts of construction activities, construction materials, and non-stormwater runoff on water quality during the demolition and construction phase focuses primarily on sediment (TSS and turbidity) and certain non-sediment-related pollutants." Because TDS and pollutants such as benzene are known to be contaminants leftover from the Kinder Morgan contamination, why are they not included? (Page 4.9-18).
4. "However, it is possible that groundwater could be encountered during excavations, due to seasonal variations in shallow groundwater levels, necessitating dewatering". This could especially occur if construction was in the winter months. Are the values in Table 4.9-7 for dry weather? (Page 4.9-27).
5. "Would the project substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?" A GSP may not be required by DWR at this time but that could change if groundwater use increases (for example). If any infrastructure is placed within the groundwater levels in the basin, it could potentially decrease the groundwater supply and storage capacity in the basin for groundwater users. (Page 4.9-32).

Chapter 4.17 – Utilities and Service Systems

1. This appendix does not consider the City's needed existing or future capacity in the sewer transmission mains where the SDSU Project proposes to send its wastewater flow.
2. Please change Metropolitan Wastewater Department to Public Utilities Department.
3. In Figure 4.17-1, the 54inch RCP line, shown as curving around the stadium, is abandoned and not part of the Existing Sewer System. The figure should be updated accordingly.
4. Do the statistics detailing the City's wastewater system consider the future when Pure Water is in place? As a known project, the impacts of the Pure Water project must be evaluated in this DEIR. (Page 4.17-2).
5. Where are the sources of the data under "Water Distribution"? (Page 4.17-5).
6. In Figure 4.17-2, the easternmost diagonal waterline has been abandoned and is no longer part of the Existing Water System. The figure should be updated accordingly.
7. Recommend moving "Pueblo Water Rights" Section to Section 4.9. (Page 4.17-11).
8. Is this project subject to City of San Diego drought policies? (Page 4.17-15).

9. "Because the proposed project's potable water demand would be minimal as compared to the Alvarado Treatment Plant capacity, impacts would be less than significant." How much water capacity is already being used from the Alvarado WTP? Does the City already have plans for the extra water capacity? (Page 4.17-19).
10. This Project requires a separate Water Supply Assessment. (Page 4.17-28).
11. This Project requires a separate Water Supply Assessment. (Page 4.17-28).

Appendix 4.9-1 - Water Quality Technical Report

1. Page 23, Section 2.5, Paragraph 1:
    a. Confirm what author means by "the capacity of the San Diego River Valley groundwater basin..."
    b. The statement "groundwater resources are limited...because of high concentrations of total dissolved..." is not quite correct. Immediately usable groundwater resources are limited. There are groundwater resources which can be used after treatment.
2. Page 23, Section 2.5, Paragraph 2
    a. Disagree with "a portion of the project is located within the Mission Valley Groundwater Basin." The project is wholly sited within the MV GWB. Please revise.
    b. In response to "subsequent to 1939, the City has not utilized the groundwater," other organizations have used and continue to use Mission Valley groundwater.
3. Page 23, Section 2.5, Paragraph 4: Report does not mention lawsuit, only settlement agreement...
4. Page 24, Table 2-17
    a. Disagree with author's dismissal of three elevated TBA levels based on their belief that they "may not be representative." But, concur that additional sampling might be prudent.
    b. TOC values were a result of proper testing and sampling protocol.
5. Page 25, Section 2.5.2, Paragraph 1: The Project does not contain 100 to 150 monitoring wells. The proposed Project site does. These wells will be removed, and it is likely that they will not be sampled in the future.
6. Page 48, Section 4.2: Testing the quality of dewatered shallow groundwater may be prudent to ensure it is appropriately handled. If pollutants are present, water shall not be allowed to infiltrate back into aquifer.
7. Page 92, Section 7.7.2. Paragraph 3: Confirm that construction of any LID BMPs takes into account State requirements regarding clearance from wells.

8. Page 92, Section 7.7.2, Paragraph 4: Need to understand what impacts, if any, the potential increased discharge to the San Diego River might have on subsurface flows, and on pollutant migration.

9. Page 93, Section 7.8.2: The removal of impervious parking lot surface, increased discharge to the San Diego River, and removal of existing soils might have an impact on existing groundwater flows, and flooding patterns. Suggest computer modeling is done to analyze these impacts.

Appendix 4.8-5 - Limited Soil and Groundwater Investigations Along Fuel Pipeline

1. Page 8, Section 5.2.1: Depth to groundwater different from groundwater elevation used in the Construction Excavation Impacts on Groundwater Storage.

Appendix 4.9-6 - SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage.

1. Page 2, Table 1: The table indicates that the distance between measured groundwater level elevations and buildings is as little as 7 feet in certain "Opening Day" elements. Can the author confirm that this distance is acceptable? That is, will this cover prevent natural subsidence/expansion? Particularly, given the natural "ebb and flow" of groundwater due to seasonal changes, dry/wet years, and other weather variabilities. Would expansion/contraction of soils become an issue with this minimal cover between the buildings and the measured water level?

2. Page 2, Table 1, groundwater will be present STARTING at elevation with an average of 43 feet and continuing to deeper elevations. If the building is any deeper, then groundwater will still be present. Therefore, the building will be affecting the groundwater storage capacity of the basin. Any structure deeper than the groundwater depth is impacting the groundwater in the basin. Please explain? Are the measured groundwater elevations representative of the natural variability of groundwater conditions in the area, or are they "snapshot" measurements of groundwater levels at one location at one time?

3. Page 2, paragraph before Table 1, "Groundwater was measured below the Stadium site at elevations ranging from 37 to 49 feet." Comment is the date of when the groundwater was measured will have a big impact on how accurate the measurement is and this isn't provided. If measured during dry weather, this will be very different then wet weather measurements.

Appendix 4.17-1 – Sewer Study

1. Study doesn't take into account any future flow the City may have planned for this area or that may be planned to flow into the existing 84/96 sewer? Also, the existing capacity of the 84/96 sewer isn't discussed.

2. What is meant by the proposed MV sewer system will be private?

Appendix 4.17-5 – Water Study

1. Table 1 and Appendix B should both be verified in Water Supply Assessment. Also, why is residential demand (1,117,650) different from Table 1 (1,117,725) in Appendix-4-17-5-SDSU-Water-Use-Estimation-Tech-Memo? Same question about the Parks water demand in each? Both water demands should match, yes?
2. Where is the City's existing/future demands/usage evaluated or accounted for on the proposed public water system? It is stated as Conclusion No. 3, but couldn't find the discussion. For example, the City's 390 Pressure Zone, do the pipes have enough capacity currently and in the future to accommodate SDSU's demands? Also, for future/build out demands, what water conservation assumptions have been used?

Appendix 4.17-5 – SDSU Water Use Estimation Memo

1. There is no map to verify the quantities in Attachment A - where are these numbers coming from? Need to show in report?
2. Table A: Attachment B isn't readable, and it doesn't explain how the acreages were achieved that were used in the table - very confusing. Also, for footnote 4, why is this reduction assumed?
3. Page 4, first paragraph below Table 1, need to include details of which "completed developments in the City have been show to use less water than calculated...". Need backup.
4. Page 5, paragraph below Table 2, need documentation to prove "this methodology using the City's WSA water use factors is more accurate....."
5. Page 7, first paragraph, "30 percent overall decline in indoor water use since 2000"- questions regarding this statement: 1. I couldn't find this % in either of the two references cited at the end of the paragraph. Please explain. 2. References only extend through 2014. Much has happened to water conservation in the last five years. Please include the last five years in this %. 3. This % differs depending on the previous years' weather; i.e., droughts and wet weather would have a big impact. Is this taken into account? 4. This % makes a difference is the demand and need to verify the number.
6. References: What document from the SDCWA in 2018 was used for the reference on page 9 of 65 gpd?
7. page 8, last paragraph, the statement "It reflects the most recent and best water savings technologies that State and local municipalities have adopted." The Code and standards referenced were from 2014; the analysis should include what has happened in the last five years.
8. To confirm, in Appendix 4.17-2 Water Study for the water demand for the Project, a different method was used to calculate the water demand then the one used in this Appendix 4-17-5, for reasons that aren't clear. Why was this done? Where is this new demand (Table 3 Best available technology) used?

General Comments

1. Per DWR Bulletin 74, no wastewater lines shall be built within a certain distance of water wells (includes monitoring wells). Certain proposed sewer lines running south through the park might come too close to proposed wells.

Insufficient information provided relating to comments submitted on the Project's NOP/IS

1. Impact to MV GWB: Additional information requested: The Mission Valley groundwater basin addressed on page 4.9-5 in document 4.9 Hydrology and Water Quality. Please provide additional details regarding what impact the additional flows into the SDR will have on the groundwater flow trends.
2. Pueblo Water Rights: Additional information requested: The City's Pueblo Water Right addressed on page 4.17-11 in document 4.17 Utilities and Service Systems. Certain Project elements and activities will impact groundwater flows, and this is an impact on the Pueblo Water Right. These impacts must be evaluated in the DEIR.
3. Construction Activities Impact to Groundwater Storage: Additional information requested: Impacts to Groundwater Storage addressed in document 4.9-6 SDSU Mission Valley Campus Project Construction Excavation Impacts on Groundwater Storage. Please identify the types of soils the project proposes to remove in its cut/fill activities? Will this removal diminish groundwater storage volume or the water's ability to infiltrate into the basin?
4. Impacts to the San Diego River Flows: Additional information requested: Impacts to the San Diego River addressed on page 5 in document 4.9-5 Hydraulic Analysis. The analysis concludes that flows into the SDR would be augmented, and that Murphy Canyon Creek is unable to contain the 100-year flows. This suggests that the project may exacerbate area flooding issues. How will the project handle the potentially increased flooding in the area? The alternatives in the DEIR are insufficient to address this impact.

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Transportation & Storm Water Department, Storm Water Division – Mark Stephens, Associate Planner – MGStephens@sandiego.gov, 858-541-4361

Executive Summary

1. Pages ES-20 to ES-21, MM Bio-10, Indirect Edge Effects. This mitigation measure should include a setback of 100 feet from Murphy Canyon Creek in addition to the already-included 100-foot setback from the San Diego River.
2. ES – Biological Resources. Upon inclusion of any necessary Murphy Canyon Creek improvements, update this section to clearly document, disclose, and mitigate impacts to Murphy Canyon Creek.
3. Page ES-76, Table ES-2, Summary of Project Impacts. This table states that the project would not expose people or structures to significant risks, including flooding. If Murphy Canyon Creek does not have capacity to accommodate the 100-year flow rate (per page 1-8 of the Draft EIR), and no improvements are proposed to correct this, how was the conclusion

reached that the proposed SDSU recreation field project would not expose people or structures to significant risks? What evidence substantiates this conclusion?

Section 1: Introduction and Existing Environmental Setting

1. Page 1-8, Murphy Canyon Creek. The last sentence on this page states that Murphy Canyon Creek does not have capacity to accommodate the 100-year flow rate, but SDSU is proposing to build in areas that will be affected by the overflow from Murphy Canyon Creek. Include any necessary modifications to Murphy Canyon Creek in order to safely convey the 100-year flow and bring it up to standard in consideration of the other project features that are being constructed on-site.

Section 2: Project Description

1. Page 2-6, Purchase Agreement. The EIR should assume that all existing storm drain system assets in the Existing Stadium Site and River Park, including the Murphy Canyon Creek Channel, will be conveyed to SDSU, including requiring that SDSU design, permit, construct and maintain all necessary storm drain improvements (pipes, channels, engineered streams, headwalls, storm water treatment facilities, and any other associated structures). Please revise and analyze these assets in the EIR as appropriate.

Section 3: Cumulative Projects and Methods

1. Page 3-5, Table 3-1 Cumulative Projects. Remove Murphy Canyon Creek Channel Master Storm Water System Maintenance Plan as this project/program was completed as of September 2018. No additional work is planned for the creek under the Master Storm Water System Maintenance Program (MMP). The MMP Program EIR expired in September 2018.

Section 4.3: Biological Resources

1. Page 4.3-41, paragraph following MM-BIO-15. This section states that "Mitigation consists of creation of new riparian habitat at a 1:1 ratio and enhancement of wetland habitat at a **2:2** ratio…." Correct this to be 2:1 as described earlier in the report (per Page 4.3-39, MM-BIO-13).
2. Page 4.3-41, same paragraph as above following MM-BIO-15. The following sentence states that, "SDSU is currently evaluating wetland creation opportunities on site, at the SDSU-owned Adobe Falls parcel approximately 3 miles east of the proposed project site, **within Murphy Canyon Creek**, or through purchase of credits…." Once Murphy Canyon Creek becomes a part of the project and the appropriate modifications are considered and become part of SDSU's inventory, restoration along the creek could be potentially used for mitigation. If Murphy Canyon Creek were to remain part of the City of San Diego's inventory, mitigation would not be allowed in or along the asset.
3. Page 4.3-55, Figure 4.3-6. Part of this figure showing impacts to Biological Resources – Off-Site Sewer and Storm Drain Connections appears to be missing. Please include/update this information so impacts are appropriately analyzed and disclosed.

Ensure that there is no impact to the existing Stadium Mitigation Site which occurs in close proximity to this area.

Section 4.9: Hydrology and Water Quality

1. Page 4.9-1, Methods for Analysis. In the second paragraph under "Methods for Analysis" and elsewhere in the document, note the correct name of the **City of San Diego Storm Water Division**.

2. Page 4.9-5, 4.9.1.6, Water Quality. The second paragraph references a study period of approximately 14 years (2004-2018), but the following sentence refers to "the 11-year span." Please reconcile this apparent discrepancy. Also, later in this paragraph, the term "San Diego River TWAS station" is used but does not appear to be explained. In the following paragraph, "Ttadium" is referenced, and "Stadium" was probably what was intended.

3. Page 4.9-28. Upon inclusion of any necessary Murphy Canyon Creek improvements, update this section to clearly document, disclose, and mitigate impacts to Murphy Canyon Creek.

    a. To ensure compliance with water quality standards, as part of the design of the Murphy Canyon Creek channel, SDSU should design, construct and maintain a "stream restoration" channel with soft channel side slopes and bottom (i.e., not concrete lined).

        i. The restored channel should be designed assuming a fully vegetated state with a corresponding roughness coefficient used in the sizing calculations;

        ii. The restored channel should be designed not to accumulate sediment or cause in-stream erosion (i.e., sediment neutral) per the City's Drainage Design Manual (DDM) Section 7.2.5;

        iii. The restored channel should be realigned in a southwesterly direction to allow for a more efficient and less erosive transition into the San Diego River.

    b. To mitigate drainage impacts, SDSU should expand the capacity of Murphy Canyon Creek channel to provide sufficient drainage of public water through the site to the San Diego River in accordance with the City's DDM (e.g., convey the 100-year design capacity), and the San Diego Municipal Code (SDMC) Section 142.0610.

    c. If any improvements are constructed within the 100-year floodplain, the improvements should be designed in accordance with federal floodplain regulations and SDMC Sections 143.0145 and 143.0146, and an indemnification agreement would be required.

4. Page 4.9-37, Figure 4.9-2. While page 4.9-29 describes runoff from the project being conveyed by four outfalls at the San Diego River and two outfalls at Murphy Canyon

Creek, the figure fails to depict the outfalls at Murphy Canyon Creek. Please revise the figure accordingly so that project impacts may be analyzed and disclosed appropriately.

5. Page 4.9-41, Figure 4.9-4. This figure depicts the locations of several proposed BMPs in an area that may be retained under City ownership. These BMPs should be located on SDSU property, outside of the 100-year Federal Emergency Management Agency (FEMA) floodplain, and maintained by SDSU.

Section 4.10: Land Use and Planning

1. Page 4.10-23. This section reports that modification or vacation of easements are beyond the scope of the EIR and not covered. If modification or vacation of easements are necessary to complete this project, how was the conclusion reached that this is beyond the scope of this EIR? If these are necessary components of the project, they should be identified and analyzed as appropriate in the EIR. The EIR should assume the conveyance of Murphy Canyon Creek to SDSU, which would require current easements to be vacated. SDSU would also be required to grant a flowage easement to the City for sufficient drainage of public water through the site to the San Diego River in accordance with the City's DDM (i.e., convey the 100-year drainage capacity) per SDMC Section 143.0146.a.4.

Section 4.17: Utilities and Service Systems

1. Page 4.17-6. This section reports that runoff from the project site is conveyed directly to the San Diego River via three existing underground storm drain systems. This section describes these three systems and gives the impression that these are the only storm drain discharges from the site. However, page 4.17-21 of this report also notes that some of the runoff from the project site goes to outfalls that discharge to Murphy Canyon Creek. Offsite runoff from the right of way seems to commingle with onsite runoff and drains to best management practices (BMPs) onsite. Offsite runoff should be managed according to Section 3.3.3 of the City's Storm Water Standards Manual (SWSM). Please revise accordingly so that project impacts may be analyzed and disclosed appropriately.
2. Page 4.17-21. The EIR should assume that all existing storm drain assets and associated drainage responsibilities would be conveyed to SDSU. A cleanout should be installed at the property line where pipe enters the stadium property per the City's DDM. SDSU will be required to grant a flowage easement to the City for sufficient drainage of public water through the site to the San Diego River in accordance with the City's DDM (e.g., convey the 100-year design capacity) per SDMC Section 143.0146.a.4.
3. Page 4.17-21. If any storm drain improvements are constructed within the River Park, the assets should be designed and constructed in accordance with the City's DDM and an Encroachment Maintenance and Removal Agreement will be required, per SDMC 129.0710.b.
4. Figure 4.17-3 Existing Storm Drain System. This figure only shows the systems that discharge to San Diego River and does not show the existing systems that discharge to

Murphy Canyon Creek. Please revise and include these systems to appropriately analyze the project's impacts.

Appendix 4.9-1: Water Quality Technical Report

1. Page 47 of 161
    a. The City Offsite Storm Water Alternative Compliance Program is currently in development; however, credits would only be traded within City jurisdiction under the Phase I MS4 Permit. The SDSU site is under the Phase II Small MS4 Permit. SDSU will need to develop its own alternative compliance program.
2. Page 60 of 161
    a. Depending on the proposed project boundary, the project may be partially located in the FEMA floodplain in the proposed condition. Please consider this during the design and comply with applicable environmental regulations (i.e. City SWSM, FEMA, DDM).
3. Section 8.4
    a. Benchmark water quality objectives are mentioned throughout the report. It isn't terminology used in the San Diego Region Basin Plan. Please verify that this is the correct terminology for the region.
4. All BMPs should be appropriately sized for pollutant and hydromodification controls and designed according to specifics in the City's SWSM.
5. Ensure that the onsite biofiltration with partial retention BMPs are sized and designed appropriately. Refer to the City's SWSM Section 5.5.2 for additional information.
6. Ensure that the onsite biofiltration BMPs are sized and designed appropriately. Refer to the City's SWSM Section 5.5.3 for additional information.

Appendix 4.9-4: Water Quality Report for SDSU Mission Valley Campus

1. Comments related to requirements in the City's Storm Water Standards Manual:
    a. Rows 20 and 21 from Worksheet B.5-1 are missing on sizing calculations spreadsheet. Add these to show best management practices (BMPs) meet minimum footprint requirement.
        i. The footprint of some BMPs is below the minimum required footprint (0.03 x area draining to BMP x adjusted runoff factor). Fill out Worksheet B.5-4 to show that BMP will not clog or increase BMP footprint.
    b. Please provide volume retention worksheets for BMPs that are less than 3% of effective drainage area, including the modular wetland system.
2. See table on page B-46 in Appendix B of the City's SWSM for guidance.

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