

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 480286
SCH No. 2015121011

SUBJECT: UNIVERSITY COMMUNITY PLAN AMENDMENT: CITY COUNCIL APPROVAL AND ADOPTION of an amendment to the City of San Diego General Plan Mobility Element, an amendment to the University Community Plan Transportation Element, and an amendment to the North University City Public Facilities Financing Plan.

This document has been prepared by the City of San Diego's Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

FINAL DOCUMENT October 10, 2016:

In response to comments received during public review and City staff input subsequent to distribution of the draft Program Environmental Impact Report (PEIR), minor revisions, clarifications and/or additions have been made to the document which do not change the conclusions of the final PEIR regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, these revisions, clarifications or additions to the document - which are shown in ~~strikeout~~/underline format - do not represent "significant new information" and therefore, recirculation of the draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

Additionally, in accordance with CEQA Section 15089, responses to comments received during the public review period of the draft PEIR have been included in this final document and are located immediately after this summary document.

The City of San Diego is proposing to amend the 1987 University Community Plan (UCP) and, in particular, the UCP Transportation Element in order to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of development without the construction of the Genesee Avenue Widening and the Regents Road Bridge. The 2008 City of San Diego General Plan Mobility Element would be amended to be consistent with the amended University Community Plan, and an amendment to the North University City Public Facilities Financing Plan, last updated in 2012, would also be required.

The University Community Planning Area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchinson, Topeka, and Santa Fe Railroad, MCAS Miramar, and Interstate 805 (I-805) on the east; State Route 52 (SR-52) on the south; and Interstate 5 (I-5), Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west. Neighboring communities include Torrey Pines, Mira Mesa, Clairemont, and La Jolla. The planning area contains two state-controlled properties – UC San Diego and Torrey Pines State Reserve – which lie outside the land use jurisdiction of the City.

Specifically, this PEIR analyzes the potential impacts related to removing the Genesee Avenue Widening and Regents Road Bridge projects from the UCP Transportation Element, as well as five (5) project alternatives. The project would amend the City of San Diego General Plan Mobility Element, amend the UCP Transportation Element, and amend to the North University City Public Facilities Financing Plan with a new Impact Fee Study (IFS) for the plan area. These actions together form the project analyzed in this PEIR. Discretionary actions by other agencies will include the California Coastal Commission.

Applicant: City of San Diego Planning Department

ENVIRONMENTAL DETERMINATION:

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Final Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA). The analysis conducted identified that the project could result in significant and unmitigated impacts to the following issue area(s): **Transportation/Circulation (Load and Capacity, Congestion, Existing or Planned Systems, Traffic Circulation, Alternative Modes), Air Quality (Air Quality Plan, Criteria Pollutants), Greenhouse Gas Emissions (Increased Emissions, Applicable Plan or Policy), Noise (Traffic), and Public Services and Facilities (Emergency Response Times).**

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Planning Department, or purchased for the cost of reproduction.

United States Government

Federal Aviation Administration (1)
Environmental Protection Agency (19)
U. S. Fish and Wildlife Service (23)
Army Corps of Engineers (26)

State of California

Caltrans District 11 (31)
Department of Fish and Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A)
Native American Heritage Commission (56)
California State Parks, San Diego Coast District (40A)
California Department of Parks and Recreation, Southern Service Center (40B)

San Diego County

Air Pollution Control Board (65)
Planning and Land Use (68)
Department of Environmental Health (76)

City of San Diego

Office of the Mayor (91)
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Councilmember Gloria, District 3
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City Advisory Boards or Committees

Park and Recreation Board (83)

Community Forest Advisory Board (90)

Historical Resources Board (87)

Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A)

University Community Branch Library (81JJ)

North University Branch Library (81JJJ)

Other City Governments

San Diego Association of Governments (108)

San Diego Unified Port District (109)
Metropolitan Transit System (112/115)
San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (125)

Community Planning Groups or Committees

University City Community Planning Group (480)

Community Councils

La Jolla Village Community Council (489)

Other Agencies, Organizations and Individuals

San Diego Chamber of Commerce (157)
Building Industry Association (158)
UC San Diego Physical & Community Planning (482)
Sierra Club (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
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Environmental Health Coalition (169)
California Native Plant Society (170)
San Diego Coastkeeper (173)
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RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.


Alyssa Muto, Deputy Director
Planning Department

June 17, 2016
Date of Draft Report

October 10, 2016
Date of Final Report

Analyst: Susan Morrison, AICP

**FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT
UNIVERSITY COMMUNITY PLAN AMENDMENT
CITY OF SAN DIEGO, CALIFORNIA**

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Final Program Environmental Impact Report

October 2016

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
AB	Assembly Bill
AC	asphalt cement
ACM	asbestos-containing material
ADT	average daily traffic
AF	acre-foot/acre-feet
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
APS	Alternative Planning Strategy
APZ	accident potential zone
AQAP	Air Quality Attainment Plan
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASBS	Areas of Special Biological Significance
AST	aboveground storage tank
AT&SF	Atchison, Topeka and Santa Fe Railway
AWSC	all-way stop-controlled
B.P.	before present
BAAQMD	Bay Area Air Quality Management District
BACT	best available control technology
BFE	Base Flood Elevation
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practice
BOE	California State Bureau of Equalization
Btu	British thermal unit
C&D	construction and demolition
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEMA	California Emergency Management Agency

CalEPA	California Environmental Protection Agency
CalOSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPRA	Commission for the Accreditation of Park and Recreation Agencies
CaRFG	California Reformulated Gasoline
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CH ₄	methane
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CIWMB	California Integrated Waste Management Board
CIWMP	Countywide Integrated Waste Management Plan
CLOMR	conditional letter of map revision
CMCP	Clairemont Mesa Community Plan
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CPIOZ	Community Plan Implementation Overlay Zone
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
cy	cubic yard

dB	decibel
dBA	A-weighted decibel
DEH	Department of Environmental Health
DOD	Department of Defense
DOE	U.S. Department of Energy
DOT	Department of Transportation
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EFZ	Earthquake Fault Zone
EIR	Environmental Impact Report
EMFAC	Emission Factors
EOC	Emergency Operations Center
EPCRA	Emergency Planning Community Right-to-Know Act
ESA	Environmental Site Assessment
ESD	City of San Diego Environmental Services Department
ESL	Environmentally Sensitive Land
FAA	Federal Aviation Administration
FAR	floor-area ratio
FBA	Facilities Benefit Assessments
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FMP	Floodplain Management Plan
FRS	Fast Response Squad
FTA	Federal Transit Administration
GHG	greenhouse gas
GWh	gigawatt hour
GWP	global warming potential
HA	hydrologic area
HAP	hazardous air pollutant
HCM	Highway Capacity Manual

HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HMMP	Hazardous Material Management Plan
HOV	high-occupancy vehicle
HRB	Historical Resources Board
HSC	Health and Safety Code
HU	hydrologic unit
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
I-805	Interstate 805
<u>ICE</u>	<u>Intersection Control Evaluation</u>
INRMP	Integrated Natural Resource Management Plan
IRP	Integrated Resources Plan
IRWM	Integrated Regional Water Management
ITS	intelligent transportation systems
JRMP	Jurisdictional Runoff Management Program
kWh	kilowatt hour
KSU	Kansas State University
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LDC	Land Development Code
L _{dn}	day-night average sound level
L _{eq}	equivalent noise level
LID	low impact development
LOMR	letter of map revision
LOS	level of service
LRDP	Long Range Development Plan
LT	long-term
LUST	leaking underground storage tank
MAF	million acre-feet a year
MBAS	methylene blue activated substances
MBTA	Migratory Bird Treaty Act

MCAS	Marine Corps Air Station
MEP	maximum extent practicable
MHMP	Multi-Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	millions of metric tons
MND	Mitigated Negative Declaration
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System
MW	megawatt
MWD	Metropolitan Water District
MWh	megawatt hour
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NB	northbound
NCCP	Natural Community Conservation Plan
NCHRP	National Cooperative Highway Research Program
NCTD	North County Transit District
NECPA	National Energy Conservation Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutant
NF ₃	nitrogen trifluoride
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO	nitrogen oxide
NO ₂	nitrogen dioxide
NO ₃	nitrogen trioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List

NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
OAL	Office of Administrative Law
OES	Office of Emergency Services
PCB	polychlorinated biphenyls
PDP	Priority Development Projects
PDS	Planning & Development Services
PEIR	Program Environmental Impact Report
PFFP	Public Facilities Financing Plan
PFC	perfluorocarbon
PM	particulate matter
PM ₁₀	respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
PM _{2.5}	fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less
Porter-Cologne	Porter-Cologne Water Quality Control Act
ppm	parts per million
PRC	Public Resources Code
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RCNM	Roadway Construction Noise Model
RHNA	Regional Housing Needs Assessment
RLP	repetitive loss property
ROG	reactive organic gas
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SB	Senate Bill
SB	southbound

SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFRD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDPD	San Diego Police Department
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFP	School Facilities Program
SIP	State Implementation Plan
SLM	sound level meter
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMARTS	Storm Water Multi-Application and Report Tracking System
SO ₂	sulfur dioxide
SOV	Single-Occupant Vehicle
SO _x	oxides of sulfur
SPCC	Spill Prevention Control and Counter-Measures Plan
SR	State Route
SRA	State Responsibility Area
SRLP	Severe Repetitive Loss Property
STAA	Surface Transportation Assistance Act
SUSMP	Standard Urban Runoff Mitigation Plan
SVP	Society of Vertebrate Paleontology
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TDS	total dissolved solids
TMA	Transportation Management Area
TMDL	total maximum daily load
TWSC	two-way stop-controlled

UBC	Uniform Building Code
UCP	University Community Plan
UC <u>San Diego</u>	University of California San Diego
UDC	Unified Disaster Council
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UTC	University Town Center
UWMP	Urban Water Management Plan
V/C ratio	volume to capacity ratio
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	Waste Discharge Requirement
WMA	Watershed Management Area
WMP	Waste Management Plan
WQIP	Water Quality Improvement Plan
WQO	water quality objective
ZEV	zero-emission vehicle

PUBLIC COMMENT LETTERS AND RESPONSES

INTRODUCTION TO THE RESPONSES TO COMMENTS

According to CEQA Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This chapter provides response to written environmental comments received during the public comment period.

This section contains responses to Comment Letters that were received during the 45-day public review period for the Draft PEIR starting June 17, 2016 and ending August 1, 2016. A total of 192 comment letters were received during the review period. In the pages that follow, each comment letter is reproduced and their corresponding responses to individual comments are placed alongside to the right. Each of the individual comments within these comment letters is assigned an alphanumeric number; and each response is labeled with the corresponding alphanumeric code. All of the comment letters received are listed in Table RTC-1, which includes the names of the public, organizations, individuals, and Native American tribes that commented during the public review period. For each comment letter, the date of the letter, the identity of the commenter, and the letter designation assigned to each comment letter is also included in Table RTC-1.

Table RTC-1
List of Commenting Agencies, Organizations, Individuals, and Tribes

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
Federal and State Agencies				
1	6/23/2016	U.S. Army Corps of Engineers, Los Angeles District Regulatory Division, Carlsbad Field Office (Shari Johnson)	USACE-1	RTC-13
2	7/21/2016	California Legislature, Senator Marty Block 39th District (Sarah Fields)	CAL-1	RTC-15
3	8/1/2016	California Department of Fish and Wildlife (Gail K. Sevrens)	CDFW-1	RTC-17
4	8/2/2016	State Clearinghouse	SCH-1	RTC-7
Special Interest/Organizations				
5	6/30/16	University Community Planning Group (1)	UCPG-1	RTC-21
6	7/15/16	Friends of Rose Canyon	FRC-1	RTC-24
7	7/19/16	San Diego Coastkeeper (Matt O'Malley)	SDCK-1	RTC-60
8	7/27/16	San Diego Audubon Society (James A. Peugh)	SDAS-1	RTC-63
9	7/27/16	San Diego Canyonlands (Eric Bowlby)	SDCL-1	RTC-65

Public Comment Letters and Responses

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
10	7/28/16	Sierra Club San Diego (George Courser)	SCSD-1	RTC-67
11	7/29/16	Friends of Rose Creek (Karin Zirk)	FORC-1	RTC-69
12	7/29/16	University Community Planning Group (Janay Kruger) (2)	UCPG-2	RTC-72
13	7/29/16	University of California, San Diego (Anu Delouri)	UCSD-1	RTC-76
14	7/29/16	Las Palmas Condominium Association (Patricia A. Wilson)	LPCA-1	RTC-84
15	7/30/16	San Diego County Archaeological Society, Inc. (James W. Royle Jr.)	SDCAS-1	RTC-87
16	7/31/16	Citizens for the Regents Road Bridge, Inc. (Austin Speed)	Citizens-1	RTC-89
17	7/31/16	Tecolote Canyon Citizens Advisory Committee (M. Eloise Battle)	TCCAC-1	RTC-109
18	8/1/16	Citizens for the Regents Road Bridge, Inc. (Evelyn F. Heidelberg)	Citizens-2	RTC-110
19	8/1/16	Friends of Rose Canyon (Deborah Knight)	FRC-2	RTC-177
20	8/1/16	Friends of Rose Canyon (Deborah Knight)	FRC-3	RTC-185
Individuals				
21	6/26/16	Reiger, Ed	ER-1	RTC-189
22	7/4/16	McCutchen Jr., Hugh	HM-1	RTC-191
23	7/12/16	Tucker, Larry	LT-1	RTC-192
24	7/13/16	Sutton, Lisa	LS-1	RTC-195
25	7/17/16	Ardeshir, Feroza	FA-1	RTC-197
26	7/17/16	Franklin, Barbara	BF-1	RTC-198
27	7/17/16	Remillard, Tom	TR-1	RTC-199
28	7/18/16	Burch, Hallie	HB-1	RTC-200
29	7/18/16	Duffey, Michael	MD-1	RTC-201
30	7/18/16	Fillius, Walker	WF-1	RTC-202
31	7/18/16	Hawkins, Jan and Jim	JJH-1	RTC-203
32	7/18/16	Ito, Andrea and Carl (1)	ACI-1	RTC-204
33	7/18/16	Quinonez, Richard	RQ-1	RTC-205
34	7/19/16	Becker-Varano, Tama	TBV-1	RTC-206
35	7/19/16	Gratteau, Tracy	TG-1	RTC-207
36	7/19/16	Krysl, Petr	PK-1	RTC-209
37	7/19/16	Smith, Lisa	LSM-1	RTC-210
38	7/20/16	Plumb, Shelley	SP-1	RTC-211
39	7/21/16	Goldsmith, Sandra S.	SG-1	RTC-212
40	7/22/16	Liu, Karen	KL-1	RTC-214
41	7/22/16	Strong, Sam (1)	SS-1	RTC-215
42	7/23/16	Barile, Laurel R.	LB-1	RTC-217
43	7/23/16	Forgey, Mackenzie	MF-1	RTC-218
44	7/23/16	Larsen, Richard M.	RL-1	RTC-219

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
45	7/23/16	Morch, Kim	KM-1	RTC-220
46	7/24/16	Breher, Bill and Joan	BJB-1	RTC-221
47	7/24/16	Fillat, Randy	RF-1	RTC-223
48	7/24/16	Griswold, William G.	WG-1	RTC-227
49	7/24/16	Hawkins, Jan	JH-1	RTC-228
50	7/24/16	Nielsen, Christopher and Dr. Paula M.D. Fitzgerald	NF-1	RTC-229
51	7/24/16	Strong, Sam (2)	SS-2	RTC-230
52	7/25/16	Ahern, Diane	DA-1	RTC-232
53	7/25/16	Gertler, Dan	DG-1	RTC-233
54	7/25/16	Jenson-Elliott, Cynthia	CJE-1	RTC-234
55	7/25/16	Lotecka, E.L. (1)	ELL-1	RTC-235
56	7/25/16	Parker, Elisa	EP-1	RTC-236
57	7/25/16	Rodolico, Katie (1)	KR-1	RTC-237
58	7/25/16	Rodolico, Katie (2)	KR-2	RTC-238
59	7/25/16	Rodolico, Katie (3)	KR-3	RTC-239
60	7/25/16	Rodolico, Katie (4)	KR-4	RTC-240
61	7/25/16	Rodolico, Katie (5)	KR-5	RTC-241
62	7/25/16	Munn, Marcia	MM-1	RTC-242
63	7/26/16	Elliott, Virgil	VE-1	RTC-245
64	7/26/16	Lotecka, E.L. (2)	ELL-2	RTC-246
65	7/27/16	Breisch, Susan	SB-1	RTC-247
66	7/27/16	Byrnes, Robert and Theresa Fassel	RBTF-1	RTC-248
67	7/27/16	DeShazo, James (1)	JD-1	RTC-249
68	7/27/16	DeShazo, James (2)	JD-2	RTC-251
69	7/27/16	Gilgun, Lynda	LG-1	RTC-252
70	7/27/16	Hung, Chiwei	CH-1	RTC-253
71	7/27/16	Jansma, Ariane	AJ-1	RTC-254
72	7/27/16	Lotecka, E.L. (3)	ELL-3	RTC-255
73	7/27/16	Lotecka, E.L. (4)	ELL-4	RTC-256
74	7/27/16	Rodolico, Louis A.	LR-1	RTC-257
75	7/27/16	Rogers, Heather K.	HR-1	RTC-268
76	7/27/16	Von Hendy, Phoenix	PVH-1	RTC-271
77	7/27/16	Wilkins, R.G.	RGW-1	RTC-272
78	7/28/16	Crane, Valerie and Robert Cox	CC-1	RTC-274
79	7/28/16	DeShazo, James (3)	JD-3	RTC-276
80	7/28/16	Duggan, C. Faye	CFD-1	RTC-277
81	7/28/16	Eberhardt, Marty	ME-1	RTC-278
82	7/28/16	Hastings, Phil	PH-1	RTC-279

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
83	7/28/16	Jahn, Dorothy V.	DJ-1	RTC-280
84	7/28/16	Lewis, John W. and Anna	JAL-1	RTC-281
85	7/28/16	Martin, Glenn	GM-1	RTC-283
86	7/28/16	Medeiros, Lisa G.	LGM-1	RTC-288
87	7/28/16	Partow, Ramona	RP-1	RTC-289
88	7/28/16	Schlaug, Robert	RS-1	RTC-290
89	7/28/16	Stigall, Cheryl	CS-1	RTC-291
90	7/28/16	Troemel, Emily	ET-1	RTC-292
91	7/29/16	Bernstein, Barry	BB-1	RTC-293
92	7/29/16	Colburn, Bill	BC-1	RTC-294
93	7/29/16	Dragin, Peter	PD-1	RTC-296
94	7/29/16	Groves, Anne-Marie	AMG-1	RTC-297
95	7/29/16	Hauck, Lane and Marilyn	LMH-1	RTC-298
96	7/29/16	Ito, Andrea and Carl (2)	ACI-2	RTC-299
97	7/29/16	Lazzaro, Katherine	KLA-1	RTC-300
98	7/29/16	Lotecka, E.L. (5)	ELL-5	RTC-301
99	7/29/16	Lotecka, E.L. (6)	ELL-6	RTC-302
100	7/29/16	Mathis, Harry	HMA-1	RTC-303
101	7/29/16	Nash, Carolyn	CN-1	RTC-310
102	7/29/16	Pelling, Elizabeth	EPE-1	RTC-317
103	7/29/16	Speed, Diane	DS-1	RTC-318
104	7/29/16	Sturm, Nancy M.	NMS-1	RTC-319
105	7/29/16	Tana, Alice M.	AMT-1	RTC-320
106	7/29/16	Webber, Stephanie	SW-1	RTC-322
107	7/30/16	Barham, Victoria	VB-1	RTC-323
108	7/30/16	Colburn, Mike	MC-1	RTC-324
109	7/30/16	Cronin, Aibhilin	AC-1	RTC-325
110	7/30/16	Fitzsimmons, Jerry (1)	JF-1	RTC-326
111	7/30/16	Fitzsimmons, Jerry (2)	JF-2	RTC-327
112	7/30/16	Fitzsimmons, Jerry (3)	JF-3	RTC-328
113	7/30/16	Fitzsimmons, Jerry (4)	JF-4	RTC-329
114	7/30/16	Fitzsimmons, Jerry (5)	JF-5	RTC-330
115	7/30/16	Fitzsimmons, Jerry (6)	JF-6	RTC-331
116	7/30/16	Fitzsimmons, Jerry (7)	JF-7	RTC-332
117	7/30/16	Leavenworth, Michael	ML-1	RTC-333
118	7/30/16	Mailloux, Christine	CM-1	RTC-334
119	7/30/16	Riffenburgh, Bob	BR-1	RTC-335
120	7/30/16	Steele, Don	DST-1	RTC-336

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
121	7/30/16	Steele, Nancy	NS-1	RTC-337
122	7/30/16	Wan, Christine	CW-1	RTC-338
123	7/30/16	Wilson, Patricia A.	PAW-1	RTC-339
124	7/31/16	Amelang, Dan	DAM-1	RTC-342
125	7/31/16	Barnes, Gregory J.	GJB-1	RTC-343
126	7/31/16	Basbaum, Karen	KB-1	RTC-350
127	7/31/16	Birnbaum, Jacob and Janina Zukotynski	BZ-1	RTC-351
128	7/31/16	Clauss, Iris	IC-1	RTC-352
129	7/31/16	Eigner, Jeanne Beach	JBE-1	RTC-353
130	7/31/16	Evans, John Lee	JLE-1	RTC-355
131	7/31/16	Fitzsimmons, Barbara	BFI-1	RTC-356
132	7/31/16	Fitzsimmons, Jerry (8)	JF-8	RTC-359
133	7/31/16	Frederich, Gary and Nancy	GNF-1	RTC-360
134	7/31/16	Griswold, Harry	HG-1	RTC-361
135	7/31/16	Hansen, Heidi	HH-1	RTC-362
136	7/31/16	Heikoff, Lisa	LH-1	RTC-363
137	7/31/16	Herzfeld, Charley	CHE-1	RTC-364
138	7/31/16	Jacobs, Elinor M.	EMJ-1	RTC-365
139	7/31/16	Jenne, Keith	KJ-1	RTC-366
140	7/31/16	Kistler, Erik and Kristin	EKK-1	RTC-368
141	7/31/16	Krous, Henry F.	HFK-1	RTC-369
142	7/31/16	Lakritz, Adam	AL-1	RTC-370
143	7/31/16	Lazerson, Keith	KLZ-1	RTC-372
144	7/31/16	Martien, Dinesh	DM-1	RTC-373
145	7/31/16	Pierre, Fabrice	FP-1	RTC-374
146	7/31/16	Steinbach, Joseph	JS-1	RTC-375
147	7/31/16	Thompson, Devon A.	DAT-1	RTC-376
148	7/31/16	Zabrocki, Luke	LZ-1	RTC-378
149	7/31/16	Kobrak, Mariette	MK-1	RTC-379
150	7/31/16	Petrie, Marlene	MP-1	RTC-380
151	7/31/16	Klima, MaryAnn and Rob	MRK-1	RTC-381
152	7/31/16	Brounstein, Patricia	PB-1	RTC-382
153	7/31/16	Jacobs, Robert A.	RAJ-1	RTC-383
154	7/31/16	Craig, Russel	RC-1	RTC-384
155	7/31/16	Cavanaugh, Roger	RCA-1	RTC-385
156	7/31/16	Danner, Roxieann	RD-1	RTC-386
157	7/31/16	Hathaway, Susan	SH-1	RTC-388
158	7/31/16	Schipper, Sid and Rita	SRS-1	RTC-389

No.	Date of Letter	Commenter	Letter Code	Page No. of Response
159	7/31/16	Traganza, Susan	ST-1	RTC-390
160	7/31/16	Ramey, Valerie and Garey	VGR-1	RTC-391
161	7/31/16	Lindblade, Vicki	VL-1	RTC-392
162	8/1/16	Butbul, Avi	AB-1	RTC-393
163	8/1/16	McKeand, Becky	BM-1	RTC-394
164	8/1/16	Stevenson, Ben	BS-1	RTC-395
165	8/1/16	Cronin, Ciaran N.	CNC-1	RTC-396
166	8/1/16	Pietras, Carole	CP-1	RTC-397
167	8/1/16	Andonian, Donna	DAN-1	RTC-404
168	8/1/16	Cavanaugh, Elliot	EC-1	RTC-405
169	8/1/16	Shaughnessy, Greg and Jan	GJS-1	RTC-406
170	8/1/16	Kay, Isabelle	IK-1	RTC-407
171	8/1/16	Bride, Joe	JB-1	RTC-410
172	8/1/16	Brooks, Joseph H.	JHB-1	RTC-411
173	8/1/16	Bott, John P.	JPB-1	RTC-413
174	8/1/16	Arden, Karen C.	KCA-1	RTC-414
175	8/1/16	Hughes, Karen	KH-1	RTC-415
176	8/1/16	Jensen-Pergakes, Kristen	KJP-1	RTC-416
177	8/1/16	Straus, Karen	KS-1	RTC-417
178	8/1/16	Wirsing, Kevin	KW-1	RTC-419
179	8/1/16	Bryden, Megan	MB-1	RTC-420
180	8/1/16	McKeand, Michele	MMK-1	RTC-421
181	8/1/16	Pelling, Michael R.	MRP-1	RTC-422
182	8/1/16	Watkins, Margie	MW-1	RTC-423
183	8/1/16	McLean, Naomi	NM-1	RTC-425
184	8/1/16	Brucker, Robert	RB-1	RTC-426
185	8/1/16	Murad, Robert E.	REM-1	RTC-427
186	8/1/16	Cronin, Roisin Heather	RHC-1	RTC-428
187	8/1/16	Sifton, Susan J.	SJS-1	RTC-429
188	8/1/16	Lippe, Sandra	SL-1	RTC-430
189	8/1/16	Selleck, Joan and Paul Maschel	SM-1	RTC-431
190	8/1/16	Wanetick, Jerry and Ann Kennedy	WK-1	RTC-432
Native American Tribes				
191	6/23/16	Rincon Band of Luiseno Indians	RINCON-1	RTC-433
192	7/5/16	Pala Band of Mission Indians (Shasta C. Gaughen)	PALA-1	RTC-434

LETTER

RESPONSE



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

August 2, 2016

Susan Morrison
City of San Diego
1010 Second Avenue, Suite 1400, MS 614C
San Diego, CA 92101

Subject: University Community Plan Amendment
SCH#: 2015121011

Dear Susan Morrison:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 1, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

State Clearinghouse (August 2, 2016)

SCH-1-1

Comment acknowledged. Please note that responses to the California Department of Fish and Wildlife comment letter follows this item (see CDFW-1).

SCH-1-1

LETTER

RESPONSE

State Clearinghouse (August 2, 2016)

Document Details Report
State Clearinghouse Data Base

SCH#	2015121011		
Project Title	University Community Plan Amendment		
Lead Agency	San Diego, City of		
Type	EIR	Draft EIR	
Description	This PEIR analyzes the potential impacts related to removing the Genesee Avenue Widening and Regents Road Bridge projects from the University Community Plan Transportation Element, as well as five project alternatives which consist of variations of including and removing the Genesee Avenue Widening and Regents Road Bridge projects. The Genesee Avenue Widening project would expand this roadway from four to six lanes between SR 52 and Nobel Dr. The Regents Rd Bridge project would construct two separate, parallel two lane bridge structures across Rose Canyon to connect the present north and south Regents Rd termini on either side of the canyon. The second alternative would analyze the potential		
Lead Agency Contact			
Name	Susan Morrison		
Agency	City of San Diego		
Phone	(619) 533-6492	Fax	
email			
Address	1010 Second Avenue, Suite 1400, MS 614C		
City	San Diego	State	CA Zip 92101
Project Location			
County	San Diego		
City			
Region			
Lat / Long			
Cross Streets	Regents Rd/Governor Dr, Genesee Ave, Nobel Dr, La Jolla Village Dr/Miramar Rd, La Jolla Farms Rd		
Parcel No.			
Township	Range	Section	Base
Proximity to:			
Highways	I-5, I-805, SR 52, SR 56		
Airports	MCAS Miramar		
Railways	San Diego Trolley, Atchinson,		
Waterways	Pacific Ocean, Los Peñasquitos Lagoon, Peñasquitos Creek		
Schools	Multiple, including UCSD		
Land Use	Mix of residential, commercial, light industrial, institutional parks, open space, military		
Project Issues	Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues		
Reviewing Agencies	Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission; State Lands Commission		
Date Received	06/17/2016	Start of Review	06/17/2016 End of Review 08/01/2016

SCH-1-1
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Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER

RESPONSE

State Clearinghouse (August 2, 2016)



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

CEQA
8-1-16
J

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



August 1, 2016

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200, MS-413
San Diego, California 92101

Governor's Office of Planning & Research

AUG 01 2016

STATE CLEARINGHOUSE

Dear Ms. Morrison:

**Subject: University Community Plan Amendment (Proposed Project)
Draft Environmental Impact Report
Project Number 480286; SCH No. 2015121011**

The California Department of Fish and Wildlife received a draft Environmental Impact Report from the City of San Diego Planning Department for the Proposed Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

The California Department of Fish and Wildlife (Department) has reviewed the above referenced Draft Environmental Impact Report (DEIR) for the University Community Plan Amendment, dated December 2, 2015. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

SCH-1-1
cont.

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PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego Planning Department

Objective: The objective of the Proposed Project is to amend the 1987 University Community Plan (UCP) and the UCP Transportation Element to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of the development without the construction of the Genesee Avenue Widening and the Regents Road Bridge.

Location: The UCP area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchinson, Topeka, and Santa Fe Railroad, MCAS Miramar, and Interstate 805 on the east;

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

State Clearinghouse (August 2, 2016)

Ms. Susan Morrison, Environmental Planner
 City of San Diego Planning Department
 August 1, 2016
 Page 2 of 4

State Route 52 on the south; and Interstate 5, Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west.

Project Description: The DEIR serves to analyze the potential impacts related to removing the Genesee Avenue Widening and Regents Road Bridge projects from the UCP Transportation Element, along with considering five project alternatives. The proposed project would amend the City of San Diego General Plan Mobility Element, amend the UCP Transportation element, and amend the North University City Public Facilities Financing Plan with a new Impact Fee Study for the plan area. The sum of these actions form the project (Proposed Project) analyzed by the DEIR. The alternatives analyzed in the DEIR are as follows: (1) the No Project alternative, widening of Genesee Avenue from four to six lanes between State Route 52 and Nobel Drive and constructing Regents Road Bridge. The bridge and roadway would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned), and through a hill within Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long; (2) the Construction of Regents Road Bridge (in the manner described in alternative 1 and not widening Genesee Avenue); (3) widening Genesee Avenue and removing the Regent Road Bridge project from the UCP; (4) constructing a pedestrian bike (with emergency vehicle access) bridge and the widening of Genesee Avenue; (5) pedestrian bike (with emergency vehicle access) bridge and no widening of Genesee Avenue.

Portions of the project area are within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Specifically, Rose Canyon (Rose Canyon Open Space Park) would be affected by alternatives that construct the Regents Road Bridge and Genesee Avenue Widening. The extent of the widening of Genesee Avenue could affect a portion of San Clemente Canyon (Marian Bear Memorial Park) depending on modifications to travel lanes (widening described to occur between State Route 52 and Nobel Drive). Rose Canyon is identified within the City SAP as an urban habitat area and east-west wildlife corridor hosting multiple sensitive habitats (e.g., coastal sage scrub, chaparral, oak woodlands, and riparian), sensitive and common wildlife species (e.g., least Bell's vireo, white-tailed kite, Cooper's hawk, red-shouldered hawk, cotton-tailed rabbit, skunks, and mule deer among others).

COMMENTS AND RECOMMENDATIONS

Project History and Prior Comments

The Department along with the U.S. Fish and Wildlife Service (Wildlife Agencies) previously provided joint comment letters (respectively, April 15, 2004, April 14, 2005, and July 31, 2006) to the City's Development Services Department during the Notice of Preparation, DEIR, and final EIR phases for the University City North/South Transportation Corridor Study (SCH#2004031011). On December 31, 2015, the Department commented that the project description provided for the 2006 University City North/South Transportation Corridor Study is very similar in scope to the project described in the Notice of Preparation (and subsequently this DEIR), with a notable difference in the current Proposed Project's removal of the Genesee Avenue Widening and Regents Road Bridge projects. In our comment letters the Department (and U.S. Fish and Wildlife Service) recommended that the City process an amendment to the UPC to remove the Genesee Avenue Widening and Regents Road Bridge from the UPC Transportation Element. Subsequently an amendment to the community plan was processed by

SCH-1-1
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LETTER

RESPONSE

State Clearinghouse (August 2, 2016)

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
August 1, 2016
Page 3 of 4

City Council resolution (R-2015-142), including removing the Genesee Avenue Widening and Regents Road Bridge projects from the UCP.

We appreciate the City's incorporation of the Department's previous comments on the University City North/South Transportation Corridor Study DEIR (SCH#2004031011), the current University Community Plan Amendment DEIR (SCH#2015121011), and the subsequent removal of the Regents Road Bridge and the Genesee Avenue Widening from the UCP. The removal of the Regents Road Bridge and Genesee Avenue Widening fulfills specific objectives of the MSCP by "... maintain[ing] a workable balance between preservation of natural resources and regional growth and economic prosperity." We offer the comment below to clarify the final environmental impact prior to certification.

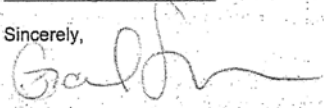
Alternatives Descriptions

The DEIR should clearly quantify and analyze the impacts of the cut and fill (e.g., earthwork) necessary to construct all DEIR alternatives involving the construction of the Regents Road Bridge design. According to the 2006 University City North/South Transportation Corridor Study, "significant landform alteration impacts would occur as a result of the Regents Road Bridge alternative. In addition, as discussed in Section 3.3.1.2, the Regents Road Bridge Alternative would involve cut and fill across a portion of a tributary to Rose Canyon and a ridge adjacent to the south edge of the canyon. Construction of the bridge and connecting cut-and-fill would involve approximately 88,000 cubic yards of earthwork. An estimated total of 6 acres would be affected by grading." Previously, the Wildlife Agencies stated that impacts to these areas would have potentially significant impacts on the implementation of the City's SAP, City's MHPA, preservation of wildlife movement corridors, sensitive plant and wildlife species, and impact a restoration area protected by state legislature. We recommend that each project alternative description relying on the Regents Road Bridge disclose in each of the alternative descriptions the quantity of cut, fill, and biological impacts (identified above) associated with constructing the bridge. We continue to support the removal of the Regents Road Bridge and the widening of Genesee Avenue as a means to reduce significant impacts to biological resources and conform to land use planning documents, including the City's SAP and California Department of Parks and Recreation Habitat Conservation Fund Program, and other City mitigation sites. We applaud the City's efforts to remove the Regents Road Bridge and Genesee Avenue Widening from the UCP.

SCH-1-1
cont.

We appreciate the opportunity to comment on the DEIR. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858) 467-4289 or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

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

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LETTER

RESPONSE

State Clearinghouse (August 2, 2016)

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
August 1, 2016
Page 4 of 4

References:

City of San Diego Planning Department, 2004. Notice of Preparation, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2005. Draft Environmental Impact Report, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2006. Final Environmental Impact Report, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2015. Notice of Preparation, University City Community Plan Amendment (SCH#2015121011).

City of San Diego Planning Department, 2016. Draft Environmental Impact Report, University City Community Plan Amendment (SCH#2015121011).

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LETTER

-----Original Message-----

From: Johnson, Shari SPL [mailto:Shari.Johnson@usace.army.mil]
Sent: Thursday, June 23, 2016 12:06 PM
To: PLN_PlanningCEQA <planningceqa@sandiego.gov>
Subject: RE: University Community Plan Amendment Project

Dear Ms. Morrison:

It has come to our attention that you are evaluating the University Community Plan Amendment Project.

This activity may require a U.S. Army Corps of Engineers permit.

A Corps of Engineers permit is required for:

a) structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act of 1899.

Examples include, but are not limited to,

1. constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water;

2. dredging, dredge disposal, filling and excavation;

b) the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;

4. placing pilings when such placement has or would have the effect of a discharge of fill material;

1

RESPONSE

U.S. Army Corps of Engineers, Los Angeles District Regulatory Division, Carlsbad Field Office (June 23, 2016)

USACE-1-1 The Project, which includes the removal of the Regents Road Bridge and the Genesee Avenue Widening from the UCP, does not include any construction activities, and therefore would not require a permit from the U.S. Army Corps of Engineers. Should one of the project alternatives that include the construction of the Regents Road Bridge and/or the Widening of Genesee Avenue be chosen over the Project, consultation with the U.S. Army Corps of Engineers regarding the permitting process would then occur.

USACE-1-1

LETTER

c) the transportation of dredged or fill material by vessel or other vehicle for the purpose of dumping the material into ocean waters pursuant to Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972;

d) any combination of the above.

An application for a Department of the Army permit is available on our website:

<http://www.usace.army.mil/Portals/2/docs/civilworks/permitapplication.pdf>.

If you have any questions, please contact me (contact information below).

Shari Johnson
Regulatory Assistant
U.S. Army Corps of Engineers, Los Angeles District Regulatory Division, Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008
Tel 760.602.4829; Fax 760.602.4848

USACE-1-1
cont.

RESPONSE

**U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division, Carlsbad Field Office (June 23, 2016)**

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LETTER

RESPONSE

California Legislature, Senator Marty Block 39th District (June 21, 2016)

From: [Fields, Sarah](#)
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: University Community Plan Amendment, PROJECT No. 480286 / SCH No. 2015121011
Date: Thursday, July 21, 2016 10:20:08 AM
Attachments: [2016-07-19 University Comm Plan EIR Comments.pdf](#)

Good Morning,

Please see the attached letter from State Senator Marty Block regarding the University City Community Plan Update.

Thank you.

--

Sarah Fields
Field Representative
Senator Marty Block 39th District

701 B Street, Suite 1840
San Diego, CA 92101

Phone: 619-645-3133
Fax: 619-645-3144
Cell: 858-254-1281

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LETTER

RESPONSE

California Legislature, Senator Marty Block 39th District (June 21, 2016)

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0039
(916) 651-4039
FAX (916) 651-4030

DISTRICT OFFICE
701 B Street, Suite 1640
SAN DIEGO, CA 92101
(619) 645-3133
FAX (619) 645-3144

WEBSITE
<http://sd39.senate.ca.gov>

California Legislature



MARTY BLOCK
SENATOR, THIRTY-NINTH DISTRICT

COMMITTEES
CHAIR, BUDGET SUBCOMMITTEE
NO. 1, EDUCATION
BUDGET & FISCAL REVIEW
BUSINESS, PROFESSIONS &
ECONOMIC DEVELOPMENT
EDUCATION
GOVERNMENTAL ORGANIZATION
CHAIR, CALIFORNIA LEGISLATIVE JEWISH
CAUCUS

July 21, 2016

Susan Morrison (PlanningCEQA@sandiego.gov)
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200, MS 413
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University COUNCIL DISTRICT: 1 (Lightner)

Dear Ms. Morrison:

I am writing to you in support of removing the Regents Road Bridge project from the University Community Plan (UCP). The planned location of the bridge over Rose Canyon, one of the last natural canyons in the area, presents a specific environmental and California State issue.

In 1998, the City's Rose Canyon Open Space Park Riparian Restoration/Enhancement Project was awarded a State of California Habitat Conservation Fund (HCF) grant. HCF grant funds were approved by the voters through the California Wildlife Protection Act of 1990. In receiving this grant, the City agreed to "maintain and operate" the designated habitat in perpetuity with the understanding that "no other use, sale or other disposition of the property except as authorized by specific act of the Legislature" would be possible, as directed in the [Procedural Guide](#).

In 2006, the California Department of State Parks learned of the potential construction of the Regents Road bridge project in the grant area. They sent a letter reminding the City of its contractual obligation that any modification to the grant area would require a special act of the Legislature. Moreover, in both 2005 and 2006, the California Department of Fish and Game (CDFG) and the United States Fish and Wildlife Service (USEWS) sent the City joint comment letters in response to the UCNSTCS DEIR and FEIR strongly recommending that the City remove the Regents Road Bridge from the UCP.

As the representative for the 39th Senate District, including this community area, I agree with these agency comments and maintain attention ought to be given to any and all relevant agreements, in addition to concerns of the built and natural environments as well as the community. Please feel free to contact me at (619) 645-3133 should you have any further questions regarding any of the issues addressed in this letter.

Sincerely,

MARTY BLOCK
Senator, 39th District

Proudly representing the cities and communities of San Diego, Del Mar, Solana Beach, and Coronado.

CAL-1-1

Comment acknowledged. Commenter discusses that the City's Rose Canyon Open Space Park Riparian Restoration/Enhancement Project was awarded a State of California Habitat Conservation Fund (HCF) grant and that HCF grant funds were approved by the voters through the California Wildlife Protection Act of 1990, and states that, in receiving this grant, the City agreed to "maintain and operate" the designated habitat in perpetuity with the understanding that "no other use, sale or other disposition of the property except as authorized by specific act of the Legislature" would be possible, as directed in the Procedural Guide. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP, and agrees that attention ought to be given to any and all relevant agreements, in addition to concerns of the built and natural environments as well as the community. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CAL-1-1



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

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



August 1, 2016

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200, MS-413
San Diego, California 92101

Dear Ms. Morrison:

**Subject: University Community Plan Amendment (Proposed Project)
Draft Environmental Impact Report
Project Number 480266; SCH No. 2015121011**

The California Department of Fish and Wildlife received a draft Environmental Impact Report from the City of San Diego Planning Department for the Proposed Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

The California Department of Fish and Wildlife (Department) has reviewed the above referenced Draft Environmental Impact Report (DEIR) for the University Community Plan Amendment, dated December 2, 2015. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego Planning Department

Objective: The objective of the Proposed Project is to amend the 1987 University Community Plan (UCP) and the UCP Transportation Element to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of the development without the construction of the Genesee Avenue Widening and the Regents Road Bridge.

Location: The UCP area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchinson, Topeka, and Santa Fe Railroad, MCAS Miramar, and Interstate 805 on the east;

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

CDFW-1-1 Comment noted.

CDFW-1-1

CDFW-1-2 Comment noted.

CDFW-1-2

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
August 1, 2016
Page 2 of 4

State Route 52 on the south; and Interstate 5, Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west.

Project Description: The DEIR serves to analyze the potential impacts related to removing the Genesee Avenue Widening and Regents Road Bridge projects from the UCP Transportation Element, along with considering five project alternatives. The proposed project would amend the City of San Diego General Plan Mobility Element, amend the UCP Transportation element, and amend the North University City Public Facilities Financing Plan with a new Impact Fee Study for the plan area. The sum of these actions form the project (Proposed Project) analyzed by the DEIR. The alternatives analyzed in the DEIR are as follows: (1) the No Project alternative, widening of Genesee Avenue from four to six lanes between State Route 52 and Nobel Drive and constructing Regents Road Bridge. The bridge and roadway would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned), and through a hill within Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long; (2) the Construction of Regents Road Bridge (in the manner described in alternative 1 and not widening Genesee Avenue); (3) widening Genesee Avenue and removing the Regent Road Bridge project from the UCP; (4) constructing a pedestrian bike (with emergency vehicle access) bridge and the widening of Genesee Avenue; (5) pedestrian bike (with emergency vehicle access) bridge and no widening of Genesee Avenue.

CDFW-1-2
cont.

Portions of the project area are within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Specifically, Rose Canyon (Rose Canyon Open Space Park) would be affected by alternatives that construct the Regents Road Bridge and Genesee Avenue Widening. The extent of the widening of Genesee Avenue could affect a portion of San Clemente Canyon (Marian Bear Memorial Park) depending on modifications to travel lanes (widening described to occur between State Route 52 and Nobel Drive). Rose Canyon is identified within the City SAP as an urban habitat area and east-west wildlife corridor hosting multiple sensitive habitats (e.g., coastal sage scrub, chaparral, oak woodlands, and riparian), sensitive and common wildlife species (e.g., least Bell's vireo, white-tailed kite, Cooper's hawk, red-shouldered hawk, cotton-tailed rabbit, skunks, and mule deer among others).

COMMENTS AND RECOMMENDATIONS

Project History and Prior Comments

The Department along with the U.S. Fish and Wildlife Service (Wildlife Agencies) previously provided joint comment letters (respectively, April 15, 2004, April 14, 2005, and July 31, 2006) to the City's Development Services Department during the Notice of Preparation, DEIR, and final EIR phases for the University City North/South Transportation Corridor Study (SCH#2004031011). On December 31, 2015, the Department commented that the project description provided for the 2006 University City North/South Transportation Corridor Study is very similar in scope to the project described in the Notice of Preparation (and subsequently this DEIR), with a notable difference in the current Proposed Project's removal of the Genesee Avenue Widening and Regents Road Bridge projects. In our comment letters the Department (and U.S. Fish and Wildlife Service) recommended that the City process an amendment to the UPC to remove the Genesee Avenue Widening and Regents Road Bridge from the UCP Transportation Element. Subsequently an amendment to the community plan was processed by

CDFW-1-3

CDFW-1-3 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. The commenter also summarizes the project history and their prior comments. The CDFW along with the U.S. Fish and Wildlife Service (Wildlife Agencies) previously provided joint comment letters (respectively, April 15, 2004, April 14, 2005, and July 31, 2006) to the City's Development Services Department during the Notice of Preparation, DEIR, and Final EIR phases for the University City North/South Transportation Corridor Study EIR (SCH#2004031011) prepared by the City of San Diego in 2006. The commenter also acknowledges that the Project would be in compliance with the MSCP as discussed in Section 4.9, Biological Resources.

LETTER

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
August 1, 2018
Page 3 of 4

City Council resolution (R-2015-142), including removing the Genesee Avenue Widening and Regents Road Bridge projects from the UCP

We appreciate the City's incorporation of the Department's previous comments on the University City North/South Transportation Corridor Study DEIR (SCH#2004031011), the current University Community Plan Amendment DEIR (SCH#2015121011), and the subsequent removal of the Regents Road Bridge and the Genesee Avenue Widening from the UCP. The removal of the Regents Road Bridge and Genesee Avenue Widening fulfills specific objectives of the MSCP by "... maintain[ing] a workable balance between preservation of natural resources and regional growth and economic prosperity." We offer the comment below to clarify the final environmental impact prior to certification.

CDFW-1-3
cont.

Alternatives Descriptions


The DEIR should clearly quantify and analyze the impacts of the cut and fill (e.g., earthwork) necessary to construct all DEIR alternatives involving the construction of the Regents Road Bridge design. According to the 2006 University City North/South Transportation Corridor Study, "significant landform alteration impacts would occur as a result of the Regents Road Bridge alternative. In addition, as discussed in Section 3.3.1.2, the Regents Road Bridge Alternative would involve cut and fill across a portion of a tributary to Rose Canyon and a ridge adjacent to the south edge of the canyon. Construction of the bridge and connecting cut-and-fill would involve approximately 88,000 cubic yards of earthwork. An estimated total of 6 acres would be affected by grading." Previously, the Wildlife Agencies stated that impacts to these areas would have potentially significant impacts on the implementation of the City's SAP, City's MHPA, preservation of wildlife movement corridors, sensitive plant and wildlife species, and impact a restoration area protected by state legislature. We recommend that each project alternative description relying on the Regents Road Bridge disclose in each of the alternative descriptions the quantity of cut, fill, and biological impacts (identified above) associated with constructing the bridge. We continue to support the removal of the Regents Road Bridge and the widening of Genesee Avenue as a means to reduce significant impacts to biological resources and conform to land use planning documents, including the City's SAP and California Department of Parks and Recreation Habitat Conservation Fund Program, and other City mitigation sites. We applaud the City's efforts to remove the Regents Road Bridge and Genesee Avenue Widening from the UCP.

CDFW-1-4

CDFW-1-5

We appreciate the opportunity to comment on the DEIR. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858) 467-4269 or eric.weiss@wildlife.ca.gov

Sincerely,


Gail K. Sevrans
Environmental Program Manager
South Coast Region

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

RESPONSE

California Department of Fish and Wildlife (August 1, 2016)

CDFW-1-4 The commenter suggests further analysis on the impacts of the cut and fill (e.g., earthwork) necessary to construct all DEIR alternatives involving the construction of the Regents Road Bridge design. CEQA Guidelines Section 15126.6 (d) discusses the requirements for evaluating alternatives:

"Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1)."

As addressed in Chapter 9.0, Alternatives Analysis, the Project alternatives analysis complied with CEQA Guidelines Section 15126.6, which requires a comparative evaluation of the Project with alternatives to the Project, including a No Project Alternative. Consistent with CEQA Guidelines Section 15126.6, this section focuses on alternatives to the Project that are capable of avoiding or substantially reducing any significant adverse impacts associated with the Project, despite the possibility that the alternatives may impede attainment of Project objectives or prove less cost efficient.

LETTER

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August 1, 2016
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References:

City of San Diego Planning Department, 2004. Notice of Preparation, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2005. Draft Environmental Impact Report, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2006. Final Environmental Impact Report, University City North/South Transportation Corridor Study (SCH#2004031011).

City of San Diego Planning Department, 2015. Notice of Preparation, University City Community Plan Amendment (SCH#2015121011).

City of San Diego Planning Department, 2016. Draft Environmental Impact Report, University City Community Plan Amendment (SCH#2015121011).

RESPONSE

California Department of Fish and Wildlife (August 1, 2016)

In addition, implementation of a project alternative may potentially result in new impacts that would not have resulted from the Project. Table 9-1 of Chapter 9.0, Alternatives Analysis, provides a matrix displaying the major characteristics and significant environmental effects of each alternative. The State CEQA Guidelines require that the analysis of project alternatives provide sufficient information about each alternative in order to allow meaningful evaluation, analysis, and comparison with the Project. Chapter 9.0, Alternatives Analysis, is consistent with these requirements.

CDFW-1-5 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

Draft response to the D-PEIR/ Amendment to the University Community Plan (UCP)- Transportation Element, project no. 480286/Sch no. 2015121011, Approved by the D-PEIR/CPA subcommittee for consideration by the full UCPG board.

We have reviewed the Draft Program Environmental Impact Report (the “D-PEIR”) and associated technical appendices prepared as part of the Amendment to the University Community Plan (UCP) - Transportation Element, project no. 480286/Sch no. 2015121011. From our review, the D[PEIR appears to be a comprehensive analysis of the relevant environmental issues, with the corrections that we note below.

Based on this review, we recommend approval of the Community Plan Amendment to remove the Regents Road Bridge and Genesee Avenue widening projects from the UCP.

We believe that the “Project”—the removal of the Regents Road Bridge and Genesee Avenue widening – best meets the “primary objectives” outlined in ES.3 of the D-PEIR: namely, to “minimize impacts to biological resources at Rose Canyon” and move toward a more “balanced transportation network” while preserving emergency access and multi-modal transportation throughout the community (ES-3).

In addition, we believe that the removal of the Regents Road Bridge and Genesee Avenue widening – maximizes the long-term health, safety, and quality of life in the University Community, and creates the greatest community benefit by:

- * minimizing the re-routing of highway traffic through the residential communities of north and south University City (Appendix C, Transportation Impact Study, p. iii).

and by

- *preserving the recreational, visual, biological, and other environmental amenities associated with Rose Canyon.

The Project:

The Project would remove two out of date infrastructure projects from the UC Plan: the Regents Road Bridge and the Genesee Avenue widening.

If constructed, the Regents Road Bridge would require construction of a 700-foot cut-and-fill road project in Rose Canyon Open Space Park, removing much of a major hillside and filling a deep tributary canyon and riparian habitat area, in addition to road widening, retaining walls, and the construction of two 870 foot-long bridge structures through environmentally sensitive lands and MHPA at the center of Rose Canyon Open Space Park (ES-9, 3-3).

If constructed, the Genesee Avenue widening project would add 26 feet of width to the roadway, expanding the thoroughfare from four to six lanes through the use of high retaining walls and crib walls along both sides of the roadway. It would involve new construction to widen the existing bridge over Rose Creek, reduction of the landscaped median, and potentially acquisition of adjacent properties from private owners. (ES-8, 3-2)

RESPONSE

University Community Planning Group (June 30, 2016)

UCPG-1-1 Commenter reasserts their objections to the No Project Alternative raised in their July 29, 2016 letter. See responses to comments UCPG-2-1 through UCPG-2-8.

UCPG-1-1

LETTER

RESPONSE

University Community Planning Group (June 30, 2016)

Environmental Impacts:

As the Draft PEIR makes clear, the construction of the Regents Road Bridge, in particular, would have “significant and irreversible” environmental impacts to the University Community (8-8, see also 4.2-29-30). In addition, the bridge and widening together would attract forecasted traffic congestion “primarily” by rerouting automobile traffic from adjacent freeways through the residential communities of north and south University City (Appendix C, p. iii).

We note that removing the Regents Road Bridge and Genesee Avenue widening is estimated to have significant environmental impacts, however, we believe that these are outweighed by other tangible environmental and community benefits of the Project.

As the D-PEIR indicates, the Project avoids significant environmental impacts in 11 of 16 categories of impact studied, including biological resources - such as sensitive habitat and threatened species, and MHPA - hydrology and water quality, energy and water use, public utilities, health and safety, visual effects and neighborhood character (ES-4; Table 9-1, p. 9-7).¹

We note, too, that the D-PEIR analysis forecasts that “significant transportation impacts would occur regardless of the implementation of the project,” and regardless of which alternative is selected (4.2-52).

The D-PEIR points out that “some operational deterioration would be worsened by removal of the planned” projects (8-9); however, we note that many of operational differences between Project and no Project alternatives are “slight” (e.g., GHGs, 9-15; Emergency Service, 9-20), and the comparative impacts are small in real terms.

Looking forward to a balanced, multi-modal solution to transportation and mobility in the decades to come, the UCPG also takes note of recent research that indicates the effect of new roadways to induce more traffic and greenhouse gas emissions – the “build it and they will come” effect.² Adding this factor to the projection that the Regents Road Bridge and Genesee Avenue widening will re-route traffic from local highways through the residential streets of the University Community, we recommend approval of the Project - removal of the Regents Road Bridge and Genesee Avenue widening from the UCP.

¹ See pg ES-4: “the Project would result in less than significant impacts with no mitigation required for the issue areas of land use, visual effects and neighborhood character, and health and safety”; and “No significant impacts were identified for the issue areas of energy, historical resources, biological resources, geologic conditions, paleontological resources, hydrology and water quality, public utilities, and population and housing.”

² Susan Handy, “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” UC Davis/National Center for Sustainable Transportation Policy Brief, Oct. , 2015(http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf)

UCPG-1-1
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LETTER

RESPONSE

University Community Planning Group (June 30, 2016)

Corrections/Recommendations:

Emergency Services:

We note that the Draft PEIR analysis of future emergency service response times does not account for the existing Squad 56 rapid response station on Governor Drive, nor the future Fire Station 50, approved for Nobel Drive.

We concur with the D-PEIR recommendation in support of a new Fire Station in south University City. We support the recommendation that "a new fire station would be beneficial to improve emergency response times in this area of the community" (Appendix C, p3).

Corrections:

We note that the Transportation Impact Study (Appendix C, table 6-7 on p 6-6) refers to projected class I bicycle paths through Rose Canyon and Roselle Canyon as part of the Coastal Rail Trail corridor. We note that the CRT route has been selected to run over different segments along Gilman Drive and through UCSD. The proposed bike paths through Rose and Roselle Canyons have been deleted from the City's Bicycle Master Plan.

We note the D-PEIR includes three schools in the Genesee Avenue corridor while stating that "no school facilities are located immediately off of Regents Road." [see p53]. This conclusion reflects the selection process for studied corridor boundaries in the D-PEIR, however, in real terms there are two elementary schools within two blocks of Regents Road. Doyle Elementary School is situated "immediately off" Regents Road at Berino Ct, just north of the study boundary and adjacent to the Doyle Community Park and Recreation Center. Sole auto access to the school is on Berino Ct. from Regents Road. In south University City, Spreckels Elementary is located two city blocks from the corner of Regents Road and Governor Drive. These schools may be located outside the defined project corridors, but they would clearly be impacted by the construction of the Regents Road Bridge. These facts reinforce our recommendation to support the Project.

Sincerely,

UCPG-1-1
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LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)



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Urban Planner
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July 15, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment and Draft Programmatic Environmental Impact Report

Dear Ms. Morrison:

This firm represents Friends of Rose Canyon ("FRC") in connection with the proposed amendment of the University Community Plan ("Plan Amendment") to remove the Regents Road Bridge project ("Bridge project") and the Genesee Avenue Widening project. The purpose of this letter is twofold: first, to thank the City for its leadership and commitment to removing the Bridge project from the Community Plan; and second, to comment on the Plan Amendment's draft environmental impact report ("DEIR") prepared pursuant the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. ("Guidelines"). It is FRC's intent to assist the City in preparing a legally adequate EIR.

I. Introduction and Background

For almost 15 years, FRC has mobilized the community to protect Rose Canyon and the Rose Creek watershed. FRC has voiced its strong opposition to the Bridge project because of its deep concerns about the far-ranging environmental impacts the project would have on Rose Canyon. FRC has also explained that the Bridge project is an outdated and misguided approach to meeting local transportation needs.

The concept of a bridge over Rose Canyon dates back to the late 1950s. The Bridge project reflects a mid-twentieth century strategy, when land use and transportation agencies pursued road-building projects without regard to environmental threats. Over

FRC-1-1

FRC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. To provide clarification, the traffic analysis performed for Scripps Memorial Hospital included the portion of the community north of La Jolla Village Drive and did not evaluate changes south of La Jolla Village Drive, nor any of the freeways. The Project generally found similar results for roadways and intersections north of La Jolla Village Drive. The comment further states opposition to the construction of the Regents Road Bridge. The comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

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the years, federal, state, and local agencies have weighed in on the Bridge project and universally agree that it is environmentally damaging. The Bridge project would invade a restoration area in Rose Canyon, which contains habitat for threatened California gnatcatchers and other species. The City accepted State funds to restore this habitat. State Parks confirmed that it cannot permit a change in use of the restored area for the Bridge project. The United States Fish and Wildlife Service and the California Department of Fish and Wildlife also alerted the City that the Bridge would have multiple biological impacts. These agencies urged the City to amend the Community Plan to remove the Bridge project. The Regional Water Quality Control Board indicated the Bridge project would cause significant unmitigable impacts on water quality and informed the City that the necessary permits would be difficult to obtain. The Bridge would also destroy the scenic open space of Rose Canyon and cause significant noise in the Regents Road corridor.

In addition to the serious environmental harm that would accompany the Bridge project, it has become increasingly apparent that the project is unnecessary. University City has grown considerably over the last several decades. Despite extensive growth and development, traffic in the area on surface streets has remained remarkably stable over the last 30 years.¹ This is confirmed by recent environmental documentation prepared for large land use development projects in University City. The Scripps Memorial Hospital, for example, evaluated the need for increased roadway capacity to serve its expansion project. The traffic analysis prepared in connection with that project determined that there would be no discernible difference in traffic congestion levels in the area regardless of whether the Bridge were built or Genesee were widened.²

The Bridge would also cause traffic to increase—not decrease—on local roads and intersections. Transportation engineers now agree that capacity increasing projects such as the Bridge and Genesee widening projects lead to increases in vehicle miles traveled (“VMT”) by way of induced demand. As road capacity increases, the “price” of driving (which includes commute times, safety, etc.) is reduced, thereby making driving a more attractive option and causing increases in per-capita VMT.³⁴ Thus, while supporters of

¹ See e.g., University Community Plan Existing and Proposed Figure 17, which shows relatively stable traffic volumes particularly between SR-52 and Eastgate Mall.

² See Memo from D. Wilson, RBF Consulting to B. Rainey, Scripps Health, December 19, 2011, Table 7, attached as Exhibit A.

³ See e.g., S. Handy and M. Boarnet, California Air Resources Board, Policy Brief in the Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and

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Friends of Rose Canyon (July 15, 2016)

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the Bridge project suggest that a bridge connecting Regents Road would save travel time, any nominal improvement in time savings—if there would be any at all—would quickly evaporate as traffic is diverted from nearby freeways. Rather than keep this “through” traffic on freeways where it belongs, the 20,000 vehicles projected to travel on the Bridge would instead travel through residential neighborhoods if the Bridge were built. The Bridge and Genesee widening projects would also threaten the overall livability of University City because they would promote increased travel by automobiles (as opposed to transit) and increased vehicular speeds.

Moreover, according to researchers, including Anthony Downs at Brookings, building new roads and widening arterials to alleviate traffic congestion that occurs for only a few hours a day is a misguided approach to mobility.⁵ Common sense dictates that the fundamental problem associated with traffic congestion is not that our roads are too small; it’s that too many people want to travel at the same times each day. To build enough road capacity to handle all drivers who want to travel in the peak hours at the same time without delays is “totally impractical” and these larger roads would be grossly underutilized during non-peak hours. *Id.* Indeed, the DEIR itself confirms that we cannot build our way out of traffic congestion, as there would still be significant traffic impacts even if the Bridge were built and Genesee were widened.⁶

In addition, it is important to note that although the level of service at certain intersections would decline if the Bridge were not built, operations at several other

FRC-1-1
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Greenhouse Gas Emissions, September, 30, 2014; available at http://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief; accessed July 5, 2016.

⁴ The State Legislature has also weighed in on the relationship between roadway capacity and increased VMT. SB 743, signed by Governor Brown in 2013, requires that automobile delay no longer be considered a significant impact on the environment. Because environmental review of transportation impacts focused on the delay that vehicles experience, mitigation for increased delay often involves increasing capacity which may increase auto use and discourage alternative forms of transportation.

⁵ Traffic: Why Its Getting Worse, What Government Can Do, Anthony Downs; available at: <http://www.brookings.edu/research/papers/2004/01/01transportation-downs>; accessed July 5, 2016.

⁶ DEIR at 4.2-52.

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intersections would actually improve.⁷ Furthermore, the level of service at other intersections would actually get noticeably worse if the Bridge were built. (See DEIR Table 4.2-10, which shows that intersections, including Regents Road/Governor Drive and Regents Road/Arriba Street, would decline from acceptable to unacceptable levels with the adoption of the UCP).

These are just a few of the myriad reasons why FRC strongly supports the proposed Plan Amendment to eliminate the contentious and ill-conceived Bridge project. While FRC is focused on removal of the threat the Bridge project poses to Rose Canyon, FRC is pleased that the City is also taking action to remove the Genesee Avenue Widening project from the Community Plan as well.

The remainder of this letter addresses our comments on the DEIR.

II. CEQA Issues

It is our opinion that the City has provided a thorough evaluation of the environmental impacts that would result from the Plan Amendment ("Project") and from the various Project alternatives. However, a couple of points are worthy of consideration. First, the DEIR's description of the Project is inaccurate as regards its description of the Bridge project and incomplete as regards its description of the PFFP. Second, it is our opinion that the DEIR overstates certain of the Project's environmental impacts including those relating to traffic, air quality, greenhouse gas emissions, and emergency services. We therefore disagree with the DEIR's conclusion that these impacts are significant and unavoidable

A. Project Description

1. The DEIR Does Not Accurately Describe The Bridge Project.

The DEIR defines the Bridge project as "two separate, parallel two-lane bridge structures across Rose Canyon" to connect the present north and south Regents Road termini on either side of the canyon. DEIR at ES-1.2. This description of the Bridge

⁷ Under the "future year with project" scenario, the following intersections would experience improved levels of service: Genesee Avenue/Johns Hopkins Drive; Regents Road/Governor Drive; Nobel Drive/La Jolla Village Square Drive; Miramar Road/Camino Santa Fe; Regents Road/Arriba Street; Regents Road/Luna Avenue; and Judicial Drive/Eastgate Mall. DEIR Table 4.2-10 at 4.2-33, 34.

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FRC-1-1
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FRC-1-2

The commenter states that the original Regents Road Bridge design as described in Section 3.2.2, which consisted of constructing "two separate, parallel two-lane bridge structures across Rose Canyon to connect the south and north ends of Regents Road" is erroneous. The commenter mentions that this concern was brought to the City's attention in a letter from D. Knight to S. Morrison dated January 4, 2016. The commenter claims that, in order to connect the 1,472-foot span between the north and south Regents Road termini on either side of the canyon, the construction of a new 600-foot road within Rose Canyon Open Space Park would be required. This comment is acknowledged.

Section 3.2.2, Removal of Regents Road Bridge, under Chapter 3.0, Project Description, provides details of all features of the Regents Road Bridge construction, including the four-lane road that would have been built by filling of a tributary canyon and cutting through a ridge. The preliminary design for the Regents Road Bridge as originally described in the University City North/South Transportation Corridor Study EIR (SCH#2004031011) prepared by the City of San Diego in 2006 was a product of extensive evaluation by the City to serve as a basis for assessing the environmental consequences as well as feasibility. The description of Regents Road Bridge provided in Section 3.2.2 of the Draft PEIR is consistent with the description provided in the University City North/South Transportation Corridor Study EIR.

FRC-1-2

Susan Morrison, Environmental Planner
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project is erroneous, and, unfortunately, it is repeated throughout the DEIR. See e.g., DEIR at 1-4, 3-1, 4.15-32, 9-3. As FRC informed the City, it is not possible to connect the two existing road ends.⁸ The Bridge design has been the subject of extensive engineering. This engineering determined that in order to connect the 1,472 foot span between the north and south Regents Road termini on either side of the canyon would require the construction of a new 600 foot road within Rose Canyon Open Space Park. The construction of the new road would require removing much of a major hillside, filling a deep tributary canyon and riparian habitat, and constructing extensive retaining walls. From the south side of Rose Canyon, the new road would extend through the canyon for about 40 percent of the distance between the two road ends; it would then connect with a bridge structure spanning the remaining 870 feet.

FRC-1-2
cont.

Because the DEIR does not accurately describe the design of the Bridge project, it understates the impacts of the No-project alternative, i.e., building the Bridge. Although the DEIR generally asserts that the impacts to biological resources for the No Project Alternative would be greater than those identified for the Project, it does not explain the severity of the impacts to the Multi-Habitat Planning Area and to the sensitive habitats and species that rely on these habitats. See DEIR at 9-17. It is imperative that the DEIR be revised to include an accurate description of the Bridge project.

FRC-1-3

FRC-1-3 Please see responses to comment Citizens-2-31. In addition, Section 3.2.2, Removal of Regents Road Bridge, under Chapter 3.0, Project Description, provides details of all features of the Regents Road Bridge construction, including the four-lane road that would have been built by filling of a tributary canyon and cutting through a ridge.

2. The DEIR Does Not Describe the Amendment to the Public Facilities Financing Plan.

In addition to an amendment to the Transportation Element of the University Community Plan, the Project includes an amendment to the North University City Public Facilities Financing Plan ("PFFP"). DEIR at 1-1. However, the DEIR does not disclose specifically how the PFFP would be amended. This is important because the existing PFFP includes several references to the Regents Road Bridge and the Genesee widening project. See e.g., North University City PFFP FY 2013, page 21,29. Along with the DEIR, the City published a "track-changes" version of the proposed UCP's Transportation Element. The City should disclose the specific changes to the proposed PFFP.

FRC-1-4

FRC-1-4 The public facilities identified in the University City Community Plan Amendment serve as the basis for the projects in the proposed North University City Public Facilities Financing Plan Amendment (PFFP). Any revision, removal, or addition of public facilities will be reflected in the PFFP. An amendment to the North University City PFFP would be required to allow for implementation of the UCP. In addition to the Project, the North University City PFFP is anticipated to add 17 new mobility projects as a result of the removal of the Regents Road Bridge and the Genesee Widening. An updated North University City PFFP would be adopted with each community plan update (UCP) to allow for implementation of the UCP.

⁸ See Letter from D. Knight to S. Morrison, January 4, 2016, submitted under separate cover.

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B. Environmental Impact Analysis

1. The DEIR Overstates the Project's Transportation Impacts.

The DEIR concludes that the Project's traffic impacts would be significant and unavoidable. DEIR at 4.2-45. While we do not dispute that certain locations would likely experience increased traffic congestion as a result of the Project, it would appear that the DEIR overstates the effect that removing the Bridge would have on traffic congestion within the University City study area.

FRC retained Neal Liddicoat with MRO Engineers, Inc. to evaluate the DEIR's transportation analysis. See MRO Engineers report, June 28, 2016, attached as Exhibit B. It is Mr. Liddicoat's determination that the DEIR's methodologies and assumptions are generally appropriate. However, he identified several technical issues which have the effect of overstating existing traffic conditions in the study area and the Project's forecasted traffic impacts. The MRO report provides a full accounting of these technical issues. Set forth below is a summary of Mr. Liddicoat's comments.

First, the DEIR's intersection analysis relies on incorrect existing lane configurations at multiple locations throughout the study area. In each instance, the DEIR assumes less intersection lane capacity than actually exists "on the ground." Had the existing intersection lane configurations been correctly identified, the Project's intersection delay values would likely be substantially lower than the DEIR determines. *Id.* at 1.

Second, the DEIR relies on a peak-hour factor for individual legs of an intersection, despite the fact that the Highway Capacity Manual specifically calls for applying the peak hour factor to the intersection as a whole. *Id.* at 2. Here too, correctly applying the correct peak hour factor would result in lower intersections delay values and, in some cases, better levels of service than has been described in the DEIR.

Third, the DEIR relies on incorrect roadway capacity values on certain roadway segments in the study area. Consequently, the document does not seem to represent a realistic indication of the maximum traffic volumes that the roads can accommodate. In fact, in certain instances, the DEIR identifies a volume to capacity ratio in excess of 1.00, (i.e., beyond capacity) even though under "existing conditions," it is physically impossible to exceed capacity. *Id.* at 2. The use of a realistic roadway capacity value would result in lower volume to capacity ratios and possibly better levels of service.

FRC-1-5 Commenter retained MRO Engineers, Inc. to evaluate the Draft PEIR transportation analysis and summarizes the findings in this comment. See responses to comments FRC-1-13 through FRC-1-20.

FRC-1-5

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& WEINBERGER LLP

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In sum, the technical issues discussed above, together with the other issues identified in the MRO Engineers report, would suggest that the DEIR may substantially overstate the Project's traffic impacts. It is important that the DEIR's traffic analysis accurately describe existing traffic conditions in University City. By overstating the amount of congestion that currently exists, the DEIR gives the misleading impression that the City should add capacity to area roadways. Moreover, because the DEIR's traffic analysis forms the basis for several other impact analyses including air quality, GHG emissions, fire and emergency response, and noise, an overestimation of the Project's traffic impacts necessarily results in an overestimation of these other impacts.

FRC-1-5
cont.

C. The DEIR Lacks The Evidentiary Basis For Its Conclusion That The Project's Air Quality Impacts Would Be Significant And Unavoidable.

The DEIR determines that the Project would violate air quality standards and concludes that this impact is significant and unavoidable. DEIR at 4.4-21. However, the DEIR appears to rely on faulty methodology to reach this significance determination.

Initially, the DEIR quantifies the Project's ROG, NOx, CO, PM₁₀ and PM_{2.5} emissions and concludes that "the Project would *not* exceed applicable daily or annual emissions thresholds established by the City." DEIR at 4.4-19 (emphasis added). The DEIR preparers then adjust the Project's emission estimates upwards and ultimately determine that the emissions' impacts would actually be significant. *Id.* It is this adjustment that is questionable. The DEIR asserts that the Project's emissions estimates, which were based on vehicle miles travelled ("VMT") projections only account for 75 percent of the total VMT in the project area. Notably, this assumption—that the DEIR only accounted for 75 percent of the study area's VMT—appears to be entirely arbitrary as the DEIR provides no explanation as to how the document's authors arrived at this figure. The DEIR then adjusts the net change in air pollutant emissions upward by 25 percent to purportedly account for the total VMT in the area. Had the DEIR not applied this seemingly arbitrary 25% adjustment, the Project's net change in air pollutant emissions would be less than significant.

FRC-1-6

D. The DEIR Incorrectly Determines That The Project's Increase In GHG Emissions Would Constitute A Significant And Unavoidable Impact.

The DEIR concludes that the Project's greenhouse gas ("GHG") emissions would be significant and unavoidable. Yet instead of comparing the Project's zero GHG emissions to existing conditions, the DEIR compares them to the purported avoided

FRC-1-7

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FRC-1-6

The commenter is concerned with the air quality methodology utilized in the Draft PEIR resulting in significant and unmitigated impacts. The estimate of 75 percent is based on freeway and arterial VMT as a percentage of the total and is not arbitrary. For each freeway or arterial segment, the appropriate speed bin emission factor was selected and multiplied by the corresponding VMT to calculate annual emissions on the segment. The traffic study did not have detailed speeds for collector and local roadways, and therefore, to fully account for the impacts of the Project, the net changes in emissions were adjusted by 25 percent to account for the total VMT in the Project area (including all roadway types). As stated in Section 4.5 of the DEIR, because specific information is not available to support different assumptions for the local roadways, it was conservatively assumed that the emissions would increase based on the percentage of VMT.

FRC-1-7

As indicated in the comment, a lead agency may use an alternative baseline if supported by substantial evidence. Since the Project includes changes to a planning document and those changes would not affect the existing infrastructure in the Project area, the use of existing conditions for the analysis would not fully demonstrate the impacts of the Project. That analysis would simply demonstrate how vehicle emission rates and miles traveled change over time. The use of a future baseline and detailed traffic analysis demonstrates how traffic volumes, average vehicle speeds, and emissions would change as a result of the Project.

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emissions under future buildout of the 1987 Community Plan, thus finding that the GHG emissions would be significant. DEIR at 4.5-13. A lead agency may use a "future" baseline only if it is supported by substantial evidence that an existing conditions existing baseline would be incorrect or misleading. *Neighbors for Smart Rail v. Exposition Metro Line Construction Agency* (2013) 57 Cal.4th 439. Here, the DEIR asserts only that the "full implications of the Project versus the 1987 Community Plan are better demonstrated at a future year that accounts for increased roadway demands from cumulative planned growth that would affect traffic operations." DEIR at 4.5-13. This is not substantial evidence that the 1987 Community Plan baseline is more accurate. Indeed, the DEIR admits that the 1987 Community Plan and its Transportation Element, which was based on the traffic studies from the "original EIR," are presently outdated. *Id.* at 3-1 ("[t]he 1987 UCP . . . do[es] not reflect the most recent development and traffic patterns").

FRC-1-7
cont.

By ignoring the existing conditions baseline, the DEIR fails to accurately show that the Project would have no GHG impact, beginning at approval and continuing indefinitely. *See Neighbors for Smart Rail*, 57 Cal.4th at 461 (EIR "neglect[ed] to inform the public and decision makers explicitly of any operational impacts that could occur in the project's first . . . years of operation" and was therefore invalid). Had the DEIR relied on a proper baseline, it would have determined that the GHG impacts from the proposed Plan Amendment would be less than significant.

FRC-1-8

FRC-1-8 Please see response to comment FRC-1-7.

E. Fire and Emergency Services

The DEIR identifies three fire stations primarily serving the UCP area: Station 35, Station 27, and Station 9. DEIR at 4.13-4. The document goes on to explain that Station 35 and Station 27 did not meet the City's target average response times for years 2014 and 2015. *Id.* at 4.13-5. The DEIR concludes that because the Project would increase projected traffic, the impact to fire and emergency service response times would be significant and unavoidable. DEIR at 4.13-19.

FRC-1-9

FRC-1-9 Fire Station 50 was not included in future analysis because a site has not been determined at the time of the preparation of the Draft PEIR. As discussed in Chapter 2.0, Section 2.1.3.7, Emergency Services, Squad 56 consists of a Fast Response Squad (FRS), which is a two-person fire crew, rather than the traditional four-person crew. At the time of the preparation of the Draft PEIR, no data were available for Squad 56. As such, only Fire Station 35, Fire Station 27, and Fire Station 9 were analyzed in the Draft PEIR.

However, the DEIR fails to acknowledge that two additional fire stations exist within the University City area. Had the DEIR included Fire Response Station 56 and Fire Station 50 (which is currently being designed) in its evaluation, it likely would have determined that impacts relating to fire and emergency services would be far less severe than the DEIR discloses.

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F. Environmentally Superior Alternative

The DEIR is misleading as regards the environmentally superior alternative. Initially, in the Executive Summary, the DEIR states that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” is the environmentally superior alternative. DEIR at ES-11. Later, however, in the alternatives chapter, the DEIR states that the Project is the environmentally superior alternative and that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” is the environmentally superior “build” alternative. DEIR at 9-6. The FEIR should eliminate this inconsistency so that the public and decision-makers understand that the Project is the environmentally superior alternative.

FRC-1-10

III. Conclusion

FRC very much appreciates the City’s efforts to remove the Bridge project and the Genesee Widening project from the Community Plan. As discussed above, it is our opinion that the DEIR provides a very conservative analysis of the Project’s environmental impacts. In fact, in many instances, the DEIR overstates the environmental impacts that would result from removing the roadway projects from the Community Plan. We thank you for the opportunity to comment on this important project.

FRC-1-11

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Laurel L. Impett, AICP,
Urban Planner

cc: Deborah Knight, Friends of Rose Canyon

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SHUTE, MIHALY
& WEINBERGER LLP

FRC-1-10

Comment acknowledged. As stated in Chapter 9.0, State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR also identify which alternative is the environmentally superior alternative among the other alternatives if the “no project” alternative is the environmentally superior alternative. However, because the Project in this Draft PEIR is the environmentally superior alternative and more closely resembles a “no project” alternative due to the removal of the Regents Road Bridge and Genesee Avenue Widening projects from the UCP (i.e., no construction = no project), an environmentally superior alternative was also selected from among the other alternatives.

FRC-1-11

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

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List of Exhibits:

- Exhibit A Memo from D. Wilson, RBF Consulting to B. Rainey,
 Scripps Health Regarding Addendum to Scripps Memorial
 Hospital La Jolla Traffic Impact Analysis Report, December
 19, 2011.
- Exhibit B MRO Engineers Report Regarding Review of Draft Program
 Environmental Impact Report University Community Plan
 Amendment— San Diego, California, June 28, 2016.

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APPENDIX Q

2035 Conditions Supplemental Analysis
(Addendum to TIA Report)

RESPONSE

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LETTER

RESPONSE

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December 19, 2011

JN 55-100698.001

Mr. Bruce Rainey
Scripps Health
10130 Sorrento Valley Road, Suite C
SV100
San Diego, CA 92121

**Subject: Addendum to Scripps Memorial Hospital La Jolla Traffic Impact Analysis Report
2035 Alternate Roadway Network Scenarios**

Dear Bruce:

This addendum to the Traffic Impact Analysis (TIA) Report evaluates the potential traffic impacts associated with Phase III of the proposed Scripps Memorial Hospital La Jolla Amendment 9 Conditional Use Permit (CUP), with three alternate roadway network scenarios for the year 2035.

The University Community Plan Circulation Element includes several major roadway improvements in the University City area such as the widening of Genesee Avenue to six lanes from Nobel Drive to SR-52, and the extension of Regents Road over Rose Canyon as a bridge to connect the two existing sides of Regents Road and provide a continuous roadway through the area. Due to the uncertainty in the funding of these planned roadway improvements, the 2035 conditions analysis in the Traffic Impact Analysis Report had conservatively assumed that neither the Regents Road Bridge over Rose Canyon nor the widening of Genesee Avenue from Nobel Drive to SR-52 would be constructed.

This addendum to the TIA report includes alternate scenarios with either the Regents Road Bridge or the Genesee Avenue widening occurring, or with both improvements occurring. The following alternate roadway network scenarios are evaluated for the year 2035 both without and with the Scripps Memorial Hospital La Jolla Amendment 9 project:

- Year 2035 With Regents Road Bridge, Without Genesee Avenue Widening
- Year 2035 Without Regents Road Bridge, With Genesee Avenue Widening
- Year 2035 With Regents Road Bridge, With Genesee Avenue Widening

The La Jolla Centre 3 Traffic Impact Study prepared by LSA had included the following roadway network scenarios for their build-out year 2030 conditions:

- Without Regents Road Bridge, Without Genesee Avenue Widening
- With Regents Road Bridge, Without Genesee Avenue Widening

Forecast traffic volumes for the Year 2035 With Regents Road Bridge, Without Genesee Avenue Widening scenario were developed based on the changes in traffic volumes between the two scenarios evaluated in the La Jolla Centre 3 Traffic Impact Study prepared by LSA. The original 2035 volumes from the TIA report and the alternate 2035 volumes developed for the "With Regents Road Bridge, Without Genesee Avenue Widening" scenario were used to develop the forecast 2035 traffic volumes for the remaining "Without Regents Road Bridge, With Genesee Avenue Widening" and the With Regents Road Bridge, With Genesee Avenue Widening" scenarios.

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The project trip distribution in the Traffic Impact Analysis Report, which assumes that neither the Regents Road Bridge nor the Genesee Avenue widening occurs, shows that 2% of the project trips use Regents Road south of Nobel Drive, and 4% use Genesee Avenue south of Nobel Drive. It is assumed that the construction of the Regents Road Bridge would increase the project trip distribution on Regents Road by 1%, and decrease the distribution on Genesee Avenue by 1%. If Genesee Avenue is widened to six lanes, it is assumed that the distribution on Genesee Avenue would increase by 1% and the distribution on the I-805 freeway south of La Jolla Village Drive would decrease by 1%. **Exhibits 1 through 3** illustrate the project trip distribution for each of the alternate roadway network scenarios under the Phase III (2035) conditions.

Phase III (2035) Conditions – With Regents Road Bridge, Without Genesee Avenue Widening

Exhibits 4 and 5 illustrate the forecast Phase III (2035) conditions peak hour intersection volumes without and with the proposed project, respectively; with the Regents Road Bridge and without the Genesee Avenue widening. **Exhibits 6 and 7** illustrate the forecast Phase III (2035) conditions ADT volumes without and with the proposed project, respectively; with the Regents Road Bridge and without the Genesee Avenue widening.

Table 1 summarizes the Phase III (2035) conditions peak hour intersection levels of service without and with the proposed project; with the Regents Road Bridge constructed and without the widening of Genesee Avenue between Nobel Drive and SR-52.

As shown in Table 1, the following four intersections are forecast to be significantly impacted by the proposed project:

- Genesee Avenue / La Jolla Village Drive
- La Jolla Village Drive / Towne Centre Drive
- Regents Road / La Jolla Village Drive
- La Jolla Village Drive / Villa La Jolla Drive

The four intersections listed above are the same four intersections that were identified to be significantly impacted by the Phase III project in the Traffic Impact Analysis Report, which assumes that neither the Regents Road Bridge nor the Genesee Avenue widening occurs. The results of this analysis show that there would be no changes in significant impacts at the study intersections if the Regents Road Bridge is built and Genesee Avenue is not widened.

Table 2 summarizes the Phase III (2035) conditions roadway segment levels of service without and with the proposed project; with the Regents Road Bridge and without the Genesee Avenue widening.

As shown in Table 2, no significant impacts were identified on the study roadway segments under Phase III (2035) conditions with the Regents Road Bridge and without the Genesee Avenue widening. These findings are consistent with the findings of the Traffic Impact Analysis Report.

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Table 1
Phase III (2035) With Regents Road Bridge, Without Genesee Avenue Widening
Peak Hour Intersection Levels of Service

Study Intersection	Phase III (2035) Without Project				Phase III (2035) With Project				Δ Delay		Sig ?
	AM		PM		AM		PM		AM	PM	
	Delay-LOS		Delay-LOS		Delay-LOS		Delay-LOS				
1. Genesee Ave / N. Torrey Pines Rd	27.4	C	33.6	C	27.4	C	33.8	C	0.0	0.2	
2. Genesee Ave / Science Center	8.3	A	20.7	C	8.6	A	21.0	C	0.3	0.3	
3. Genesee Ave / I-5 SB Ramps	49.4	D	30.2	C	49.7	D	34.8	C	0.3	4.6	
4. Genesee Ave / I-5 NB Ramps	26.6	C	32.8	C	27.5	C	38.0	D	0.9	5.2	
5. Genesee Ave / Scripps Hospital Driveway	22.2	C	23.0	C	30.9	C	30.3	C	8.7	7.3	
6. Genesee Ave / Campus Point Dr	35.7	D	47.1	D	38.4	D	54.6	D	2.7	7.5	
7. Genesee Ave / Regents Rd	20.4	C	18.9	B	22.5	C	19.4	B	2.1	0.5	
8. Genesee Ave / Eastgate Mall	46.8	D	45.1	D	51.4	D	46.4	D	4.6	1.3	
9. Genesee Ave / Executive Dr	23.9	C	31.2	C	24.0	C	31.2	C	0.1	0.0	
10. Genesee Ave / La Jolla Village Dr	50.2	D	56.1	E	52.9	D	60.0	E	2.7	3.9	Yes
11. Genesee Ave / Nobel Dr	43.9	D	47.4	D	44.6	D	47.8	D	0.7	0.2	
12. Eastgate Mall / Towne Centre Dr	33.0	C	43.8	D	33.4	C	45.1	D	0.4	1.3	
13. Eastgate Mall / Judicial Dr	28.9	C	30.7	C	28.9	C	30.7	C	0.0	0.0	
14. La Jolla Village Dr / Towne Centre Dr	49.9	D	66.3	E	52.8	D	73.7	E	2.9	5.4	Yes
15. La Jolla Village Dr / I-805 SB Ramps ¹	See footnote ¹										
16. La Jolla Village Dr / I-805 NB Ramps ¹	See footnote ¹										
17. Regents Rd / Health Sciences Dr	23.5	C	39.1	D	23.5	C	43.1	D	0.0	4.0	
18. Regents Rd / Eastgate Mall	37.6	D	24.3	C	46.8	D	24.3	C	9.2	0.0	
19. Regents Rd / Miramar St-Executive Dr	17.7	B	36.4	D	21.1	C	37.7	D	3.4	1.3	
20. Regents Rd / La Jolla Village Dr	57.6	E	82.0	F	59.1	E	87.7	F	1.5	5.7	Yes
21. Regents Rd / Nobel Dr	43.5	D	41.7	D	43.8	D	43.5	D	0.3	1.8	
22. Gilman Dr / Villa La Jolla Dr	27.9	C	98.9	F	27.9	C	98.9	F	0.0	0.0	No
23. Gilman Dr / Voigt Dr	26.7	C	29.9	C	26.7	C	29.9	C	0.0	0.0	
24. Voigt Drive / I-5 DAR	48.2	D	34.2	C	53.0	D	36.1	D	3.0	1.9	
25. Voigt Drive / Campus Point Dr	36.3	D	32.8	C	46.3	D	41.8	D	10.0	9.0	
26. La Jolla Village Dr / Torrey Pines Rd	33.1	C	50.8	D	33.3	C	51.7	D	0.2	0.9	
27. La Jolla Village Dr / La Jolla Scenic Dr	16.2	B	11.5	B	16.2	B	11.5	B	0.0	0.0	
28. La Jolla Village Dr / Gilman Drive EB ²	12.1	B	212.1	F	12.1	B	212.1	F	0.0	0.0	No
29. La Jolla Village Dr / Gilman Drive WB ²	25.0	C	21.4	C	25.0	C	21.4	C	0.0	0.0	
30. La Jolla Village Dr / Villa La Jolla Drive	86.3	F	123.2	F	86.8	F	125.4	F	0.5	2.2	Yes

Notes: Deficient intersection operation shown in bold *Unsignalized intersection
¹The ramps at I-805/La Jolla Village Drive are uncontrolled; no LOS is measured.
² Eastbound and westbound through movements at La Jolla Village Drive / Gilman Drive are uncontrolled and excluded from the analysis.

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Table 2
Phase III (2035) With Regents Road Bridge, Without Genesee Avenue Widening
Roadway Segment Levels of Service

Roadway	Segment	Phase III (2035) Without Project			Phase III (2035) With Project			Sig?		
		LOS E Capacity	ADT	V/C	LOS	Project Trips	ADT		V/C	LOS
Genesee Ave	N. Torrey Pines Road to Sciences Center	60,000	47,000	0.78	C	440	47,440	0.79	C	0.01
	Sciences Center to I-5 SB Ramps	60,000	49,000	0.85	D	770	51,770	0.86	D	0.01
	I-5 SB to I-5 NB Ramps	60,000	49,000	0.82	C	2,309	51,309	0.86	D	0.04
	I-5 NB Ramps to Scripps Hospital Entrance	60,000	48,500	0.81	C	4,398	52,898	0.88	D	0.07
	Scripps Hospital to Campus Point Drive	60,000	45,000	0.75	C	6,597	51,597	0.86	D	0.11
	Campus Point Dr to Regents Road	60,000	38,000	0.63	C	5,607	43,607	0.73	C	0.09
	Regents Road to Eastgate Mall	50,000	32,800	0.66	C	4,288	37,088	0.74	C	0.09
	Eastgate Mall to Executive Dr	50,000	29,700	0.59	C	2,659	32,359	0.65	C	0.05
	Executive Dr to La Jolla Village Dr	50,000	34,500	0.69	C	1,979	36,479	0.73	C	0.04
	La Jolla Village Dr to Nobel Dr	50,000	30,900	0.62	C	330	31,230	0.62	C	0.01
Eastgate Mall	Nobel Dr to Decoro Street	40,000	29,500	0.74	C	330	29,830	0.75	C	0.01
	Regents Road to Genesee Ave	15,000	7,000	0.47	B	0	7,000	0.47	B	0.00
	Genesee Ave to Towne Centre Dr	30,000	16,000	0.53	C	990	16,990	0.57	C	0.03
	East of Judicial Dr	30,000	10,000	0.33	A	440	10,440	0.35	B	0.01
	Torrey Pines Road to La Jolla Scenic Dr	60,000	49,000	0.82	C	220	49,220	0.82	C	0.00
	La Jolla Scenic Dr to Gilman Dr	60,000	54,000	0.90	D	220	54,220	0.90	D	0.00
	Gilman Dr to Villa La Jolla Dr	60,000	52,000	0.87	D	330	52,330	0.87	D	0.01
	Villa La Jolla Dr to Genesee Ave	60,000	58,000	0.97	E	330	58,330	0.97	E	0.01
	Genesee Ave to Towne Centre Dr	60,000	52,700	0.88	D	1,539	54,239	0.90	D	0.03
	Towne Centre Dr to I-805 SB Ramps	80,000	67,700	0.86	E	1,649	69,349	0.87	E	0.01
Regents Rd	East of I-805 NB Ramps	60,000	63,000	1.05	F	220	63,220	1.05	F	0.00
	Genesee Ave to Health Sciences Dr	40,000	8,200	0.21	A	1,319	9,519	0.24	A	0.03
	Health Sciences Dr to Eastgate Mall	40,000	16,200	0.41	B	1,319	17,519	0.44	B	0.03
	Eastgate Mall to Miramar Street-Executive Dr	40,000	18,300	0.46	B	1,319	19,619	0.49	B	0.03
	Miramar St-Executive Dr to La Jolla Village Dr	40,000	24,500	0.61	C	1,100	25,600	0.64	C	0.03
	La Jolla Village Dr to Nobel Dr	45,000	17,750	0.39	B	960	18,410	0.41	B	0.01
	South of Nobel Dr	40,000	20,500	0.51	B	330	20,830	0.52	B	0.01
	Voigt Dr to Villa La Jolla Dr	10,000	9,800	0.98	E	0	9,800	0.98	E	0.00
	I-5 to Scripps Hospital Entrance	15,000	12,000	0.80	D	880	12,880	0.86	D	0.06
	Scripps Hospital to Campus Point Dr	15,000	12,000	0.80	D	880	12,880	0.87	D	0.07
Villa La Jolla Dr	Gilman Dr to La Jolla Village Dr	60,000	14,000	0.23	A	0	14,000	0.23	A	0.00

Note: Efficient LOS operation shown in bold

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Friends of Rose Canyon (July 15, 2016)

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Phase III (2035) Conditions – Without Regents Road Bridge, With Genesee Avenue Widening

Exhibits 8 and 9 illustrate the forecast Phase III (2035) conditions peak hour intersection volumes without and with the proposed project, respectively; without the Regents Road Bridge and with the Genesee Avenue widening. Exhibits 10 and 11 illustrate the forecast Phase III (2035) conditions ADT volumes without and with the proposed project, respectively; without the Regents Road Bridge and with the Genesee Avenue widening.

Table 3 summarizes the Phase III (2035) conditions peak hour intersection levels of service without and with the proposed project; without the Regents Road Bridge and with the widening of Genesee Avenue between Nobel Drive and SR-52.

As shown in Table 3, the following four intersections are forecast to be significantly impacted by the proposed project:

- Genesee Avenue / La Jolla Village Drive
- La Jolla Village Drive / Towne Centre Drive
- Regents Road / La Jolla Village Drive
- La Jolla Village Drive / Villa La Jolla Drive

The four intersections listed above are the same four intersections that were identified to be significantly impacted by the Phase III project in the Traffic Impact Analysis Report, which assumes that neither the Regents Road Bridge nor the Genesee Avenue widening occurs. The results of this analysis show that there would be no changes in significant impacts at the study intersections if the Regents Road Bridge is not built and Genesee Avenue is widened.

Table 4 summarizes the Phase III (2035) conditions roadway segment levels of service without and with the proposed project; without the Regents Road Bridge and with the Genesee Avenue widening.

As shown in Table 4, no significant impacts were identified on the study roadway segments under Phase III (2035) conditions without the Regents Road Bridge and with the Genesee Avenue widening. These findings are consistent with the findings of the Traffic Impact Analysis Report.

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Table 3
Phase III (2035) Without Regents Road Bridge, With Genesee Avenue Widening
Peak Hour Intersection Levels of Service

Study Intersection	Phase III (2035) Without Project				Phase III (2035) With Project				Δ Delay		Sig ?
	AM		PM		AM		PM		AM	PM	
	Delay-LOS	Delay-LOS	Delay-LOS	Delay-LOS	Delay-LOS	Delay-LOS	Delay-LOS	Delay-LOS			
1. Genesee Ave / N. Torrey Pines Rd	27.4	C	33.6	C	27.4	C	33.8	C	0.0	0.2	
2. Genesee Ave / Science Center	8.3	A	20.7	C	8.6	A	21.0	C	0.3	0.3	
3. Genesee Ave / I-5 SB Ramps	49.4	D	30.2	C	49.7	D	34.8	C	0.3	4.6	
4. Genesee Ave / I-5 NB Ramps	26.6	C	32.9	C	27.6	C	38.2	D	1.0	5.3	
5. Genesee Ave / Scripps Hospital Driveway	22.2	C	23.0	C	30.9	C	30.3	C	8.7	7.3	
6. Genesee Ave / Campus Point Dr	35.8	D	47.2	D	38.5	D	54.8	D	2.7	7.6	
7. Genesee Ave / Regents Rd	19.8	B	18.8	B	21.8	C	19.1	B	2.0	0.3	
8. Genesee Ave / Eastgate Mall	47.3	D	45.2	D	52.6	D	46.7	D	5.3	1.5	
9. Genesee Ave / Executive Dr	24.0	C	31.1	C	24.3	C	31.1	C	0.3	0.0	
10. Genesee Ave / La Jolla Village Dr	52.5	D	59.6	E	56.3	E	63.8	E	3.8	4.2	Yes
11. Genesee Ave / Nobel Dr	44.0	D	50.9	D	44.9	D	51.3	D	0.9	0.4	
12. Eastgate Mall / Towne Centre Dr	33.0	C	43.8	D	33.4	C	45.1	D	0.4	1.3	
13. Eastgate Mall / Judicial Dr	28.9	C	30.7	C	28.9	C	30.7	C	0.0	0.0	
14. La Jolla Village Dr / Towne Centre Dr	49.3	D	68.3	E	52.1	D	73.4	E	2.8	5.1	Yes
15. La Jolla Village Dr / I-805 SB Ramps ¹	See footnote ¹										
16. La Jolla Village Dr / I-805 NB Ramps ¹	See footnote ¹										
17. Regents Rd / Health Sciences Dr	23.4	C	38.2	D	23.4	C	41.8	D	0.0	3.6	
18. Regents Rd / Eastgate Mall	35.9	D	24.1	C	43.6	D	24.1	C	7.7	0.0	
19. Regents Rd / Miramar St-Executive Dr	17.5	B	36.0	D	21.0	C	37.1	D	3.5	1.1	
20. Regents Rd / La Jolla Village Dr	54.5	D	74.7	E	55.7	E	80.1	F	1.2	5.4	Yes
21. Regents Rd / Nobel Dr	42.8	D	35.1	D	43.0	D	36.1	D	0.2	1.0	
22. Gilman Dr / Villa La Jolla Dr	27.9	C	98.9	F	27.9	C	98.9	F	0.0	0.0	No
23. Gilman Dr / Voigt Dr	26.7	C	29.9	C	26.7	C	29.9	C	0.0	0.0	
24. Voigt Drive / I-5 DAR	48.2	D	34.2	C	53.0	D	36.1	D	3.0	1.9	
25. Voigt Drive / Campus Point Dr	36.3	D	32.8	C	46.3	D	41.8	D	10.0	9.0	
26. La Jolla Village Dr / Torrey Pines Rd	33.1	C	50.8	D	33.3	C	51.7	D	0.2	0.9	
27. La Jolla Village Dr / La Jolla Scenic Dr	16.2	B	11.5	B	16.2	B	11.5	B	0.0	0.0	
28. La Jolla Village Dr / Gilman Drive EB ²	12.1	B	212.1	F	12.1	B	212.1	F	0.0	0.0	No
29. La Jolla Village Dr / Gilman Drive WB ²	25.0	C	21.4	C	25.0	C	21.4	C	0.0	0.0	
30. La Jolla Village Dr / Villa La Jolla Drive	86.3	F	123.2	F	86.8	F	125.4	F	0.5	2.2	Yes

Notes: Deficient intersection operation shown in **bold** *Unsignalized intersection
¹The ramps at I-805/La Jolla Village Drive are uncontrolled; no LOS is measured.
²Eastbound and westbound through movements at La Jolla Village Drive / Gilman Drive are uncontrolled and excluded from the analysis.

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Table 4
Phase III (2035) Without Regents Road Bridge, With Genesee Avenue Widening
Roadway Segment Levels of Service

Roadway	Segment	Phase III (2035) Without Project			Phase III (2035) With Project					
		LOS E Capacity	ADT	V/C	LOS	Project Trips	ADT	V/C	LOS	A V/C
Genesee Ave	N. Torrey Phibes Road to Science Center	60,000	47,000	0.78	C	440	47,440	0.79	C	0.01
	Science Center to I-5 SB Ramps	60,000	51,000	0.85	D	770	51,770	0.86	D	0.01
	I-5 SB to I-5 NB Ramps	60,000	49,000	0.82	C	2,309	51,309	0.86	D	0.04
	I-5 NB Ramps to Scripps Hospital Entrance	60,000	48,600	0.81	C	4,398	52,998	0.88	D	0.07
	Scripps Hospital to Campus Point Drive	60,000	45,150	0.75	C	6,587	51,747	0.86	D	0.11
	Campus Point Dr. to Regents Road	60,000	38,200	0.64	C	5,667	43,867	0.73	C	0.09
	Regents Road to Eastgate Mall	50,000	33,200	0.66	C	4,398	37,598	0.75	C	0.09
	Eastgate Mall to Executive Dr	50,000	30,350	0.61	C	2,749	33,099	0.66	C	0.05
	Executive Dr to La Jolla Village Dr	50,000	35,000	0.70	C	2,089	37,089	0.75	C	0.04
	La Jolla Village Dr to Nobel Dr	50,000	35,000	0.70	C	560	35,560	0.71	C	0.01
Eastgate Mall	Nobel Dr to Decoro Street	40,000	38,000	0.76	C	550	38,550	0.77	C	0.01
	Regents Road to Genesee Ave	15,000	7,000	0.47	B	0	7,000	0.47	B	0.00
	Genesee Ave to Towne Centre Dr	30,000	16,000	0.53	C	990	16,990	0.57	C	0.03
	East of Judicial Dr	30,000	10,000	0.33	A	440	10,440	0.35	B	0.01
	Torrey Phibes Road to La Jolla Scenic Dr	60,000	49,000	0.82	C	220	49,220	0.82	C	0.00
	La Jolla Scenic Dr to Gilman Dr	60,000	54,000	0.90	D	220	54,220	0.90	D	0.00
	Villa La Jolla Dr to Genesee Ave	60,000	52,000	0.87	D	330	52,330	0.87	D	0.01
	Villa La Jolla Dr to Genesee Ave	60,000	58,000	0.97	E	330	58,330	0.97	E	0.01
	Genesee Ave to Towne Centre Dr	60,000	53,300	0.89	D	1,429	54,729	0.91	D	0.02
	Towne Centre Dr to I-805 SB Ramps	60,000	67,300	0.86	E	1,539	68,839	0.86	E	0.00
Regents Rd	Genesee Ave to Health Sciences Dr	40,000	8,000	0.20	A	1,209	9,209	0.23	A	0.03
	Health Sciences Dr to Eastgate Mall	40,000	16,000	0.40	B	1,209	17,209	0.43	B	0.03
	Eastgate Mall to Miramar Street-Executive Dr	40,000	18,000	0.45	B	1,209	19,209	0.48	B	0.03
	Miramar St-Executive Dr to La Jolla Village Dr	40,000	24,000	0.60	C	990	24,990	0.62	C	0.02
	La Jolla Village Dr to Nobel Dr	45,000	14,000	0.31	A	550	14,550	0.32	A	0.01
	South of Nobel Dr	40,000	13,000	0.33	A	220	13,220	0.33	A	0.01
	Vogtl Dr to Villa La Jolla Dr	10,000	9,800	0.98	E	0	9,800	0.98	E	0.00
	I-5 to Scripps Hospital Entrance	15,000	12,000	0.80	D	880	12,880	0.85	D	0.06
	Scripps Hospital to Campus Point Dr	15,000	12,000	0.80	D	880	12,880	0.87	D	0.07
	Villa La Jolla Dr	60,000	14,000	0.23	A	0	14,000	0.23	A	0.00

Note: Deficient LOS operation shown in bold

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Phase III (2035) Conditions – With Regents Road Bridge, With Genesee Avenue Widening

Exhibits 12 and 13 illustrate the forecast Phase III (2035) conditions peak hour intersection volumes without and with the proposed project, respectively; with the Regents Road Bridge and with the Genesee Avenue widening. Exhibits 14 and 15 illustrate the forecast Phase III (2035) conditions ADT volumes without and with the proposed project, respectively; with the Regents Road Bridge and with the Genesee Avenue widening.

Table 5 summarizes the Phase III (2035) conditions peak hour intersection levels of service without and with the proposed project; with the Regents Road Bridge and with the widening of Genesee Avenue between Nobel Drive and SR-52.

As shown in Table 5, the following four intersections are forecast to be significantly impacted by the proposed project:

- Genesee Avenue / La Jolla Village Drive
- La Jolla Village Drive / Towne Centre Drive
- Regents Road / La Jolla Village Drive
- La Jolla Village Drive / Villa La Jolla Drive

The four intersections listed above are the same four intersections that were identified to be significantly impacted by the Phase III project in the Traffic Impact Analysis Report, which assumes that neither the Regents Road Bridge nor the Genesee Avenue widening occurs. The results of this analysis show that there would be no changes in significant impacts at the study intersections if the Regents Road Bridge is built and Genesee Avenue is widened.

Table 6 summarizes the Phase III (2035) conditions roadway segment levels of service without and with the proposed project; with the Regents Road Bridge and with the Genesee Avenue widening.

As shown in Table 6, no significant impacts were identified on the study roadway segments under Phase III (2035) conditions with the Regents Road Bridge and with the Genesee Avenue widening. These findings are consistent with the findings of the Traffic Impact Analysis Report.

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Table 5
Phase III (2035) With Regents Road Bridge, With Genesee Avenue Widening
Peak Hour Intersection Levels of Service

Study Intersection	Phase III (2035) Without Project				Phase III (2035) With Project				Δ Delay		Sig ?
	AM		PM		AM		PM		AM	PM	
	Delay-LOS		Delay-LOS		Delay-LOS		Delay-LOS				
1. Genesee Ave / N. Torrey Pines Rd	27.4	C	33.6	C	27.4	C	33.8	C	0.0	0.2	
2. Genesee Ave / Science Center	8.3	A	20.7	C	8.6	A	21.0	C	0.3	0.3	
3. Genesee Ave / I-5 SB Ramps	49.4	D	30.2	C	49.7	D	34.8	C	0.3	4.6	
4. Genesee Ave / I-5 NB Ramps	26.6	C	32.9	C	27.6	C	38.2	D	1.0	5.3	
5. Genesee Ave / Scripps Hospital Driveway	22.2	C	23.0	C	30.9	C	30.3	C	8.7	7.3	
6. Genesee Ave / Campus Point Dr	35.8	D	47.2	D	39.5	D	54.8	D	2.7	7.6	
7. Genesee Ave / Regents Rd	20.4	C	18.9	B	22.6	C	19.4	B	2.2	0.5	
8. Genesee Ave / Eastgate Mall	46.8	D	45.2	D	51.4	D	46.5	D	4.6	1.3	
9. Genesee Ave / Executive Dr	23.9	C	31.2	C	24.0	C	31.2	C	0.1	0.0	
10. Genesee Ave / La Jolla Village Dr	51.1	D	57.9	E	54.2	D	61.8	E	3.1	3.9	Yes
11. Genesee Ave / Nobel Dr	42.2	D	48.6	D	42.8	D	49.0	D	0.6	0.4	
12. Eastgate Mall / Towne Centre Dr	33.0	C	43.8	D	33.4	C	45.1	D	0.4	1.3	
13. Eastgate Mall / Judicial Dr	28.9	C	30.7	C	28.9	C	30.7	C	0.0	0.0	
14. La Jolla Village Dr / Towne Centre Dr	49.5	D	68.0	E	52.3	D	73.1	E	2.8	5.1	Yes
15. La Jolla Village Dr / I-805 SB Ramps ¹	See footnote ¹										
16. La Jolla Village Dr / I-805 NB Ramps ¹	See footnote ¹										
17. Regents Rd / Health Sciences Dr	23.5	C	39.1	D	23.5	C	43.1	D	0.0	4.0	
18. Regents Rd / Eastgate Mall	37.6	D	24.3	C	46.8	D	24.3	C	9.2	0.0	
19. Regents Rd / Miramar St-Executive Dr	17.7	B	36.4	D	20.9	C	37.7	D	3.2	1.3	
20. Regents Rd / La Jolla Village Dr	57.5	E	81.6	F	59.0	E	87.3	F	1.5	5.7	Yes
21. Regents Rd / Nobel Dr	43.5	D	41.7	D	43.8	D	43.4	D	0.3	1.7	
22. Gilman Dr / Villa La Jolla Dr	27.9	C	98.9	F	27.9	C	98.9	F	0.0	0.0	No
23. Gilman Dr / Voigt Dr	26.7	C	29.9	C	26.7	C	29.9	C	0.0	0.0	
24. Voigt Drive / I-5 DAR	48.2	D	34.2	C	53.0	D	36.1	D	3.0	1.9	
25. Voigt Drive / Campus Point Dr	36.3	D	32.8	C	46.3	D	41.8	D	10.0	9.0	
26. La Jolla Village Dr / Torrey Pines Rd	33.1	C	50.8	D	33.3	C	51.7	D	0.2	0.9	
27. La Jolla Village Dr / La Jolla Scenic Dr	16.2	B	11.5	B	16.2	B	11.5	B	0.0	0.0	
28. La Jolla Village Dr / Gilman Drive EB ²	12.1	B	212.1	F	12.1	B	212.1	F	0.0	0.0	No
29. La Jolla Village Dr / Gilman Drive WB ²	25.0	C	21.4	C	25.0	C	21.4	C	0.0	0.0	
30. La Jolla Village Dr / Villa La Jolla Drive	86.3	F	123.2	F	86.8	F	125.4	F	0.5	2.2	Yes

Notes: ¹Deficient intersection operation shown in bold ²Unsignalized intersection
¹The ramps at I-805/La Jolla Village Drive are uncontrolled; no LOS is measured.
²Eastbound and westbound through movements at La Jolla Village Drive / Gilman Drive are uncontrolled and excluded from the analysis.

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Friends of Rose Canyon (July 15, 2016)

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Table 6
Phase III (2035) With Regents Road Bridge, With Genesee Avenue Widening
Roadway Segment Levels of Service

Roadway	Segment	LOS E Capacity	Phase III (2035) Without Project			Phase III (2035) With Project			Sig ?	
			ADT	V/C	LOS	ADT	V/C	LOS		A V/C
Genesee Ave	N. Torrey Pines Road to Science Center	80,000	47,000	0.78	C	440	47,440	0.79	C	0.01
	Science Center to I-5 SB Ramps	60,000	51,000	0.85	D	770	51,770	0.86	D	0.01
	I-5 SB to I-5 NB Ramps	60,000	49,000	0.82	C	2,309	51,309	0.86	D	0.04
	I-5 NB Ramps to Scripps Hospital Entrance	60,000	48,500	0.81	C	4,398	52,998	0.89	D	0.07
	Scripps Hospital to Campus Point Drive	60,000	45,150	0.75	C	6,597	51,747	0.86	D	0.11
	Campus Point Dr to Regents Road	60,000	38,200	0.64	C	5,607	43,807	0.73	C	0.09
	Regents Road to Eastgate Mall	50,000	33,000	0.66	C	4,288	37,288	0.75	C	0.09
	Eastgate Mall to Executive Dr	50,000	30,000	0.60	C	2,639	32,639	0.65	C	0.05
	Executive Dr to La Jolla Village Dr	50,000	35,000	0.70	C	1,978	36,978	0.74	C	0.04
	La Jolla Village Dr to Nobel Dr	50,000	32,900	0.66	C	440	33,340	0.67	C	0.01
Eastgate Mall	Nobel Dr to Decoro Street	40,000	33,500	0.67	C	440	33,940	0.68	C	0.01
	Regents Road to Genesee Ave	15,000	7,000	0.47	B	0	7,000	0.47	B	0.00
	Genesee Ave to Towne Centre Dr	30,000	16,000	0.53	C	990	16,990	0.57	C	0.03
	East of Judicial Dr	30,000	10,000	0.33	A	440	10,440	0.35	B	0.01
La Jolla Village Dr	Torrey Pines Road to La Jolla Scenic Dr	60,000	49,000	0.82	C	220	49,220	0.82	C	0.00
	La Jolla Scenic Dr to Gilman Dr	60,000	54,000	0.90	D	220	54,220	0.90	D	0.00
	Gilman Dr to Villa La Jolla Dr	60,000	52,000	0.87	D	330	52,330	0.87	D	0.01
	Villa La Jolla Dr to Genesee Ave	60,000	58,000	0.97	E	330	58,330	0.97	E	0.01
	Genesee Ave to Towne Centre Dr	60,000	55,300	0.92	D	1,429	54,729	0.91	D	0.02
	Towne Centre Dr to I-805 SB Ramps	60,000	67,500	0.86	E	1,539	69,039	0.86	E	0.00
Regents Rd	East of I-805 NB Ramps	60,000	63,000	1.05	F	220	63,220	1.05	F	0.00
	Genesee Ave to Health Sciences Dr	40,000	8,200	0.21	A	1,319	9,519	0.24	A	0.03
	Health Sciences Dr to Eastgate Mall	40,000	16,200	0.41	B	1,319	17,519	0.44	B	0.03
	Eastgate Mall to Miramar Street-Executive	40,000	18,300	0.46	C	1,319	19,619	0.49	C	0.03
	Miramar St-Executive Dr to La Jolla Village	40,000	24,500	0.61	C	1,100	25,600	0.64	D	0.03
	La Jolla Village Dr to Nobel Dr	45,000	17,750	0.39	B	660	18,410	0.41	B	0.01
Gilman Dr	South of Nobel Dr	40,000	20,500	0.51	C	330	20,830	0.52	C	0.01
	Voigt Dr to Villa La Jolla Dr	10,000	9,000	0.90	E	0	9,000	0.90	E	0.00
	I-5 to Scripps Hospital Entrance	15,000	12,000	0.80	D	880	12,880	0.86	D	0.06
Villa La Jolla Dr	Scripps Hospital to Campus Point Dr	15,000	12,900	0.80	D	880	12,880	0.87	D	0.07
	Gilman Dr to La Jolla Village Dr	60,000	14,000	0.23	A	0	14,000	0.23	A	0.00

Note: Dependent LOS operation shown in bold

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Mr. Bruce Rainey
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Table 7 provides a summary of the Phase III (2035) conditions peak hour intersection analysis under all four roadway network scenarios, including the "without Regents Road Bridge, without Genesee Avenue widening" scenario from the Traffic Impact Analysis Report.

Table 8 summarizes the Phase III (2035) conditions roadway segment analysis under the four roadway network scenarios that include the "without Regents Road Bridge, without Genesee Avenue widening" scenario from the Traffic Impact Analysis Report.

If you should have any questions regarding this analysis, please call me at (760) 603-6246.

Sincerely,



Dawn L. Wilson, P.E., T.E.
Traffic Engineer
Transportation Services

RESPONSE

Friends of Rose Canyon (July 15, 2016)

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Table 7
Phase III (2035) Conditions – Alternate Roadway Network Scenarios
Intersection Level of Service Summary (Delay & LOS)

Study Intersection	2035 Without Regents Bridge, Without Genesee Widening (from TIA Report)						2035 With Regents Bridge, Without Genesee Widening						2035 Without Regents Bridge, With Genesee Widening						2035 With Regents Bridge, With Genesee Widening						
	No Project		With Project		No Project		With Project		No Project		With Project		No Project		With Project		No Project		With Project		No Project		With Project		
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1. Genesee Ave / N. Torrey Pines Road	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.6	27.4	33.8	
2. Genesee Ave / Science Center	8.3	20.7	8.6	21.0	8.3	20.7	8.6	21.0	8.3	20.7	8.6	21.0	8.3	20.7	8.6	21.0	8.3	20.7	8.6	21.0	8.3	20.7	8.6	21.0	
3. Genesee Ave / I-5 SB Ramps	49.4	30.2	49.7	34.8	49.4	30.2	49.7	34.8	49.4	30.2	49.7	34.8	49.4	30.2	49.7	34.8	49.4	30.2	49.7	34.8	49.4	30.2	49.7	34.8	
4. Genesee Ave / I-5 NB Ramps	26.6	32.8	27.5	38.0	26.6	32.8	27.5	38.0	26.6	32.9	27.6	38.2	26.6	32.9	27.6	38.2	26.6	32.9	27.6	38.2	26.6	32.9	27.6	38.2	
5. Genesee Ave / Scripps Hospital Dwy	22.2	23.0	30.9	30.3	22.2	23.0	30.9	30.3	22.2	23.0	30.9	30.3	22.2	23.0	30.9	30.3	22.2	23.0	30.9	30.3	22.2	23.0	30.9	30.3	
6. Genesee Ave / Campus Point Drive	35.7	47.1	38.4	54.6	35.7	47.1	38.4	54.6	35.8	47.2	38.5	54.8	35.8	47.2	38.5	54.8	35.8	47.2	38.5	54.8	35.8	47.2	38.5	54.6	
7. Genesee Ave / Regents Road	19.8	16.8	21.8	19.1	20.4	18.9	22.5	19.4	19.8	16.8	21.8	19.1	20.4	18.9	22.5	19.4	19.8	16.8	21.8	19.1	20.4	18.9	22.6	19.4	
8. Genesee Ave / Eastgate Mall	47.1	45.2	52.1	46.6	46.8	45.1	51.4	46.4	47.3	45.2	52.5	46.7	46.8	45.2	51.4	46.5	46.8	45.2	51.4	46.5	46.8	45.2	51.4	46.5	
9. Genesee Ave / Executive Drive	24.0	31.1	24.2	31.1	23.9	31.2	24.0	31.2	24.0	31.1	24.3	31.1	23.9	31.2	24.0	31.2	23.9	31.2	24.0	31.2	23.9	31.2	24.0	31.2	
10. Genesee Ave / La Jolla Village Drive	51.3	58.2	54.8	62.5	50.2	56.1	52.9	60.0	52.5	59.6	56.3	63.8	51.1	57.9	54.2	61.8	51.1	57.9	54.2	61.8	51.1	57.9	54.2	61.8	
11. Genesee Ave / Nobel Drive	47.4	49.0	48.8	49.3	43.9	47.4	44.6	47.6	44.0	50.9	44.9	51.3	42.2	48.6	42.8	48.0	42.2	48.6	42.8	48.0	42.2	48.6	42.8	48.0	
12. Eastgate Mall / Towne Centre Drive	33.0	43.6	33.4	45.1	33.0	43.8	33.4	45.1	33.0	43.8	33.4	45.1	33.0	43.8	33.4	45.1	33.0	43.8	33.4	45.1	33.0	43.8	33.4	45.1	
13. Eastgate Mall / Judicial Drive	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	28.9	30.7	
14. La Jolla Village Dr / Towne Centre Drive	50.8	68.8	58.7	74.3	49.9	68.3	52.8	73.7	49.3	68.3	52.1	73.4	49.5	68.0	52.3	73.1	49.5	68.0	52.3	73.1	49.5	68.0	52.3	73.1	
15. La Jolla Village Dr / I-805 SB Ramps																									
16. La Jolla Village Dr / I-805 NB Ramps																									

See footnote

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Friends of Rose Canyon (July 15, 2016)

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Table 7
Phase III (2035) Conditions – Alternate Roadway Network Scenarios
Intersection Level of Service Summary (Delay & LOS)

Study Intersection	2035 Without Regents Bridge, Without Genesee Widening (from TIA Report)				2035 With Regents Bridge, Without Genesee Widening				2035 Without Regents Bridge, With Genesee Widening				2035 With Regents Bridge, With Genesee Widening			
	No Project		With Project		No Project		With Project		No Project		With Project		No Project		With Project	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
17. Regents Road / Health Sciences Drive	23.4 C	38.2 D	23.4 C	41.8 D	23.5 C	38.1 D	23.5 C	43.1 D	23.4 C	39.2 D	23.4 C	41.8 D	23.5 C	39.1 D	23.5 C	43.1 D
18. Regents Road / Eastgate Mall	35.8 D	24.1 C	43.6 D	24.1 C	37.6 D	24.3 C	48.8 D	24.3 C	36.9 D	24.1 C	43.6 D	24.1 C	37.6 D	24.3 C	46.8 D	24.3 C
19. Regents Road / Miramar St-Executive	17.5 B	36.0 D	21.0 B	37.1 D	17.7 B	36.4 D	21.1 B	37.7 D	17.5 B	36.0 D	17.7 B	36.4 D	17.7 B	36.4 D	20.9 C	37.7 D
20. Regents Road / La Jolla Village Drive	54.6 D	74.8 E	55.7 E	80.2 F	57.6 E	82.0 F	59.1 E	87.7 F	54.5 E	74.7 E	55.7 E	80.1 E	57.5 E	81.8 E	59.0 E	87.3 F
21. Regents Road / Robert Drive	43.8 D	35.1 D	43.0 D	36.1 D	43.5 D	41.7 D	43.8 D	43.5 D	42.8 D	35.1 D	43.0 D	36.1 D	43.5 D	41.7 D	43.8 D	43.4 D
22. Gilman Drive / Villa La Jolla Drive	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F	27.9 C	98.9 F
23. Gilman Drive / Voigt Drive*	26.7 C	28.9 C	26.7 C	29.9 C	26.7 C	28.9 C	26.7 C	29.9 C	26.7 C	28.9 C	26.7 C	29.9 C	26.7 C	28.9 C	26.7 C	29.9 C
24. Voigt Drive / I-5 DAR	48.2 D	34.2 C	53.0 D	36.1 C	48.2 D	34.2 C	53.0 D	36.1 C	48.2 D	34.2 C	53.0 D	36.1 C	48.2 D	34.2 C	53.0 D	36.1 C
25. Voigt Drive / Campus Point Drive	35.3 D	32.8 C	46.3 D	45.7 D	36.3 D	32.8 C	46.3 D	41.8 D	36.3 D	32.8 C	46.3 D	41.8 D	36.3 D	32.8 C	46.3 D	41.8 D
26. La Jolla Village Dr / Torrey Pines Road	33.1 C	50.8 D	33.3 C	51.7 D	33.1 C	50.8 D	33.3 C	51.7 D	33.1 C	50.8 D	33.3 C	51.7 D	33.1 C	50.8 D	33.3 C	51.7 D
27. La Jolla Village Dr / La Jolla Scenic Drive	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B	16.2 B	11.5 B
28. La Jolla Village Dr / Gilman Dr EB ramp*	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F	12.1 B	212.1 F
29. La Jolla Village Dr / Gilman Dr WB ramp	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C	25.0 C	21.4 C
30. La Jolla Village Dr / Villa La Jolla Drive	86.3 F	123.2 F	86.8 F	125.4 F	86.3 F	123.2 F	86.8 F	125.4 F	86.3 F	123.2 F	86.8 F	125.4 F	86.3 F	123.2 F	86.8 F	125.4 F
31. Voigt Drive / Scraps Driveway*																

Notes: *Unsignalized intersection
*The ramps at I-805/La Jolla Village Drive are uncontrolled; no LOS is measured, but construction has begun on an interchange reconfiguration.

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June 28, 2016

Ms. Laurel L. Impett, AICP
 Shute, Mihaly & Weinberger LLP
 396 Hayes Street
 San Francisco, California 94102

Subject: **Review of Draft Program Environmental Impact Report
 University Community Plan Amendment – San Diego, California**

Dear Ms. Impett:

On March 14, 2016, MRO Engineers, Inc., submitted to the City of San Diego a letter report documenting our review of the “Existing Conditions Summary” (Version 4, December 2015) completed with respect to the proposed University Community Plan Amendment in San Diego, California. That letter described several technical issues, which have the effect of overstating the average vehicular delay at the study intersections, for example.

We have now had the opportunity to review the “Transportation/Circulation” section of the Draft Program Environmental Impact Report (DPEIR) for the proposed community plan amendment, as well as the traffic analysis technical report (Reference: Kimley-Horn, *University Community Plan Amendment – Transportation Impact Study*, June 2014). Our review revealed that the technical issues we previously identified are also present in the DPEIR analysis and, as such, the analysis overstates the effects of the proposed amendment on traffic operations in the community plan area. The specific issues are summarized below.

REVIEW OF DPEIR TRANSPORTATION/CIRCULATION ANALYSIS

Intersection Analysis

As noted in our March 14, 2016 letter, we generally found that the methodologies and assumptions employed in analyzing intersection operations are appropriate. However, we identified several issues regarding the intersection analyses, each of which would have the effect of incorrectly increasing the intersection delay values resulting from the level of service (LOS) calculations.

Incorrect Existing Intersection Lane Configurations

We found that the intersection lane configurations assumed in the LOS calculations do not always match the actual configurations revealed by field observations. Specific locations where incorrect lane configurations were used are listed below:

1. Genesee Avenue/Decoro Street – As we illustrated in our earlier letter, although the June 2006 *Final Environmental Impact Report for the University City North/South Transportation Corridor Study* assumed two lanes in the eastbound and westbound directions on Decoro Street, the current work assumed only one lane. We provided several aerial images obtained from Google Earth, which clearly indicate that the current assumption is inaccurate, in that both Decoro Street approaches at the intersection operate as two-lane approaches. Use of the correct lane configurations would result in substantially lower average delay values at this location.
2. Multiple Locations – At the locations listed below, the analysis failed to correctly designate “free-flow” right-turn lanes, typically at freeway ramp intersections. At these locations, the right turns do not affect operation of the intersection; the turns generally occur in advance of the intersection, so they don’t pass through the intersection and are not controlled by the signal. The calculations,

FRC-1-12 Comment noted. The commenter has included as an attachment a letter report prepared on June 28, 2016 by MRO Engineers, Inc. analyzing the Transportation Impact Study prepared by Kimley-Horn, which was included as Appendix C in the Draft PEIR. The commenter claims that the Transportation Impact Study overstates the effects on traffic operations in the community plan area.

FRC-1-13 The westbound approach (Decoro Street) measures approximately 24 feet wide. At this approach, there are no parking restrictions and no lane delineations. The eastbound approach (Decoro Street) measures approximately 30 feet wide. At this approach, there are parking restrictions approximately 30 feet from the limit line. There are also no lane delineations for this approach. While the width of both approaches allows for accommodating of two lanes of traffic, without lane delineations it is not guaranteed that vehicles (both vehicles traveling through the intersection and parked vehicles) would maneuver as if there are two lanes of traffic at both the eastbound and westbound approaches. The geometry of this intersection in the Existing Conditions Report prepared in December 2015 is accurate based on the existing lane delineations.

FRC-1-14 The intersection geometry assumptions at the locations identified were checked and modified where necessary.

Ms. Laurel Impett
June 28, 2016
Page 2



however, treat them as though they are passing through the intersection, thereby consuming capacity and increasing delay (and possibly reducing level of service). If these right turns were handled correctly, the delay values would be lower (and, very possibly, substantially so).

- Genesee Ave./I-5 Southbound Ramps
- Genesee Ave./I-5 Northbound Ramps
- Genesee Ave./La Jolla Village Dr.
- Genesee Ave./SR 52 Westbound Ramps
- Regents Rd./Arriba St.
- La Jolla Village Dr./I-5 Southbound Off-ramp
- La Jolla Village Dr./I-5 Northbound Off-ramp
- La Jolla Village Dr./I-805 Southbound Ramps
- La Jolla Village Dr./I-805 Northbound Ramps
- Regents Rd./SR 52 Westbound Ramps

FRC-1-14
cont.

As an example, Attachment A contains a photo of the Genesee Avenue/I-5 Southbound Ramps intersection, where the southbound right turn from the off-ramp to westbound Genesee Avenue has its own lane as it merges onto Genesee, totally avoiding the intersection. The same is true of the right turn from eastbound Genesee Avenue to the southbound I-5 on-ramp. The LOS calculations, though, improperly include these right turns in the intersection.

Peak Hour Factor

The second issue mentioned in our March 14 letter concerns how the peak-hour factor (PHF) has been applied in all of the intersection level of service (LOS) calculations. The Kimley-Horn analysis employed approach-specific PHF factors (i.e., different values for the north, south, east, and west legs of the intersection), while the current edition of the *Highway Capacity Manual* (HCM) says to apply the PHF factor for the intersection as a whole. In fact, the June 2006 *Final Environmental Impact Report for the University City North/South Transportation Corridor Study* correctly applied the overall intersection PHF uniformly to all movements and approaches.

FRC-1-15

Examination of the data collection summary sheets in Appendix C of the Existing Conditions Summary revealed that many of the PHF values for individual intersection approaches are lower than the overall intersection values. Because of the way the PHF is applied, use of the low approach values is likely to result in higher delay values for those approaches and for the intersection as a whole. Correctly applying the PHF, therefore, would result in lower intersections delay values and, in some cases, better levels of service than has been described in the DPEIR.

Road Segment Analysis

Two issues have been identified with respect to the analysis of study area road segments.

Incorrect Roadway Capacity Values

The Kimley-Horn analysis of road segment operations consists of a comparison of the daily traffic volume on the selected road segments to an assumed capacity value. As we described in our March 14 letter, the validity of the analysis is entirely dependent upon the accuracy of the assumed capacity values. We also noted that the assumed roadway capacities do not seem to represent a realistic indication of the maximum traffic volumes that the roads can accommodate.

FRC-1-16

As an example, we pointed out that several road segments were shown to have volume/capacity (V/C) ratios in excess of 1.00 (i.e., beyond capacity) even though under Existing Conditions, it is physically impossible to exceed capacity. In these cases, the assumed capacity value must be too low, and use of a realistic capacity value would result in lower V/C ratios and possibly better levels of service. Thus, the traffic analysis again overstates the impacts of the proposed community plan amendment.

FRC-1-15

The City prefers to use peak-hour factor (PHFs) by approach and acknowledges it may result in more conservative results. PHFs by approach were used instead of intersection-wide PHFs to capture the highest 15-minute volume of each approach within the 1-hour analysis. This is a typical practice in long-term planning. The analysis was for each future alternative, providing a fair comparison between alternatives.

FRC-1-16

Roadway capacities used for the analysis are consistent with the City of San Diego Street Design Manual 2002 adopted on November 25, 2002. In the City of San Diego Street Design Manual 2002, it states; "The ADTs corresponding to the various LOS included in the Traffic Impact Studies Manual are intended as guidelines to correlate the quality of traffic service with typical sections of different street classifications." Roadway capacities are not meant to be the maximum number of daily traffic utilizing the segment. As stated in Chapter 4 of the 2010 Highway Capacity Manual (HCM); "Vehicle capacity is the maximum number of vehicles that can pass a given point during a specified period under prevailing roadway, traffic, and control conditions. This assumes that there is no influence from downstream traffic operations, such as queues backing into the analysis point...The stated capacity for a given system element is a flow rate that can be achieved repeatedly for peak periods of

LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)



Ms. Laurel Impett
June 28, 2016
Page 3

Improper Application of Level of Service Thresholds

For the segment of La Jolla Village Drive between Revelle College Drive and Villa La Jolla, the traffic volume thresholds for various levels of service under Future Conditions have been misapplied. As a result, that segment has been described as being at an unacceptable LOS E when it will actually be at an acceptable LOS D. Specifically, according to DPEIR Table 4.2-9 (p. 4.2-30), that segment has a projected future daily traffic volume of 55,000 vehicles per day (VPD). For that type of road, 55,000 VPD is the maximum volume in the LOS D range, according to the July 1998 City of San Diego "Traffic Impact Study Manual," which is the source for the road segment LOS parameters. Similar information is presented in Table 3-9 (p. 3-7) of the Kimley-Horn report. (See Attachment B.) The DPEIR has made the mistake of adding a "<" (i.e., "less than") symbol in front of the various volume thresholds, which changes the meaning of the thresholds; that symbol is not found in either the city's document or in the Kimley-Horn study.

FRC-1-17

In summary, correctly applying the LOS thresholds indicates that this roadway segment will operate at an acceptable LOS D, and the project-related impact will be less than significant rather than the significant impact indicated in the DPEIR.

Corridor Travel Time and Speed Analyses

Although not included in the DPEIR, the Kimley-Horn technical report describes an evaluation of travel times and speeds along four key corridors in the community plan area. In our March 14 letter, we described the shortcomings of this analysis, particularly with regard to the inconsistencies between the data collected in the field and the travel time simulations developed using the level of service software. Generally, the simulated travel times were longer than observed travel times, which is a significant problem since the future conditions analysis relies exclusively on the simulations. Because the Existing Conditions simulation results were not calibrated to reflect the field data, the travel time simulations do not accurately represent conditions in the Community Plan Area. Further, in most cases, the simulation results indicate higher travel times and slower speeds than the field data, thereby indicating worse conditions than will actually occur upon implementation of the proposed plan amendment.

FRC-1-18

Vehicle-Miles Traveled Estimate

The analysis of air quality impacts is based, in part, on an estimated value for vehicle-miles traveled (VMT). DPEIR p. 4.4-19 states that the project-related net change in key emissions, "... would not exceed applicable daily or annual thresholds established by the City of San Diego." However, it goes on to say that, "... to fully account for the impacts of the Project, the net changes in emissions were adjusted [i.e., increased] by 25 percent to account for the total VMT in the Project area. No evidence is provided to justify this 25 percent increase in VMT, and no basis is provided to substantiate the 25 percent figure.

FRC-1-19

CONCLUSION

Our review of the "Transportation/Circulation" section of the DPEIR for the proposed University Community Plan Amendment in San Diego, California indicated that the traffic impacts associated with the proposed amendment are overstated. We have identified several areas for which a modified analysis approach would indicate that the proposed plan's impacts would be less than the DPEIR has disclosed.

FRC-1-20

sufficient demand. Capacity is not the absolute maximum flow rate observed." Therefore, the Transportation Impact Study provided in Appendix C did adequately analyze roadway capacity values.

FRC-1-17 The commenter discusses that Table 4.2-9, Future Year Roadway Segments with Unacceptable Level of Service, has incorrectly described the segment of La Jolla Village Drive between Revelle College Drive and Villa La Jolla under "Future Year with Project" as being at an unacceptable LOS E. The comment is acknowledged and Table 4.2-9 has been revised. "Future Year with Project" for roadway segment La Jolla Village Drive between Revelle College Drive and Villa La Jolla under "Future Year with Project" has been revised to LOS D.

FRC-1-18 The commenter discusses the inconsistencies between the data collected in the field and the travel time simulations. It is acknowledged that the simulation and field results do not correlate very well. This may be attributed to the simulation methodology. As discussed on page 4-26 of Appendix C, Transportation Impact Study, a speed-based travel time analysis of key corridors within the University community was conducted during peak hours of the day. This analysis evaluates the roadway segment LOS perceived by auto users based on the average speed a vehicle maintains along the corridor. The travel time information along each corridor was calculated using Synchro software and actual travel time information. A comparison of the two methods was provided to depict how well the simulation reflects actual travel times. For the corridor speed-based analysis simulation, the average speed was computed by adding the running time between signalized intersections and did not accurately reflect signal synchronization advantages. The simulation also used the worst 15 minutes for each intersection rather than the same time for all intersections. Corridor travel time speed results were included for the future conditions; however, because the existing simulation and field results did not correlate, no impact or mitigation decisions were made based on the future corridor travel time speed analysis results.

LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)

M R O

ENGINEERS

Ms. Laurel Impett
June 28, 2016
Page 4

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.



Neal K. Liddicoat, P.E.
Traffic Engineering Manager

cc: Ms. Deborah Knight
Dr. Daniel Arovass

FRC-1-20
cont.

FRC-1-19

The comment does not provide a full reference to the statement in Section 4.4, which indicates that "the emission estimates were based on available detailed traffic data (e.g., peak hour speeds) that only account for 75 percent of the total VMT in the Project area. Therefore, to fully account for the impacts of the Project, the net changes in emissions were adjusted by 25 percent to account for the total VMT in the Project area."

FRC-1-20

Comment noted.



LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)

ATTACHMENT TO
COMMENT LETTER FRC-1

ATTACHMENT A

GENESEE AVENUE/I-5 SOUTHBOUND RAMPS
AERIAL IMAGE ILLUSTRATING FREE-FLOW RIGHT-TURN LANES

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LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)

ATTACHMENT TO
COMMENT LETTER FRC-1



GENESEE AVENUE / I-5 SOUTHBOUND RAMPS
(Note southbound and eastbound free-flow right-turn lanes)

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LETTER

RESPONSE

Friends of Rose Canyon (July 15, 2016)



ATTACHMENT TO
COMMENT LETTER FRC-1

ATTACHMENT B

ROADWAY SEGMENT LEVEL OF SERVICE THRESHOLDS

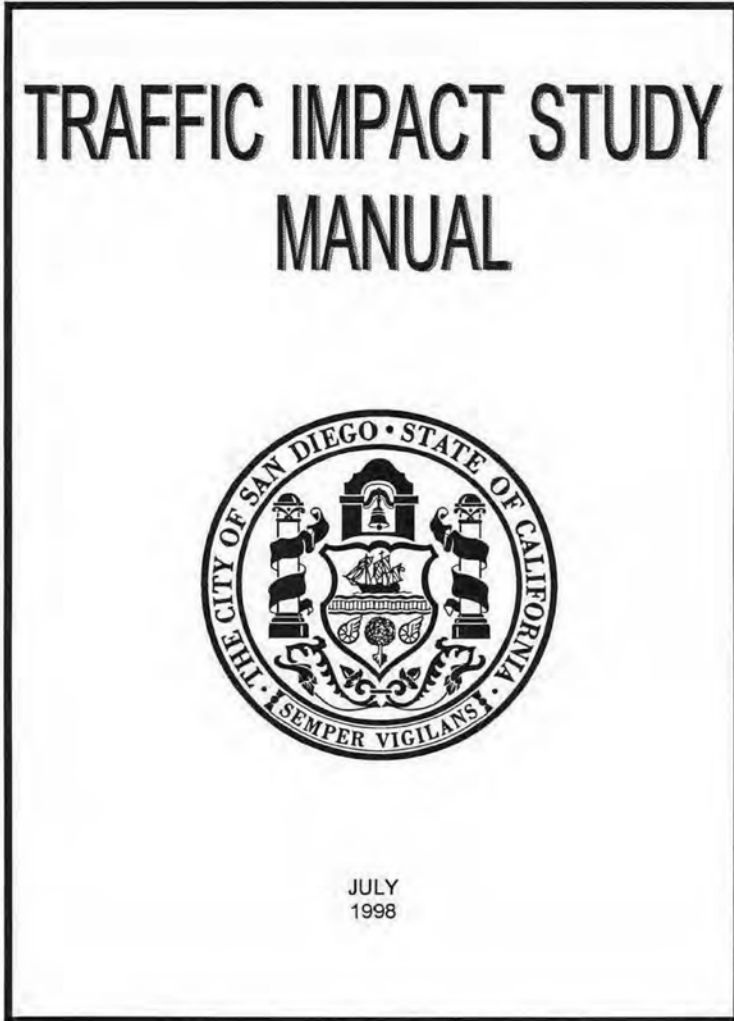
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LETTER

RESPONSE

ATTACHMENT TO
COMMENT LETTER FRC-1

Friends of Rose Canyon (July 15, 2016)



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LETTER

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ATTACHMENT TO
COMMENT LETTER FRC-1

Friends of Rose Canyon (July 15, 2016)



City of San Diego

TRAFFIC IMPACT STUDY MANUAL

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FINAL

JULY 1998

This information, document, or portions thereof, will be made available in alternative formats

ATTACHMENT TO
COMMENT LETTER FRC-1

Friends of Rose Canyon (July 15, 2016)

TABLE 2
Roadway Classifications, Levels of Service (LOS)
and Average Daily Traffic (ADT)

STREET CLASSIFICATION	LANES	CROSS SECTIONS	LEVEL OF SERVICE				
			A	B	C	D	E
Freeway	8 lanes		60,000	84,000	120,000	140,000	150,000
Freeway	6 lanes		45,000	63,000	90,000	110,000	120,000
Freeway	4 lanes		30,000	42,000	60,000	70,000	80,000
Expressway	6 lanes	102/122	30,000	42,000	60,000	70,000	80,000
Primary Arterial	6 lanes	102/122	25,000	35,000	50,000	55,000	60,000
Major Arterial	6 lanes	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial	4 lanes	78/98	15,000	21,000	30,000	35,000	40,000
Collector	4 lanes	72/92	10,000	14,000	20,000	25,000	30,000
Collector (no center lane) continuous left-turn lane)	4 lanes 2 lanes	64/84 50/70	5,000	7,000	10,000	13,000	15,000
Collector (no fronting property)	2 lanes	40/60	4,000	5,500	7,500	9,000	10,000
Collector (commercial-industrial fronting)	2 lanes	50/70	2,500	3,500	5,000	6,500	8,000
Collector (multifamily)	2 lanes	40/60	2,500	3,500	5,000	6,500	8,000
Sub-Collector (single-family)	2 lanes	36/56	—	—	2,200	—	—

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LEGEND:

XXX/XXX = Curb to curb width (feet)/right-of-way width (feet); based on the City of San Diego Street Design Manual

XX/XXX = Approximate recommended ADT based on the City of San Diego Street Design Manual.

NOTES:

1. The volumes and the average daily level of service listed above are only intended as a general planning guideline.
2. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

LETTER

RESPONSE

ATTACHMENT TO
COMMENT LETTER FRC-1

Friends of Rose Canyon (July 15, 2016)

UNIVERSITY COMMUNITY PLAN AMENDMENT

Transportation Impact Study



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JUNE 2016 | FINAL

Prepared By:

Kimley»»Horn

ROADWAY SEGMENT CAPACITY LEVEL OF SERVICE ANALYSIS

In order to determine the operations along the study area roadway segments, capacity thresholds and associated LOS have been developed by the City of San Diego and is used as a reference. **Table 3-9** presents this information. The segment traffic volumes under LOS E as shown in this table are considered to be the capacity of the roadway. It should be noted that the values listed in the table are planning-level estimates only. The actual operations of a roadway segment would be affected by the type and frequency of traffic control, terrain, lane width, percent of heavy vehicles, and other factors.

Table 3-9 City of San Diego Roadway Segment Capacity and LOS Summary

Road Class	Lanes	Cross Section ¹	A	B	C	D	E
Freeway	8		60,000	84,000	120,000	140,000	150,000
Freeway	6		45,000	63,000	90,000	110,000	120,000
Freeway	4		30,000	42,000	60,000	70,000	80,000
Expressway	6	102/122	30,000	42,000	60,000	70,000	80,000
Prime Arterial*	8		35,000	50,000	70,000	75,000	80,000
Prime Arterial	6	102/122	25,000	35,000	50,000	55,000	60,000
Major Arterial*	7		22,500	31,500	45,000	50,000	55,000
Major Arterial	6	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial*	5		17,500	24,500	35,000	40,000	45,000
Major Arterial	4	78/98	15,000	21,000	30,000	35,000	40,000
Collector	4	72/92	10,000	14,000	20,000	25,000	30,000
Collector (continuous left-turn lane)*	3		7,500	10,500	15,000	18,750	22,500
Collector(No center lane) (continuous left-turn lane)	4	64/84	5,000	7,000	10,000	13,000	15,000
	2	50/70					
Collector (No fronting property)	2	40/60	4,000	5,500	7,500	9,000	10,000
Collector (commercial-industrial fronting)	2	50/70	2,500	3,500	5,000	6,500	8,000
Collector (multifamily)	2	40/60	2,500	3,500	5,000	6,500	8,000
Sub-Collector (single-family)	2	36/56	—	—	2,200	—	—

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Notes:

The volumes and the average daily level of service listed above are only intended as a general planning guideline.

Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

¹Cross Section: Curb to Curb width (feet)/Right-of-way width (feet)

Sources:

City of San Diego Traffic Impact Study Manual, Table 2, Page 8, July 1998.

*City of San Diego Planning Department Mobility Staff Input

LETTER

RESPONSE

San Diego Coastkeeper (July 19, 2016)

From: [Matt O'Malley](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment, No. 480286 / SCH No. 2015121011
Date: Tuesday, July 19, 2016 8:15:23 AM
Attachments: [University Community Plan Amendment, No. 480286 SCH No. 2015121011.pdf](#)

Dear Ms. Morrison,

Please accept the attached comments on behalf of San Diego Coastkeeper.

Please feel free to contact me with any questions or for any clarification.

Thank you.

Sincerely,

Matt

--
Matt O'Malley
Legal & Policy Director
matt@sdcoastkeeper.org
(o) 619-758-7743 x119
(c) 619-241-1894

San Diego Coastkeeper@

www.sdcoastkeeper.org

@SDWaterkeeper
@sd_coastkeeper

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LETTER

RESPONSE

San Diego Coastkeeper (July 19, 2016)



July 19, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Ave, East Tower
Suite 1200, MS 413
San Diego, CA 92101
PlanningCEQA@sandiego.gov

Re: University Community Plan Amendment, No. 480286 / SCH No. 2015121011

Sent via email

Dear Ms. Morrison:

Thank you for the opportunity to comment on the Draft PEIR. San Diego Coastkeeper (Coastkeeper) is a non-profit organization working to protect and restore the San Diego region's bays, beaches, watersheds, and ocean.

Coastkeeper applauds the City for its leadership throughout the process of removing the Regents Road Bridge Project from the UCP. The Rose Creek Watershed is an important coastal watershed, extending from MCAS Miramar to Mission Bay. By removing the Regents Road Bridge Project from the UCP, the City will protect an important area of undeveloped land in Rose Canyon, which will in turn allow those undeveloped areas of the Watershed to continue to provide their associated water quality and recreational benefits. As the 2006 PEIR stated, the Regents Road Bridge Project, "would represent an additional source of pollutants to Rose Creek and ultimately Mission Bay." (FEIR, p. 4.10-12). Removing the Regents Road Bridge Project from the community plan will help protect the water quality of Rose Creek, which is the main source of water flowing into Mission Bay.

We strongly support the project objective of "Minimiz[ing] impacts to biological resources at Rose Canyon". With this support we also request that the FEIR clarify in the Executive Summary that the No Regent Road Bridge, No Genesee Widening Project is the Environmentally Superior Alternative. This Project would have no impact on Biological Resources or Hydrology and Water Quality or Landform. It is important to note that all of the Alternatives, and especially the Regents Road Bridge Project, would have significant and lasting impacts in these areas. Furthermore, since much of the Rose Canyon greenbelt is in the MSCP, a Regents Road Bridge Project would not be in compliance with the MHPA.

Thank you for the opportunity to comment on the Draft PEIR. Please feel free to contact me with any questions or for additional feedback. We look forward to the removal of the Regents Road Bridge Project from the UCP.

SDCK-1-1 Comment acknowledged. Commenter expresses support of the proposed removal of the Regents Road Bridge as part of the Project. This comment does not address the adequacy of the Draft PEIR, but through this process, is part of the administrative record.

SDCK-1-1

SDCK-1-2 Please see response to comment FRC-1-10.

SDCK-1-2

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3025 Dewey Road #200
San Diego, CA 92108
619.738.7741
www.sandiego.coastkeeper.org

LETTER

RESPONSE

San Diego Coastkeeper (July 19, 2016)

Sincerely,

A handwritten signature in black ink, appearing to read "M. O'Malley".

Matt O'Malley
Legal & Policy Director

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LETTER

RESPONSE

San Diego Audubon Society (July 27, 2016)



Furthering the protection and appreciation of birds, other wildlife and their habitats.

July 27, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200, MS 413
San Diego, CA 92101
Via email: PlanningCEQA@sandiego.gov

Re: University Community Plan Amendment
No. 480286/SCH No. 2015121011

Dear Ms. Morrison:

The San Diego Audubon Society (SDAS) strongly supports the University Community Plan (UCP) amendment to delete both the Regents Road Bridge project and the Widening of Genesee.

SDAS has been involved in this issue going back to 2003 when we were represented on the University Community North South Transportation Corridor Study group. We have always been opposed to construction of the bridge and we thank the City for its leadership in removing it and the widening of Genesee from the UCP. This action best meets the Project Objective of "Minimize impacts to biological resources at Rose Canyon."

We request the following corrections be made in the FEIR.

1. As stated on p. 9-6 of the Draft EIR, the Project is the Environmentally Superior Alternative. P. 9-6 also identifies the Environmentally Superior of the "build" alternatives. The Executive Summary at ES-11 needs to be corrected to clearly state the Project is the Environmentally Superior Alternative.
2. The FEIR must accurately describe the Regents Road bridge project. The DEIR repeatedly describes it as a bridge connecting the two existing road ends. This is not accurate – and not possible due to the topography. The Regents Road bridge project requires construction of 700' of a new 4-lane cut-and-fill road from Lahitte Court northward to the middle of Rose Canyon, where the new road would connect to the bridge. The bridge would span the remaining 870' distance across the canyon. (See UCNSTCS FEIR, June 2006, p. 3-15).

Finally, SDAS urges the City to move forward expeditiously with this Community Plan amendment.

Sincerely,

James A. Peugh
Conservation Committee Chair
San Diego Audubon Society

858-273-7800 • 4010 Morena Blvd., Suite 100, San Diego, CA 92117 • Fax 858-273-7801 • www.sandiegoaudubon.org

- SDAS-1-1 Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP.
- SDAS-1-1
- SDAS-1-2 Please see response to comment FRC-1-10.
- SDAS-1-2
- SDAS-1-3 The commenter asserts that the original Regents Road Bridge design as described in Section 3.2.2, which consisted of constructing "two separate, parallel two-lane bridge structures across Rose Canyon to connect the south and north ends of Regents Road" is erroneous. The commenter claims that in order to connect the span between the north and south Regents Road termini on either side of the canyon, the construction of 700 feet of a new four-lane cut-and-fill road from Lahitte Court northward to the middle of Rose Canyon would be necessary. This comment is acknowledged.
- SDAS-1-3
- SDAS-1-4

Section 3.2.2, Removal of Regents Road Bridge, under Chapter 3.0, Project Description, provides details of all features of the Regents Road Bridge construction, including the four-lane road that would have been built by filling of a tributary canyon and cutting through a ridge. The preliminary design for the Regents Road Bridge as originally described in the University City North/South Transportation Corridor Study EIR

LETTER

San Diego Audubon Society (July 27, 2016)

RESPONSE

San Diego Audubon Society (July 27, 2016)

(SCH#2004031011) prepared by the City of San Diego in 2006 was a product of extensive evaluation by the City to serve as a basis for assessing the environmental consequences as well as feasibility. The description of Regents Road Bridge provided in Section 3.2.2 of the Draft PEIR is consistent with the description provided in the University City North/South Transportation Corridor Study EIR.

SDAS-1-4 Comment acknowledged.

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LETTER

RESPONSE

San Diego Canyonlands (July 27, 2016)

From: [Eric Bowlby](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment No. 480286/SCH No. 2015121011
Date: Wednesday, July 27, 2016 12:47:35 PM
Attachments: [DeletionOfRoseCanyonBridge-GeneseWindeningo.pdf](#)

University Community Plan Amendment No. 480286/SCH No. 2015121011

Dear Susan Morrison and to whom it may concern,

Please confirm receipt of these comments for inclusion in the public review comments for the above referenced project.

Thank you,

Eric Bowlby
Executive Director
San Diego Canyonlands (SDCL)
(619) 284-9399
eric@sdcanyonlands.org

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LETTER

RESPONSE

San Diego Canyonlands (July 27, 2016)



San Diego Canyonlands

♦ 3552 Bancroft Street San Diego, CA 92104 ♦ 619-284-9399 ♦
♦www.sdcanionlands.org♦

July 25, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101
Submitted via email: PlanningCEQA@san-diego.gov

Re: Support for University Community Plan Amendment
No. 480286/SCH No. 2015121011

Dear Ms. Morrison:

San Diego Canyonlands' mission is to promote, protect and restore the natural habitats in San Diego County's canyons and creeks. We have long opposed the environmentally damaging Regents Road bridge project. Canyons have tremendous ecological, educational and recreational values including species conservation, wetlands that filter runoff protecting our beaches, nature classrooms used for cutting edge, environment-based curriculum, hiking, jogging, riding bikes, wildlife watching... the list is long.

SDCL-1-1

We strongly support the project and we thank the City for moving forward to delete the two road projects from the University Community Plan, especially the Regents Road bridge project. We request that the following be corrected in the FEIR:

1. The FEIR must clarify in the Executive Summary that the Project is the "Environmentally Superior Alternative" (as stated on p. 9-6). Please correct the Executive Summary, p. ES-11.
2. The DEIR inaccurately describes the Regents Road bridge project as "bridging the two existing road ends." This needs to be corrected throughout the FEIR. Bridging the two existing road ends is not possible. The Regents Road bridge project would require construction of a new 4-lane cut and fill road for 700' from Lahitte Court northward to the middle of Rose Canyon. There, the new roadway would connect to the bridge, which would span the remaining 870' across the canyon. (UCNSTCS FEIR, June 2006 at p. 3-15).

SDCL-1-2

SDCL-1-3

On behalf of San Diego Canyonlands, I'd like to thank you for considering our comments.

Sincerely,

Eric Bowlby
Executive Director
San Diego Canyonlands
eric@sdcanionlands.org
619-284-9399

Canyons - The Geographic DNA of San Diego

SDCL-1-1 Comment acknowledged. Commenter expresses support of the proposed removal of the Regents Road Bridge as part of the Project. This comment does not address the adequacy of the Draft PEIR, but through this process, is part of the administrative record.

SDCL-1-2 Please see response to comment FRC-1-10.

SDCL-1-3 Please see response to comment SDAS-1-3.

LETTER

RESPONSE

Sierra Club San Diego (July 28, 2016)

From: [George Courser](#)
 To: [P.N. Planning/CEQA](#)
 Cc: richard.miller@sierrclub.org
 Subject: Re: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
 Date: Thursday, July 28, 2016 9:30:49 AM

Sierra Club San Diego
 8304 Clairemont Mesa Blvd. Suite 101
 San Diego, Ca 92111-1315

July 28, 2016

Susan Morrison, Environmental Planner
 City of San Diego Planning Department
 1010 Second Avenue, East Tower
 Suite 1200, MS 413
 San Diego, CA 92101

Re: University Community Plan Amendment
 No. 480286/SCH No. 2015121011

Submitted via email: PlanningCEQA@sandiego.gov

Dear Ms. Morrison:

Thank you for the opportunity to comment on the Draft PEIR. Sierra Club San Diego strongly supports the Project, especially the deletion of the Regents Road bridge project from the University Community Plan. We also strongly support the Project objective "to minimize biological impacts at Rose Canyon."

SCSD-1-1

SCSD-1-1 Comment acknowledged. Commenter expresses support of the proposed removal of the Regents Road Bridge as part of the Project. This comment does not address the adequacy of the Draft PEIR, but through this process, is part of the administrative record.

Sierra Club San Diego has long opposed the environmentally damaging Regents Road bridge project. We thank the City for its leadership in moving forward to delete the Regents Road bridge project.

We note the following items in the DEIR that need correction:

1. As stated on p. 9-6, the Project is the Environmentally Superior Alternative. Please correct the Executive Summary, p. ES-11, to clearly identify the Project as the Environmentally Superior Alternative.

SCSD-1-2

SCSD-1-2 Please see response to comment FRC-1-10.

2. Throughout the DEIR, the Regents Road bridge project is described as bridging the two existing road ends. This is highly inaccurate and needs to be corrected throughout the FEIR. The Regents Road bridge project would require construction of a new 4-lane cut and fill road for 700' from Lahitte Court northward to the middle of Rose Canyon. There, the new roadway would connect to the bridge, which would span the remaining 870' across the canyon. (UCNSTCS FEIR, June 2006 at p. 3-15).

SCSD-1-3

SCSD-1-3 Please see response to comment SDAS-1-3.

Sincerely,

LETTER

George Courser
Sierra Club San Diego
Conservation Committee Chair

RESPONSE

Sierra Club San Diego (July 28, 2016)

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LETTER

RESPONSE

Friends of Rose Creek (July 29, 2016)

From: [Karin Zirk](#)
To: [PLN PlanningCEOA](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Friday, July 29, 2016 7:15:23 AM
Attachments: [FriendsOfRoseCreek_Comments_UCP_Amendment_20160728.pdf](#)

Dear Ms. Morrison,

Please find our comments attached in PDF format.

Regards,

Karin Zirk, Ph.D.
Executive Director
Friends of Rose Creek
Connecting Our Communities
<http://www.saverosecreek.org>

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LETTER

RESPONSE

Friends of Rose Creek (July 29, 2016)



Friends of Rose Creek *
"Connecting Our Communities"
4629 Cass Street #188
San Diego CA 92109



July 28, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment
No. 480286/SCH No. 2015121011

Submitted via email: PlanningCEQA@sandiego.gov

Dear Ms. Morrison:

The Friends of Rose Creek's vision is for lower Rose Creek to be an open space park providing recreational and learning opportunities and a clean, healthy, aesthetically pleasing environment for residents, visitors, businesses, and native plants and animals, while serving as an accessible link for bicyclists and pedestrians to move between Rose Canyon Open Space Park, Marian Bear Natural Park, Mission Bay Park, and surrounding communities. As partners in advocating for the protection of the Rose Creek Watershed, we know that impacts to the upper part of the watershed create impacts in the lower portion of the watershed and ultimately Mission Bay Park – the largest aquatic park in the United States with an attendance of approximately 15 million tourists, residents, and students each year.

We have long opposed the environmentally damaging Regents Road bridge project and applaud the City for its commitment to the moving San Diego transportation planning into a new era by undertaking this project.

We strongly support the Project, which would delete both the Regents Road bridge project and the Widening of Genesee Avenue from the University Community Plan (UCP). We are truly grateful to the City of San Diego for studying potential impacts and encourage the City to move forward with deleting these transportation elements from the UCP.

We strongly support the Project objective "to minimize biological impacts at Rose Canyon." The Rose Creek watershed is an important coastal watershed, extending from MCAS Miramar to Mission Bay. Protecting undeveloped land in the watershed helps protect the water quality in Rose Creek and ultimately in Mission Bay Park.

**A member of the Rose Creek Watershed Alliance
A Friends Group of San Diego Canyonlands, Inc.
Visit us on-line at <http://www.saverosecreek.org>

FORC-1-1

FORC-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Friends of Rose Creek (July 29, 2016)

Friends of Rose Creek Letter to S. Morrison

July 28, 2016, Page 2 of 2

We request that the following items be corrected in the FEIR:

- 1. The FEIR should clarify in the Executive Summary that the Project is the "Environmentally Superior Alternative" (as stated on p. 9-6). Please correct the Executive Summary, p. ES-11, to clearly state the Project is the Environmentally Superior Alternative. FORC-1-2
- 2. The DEIR incorrectly describes the Regents Road bridge project as "bridging the two existing road ends." This is inaccurate and needs to be corrected throughout the FEIR. Bridging the two existing road ends is not possible. The Regents Road bridge project would require construction of a new 4-lane cut and fill road for 700' from Lahitte Court northward to the middle of Rose Canyon. There, the new roadway would connect to the bridge, which would span the remaining 870' across the canyon. (UCNSTCS FEIR, June 2006 at p. 3-15). FORC-1-3

FORC-1-2 Please see response to comment FRC-1-10.

FORC-1-3 Please see response to comment SDAS-1-3.

Thank you for the opportunity to comment on the UCP amendment PEIR.

Respectfully,



Karin Zirk, Ph.D.
Executive Director
Friends of Rose Creek

**A member of the Rose Creek Watershed Alliance*
**A Friends Group of San Diego Canyonlands, Inc.*
Visit us on-line at <http://www.saverosecreek.org>

LETTER

University Community Planning Group

4660 La Jolla Village Dr., Suite 1080 San Diego, CA 92122

July 18, 2016

Mr. Dan Monroe

Senior Planner

City of San Diego Planning Dept.

1010 2nd Ave., 6th Floor

San Diego, CA 92101

CITY OF SAN DIEGO

JUL 29 2016

Facilities Financing

Re: Response to the D-PEIR/Amendment to the University Community Plan (UCP)-
Transportation Element, project no. 480286/Sch no. 2015121011. Approved by the D-PEIR/CPA
subcommittee for consideration by the full UCPG board.

Dear Mr. Monroe:

The UCPG reviewed the Draft Program Environmental Impact Report (the "D-PEIR") and associated technical appendices prepared as part of the Amendment to the University 2015121011. From our review, the D-PEIR appears to be a comprehensive analysis of the relevant environmental issues, with the corrections that we note below.

Based on this review, we recommend approval of the Community Plan Amendment to remove the Regents Road Bridge and Genesee Avenue widening projects from the University Community Plan.

We note that the "Project"-the removal of the Regents Road Bridge and Genesee Avenue widening-is the environmentally superior alternative and best meets the primary objectives outlined in ES.3 of the D-PEIR: namely, to "minimize impacts to biological resources at Rose Canyon" and move toward a more "balanced transportation network" while preserving emergency access and multi-modal transportation throughout the community (ES-3).

We also believe that the removal of the Regents Road Bridge and Genesee Avenue widening-maximized the long-term health, safety, and quality of life in the University Community, and creates the greatest community benefit by:

- Minimizing the re-routing of highway traffic through the residential communities of North and South University City (Appendix C, Transportation Impact Study, p.iii)

UCPG-2-1

RESPONSE

University Community Planning Group (July 29, 2016)

UCPG-2-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

University Community Planning Group (July 29, 2016)

And by

- Preserving the recreational, visual, biological and other environmental amenities associated with Rose Canyon.

UCPG-2-1 cont.

The Project:

The Project would remove two out of date infrastructure projects from the UC Plan: the Regents Road Bridge and the Genesee Avenue widening.

If constructed, the Regents Road Bridge would require construction of a 700-foot cut-and-fill road project in Rose Canyon Open Space park, removing much of a major hillside and filling a deep tributary canyon and riparian habitat area, in addition to road widening, retaining walls, and the construction of two 970 foot-long bridge structures through environmentally sensitive lands and MHPA at the center of Rose Canyon Open Space Park (ES-9, 3-3).

UCPG-2-2

If constructed, the Genesee Avenue widening project would add 26 feet of width to the roadway, expanding the thoroughfare from four to six lanes through the use of high retaining walls and crib walls along both sides of the roadway. It would involve new construction to widen the existing bridge over Rose Creek, reduction of the landscaped median, and potentially acquisition of adjacent properties from private owners (ES-8, 3-2).

Environmental Impacts:

As the D-PEIR makes clear, the construction of the Regents Road Bridge, in particular, would have "significant and irreversible" environmental impacts to the University Community (8-8, see also 4.2-29-30). In addition, the bridge and widening together would attract forecasted traffic congestion "primarily" by rerouting automobile traffic from adjacent freeways through the residential communities of North and South University City (Appendix C, p. iii).

UCPG-2-2 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

We note that removing the Regents Road Bridge and Genesee Avenue widening is estimated to have significant environmental impacts; however, we believe that these are outweighed by other tangible environmental and community benefits of the Project.

UCPG-2-3

As the D-PEIR indicates, the Project avoids significant environmental impacts in 11 of 16 categories of impact studied, including biological resources such as sensitive habitat and threatened species, and MHPA-hydrology and water quality, energy and water use, public utilities, health and safety, visual effects and neighborhood character (ES-4; Table 9-1, p.9-7)¹.

UCPG-2-3 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. In addition, Commenter cites additional research that indicates the effect of new roadways to induce more traffic and greenhouse gas emissions—the "build it and they will come"—effect (Susan Handy, "Increasing Highway Capacity Unlikely to Relieve Traffic Congestion," UC Davis/National Center for Sustainable Transportation Policy Brief, Oc., 2015). This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

¹ See pg ES-4: "the project would result in less than significant impacts with no mitigation required for the issue areas of land use, visual effects and neighborhood character, and health and safety"; and "No significant impacts were identified for the issue areas of energy, historical resources, biological resources, geologic conditions, paleontological resources, hydrology and water quality, public utilities, and population and housing."

LETTER

RESPONSE

University Community Planning Group (July 29, 2016)

We note, too, that the D-PEIR analysis forecasts that “significant transportation impacts would occur regardless of the implementation of the project,” and regardless of which alternative is selected (4.2-52).

The D-PEIR points out that “some operational deterioration would be worsened by removal of the planned” projects (8-9); however, we note that many of operational differences between Project and no Project alternative are “slight” (e.g. GHGs, 9-15; Emergency Service, 9-20), and the comparative impacts are small in real terms.

Looking forward to a balanced, multi-modal solution to transportation and mobility in the decades to come, the UCPG also takes note of recent research that indicates the effect of new roadways to induce more traffic and greenhouse gas emissions—the “build it and they will come” effect.² Adding this factor to the projection that the Regents Road Bridge and Genesee Avenue widening will re-route traffic from local highways through the residential streets of the University Community, we recommend approval of the Project-removal of the Regents Road Bridge and Genesee Avenue widening from the UCP.

Corrections/Recommendations:

Emergency Services:

We note that the D-PEIR analysis of future emergency service response times does not account for the existing Squad 56 rapid response station on Governor Drive, nor the future Fire Station 50, approved for Nobel Drive.

We concur with the D-PEIR recommendation in support of a new Fire Station in South University City. We support the recommendation that “a new fire station would be beneficial to improve emergency response times in this area of the community” (Appendix C, p 3).

Corrections:

We note that the Transportation Impact Study (Appendix C, table 6-7 on p 6-6) refers to projected class I bicycle paths through Rose Canyon and Roselle Canyon as part of the Coastal Rail Trail corridor. We note that the CRT route has been selected to run over different segments along Gilman Drive and through UCSD. The proposed bike paths through Rose and Roselle Canyons have been deleted from the City’s Bicycle Master Plan.

²Susan Handy, “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” UC Davis/National Center for Sustainable Transportation Policy Brief, Oct., 2015 [http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf]

UCPG-2-3
cont.

UCPG-2-4

UCPG-2-5

UCPG-2-6

UCPG-2-4 Comment noted. Please see response to comment FRC-1-9.

UCPG-2-5 Comment noted.

UCPG-2-6 Commenter expresses concern regarding the proposed Class I Bicycle Paths through Rose Canyon and Roselle Canyon as part of the Coastal Rail Trail corridor as discussed in Appendix C, Transportation Impact Study (Table 6-7 on page 6-6). The Coastal Rail Trail Project is not included in the Project, but is depicted in San Diego Association of Governments’ Bicycle Master Plan (2013). This improvement is not shown on the recommended bicycle network maps. This comment does not address the adequacy of the Draft EIR, but is part of the administrative record and will be considered by the City during the decision-making process.

LETTER

RESPONSE

University Community Planning Group (July 29, 2016)

We note the D-PEIR includes three schools in the Genesee Avenue corridor while stating that "no school facilities are located immediately off of Regents Road" [see p 53]. This conclusion reflects the selection process for studied corridor boundaries in the D-PEIR; however, in real terms there are two elementary schools within two blocks of Regents Road. Doyle Elementary School is situated "immediately off" Regents Road at Berino Ct., just north of the study boundary and adjacent to the Doyle Community Park and Recreation Center. Sole auto access to the school is on Berino Ct. from Regents Road. In south University City, Spreckels Elementary is located two city blocks from the corner of Regents Road and Governor Drive. These schools may be located outside the defined project corridors, but they would clearly be impacted by the construction of the Regents Road Bridge. These facts reinforce our recommendation to support the Project.

UCPG-2-7

In regards to Chapter 10 of the D-PEIR mitigation measures, we strongly oppose two mitigation measures-TRA 1.6 and TRA 2.3 because they are inconsistent with "the Project" description.

UCPG-2-8

We support five mitigation measures-TRA 1.8, 1.9 and 1.10 Adaptive Traffic Signals, and also support TRA 2.6 and TRA 2.5. In general, we did not support the remaining 16 mitigation measures.

Thank you for your attention to this project.

Sincerely,



Janay Kruger, Chair, UCPG

UCPG-2-7

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. Commenter notes the schools within the Genesee Avenue and Regents Road Corridors. Section 4.13, Public Services and Facilities, discusses the educational facilities in the UCP area, which consist of public, private, and higher education institutions. These include three elementary schools (Curie Elementary, Doyle Elementary, and Speckles Elementary); one public middle school (Standley Middle School); one public high school (University City Senior High); and one private school (La Jolla Country School). This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

UCPG-2-8

Comment acknowledged. Commenter states their strong objections to Mitigation Measures TRA 1.6 and TRA 2.3 and their support for Mitigation Measures TRA 1.8, 1.9, 1.10, TRA 2.6, and 2.5. Commenter also states their opposition to the remaining mitigation measures. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

University of California, San Diego (July 29, 2016)

From: [Delour, Anuradha](#)
To: [PLN_Planning@UCSD](#)
Subject: Feedback with DEIR - University Community Plan Amendment
Date: Friday, July 29, 2016 2:00:31 PM
Attachments: [Graphics Comments 07_16.pdf](#)

Hello Susna,

Thank you for sharing the PEIR with us for the University Community Plan Amendment.

Upon review we found a few instances of inconsistencies with reference to the University as well as graphics.

Please modify the document to reflect per the suggestions below and feel free to email or call me with questions.

1. Please replace throughout the document all references to UCSD with UC San Diego. UC San Diego = University of California, San Diego.
2. Replace Scripps Institute with Scripps Institution of Oceanography. See Page 54 - Residential development in the La Jolla Shores Planned District lies to the south of Scripps Institute and La Jolla Village Drive (City of San Diego 2014b).
3. Correct UCSD to University of California, San Diego. See top of page 567 UCSD. See University of San Diego. Followed by University of San Diego (UCSD) 2014 GHG Emissions Inventory for the San Diego Region. Energy Policy Initiatives Center (EPIC) at University of San Diego. April.
4. I think reference is to the new Gilman Bridge, please correct. See Page 126 - New Eastgate Mall connection across I-5
5. Attached are graphics with comments to reflect UC San Diego land appropriately.

Thanks.

Anu

Anu Delour
Assistant Director, Communications and Community Planning

University of California, San Diego
Physical and Community Planning
adelour@ucsd.edu
(O) 858-822-0150; (C) 858-610-0376;
<http://physicalplanning.ucsd.edu/>

UCSD-1-1	UCSD-1-1	All references to “UCSD” have been replaced with “UC San Diego” in the Final PEIR.
UCSD-1-2	UCSD-1-2	Page 2-4 of the Final PEIR has been revised to replace “Scripps Institute” with “Scripps Institution of Oceanography.”
UCSD-1-3	UCSD-1-3	All references to “UCSD” have been replaced with “UC San Diego” in the Final PEIR. In addition, the typographical errors on page 11-17 of the Draft PEIR referencing University of San Diego have been revised and replaced with University of California, San Diego.
UCSD-1-4	UCSD-1-4	The reference to “new Eastgate Mall” has been replaced with “new Gilman Bridge” under “Methodologies and Assumptions” in Section 4.2.3, Significance Determination Thresholds, of Section 4.2, Transportation/Circulation.
UCSD-1-5	UCSD-1-5	Figure 2-2 and Figures 4.1-1 through 4.1-4 have been revised and included in this Final PEIR.

University of California, San Diego (July 29, 2016)



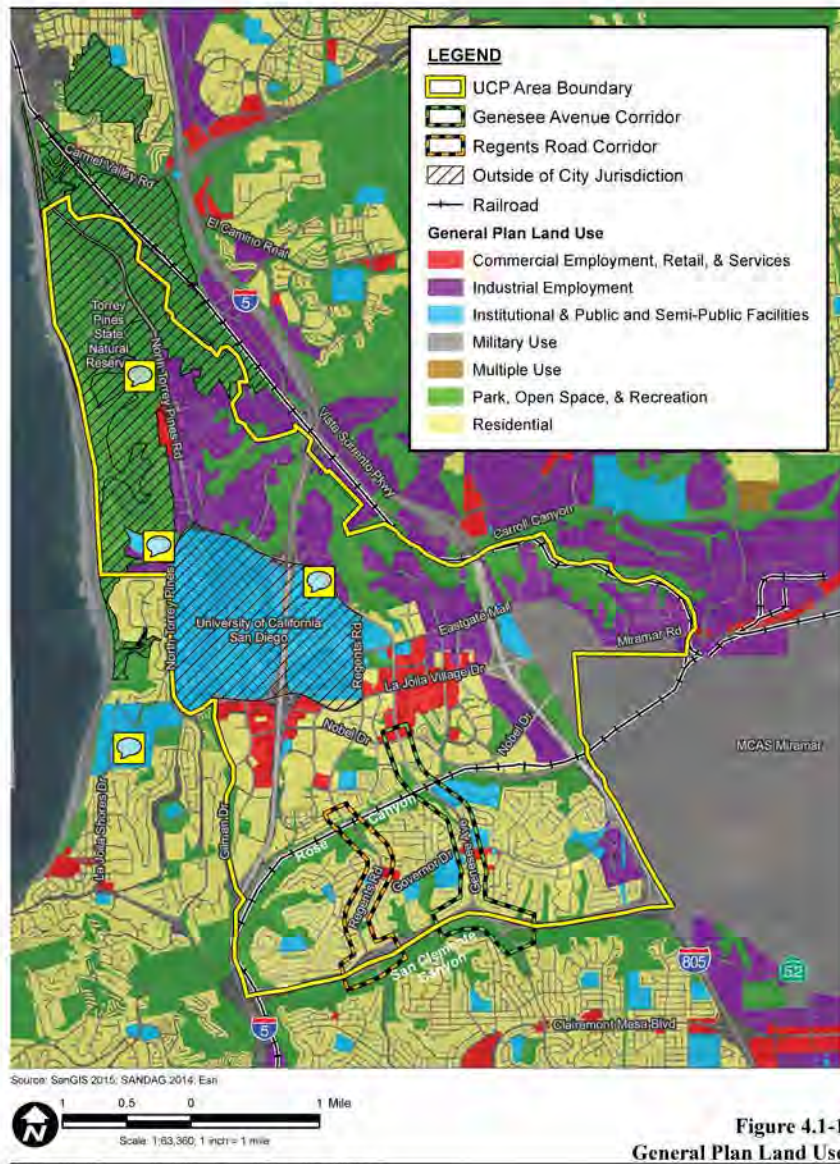
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Figure 2-2
Vicinity Map

University Community Plan Amendment Draft PEIR

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University of California, San Diego (July 29, 2016)



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University of California, San Diego (July 29, 2016)

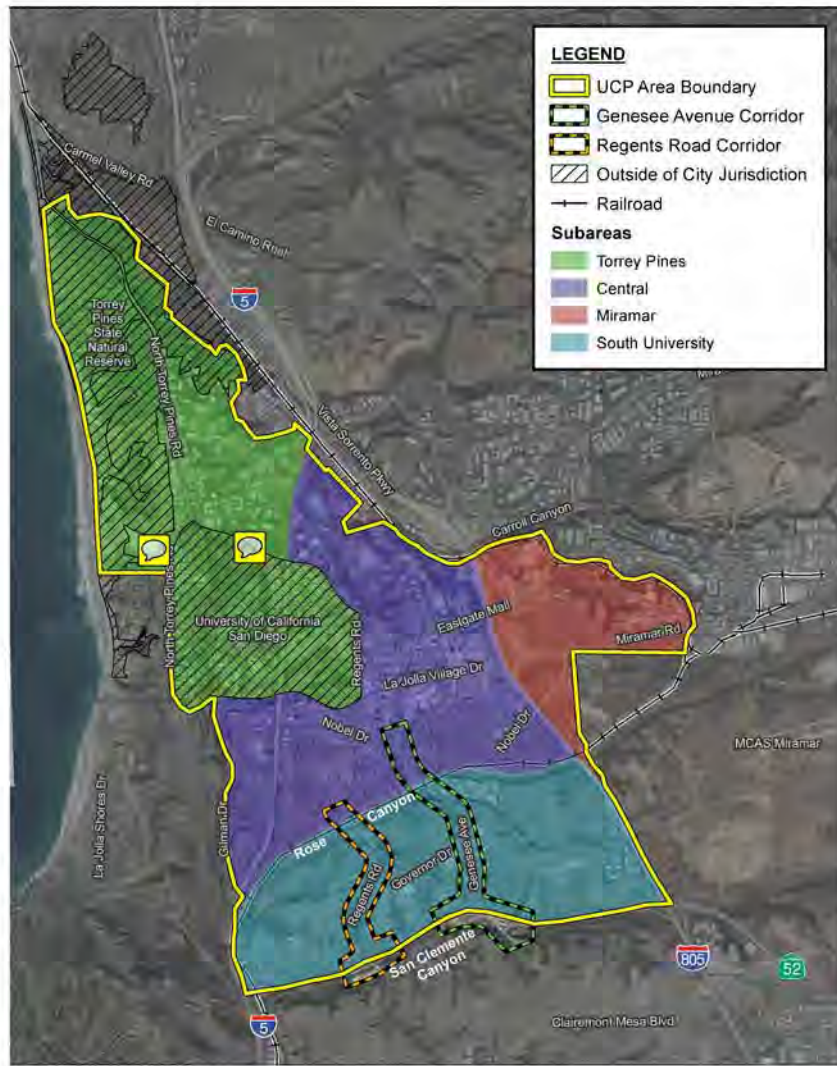
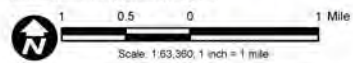


Figure 4.1-2 UCP Subareas

Source: SanGIS 2015; SANDAG 2014; Esri

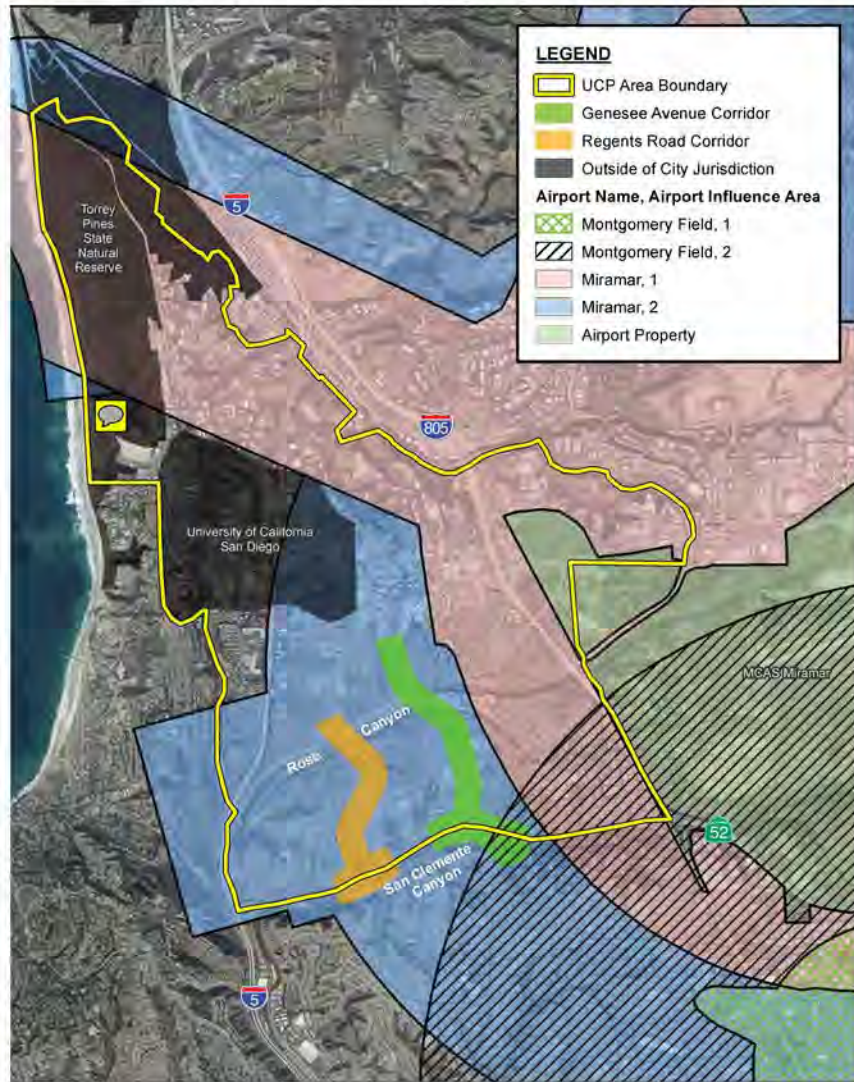


University Community Plan Amendment Draft PEIR

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University of California, San Diego (July 29, 2016)



Source: SanGIS 2015; SANDAG 2014; Esri.

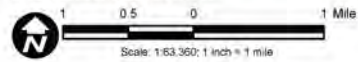


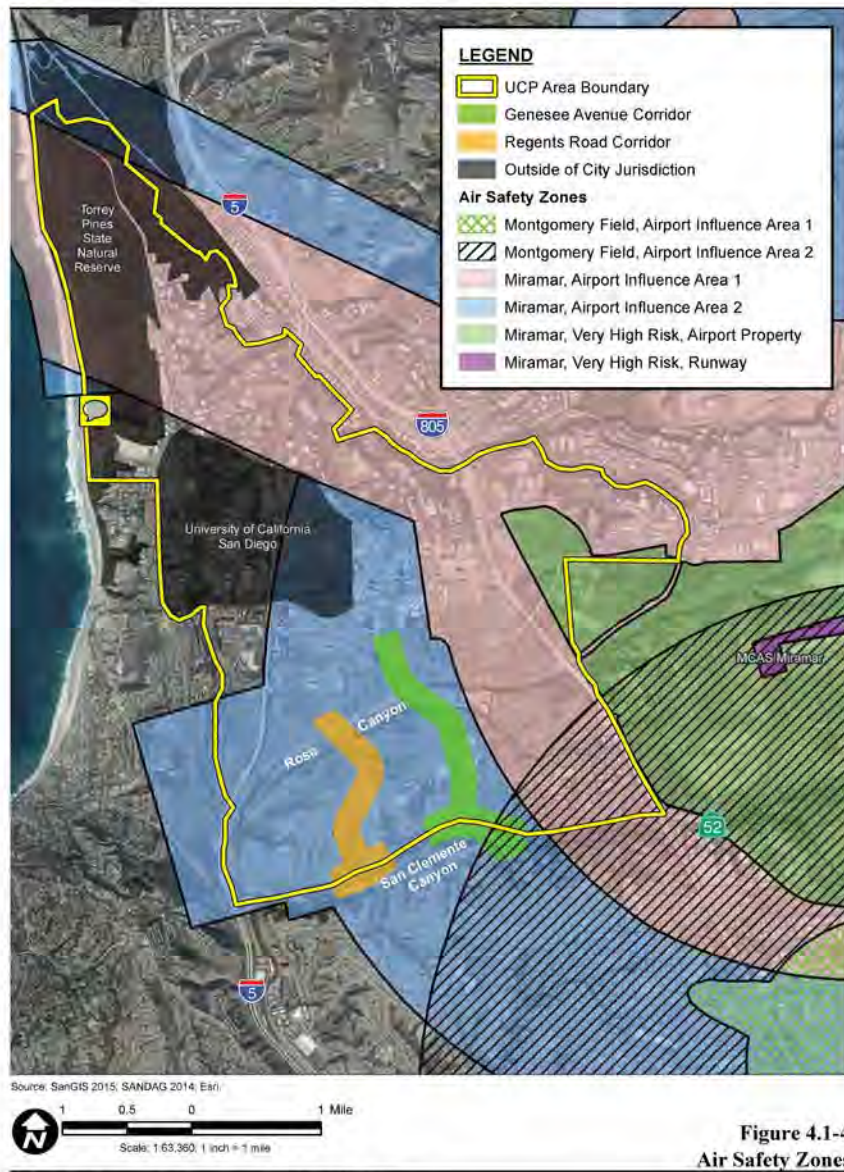
Figure 4.1-3
Airport Influence Areas

University Community Plan Amendment Draft PEIR

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University of California, San Diego (July 29, 2016)



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LETTER

RESPONSE

University of California, San Diego (July 29, 2016)

From: Delouri, Anuradha <adelouri@ucsd.edu>
Sent: Wednesday, August 03, 2016 12:08 PM
To: PLN_PlanningCEQA
Subject: RE: Feedback with DEIR - University Community Plan Amendment

Hello Susan,



Included below is also a graphic that depicts the campus lands. Hope this helps.
Thanks,
Anu.

Anu Delouri

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LETTER

RESPONSE

University of California, San Diego (July 29, 2016)

Assistant Director, Communications and Community Planning

University of California, San Diego
Physical and Community Planning
adelouri@ucsd.edu
(O) 858-822-0150; (C) 858-610-0376;
<http://physicalplanning.ucsd.edu/>

From: Delouri, Anuradha
Sent: Friday, July 29, 2016 2:00 PM
To: 'PlanningCEQA@sandiego.gov' <PlanningCEQA@sandiego.gov>
Subject: Feedback with DEIR - University Community Plan Amendment

Hello Susan,
Thank you for sharing the PEIR with us for the University Community Plan Amendment.
Upon review we found a few instances of inconsistencies with reference to the University as well as graphics.
Please modify the document to reflect per the suggestions below and feel free to email or call me with questions.

1. Please replace throughout the document all references to UCSD with UC San Diego. UC San Diego = University of California, San Diego.
2. Replace Scripps Institute with Scripps Institution of Oceanography. See Page 54 - Residential development in the La Jolla Shores Planned District lies to the south of Scripps Institute and La Jolla Village Drive (City of San Diego 2014b).
3. Correct UCSD to University of California, San Diego. See top of page 567 UCSD. See University of San Diego. Followed by University of San Diego (UCSD) 2014 GHG Emissions Inventory for the San Diego Region. Energy Policy Initiatives Center (EPIC) at University of San Diego. April.
4. I think reference is to the new Gilman Bridge, please correct. See Page 126 - New Eastgate Mall connection across I-5
5. Attached are graphics with comments to reflect UC San Diego land appropriately.

Thanks.
Anu

Anu Delouri
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LETTER

RESPONSE

Las Palmas Condominium Association (July 30, 2016)

From: rwilson013@san.rr.com
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment# 480286/SCH No. 2015121011
Date: Saturday, July 30, 2016 7:15:23 AM
Attachments: 480286-Sch No. 2015121011 Las Palmas UC Amendment.docx

Response from Las Palmas Condominium Association.

Thank you.

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LETTER

RESPONSE

Las Palmas Condominium Association (July 30, 2016)

EMAIL: PlanningCEQA@sandiego.gov

July 29, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
East Tower, Ste. 1200
San Diego, CA 92101

RE: University Community Plan Amendment# 480286/SCH No. 2015121011

The Board of Directors of the Las Palmas Condominium Association ("Association") strongly supports the amendment to the Transportation Element of the University Community Plan which deletes the construction of the Regents Road Bridge and the widening of Genesee Avenue.

The Board believes, as it did in 2006 when the Bridge was last considered, that the construction and completion of the Bridge will negatively impact the health, safety, comfort and/or general welfare of the nearby communities and, in particular, our residents here in Las Palmas, as our community directly borders Regents Road south from Arriba almost to Rose Canyon.

The Board believes that the construction and completion of the Regents Road Bridge will likely cause noise, air pollution, traffic circulation and other negative impacts within the Association's 218-unit community, and, even further negatively affect those units facing, and closest, to Regents Road, as well as the units and recreational area on the Porte de Merano cul de sac.

Further, in 2006 it was uncertain as to the extent the City of San Diego could mitigate issues under the California Environmental Quality Act ("CEQA"); these matters remain unresolved ten years later in 2016.

In addition, we believe that the removal of the Regents Road Bridge and Genesee Avenue widening maximizes the long-term health, safety, and quality of life in North and South University City and creates the greatest community benefit by:

- Minimizing the re-routing of highway traffic through residential neighborhoods, including the Las Palmas community, Doyle School (over 900 enrolled students), and Doyle Recreation Park.
- Maintaining a level of acceptable noise in residential interiors and exteriors.
- Allowing for current residential parking on Regents Road.
- Preventing the deterioration of our neighborhood aesthetics and the environment of our nearest natural resource, Rose Canyon.

LPCA-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LPCA-1-1

LETTER

We want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road Bridge.

LPCA-1-1
cont.

Sincerely,

Patricia A. Wilson

ON BEHALF OF THE LAS PALMAS CONDOMINIUM ASSOCIATION
Patricia A. Wilson, President
Las Palmas Condominium Association
4185 Porte de Palmas, Unit #165
San Diego, CA 92122
858-202-1879

RESPONSE

Las Palmas Condominium Association (July 30, 2016)

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LETTER

RESPONSE

San Diego County Archaeological Society, Inc. (July 30, 2016)

From: [Jim Royle](#)
To: [PLN_PlanningCEQA](#)
Subject: SDCAS Letter - University Community Plan Amendment DPEIR
Date: Saturday, July 30, 2016 8:15:31 PM
Attachments: [University Community Plan Amendment DPEIR.pdf](#)

Attached is a scan of the SDCAS comment letter on the University Community Plan Amendment DPEIR. A hard copy will arrive via regular mail.

Regards,
Jim Royle

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LETTER

RESPONSE

San Diego County Archaeological Society, Inc. (July 30, 2016)



San Diego County Archaeological Society, Inc.

Environmental Review Committee

30 July 2016

To: Ms. Susan Morrison
 Planning Department
 City of San Diego
 Suite 1200, East Tower, MS413
 1010 Second Avenue
 San Diego, California 92101

Subject: Draft Program Environmental Impact Report
 University Community Plan
 Project No. 480286


Dear Ms. Morrison:

I have reviewed the cultural resources aspects of the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DPEIR, we agree that the changes proposed would not result in any impacts to cultural resources or require any cultural resources mitigation measures.

We appreciate the opportunity to review and comment upon the environmental impacts of this community plan amendment.

Sincerely,



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

cc: SDCAS President
File

SDCAS-1-1 Comment noted. Commenter acknowledged that the Project would not result in impacts to cultural resources or require any cultural resources mitigation measures. This comment will be part of the administrative record and will be considered by the City during the decision-making process.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

From: [susped](#)
To: [PN_Planning_CDA](#)
Subject: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Sunday, July 31, 2016 9:48:04 PM
Attachments: [CFRRB Comments to Susan Morrison - 1 Aug 2016.pdf](#)

CITIZENS FOR THE REGENTS ROAD BRIDGE, INC.

Austin Speed, President

7110 Cather Ct.

San Diego, CA 92122

July 31, 2016

Susan Morrison, Environmental Planner

City of San Diego Planning Department

1010 Second Avenue

East Tower, Suite 1200, MS 614C

San Diego, CA 92101

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University

COUNCIL DISTRICT: 1 (Lightner)

(A signed PDF version of this letter is attached).

Ms. Morrison,

As president of the *Citizens for the Regents Road Bridge, Inc.*, a public advocacy group supporting better and safer traffic circulation in University City and surrounding communities, we appreciate the opportunity to offer our comments on the subject Draft Program Environmental Impact Report (DPEIR) I.O. No.: 21003841 (Project No. 480286 / SCH No. 2015121011).

The document was a challenge to review due to its volume and the inconsistent treatment of many of the subject areas. One of the more challenging characteristics of the report is the inverted logic that defines "The Project" as eliminating two planned projects. This semantic construct permeates much of the language in the document including referring to the combination of the two projects: (1.) the Regents Road Bridge (RRB) project and (2.) the Genesee Avenue Widening (GAW) project as the "No Project" alternative.

Citizens-1-1

Citizens-1-1 Comment acknowledged.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

We find the DPEIR to be an insufficient document to justify the conclusions from the review of alternatives and thus does not sufficiently support any resultant conclusions or recommendations for The Project. The DPEIR says that the proposed "Project" (not building the Regents Road Bridge and not Widening Genesee Avenue) would result in significant and unmitigated impacts in the following areas:

- Transportation/Circulation
- Air Quality
- Greenhouse Gas Emissions
- Noise
- Public Services and Facilities.

All of these environmental factors would be adversely affected by The Project.

We believe that the primary purpose for having two complete north-south arterials in University City (Genesee Avenue and Regents Road) is to serve the rapidly expanding business, scientific research, healthcare, and university (UCSD) communities in North UC. There have been recent approvals of over **26 major construction projects** in the University City area. Many of these projects are already well underway in various phases of construction. There are **22 other projects** pending approval. Almost all of these projects involve parking structures or parking lots that indicate a major growth in SOVs and MOVs traveling to and from the UC area.

In addition, on the UCSD campus there are over **23 construction projects** that are either in the planning stages or under construction. **Thirteen of these projects** are in the East Campus area where many of the personnel who work there or travel to these destinations for appointments will use Genesee Avenue as their primary north-south artery for access.

The roadway network in University City is intended primarily to deliver workplace personnel, goods, and services to and from these enterprises. Denying the University City community a second major north-south surface artery, which is in the current UC Plan, will continue to constrain vehicle travel to business sites, healthcare institutions, scientific research centers, and educational institutions and will stifle effective growth. University City will be relegated to a future of unacceptably dysfunctional roadways that will worsen significantly in the near future. The growth in University City should not and cannot be sustained without delivery of the roadway system currently in the UC Plan.

Here are our major findings as a result of reviewing the DPEIR.

TRANSPORTATION/CIRCULATION

Section 4.2 describes and discusses "Transportation/Circulation" in University City which is at a critical point in the history of the community. Transportation/circulation is the key issue

Citizens-1-1
cont.

Citizens-1-2 Comment acknowledged. Chapter 5.0, Cumulative Impacts, of the Draft PEIR discusses the Project's cumulative impacts.

Citizens-1-2

Citizens-1-3 Comment acknowledged.

Citizens-1-3

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

that should be addressed in the contents of this DPEIR. The Genesee Avenue roadway is a primary route for traffic coming into UC from the south in the morning and leaving in the evening. The DPEIR does address many of the issues related to traffic circulation in UC. The document does state that nine out of 20 intersections on Genesee Avenue operate at UNACCEPTABLE levels (E or F) during peak traffic hours during the work week. This realization alone should obligate the City of San Diego to seek traffic relief solutions for the Genesee Avenue roadway and other roadways in University City that have unacceptable intersections and roadway segments.

The DPEIR lists **eight roadway intersections** that would operate acceptably under the current University Community Plan (UCP) upon the completion of the Regents Road Bridge (RRB) and the Genesee Avenue Widening (GAW) projects, but will operate at unacceptable levels (Level of Service E or F) under The Project (with no RRB or GAW projects):

The DPEIR lists **twenty one roadway intersections** in the University City area that would operate at unacceptable levels under the current UCP, however they would be significantly worse during one or both of the AM or PM peak hours if the RRB and GAW are removed from the UCP.

In addition to the above intersections that would be significantly affected by removing RRB and GAW from the UCP, the EIR identifies **four roadway segments** that operate at unacceptable Levels of Service (LOS E or F) which would be acceptable if RRB and GAW remain in the UCP. The DPEIR also lists **fourteen roadway segments** that would operate at unacceptable LOS and would become significantly worse if RRB and GAW are removed from the UCP.

The DPEIR also cites negative impacts to **eight freeway segments** and **eight freeway ramps** if RRB and GAW are removed from the UCP.

It is noted that, in spite of recommendations that we submitted in response to the December 2015 *Draft Existing Conditions Summary Report* (posted to the City's website on 17 January 2016) recommending the inclusion of the 3:00 pm to 4:00 pm time frame in the traffic analysis recommendations, this was not accomplished. The 3:00 to 4:00 pm time period on Genesee Avenue often has as much as a 10% greater vehicle count than the hours from 4:00 pm to 6:00 pm, the time period that was analyzed. This time period, 3:00 pm to 4:00 pm is often indicated in the City's own traffic data as the peak traffic volume hour of the day. Those of us who live here know that this hour is an important hour to evaluate, if not the most important hour to consider in this traffic analysis. Unlike other communities, Genesee Avenue in University City particular is subject to extraordinary traffic during the 3:00 pm to 4:00 pm hour due to hospital shift changes, school schedules, and the departure of many persons who work in financial organizations that follow the NYSE open and close schedule in their daily work.

The failure to include this peak traffic hour (3:00 pm to 4:00 pm) in traffic analysis calculations may indicate Levels of Service during peak hours that are inaccurate. Intersections or roadway segments that are C or D during other hours of the day, even 4:00 pm to 6:00 pm may be E or F during this hour. It is important to get this right in order to have confidence in the findings of the DPEIR. *Our recommendation is still to add this peak traffic hour to the PM traffic analysis (extending the analysis to the 3:00 pm to 6:00 pm time frame) in order to truly capture the impact of the peak traffic period.*

Citizens-1-3 cont.

Citizens-1-4

Citizens-1-4

The commenter discusses a response submitted to the December 2015 Existing Conditions Summary Report (posted to the City's website on January 17, 2016) recommending the inclusion of the 3:00 p.m. to 4:00 p.m. time frame in the traffic analysis. The 24-hour roadway segment counts were collected at 81 locations throughout the community. As described in Appendix C, Transportation Impact Study, 80 percent of the roadway segments had the peak hour fall between 4:00 p.m. and 6:00 p.m. The remaining 20 percent of roadway segments showed peak hours just before or after the 4:00 p.m. to 6:00 p.m. timeframe and documented minor differences in volumes between their peak hour and the volumes experienced between 4:00 p.m. to 6:00 p.m. Segments that had peak hours earlier were primarily around the schools in South University. Volumes on Genesee Avenue across Rose Canyon were found to have peak hours at 5:00 p.m. A second set of 24-hour counts were collected along Genesee Avenue between Governor Drive and Nobel Drive and found the same peak patterns between 4:00 p.m. to 6:00 p.m. It is recognized that other portions of Genesee Avenue may have peaks on certain days that are slightly outside of the 4:00 p.m. to 6:00 p.m. timeframe, but the intersecting roadways at those locations

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Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

The *Transportation Circulation* discussion in section 4.2 recognizes significant improvements in UC traffic circulation that would result from the completion of the Regents Road Roadway and the Genesee Avenue Widening project. However the document begins to stumble through a muddled, unclear explanation that underplays the value of these important UCP projects. Then the document drops in an unexplained list of mitigations in section 4.2.4.3 (Mitigation Framework, lists under TRA-1 and TRA-2). These lists of mitigations have no substantive explanation as to their individual benefits, cost estimates, or probability of being approved and funded. The document does not contain substantive descriptions of each of these mitigations There is no explanation as to all of the possible mitigations that were considered and the criteria that was used to select the mitigations on these lists (TRA-1 and TRA-2).

Citizens-1-5

The lists of mitigations in section 4.2.4.3 seem to be offered without any explanation as to whether they represent an additional alternative that might be called "The Project Plus a Number of Unexplained Mitigation Projects." Some of the items in these mitigation lists (TRA-1 and TRA-2) have been discussed and dismissed in the past as impractical (grade separation at Governor and Genesee for example, Mitigation Framework item TRA-2.3). One of the mitigations listed, another major one, is an almost complete surprise ("Install roundabout control at this roadway intersection", Governor Drive and I-805 northbound ramps, TRA-2.13).

An additional weakness in the Traffic Circulation section is that the discussion of the modeling results for future transportation – particularly the effects of implementing the Regents Road Bridge – are not credible. It is simply not logical that the implementation of the Regents Road arterial route won't have a more positive impact on north-south traffic.

Citizens-1-6

AIR QUALITY IMPACTS

The DPEIR concludes that due to its traffic and circulation impacts, The Project would have significant, unmitigated impacts to air quality (see DPEIR, section 4.4). Thresholds for nitrogen oxides (a precursor of ozone or smog) and carbon monoxide would be exceeded. The Project could violate ambient air quality standards and the impact would be significant. However, the air quality data used in the analysis for the DPEIR was taken from the Beardsley Street monitoring station which is approximately 14 miles from University City.

Citizens-1-7

Given that The Project actually represents the current status of air quality in University City (No RRB and No GAW), it is entirely possible that the current ambient air quality actually exceeds the thresholds for nitrogen oxides and carbon monoxide at this time. Given the proximity of Genesee Avenue to a number of schools in the area including UC High School, Standley Middle School, Curie Elementary School, La Jolla Country Day, and UCSD, the issue of air quality in University City is a serious one that should be monitored more directly within the community.

Citizens-1-8

We recommend that a local air quality monitoring be conducted in the UC area during the school year to determine the effects that idling vehicle engines, particularly on Genesee Avenue, are having on air quality in the vicinity of these schools as well as other populated areas. This UC-specific air quality monitoring study should be conducted and included as part of the DPEIR study effort in order to provide a complete picture of the air quality impacts of The Project in the UC area.

Citizens-1-9

ERROR IN KEY ALTERNATIVE DESCRIPTION

The description of two of the alternatives is *incorrect* in Section 9.2 of the DPEIR. This

Citizens-1-10

have much less traffic at those times and volumes approaching the intersection as a whole are not as high. The methodology restricted the available timeframe to collect peak-hour counts to a 2-hour window to help capture a similar traffic moment in time community-wide. Based on the roadway segment count collection, 4:00 p.m. to 6:00 p.m. was determined to be the timeframe that best represented highest traffic volumes in the study area. With the exception of Centurion Square, the intersections along Genesee Avenue between SR 52 and Nobel Drive were identified as having an impact with the peak hours analyzed under each alternative.

Citizens-1-5

The Mitigation Framework is explained at the beginning of Section 4.2.4.3. As it states in the section, project-level analysis of the potential impacts of the proposed mitigation measure would be completed at such a time as the improvements are implemented.

Citizens-1-6

The commenter asserts that the implementation of the Regents Road Bridge should have a more positive impact on north-south traffic that should be reflected in the traffic analysis included in Section 4.2, Traffic/Circulation. Future traffic patterns were based on SANDAG models and considered to be reasonable. The models showed that implementing the Regents Road Bridge would relieve some traffic on Genesee Avenue, but would also provide another route for vehicles that are currently using the adjacent freeways. Currently, Genesee Avenue, I-5, and I-805 are options that provide north-south connections. Regents Road Bridge would provide a fourth north-south connection that would shift traffic from each of these other three routes. The overall north-south demand between the four route options is large enough that each route would be utilized heavily. More detailed explanations of the change in patterns for each alternative are provided in Chapter 7 of Appendix C (Transportation Impact Study).

Citizens-1-7

The purpose of the air quality monitoring station data is to present the existing air quality in the San Diego Air Basin and was not directly used in the analysis of the Project impacts.

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Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

- Citizens-1-8 It is unclear how the "Project actually represents the current status of air quality" as stated in the comment. The Air Resources Board and SDAPCD are responsible for monitoring air quality in the area, and any monitoring would be done by those agencies.
- Citizens-1-9 Please see responses to comments Citizens-1-7 and Citizens-1-8.

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RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

includes one of the more important alternatives – *No Construction of Regents Road Bridge and Widening Genesee Avenue*, which is considered an environmentally superior alternative (or an environmentally superior “build” alternative) to implementing both projects. The description of the Widening of Genesee Avenue project in this section includes a passage beginning in the last paragraph on page 9-4 that states the “*Widening of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive...*”

Citizens-1-10 cont.

This is not a correct description of the Widening of Genesee Avenue project. That project, as described in current North UC Facilities Financing Plan’s description of Project NUC-A, does not include the grade-separated intersection on Genesee Avenue at Governor Drive. The grade separation project has been considered in the past as a separate alternative, but it is not part of the project description for Genesee Avenue Widening. A similar mistake is repeated on page 9-5 in the description of the *Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative*.

It is reasonable to assume that calculations for traffic capacity for the Genesee Avenue Widening were erroneously influenced by the incorrect inclusion of Genesee Avenue/Governor Drive grade separation as part of the description of the GAW project. These assumptions and calculations should be reevaluated to correct any errors regarding traffic flow with the grade separation feature included.

Citizens-1-11

The description of Genesee Avenue Widening should be rewritten to conform to what is currently in the UC Plan and the associated calculations should be corrected. The evaluations of this alternative as being the environmentally superior alternative or the environmentally superior “build” alternative should be reviewed in light of the error in defining this project. Without the grade separation feature (a dramatic and very costly feature that is not reflected in the current NUC-4 project budget), it is assumed that the improved transportation/circulation capacity throughput for the appropriately scoped GAW project would be significantly less than the incorrectly defined GAW project in the DPEIR.

Citizens-1-12

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

The conclusions regarding the *Visual Effects and Neighborhood Character* (section 4.3) are puzzling to say the least. The UCP states that a key goal is to “improve accessibility and use relationships within the community by establishing well-defined, multi-modal linkage systems.” Multi-modal accommodations within UC are almost universally viewed as deficient especially when considering bicyclists and pedestrians wanting to travel between South and North UC across Rose Canyon. The Project (eliminating the Regents Road Bridge in particular) will eliminate one of the true possibilities of connecting key segments of the community. Genesee Avenue’s lack of safety for bicyclists and lack of reasonable comfort and safety for pedestrians walking between Governor Drive and Nobel Drive are well documented. The elimination of the pedestrian and bicyclist accommodations as a result of the removal of the RRP project from the UC Plan should be viewed as a deficiency in the plans for improving neighborhood character by more effectively connecting south and north UC.

Citizens-1-13

In addition, it is implied that the mere presence of the Regents Road Bridge across Rose Canyon would be some kind of eyesore, interrupting the beauty of the canyon and disrupting the peaceful neighborhood character of UC’s western neighborhoods. This implication belies the fact that the planned bridge, which will be approximately 79 feet wide in an approximately 3 mile long canyon (15,840 feet) is, and has been, intended to SPAN the narrow section of the

Citizens-1-14

Citizens-1-10 Comment acknowledged. The public facilities identified in the University Community Plan Amendment serve as the basis for the projects in the proposed North University City PFFP. If an alternative, as described in Section 9.2, Alternatives Considered, to the Project is selected, then the current PFFP would be amended. In particular, NUC-A, the widening of Genesee Avenue, would be modified to include the features described under the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR) or Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

Citizens-1-11 Please see response to comment Citizens-1-10.

Citizens-1-12 Please see response to comment Citizens-1-10.

Citizens-1-13 As discussed in Section 4.3.6.1 of the Draft PEIR, the elimination of the planned Regents Road Bridge would continue to exclude the ability of travelers to access the opposite side of Rose Canyon via Regents Road, thus reducing access provided to and from the community. However, it is further discussed that the elimination of Regents Road Bridge and retention of the roadway in its current condition would not change the overall character of the community. While elimination of the Regents Road Bridge would not improve accessibility or establish well-defined, multi-modal linkage systems in the area, the UCP as a whole includes other proposed bicycle and pedestrian linkages that would improve accessibility. As described in the current University Community Plan Urban Design Element Section III, Linkages, additional pedestrian connections, such as urban paths and trails through nature, are proposed in the South University Subarea to connect the area to other subareas in the University community (see Figure 10 of the UCP). In addition, the Draft UCP Transportation Element Amendment proposes other

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

canyon where the 4-lane Regents Road comes to an abrupt end on both the south and north sides of the canyon. The width of the bridge constitutes less than 0.5 % (0.00498) of the total length of Rose Canyon. We believe that an appropriately pleasing bridge design, coupled with the accommodations for pedestrians to walk across the bridge above the canyon floor will enable the public to appreciate the canyon from an elevated vantage point. Sunrise or sunset views of Rose Canyon from the canyon's elevated hillsides will no longer be the exclusive domain of private property owners. These views will be accessible to the general public once the bridge is built and put in service.

Citizens-1-14 cont.

BIOLOGICAL RESOURCES

The discussions in section 4.9 regarding the impacts of The Project on biological resources is a continuous statement of the obvious. The Project doesn't do anything. The Project eliminates two planned projects without arguing for the substitution of any legitimately defined/analyzed mitigations. Therefore, The Project cannot possibly have any adverse impact on biological resources. The 10 pages that discuss Significance Determination Thresholds (4.9.3) and Impact Analysis (4.9.4) are a vacuous waste of effort.

Citizens-1-15

Citizens-1-14

If a more involved discussion had compared the other cited alternatives in terms of their relative impact on biological resources then these sections would have some value. However, as is, this discussion is not meaningful.

TOO MUCH EMPHASIS ON ENVIRONMENTAL IMPACTS OF CONSTRUCTION

If the DPEIR was truly comparing a real project (as opposed to a project that simply eliminates projects and doesn't substitute anything) to the "No Project" alternative which is actually two projects then some of this document might make sense. It is not difficult to understand that doing nothing does not have the environmental impacts from construction that actual construction projects would.

Citizens-1-16

Citizens-1-15

However, it should be pointed out that the construction activity for Genesee Avenue Widening, as compared to constructing the Regents Road Bridge, would have significantly more impact on the University City air quality, transportation/circulation, and biological resources. Civil engineering estimates done for the *University City North/South Transportation Corridor Study* showed significantly more earth moving trips would be required for GAW than RRB. For example, the estimated earth transport truck trips for the RRB project come in at approximately 370. The estimated earth transport truck trips for the GAW project are over 1,900. Also, GAW would result in the removal of as many as 200 mature trees. The RRB project wouldn't remove any mature trees.

These arguments are important in comparing the environmental impacts of the alternatives. The GAW project's impacts on biological resources, air quality, and transportation/circulation are substantially greater than the RRB project.

FAILURE TO CORRECT ERRORS IN TRAFFIC DATA THAT WERE PRESENT IN DECEMBER VERSION OF EXISTING CONDITIONS SUMMARY

In a letter we submitted to the City Planning Department on May 1, 2016 we pointed out a number of deficiencies in the Existing Conditions summary. Some of those issues have not been addressed. Most importantly, calculation data in the appendices has not been corrected. Here is the summary from that letter:

Citizens-1-17

bikeways in the South University Subarea (see Figure 23 of the Draft UCP Transportation Element). Other linkages are discussed in the Draft UCP Transportation Element Amendment such as the Mid-Coast Corridor Transit Project. The Mid-Coast Corridor Transit Project will extend the Trolley Blue Line service to the University community, which will provide additional linkages within the area as six trolley stations are currently proposed for the University community.

As discussed in Section 4.3.5.1 of the Draft PEIR, the development of Regents Road Bridge and associated roadway modifications would introduce a new large and urban visual element that would affect the natural aesthetic character of the Rose Canyon area. It should be noted that the analysis in this section discusses the development of Regents Road Bridge in comparison to existing conditions (i.e., no development of the bridge). Should Regents Road Bridge be constructed, while it has the potential to be aesthetically pleasing in its design, it also has the potential to create a negative aesthetic when compared to retaining the Rose Canyon area as it currently exists.

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

As discussed in CEQA Guidelines Section 15126.6(e)(3)(A), when the Project is a revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project Alternative will be the continuation of the existing plan, policy, or operation into the future. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

Additionally, the commenter states that the construction activity for Genesee Avenue Widening should be compared to construction activity for the Regents Road Bridge. However, as discussed in CEQA Guidelines Section 15126.6(d), the evaluation of alternatives shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

NUMEROUS DATA ERRORS IN TABLES IN THE APPENDICES.

The Appendices to the Existing Conditions Summary report contain data tables and illustrations that include the traffic count data in Appendix C. A number of these tables contain format errors and calculation errors. Data format errors, indicated by the character string #####, indicate improper formatting of the published data as it was extracted from a database or spreadsheet program. Calculation errors are indicated in numerous places by the character string #DIV/0! which indicates a formula that has attempted to divide a quantity by zero. Both types of errors, format and calculation errors, appear many times in tables throughout Appendix C. (See the examples in Figure 1).

RECOMMENDATION: The appendix tables that contain format and calculation errors should

be corrected and the report should be republished and recirculated.

Citizens-1-17
cont.

Citizens-1-17

project. The Draft PEIR adequately addressed the impacts of the alternatives against the impacts of the Project.

Commenter states that a separate letter was submitted to the City Planning Department on May 1, 2016, addressing their concerns with the Existing Conditions. See Comment Letter Citizens-2. Calculation data in the appendices included in Appendix C, Transportation Impact Study, is correct and does not have calculation errors. The #DIV/0 and ##### character strings indicate a formula that has attempted to divide a quantity by zero. In all instances where this is present, the movement volumes are 0.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)



**Figure 1. Examples of Calculation and Data Format Errors
from Appendix C -- see attached PDF**

Notification of Attorney Representation

We are hereby notifying the City of San Diego that *Citizens for the Regents Road Bridge, Inc.* has engaged the services of an attorney experienced in CEQA compliance guidelines and EIR case law. Our attorney, Ms. Evelyn R. Heidelberg, has submitted a letter with a substantial number of additional comments on behalf of our organization.

Citizens-1-18

Citizens-1-18

Comment acknowledged. Please see responses to comments for Letter Citizens-2.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

You will see in the submission by Ms. Heidelberg, that the DPEIR has many critical challenges with regard to CEQA compliance and also compliance with the City's own Climate Action Plan, General Plan, and numerous other guidelines and plans.

Citizens-1-18
cont.

We are striving to participate constructively and fully in this process, however it has been our observation that the process is being rushed for no apparent legitimate reason, and that the work product has suffered significantly.

We note, for the record, the following irregularities in the process to date:

- The NOP Scoping comment period took place over the major Christmas/New Year holiday period (2015-2016) which discouraged and diminished full public participation in the process.

Citizens-1-19

- The cover of the Draft Existing Conditions Report indicates that it was completed in December 2015 before the NOP Scoping period comments were due on January 1, 2016 (a holiday). The report was not posted until 17 January. This indicates that the public NOP Scoping comments had no impact whatsoever on the traffic analysis effort that went into the Draft Existing Conditions Report. The data formatting and calculation errors that were noted in that report still exist in the DPEIR.

Citizens-1-20

- The public comment period for the DPEIR meets the absolute minimum under CEQA guidelines for an EIR and it is taking place during a major summer vacation period. This DPEIR has too much volume and is too important to rush the public comment period. *We recommend that this comment period be extended at least 30 days to support a more complete and thorough review and comment process by the public.*

Citizens-1-21

Feel free to call or email me with any questions or concerns you may have regarding this letter or the letter submitted by our attorney, Ms. Heidelberg.

Sincerely,

Austin Speed, President

Citizens for the Regents Road Bridge

(619) 665-6865

Citizens-1-19

Consistent with the requirements of CEQA, a good faith effort was made during the preparation of the Draft PEIR. The CEQA Guidelines, Section 15082, NOP and Determination of Scope of PEIR, were met. Pursuant to CEQA Guidelines 15082, an NOP was prepared and circulated on December 2, 2015, which began a 30-day comment period that ended on January 4, 2016. Approximately 100 comment letters were received on the NOP during this time and were considered in preparation of the PEIR. A scoping meeting was held on December 16, 2015, starting at 6:00 p.m. at the Nobel Recreation Center Meeting Room #2, located at 8810 Judicial Drive, San Diego, California 92122, to inform the public about the Project and receive comments. Appendix A of the Draft PEIR includes all the comment letters received during the NOP review period. In addition, the public was advised during the scoping meeting and in responses to email/phone inquiries about an extension that the NOP and scoping meeting were just the beginning of the public input process for the environmental review document, and that there would be other opportunities to become involved throughout the Project. Further, the public was advised that, while the NOP states a 30-day deadline for the receipt of comments, public comments would be accepted throughout the EIR process, and that there would be additional opportunities to provide comment on the Project, such as during public review of the draft environmental document and any public hearings. The public was also encouraged to provide their contact information so they could receive future notices. All applicable requirements established by the CEQA Guidelines related to the preparation, notice, and public review and comment to both the NOP and Draft PEIR prepared for the Project have been adequately followed and complied with.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

- Citizens-1-20 As stated in Chapter 1, Introduction, of the Existing Conditions Report prepared in December 2015 and posted to the City’s website on January 17, 2016, the purpose of the Existing Conditions Report was to “summarize the existing conditions within the community for all modes of transportation and to identify potential deficiencies and conflicts that could be addressed through future changes in the transportation network.” As stated in response to comment Citizens-1-19, a good faith effort was made during the preparation of the PEIR to contact all responsible and trustee agencies; organizations; persons who may have an interest in the Project; and all government agencies, including the State Clearinghouse. Pursuant to CEQA Guidelines 15082, an NOP was prepared and circulated on December 2, 2015, which began a 30-day comment period that ended on January 4, 2016. Approximately 100 comment letters were received on the NOP. Any applicable and/or substantive comments in these comment letters were addressed in the Draft PEIR. All applicable requirements established by the CEQA Guidelines related to the preparation, notice, and public review and comment to the NOP prepared for the Project have been adequately followed and complied with.
- Citizens-1-21 Pursuant to CEQA Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by State Agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft PEIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft PEIR was available for public review from June 17, 2016 through August 1, 2016, a 45-day time frame consistent with the public review period requirements under CEQA. As such, the requisite public review period was fulfilled pursuant to the CEQA Guidelines.

LETTER

CITIZENS FOR THE REGENTS ROAD BRIDGE, INC.



Austin Speed, President
7110 Cather Ct.
San Diego, CA 92122
July 31, 2016

Via Email: PlanningCEQA@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue
East Tower, Suite 1200, MS 614C
San Diego, CA 92101

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Ms. Morrison,

As president of the *Citizens for the Regents Road Bridge, Inc.*, a public advocacy group supporting better and safer traffic circulation in University City and surrounding communities, we appreciate the opportunity to offer our comments on the subject Draft Program Environmental Impact Report (DPEIR) I.O. No.: 21003841 (Project No. 480286 / SCH No. 2015121011).

The document was a challenge to review due to its volume and the inconsistent treatment of many of the subject areas. One of the more challenging characteristics of the report is the inverted logic that defines "The Project" as eliminating two planned projects. This semantic construct permeates much of the language in the document including referring to the combination of the two projects: (1.) the Regents Road Bridge (RRB) project and (2.) the Genesee Avenue Widening (GAW) project as the "No Project" alternative.

We find the DPEIR to be an insufficient document to justify the conclusions from the review of alternatives and thus does not sufficiently support any resultant conclusions or recommendations for The Project. The DPEIR says that the proposed "Project" (not building the Regents Road Bridge and not Widening Genesee Avenue) would result in significant and unmitigated impacts in the following areas:

- Transportation/Circulation
- Air Quality

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

Commenter requests the comment period be extended at least 30 days. In accordance with San Diego Municipal Code §128.0307, Requests for Additional Public Review Time on the Draft Environmental Document, "The Planning Director may approve a request from the affected officially recognized community planning group or interested party if there is no officially recognized community planning group for an additional review period not to exceed 14 calendar days. The additional time for review shall not extend the time for action beyond that required under law." The University Community Planning Group, as "the affected officially recognized community planning group" did not request an additional review period beyond the 45-day comment period occurring between June 17, 2016 and August 1, 2016.

Citizens-1-22 Please see responses to comments Citizens-1-1 through Citizens-1-21. It should be noted that this duplicate letter includes Figure 1, which was used to respond to comment Citizens-1-17.

Citizens-1-22

LETTER

- Greenhouse Gas Emissions
- Noise
- Public Services and Facilities.

All of these environmental factors would be adversely affected by The Project.

We believe that the primary purpose for having two complete north-south arterials in University City (Genesee Avenue and Regents Road) is to serve the rapidly expanding business, scientific research, healthcare, and university (UCSD) communities in North UC. There have been recent approvals of over **26 major construction projects** in the University City area. Many of these projects are already well underway in various phases of construction. There are **22 other projects** pending approval. Almost all of these projects involve parking structures or parking lots that indicate a major growth in SOVs and MOVs traveling to and from the UC area.

In addition, on the UCSD campus there are over **23 construction projects** that are either in the planning stages or under construction. **Thirteen of these projects** are in the East Campus area where many of the personnel who work there or travel to these destinations for appointments will use Genesee Avenue as their primary north-south artery for access.

The roadway network in University City is intended primarily to deliver workplace personnel, goods, and services to and from these enterprises. Denying the University City community a second major north-south surface artery, which is in the current UC Plan, will continue to constrain vehicle travel to business sites, healthcare institutions, scientific research centers, and educational institutions and will stifle effective growth. University City will be relegated to a future of unacceptably dysfunctional roadways that will worsen significantly in the near future. The growth in University City should not and cannot be sustained without delivery of the roadway system currently in the UC Plan.

Here are our major findings as a result of reviewing the DPEIR.

TRANSPORTATION/CIRCULATION

Section 4.2 describes and discusses "Transportation/Circulation" in University City which is at a critical point in the history of the community. Transportation/circulation is the key issue that should be addressed in the contents of this DPEIR. The Genesee Avenue roadway is a primary route for traffic coming into UC from the south in the morning and leaving in the evening. The DPEIR does address many of the issues related to traffic circulation in UC. The document does state that nine out of 20 intersections on Genesee Avenue operate at UNACCEPTABLE levels (E or F) during peak traffic hours during the work week. This realization alone should obligate the City of San Diego to seek traffic relief solutions for the Genesee Avenue roadway and other roadways in University City that have unacceptable intersections and roadway segments.

The DPEIR lists **eight roadway intersections** that would operate acceptably under the current University Community Plan (UCP) upon the completion of the Regents Road Bridge (RRB) and the Genesee Avenue Widening (GAW) projects, but will operate at unacceptable levels (Level of Service E or F) under The Project (with no RRB or GAW projects):

Citizens-1-22
cont.

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

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LETTER

The DPEIR lists **twenty one roadway intersections** in the University City area that would operate at unacceptable levels under the current UCP, however they would be significantly worse during one or both of the AM or PM peak hours if the RRB and GAW are removed from the UCP.

In addition to the above intersections that would be significantly affected by removing RRB and GAW from the UCP, the EIR identifies **four roadway segments** that operate at unacceptable Levels of Service (LOS E or F) which would be acceptable if RRB and GAW remain in the UCP. The DPEIR also lists **fourteen roadway segments** that would operate at unacceptable LOS and would become significantly worse if RRB and GAW are removed from the UCP.

The DPEIR also cites negative impacts to **eight freeway segments** and **eight freeway ramps** if RRB and GAW are removed from the UCP.

It is noted that, in spite of recommendations that we submitted in response to the December 2015 *Draft Existing Conditions Summary Report* (posted to the City's website on 17 January 2016) recommending the inclusion of the 3:00 pm to 4:00 pm time frame in the traffic analysis recommendations, this was not accomplished. The 3:00 to 4:00 pm time period on Genesee Avenue often has as much as a 10% greater vehicle count than the hours from 4:00 pm to 6:00 pm, the time period that was analyzed. This time period, 3:00 pm to 4:00 pm is often indicated in the City's own traffic data as the peak traffic volume hour of the day. Those of us who live here know that this hour is an important hour to evaluate, if not the most important hour to consider in this traffic analysis. Unlike other communities, Genesee Avenue in University City particular is subject to extraordinary traffic during the 3:00 pm to 4:00 pm hour due to hospital shift changes, school schedules, and the departure of many persons who work in financial organizations that follow the NYSE open and close schedule in their daily work.

The failure to include this peak traffic hour (3:00 pm to 4:00 pm) in traffic analysis calculations may indicate Levels of Service during peak hours that are inaccurate. Intersections or roadway segments that are C or D during other hours of the day, even 4:00 pm to 6:00 pm may be E or F during this hour. It is important to get this right in order to have confidence in the findings of the DPEIR. *Our recommendation is still to add this peak traffic hour to the PM traffic analysis (extending the analysis to the 3:00 pm to 6:00 pm time frame) in order to truly capture the impact of the peak traffic period.*

The *Transportation Circulation* discussion in section 4.2 recognizes significant improvements in UC traffic circulation that would result from the completion of the Regents Road Roadway and the Genesee Avenue Widening project. However the document begins to stumble through a muddled, unclear explanation that underplays the value of these important UCP projects. Then the document drops in an unexplained list of mitigations in section 4.2.4.3 (Mitigation Framework, lists under TRA-1 and TRA-2). These lists of mitigations have no substantive explanation as to their individual benefits, cost estimates, or probability of being approved and funded. The document does not contain substantive descriptions of each of these mitigations. There is no explanation as to all of the possible mitigations that were considered and the criteria that was used to select the mitigations on these lists (TRA-1 and TRA-2).

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

Citizens-1-22
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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

The lists of mitigations in section 4.2.4.3 seem to be offered without any explanation as to whether they represent an additional alternative that might be called “The Project Plus a Number of Unexplained Mitigation Projects.” Some of the items in these mitigation lists (TRA-1 and TRA-2) have been discussed and dismissed in the past as impractical (grade separation at Governor and Genesee for example, Mitigation Framework item TRA-2.3). One of the mitigations listed, another major one, is an almost complete surprise (“Install roundabout control at this roadway intersection”, Governor Drive and I-805 northbound ramps, TRA-2.13).

An additional weakness in the Traffic Circulation section is that the discussion of the modeling results for future transportation – particularly the effects of implementing the Regents Road Bridge – are not credible. It is simply not logical that the implementation of the Regents Road arterial route won’t have a more positive impact on north-south traffic.

AIR QUALITY IMPACTS

The DPEIR concludes that due to its traffic and circulation impacts, The Project would have significant, unmitigated impacts to air quality (see DPEIR, section 4.4). Thresholds for nitrogen oxides (a precursor of ozone or smog) and carbon monoxide would be exceeded. The Project could violate ambient air quality standards and the impact would be significant. However, the air quality data used in the analysis for the DPEIR was taken from the Beardsley Street monitoring station which is approximately 14 miles from University City.

Given that The Project actually represents the current status of air quality in University City (No RRB and No GAW), it is entirely possible that the current ambient air quality actually exceeds the thresholds for nitrogen oxides and carbon monoxide at this time. Given the proximity of Genesee Avenue to a number of schools in the area including UC High School, Standley Middle School, Curie Elementary School, La Jolla Country Day, and UCSD, the issue of air quality in University City is a serious one that should be monitored more directly within the community.

We recommend that a local air quality monitoring be conducted in the UC area during the school year to determine the effects that idling vehicle engines, particularly on Genesee Avenue, are having on air quality in the vicinity of these schools as well as other populated areas. This UC-specific air quality monitoring study should be conducted and included as part of the DPEIR study effort in order to provide a complete picture of the air quality impacts of The Project in the UC area.

ERROR IN KEY ALTERNATIVE DESCRIPTION

The description of two of the alternatives is *incorrect* in Section 9.2 of the DPEIR. This includes one of the more important alternatives – *No Construction of Regents Road Bridge and Widening Genesee Avenue*, which is considered an environmentally superior alternative (or an environmentally superior “build” alternative) to implementing both projects. The description of the Widening of Genesee Avenue project in this section includes a passage beginning in the last

Citizens-1-22
cont.

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paragraph on page 9-4 that states the “Widening of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive...”

This is not a correct description of the Widening of Genesee Avenue project. That project, as described in current North UC Facilities Financing Plan’s description of Project NUC-A, does not include the grade-separated intersection on Genesee Avenue at Governor Drive. The grade separation project has been considered in the past as a separate alternative, but it is not part of the project description for Genesee Avenue Widening. A similar mistake is repeated on page 9-5 in the description of the *Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative*.

It is reasonable to assume that calculations for traffic capacity for the Genesee Avenue Widening were erroneously influenced by the incorrect inclusion of Genesee Avenue/Governor Drive grade separation as part of the description of the GAW project. These assumptions and calculations should be reevaluated to correct any errors regarding traffic flow with the grade separation feature included.

The description of Genesee Avenue Widening should be rewritten to conform to what is currently in the UC Plan and the associated calculations should be corrected. The evaluations of this alternative as being the environmentally superior alternative or the environmentally superior “build” alternative should be reviewed in light of the error in defining this project. Without the grade separation feature (a dramatic and very costly feature that is not reflected in the current NUC-4 project budget), it is assumed that the improved transportation/circulation capacity throughput for the appropriately scoped GAW project would be significantly less than the incorrectly defined GAW project in the DPEIR.

Citizens-1-22
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VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

The conclusions regarding the *Visual Effects and Neighborhood Character* (section 4.3) are puzzling to say the least. The UCP states that a key goal is to “improve accessibility and use relationships within the community by establishing well-defined, multi-modal linkage systems.” Multi-modal accommodations within UC are almost universally viewed as deficient especially when considering bicyclists and pedestrians wanting to travel between South and North UC across Rose Canyon. The Project (eliminating the Regents Road Bridge in particular) will eliminate one of the true possibilities of connecting key segments of the community. Genesee Avenue’s lack of safety for bicyclists and lack of reasonable comfort and safety for pedestrians walking between Governor Drive and Nobel Drive are well documented. The elimination of the pedestrian and bicyclist accommodations as a result of the removal of the RRP project from the UC Plan should be viewed as a deficiency in the plans for improving neighborhood character by more effectively connecting south and north UC.

In addition, it is implied that the mere presence of the Regents Road Bridge across Rose Canyon would be some kind of eyesore, interrupting the beauty of the canyon and disrupting the peaceful neighborhood character of UC’s western neighborhoods. This implication belies the fact that the planned bridge, which will be approximately 79 feet wide in an approximately 3 mile long canyon (15,840 feet) is, and has been, intended to SPAN the narrow section of the canyon where the 4-lane Regents Road comes to an abrupt end on both the south and north sides of the canyon.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

The width of the bridge constitutes less than 0.5 % (0.00498) of the total length of Rose Canyon. We believe that an appropriately pleasing bridge design, coupled with the accommodations for pedestrians to walk across the bridge above the canyon floor will enable the public to appreciate the canyon from an elevated vantage point. Sunrise or sunset views of Rose Canyon from the canyon's elevated hillsides will no longer be the exclusive domain of private property owners. These views will be accessible to the general public once the bridge is built and put in service.

BIOLOGICAL RESOURCES

The discussions in section 4.9 regarding the impacts of The Project on biological resources is a continuous statement of the obvious. The Project doesn't do anything. The Project eliminates two planned projects without arguing for the substitution of any legitimately defined/analyzed mitigations. Therefore, The Project cannot possibly have any adverse impact on biological resources. The 10 pages that discuss Significance Determination Thresholds (4.9.3) and Impact Analysis (4.9.4) are a vacuous waste of effort.

If a more involved discussion had compared the other cited alternatives in terms of their relative impact on biological resources then these sections would have some value. However, as is, this discussion is not meaningful.

TOO MUCH EMPHASIS ON ENVIRONMENTAL IMPACTS OF CONSTRUCTION

If the DPEIR was truly comparing a real project (as opposed to a project that simply eliminates projects and doesn't substitute anything) to the "No Project" alternative which is actually two projects then some of this document might make sense. It is not difficult to understand that doing nothing does not have the environmental impacts from construction that actual construction projects would.

However, it should be pointed out that the construction activity for Genesee Avenue Widening, as compared to constructing the Regents Road Bridge, would have significantly more impact on the University City air quality, transportation/circulation, and biological resources. Civil engineering estimates done for the *University City North/South Transportation Corridor Study* showed significantly more earth moving trips would be required for GAW than RRB. For example, the estimated earth transport truck trips for the RRB project come in at approximately 370. The estimated earth transport truck trips for the GAW project are over 1,900. Also, GAW would result in the removal of as many as 200 mature trees. The RRB project wouldn't remove any mature trees.

These arguments are important in comparing the environmental impacts of the alternatives. The GAW project's impacts on biological resources, air quality, and transportation/circulation are substantially greater than the RRB project.

Citizens-1-22
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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

FAILURE TO CORRECT ERRORS IN TRAFFIC DATA THAT WERE PRESENT IN DECEMBER VERSION OF EXISTING CONDITIONS SUMMARY

In a letter we submitted to the City Planning Department on May 1, 2016 we pointed out a number of deficiencies in the Existing Conditions summary. Some of those issues have not been addressed. Most importantly, calculation data in the appendices has not been corrected. Here is the summary from that letter:

NUMEROUS DATA ERRORS IN TABLES IN THE APPENDICES.

The Appendices to the Existing Conditions Summary report contain data tables and illustrations that include the traffic count data in Appendix C. A number of these tables contain format errors and calculation errors. Data format errors, indicated by the character string #####, indicate improper formatting of the published data as it was extracted from a database or spreadsheet program. Calculation errors are indicated in numerous places by the character string #DIV/0! which indicates a formula that has attempted to divide a quantity by zero. Both types of errors, format and calculation errors, appear many times in tables throughout Appendix C. (See the examples in Figure 1).

RECOMMENDATION: The appendix tables that contain format and calculation errors should be corrected and the report should be republished and recirculated.

Citizens-1-22
cont

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Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

Location: La Jolla Village Drive @ Genesee Avenue

AM Period (7:00 AM - 9:00 AM)					
	Southbound U-Turn	Westbound U-Turn	Northbound U-Turn	Eastbound U-Turn	TOTAL
7:00 AM	0	3	1	1	5
7:15 AM	0	2	0	0	2
7:30 AM	0	2	0	0	2
7:45 AM	0	1	0	0	1
8:00 AM	0	2	0	1	3
8:15 AM	0	0	0	0	0
8:30 AM	0	2	0	0	2
8:45 AM	0	2	0	0	2
Total	0	14	1	2	17

AM Intersection Peak Hour: 7:15 AM - 8:15 AM Intersection PHF: 0.67

	North Leg EB	East Leg	South Leg EB	West Leg SB	TOTAL
Volume	0	0	0	1	8
PHF	#DIV/0!	0.88	#DIV/0!	0.25	0.67
Movement PHF	#DIV/0!	0.88	#DIV/0!	0.25	0.67

Location: La Jolla Village Drive @ Genesee Avenue

AM Period (7:00 AM - 9:00 AM)													
	Southbound			Westbound			Northbound			Eastbound			TOTAL
	Right	Thru	Left	Right	Thru	Left	Right	Thru	Left	Right	Thru	Left	
7:00 AM	0	2	0	0	1	0	0	1	1	0	0	0	5
7:15 AM	0	2	0	0	2	0	0	8	0	0	0	0	12
7:30 AM	0	2	0	0	0	0	0	8	0	0	1	1	12
7:45 AM	0	0	0	0	1	0	0	6	0	0	1	1	9
8:00 AM	0	2	0	0	1	0	0	4	0	0	1	0	8
8:15 AM	0	2	0	0	0	0	0	6	0	0	1	0	9
8:30 AM	0	0	0	0	0	0	0	2	0	0	2	0	4
8:45 AM	0	1	0	0	0	0	0	1	0	0	2	0	4
Total	0	11	0	0	5	0	0	36	1	0	8	2	63

AM Intersection Peak Hour: 7:15 AM - 8:15 AM Intersection PHF: 0.88

	Southbound			Westbound			Northbound			Eastbound			TOTAL
	Right	Thru	Left	Right	Thru	Left	Right	Thru	Left	Right	Thru	Left	
Volume	0	6	0	0	0	0	0	0	3	2	2	4	41
PHF	0.75	0.75	0.75	0.50	0.50	0.50	0.81	0.81	0.81	0.75	0.50	0.50	0.85
Movement PHF	0.75	0.75	0.75	0.50	0.50	0.50	0.81	0.81	0.81	0.75	0.50	0.50	0.85

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Figure 1. Examples of Calculation and Data Format Errors from Appendix C

Notification of Attorney Representation

We are hereby notifying the City of San Diego that *Citizens for the Regents Road Bridge, Inc.* has engaged the services of an attorney experienced in CEQA compliance guidelines and EIR

Citizens-1-22 cont.

LETTER

case law. Our attorney, Ms. Evelyn R. Heidelberg, has submitted a letter with a substantial number of additional comments on behalf of our organization.

You will see in the submission by Ms. Heidelberg, that the DPEIR has many critical challenges with regard to CEQA compliance and also compliance with the City's own Climate Action Plan, General Plan, and numerous other guidelines and plans.

We are striving to participate constructively and fully in this process, however it has been our observation that the process is being rushed for no apparent legitimate reason, and that the work product has suffered significantly.

We note, for the record, the following irregularities in the process to date:

- The NOP Scoping comment period took place over the major Christmas/New Year holiday period (2015-2016) which discouraged and diminished full public participation in the process.
- The cover of the Draft Existing Conditions Report indicates that it was completed in December 2015 before the NOP Scoping period comments were due on January 1, 2016 (a holiday). The report was not posted until 17 January. This indicates that the public NOP Scoping comments had no impact whatsoever on the traffic analysis effort that went into the Draft Existing Conditions Report. The data formatting and calculation errors that were noted in that report still exist in the DPEIR.
- The public comment period for the DPEIR meets the absolute minimum under CEQA guidelines for an EIR and it is taking place during a major summer vacation period. This DPEIR has too much volume and is too important to rush the public comment period. *We recommend that this comment period be extended at least 30 days to support a more complete and thorough review and comment process by the public.*

Citizens-1-22
cont.

Feel free to call or email me with any questions or concerns you may have regarding this letter or the letter submitted by our attorney, Ms. Heidelberg.

Sincerely,



Austin Speed, President
Citizens for the Regents Road Bridge
(619) 665-6865

RESPONSE

Citizens for the Regents Road Bridge, Inc. (July 31, 2016)

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LETTER

RESPONSE

Tecolote Canyon Citizens Advisory Committee (July 31, 2016)

From: [M. Eloise Battle](#)
To: [P.N. Planning/CDA](#)
Subject: University Community Plan Amendment, No. 480386/ SCH No. 2015121011
Date: Sunday, July 31, 2016 5:37:31 PM

The City of San Diego has a unique treasure in its protected Open Space. San Diego County is home to more Endangered, Threatened and Species of Concern than any other county in the lower 48 states. This Dedicated Open Space Parkland not only gives respite to our valued native wildlife but also to our urban human residents. It is a highly prized outdoor classroom for several schools, a wildlife preserve and recreational area. I have introduced school children to the wonders of our canyons for decades and am now meeting their children, anxious to be introduced to the same wonders. I am strongly opposed to the construction of a bridge across Rose Canyon and the widening of Genesee Ave and just as strongly support its deletion from the University City Community Plan. The bridge construction would do tremendous damage to Rose Canyon's slopes and general integrity. Every square foot of our Open Space is precious and once paved over or changed, it is gone forever and future generations will never experience our special Coastal Sage Shrub canyons. Instead, please improve our public transportation system and traffic circulation without laying more and more concrete over what few open areas still exist in our urban core.

Sincerely,
 M. Eloise Battle, Chair Emerita
 Tecolote Canyon Citizens Advisory Committee
 5635 Tamres Dr
 San Diego, CA, 92111
 858-278-1617

TCCAC-1-1

TCCAC-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

From: Evelyn Heidelberg <eheidelberg@cgs3.com>
Sent: Monday, August 01, 2016 1:46 PM
To: PLN_PlanningCEQA; Morrison, Susan
Subject: Comments on DPEIR on University Community Plan Amendment (#480286)
Attachments: Citizens - Comment Letter on DEIR 07-29-16.pdf

Please see the attached.

Evelyn F. Heidelberg

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RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)



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July 29, 2016

VIA FEDERAL EXPRESS AND E-MAIL (PlanningCEQA@sandiego.gov)

Ms. Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200
MS 413
San Diego, CA 92101

Re: Draft EIR for University Community Plan Amendment, Project No. 480286

Dear Ms. Morrison:

On behalf of my client, Citizens for the Regents Road Bridge, Inc. ("Citizens"), I submit these comments (including attachments) on the Draft Program Environmental Impact Report for the pending University Community Plan Amendment ("DPEIR").

I. SUMMARY OF COMMENTS

Citizens finds the DPEIR to be inadequate and misleading in numerous, significant respects:

- Foremost among these inadequacies is that the DPEIR ignores or downplays the inconsistency of the proposed Project – removal of the Regents Road Bridge and of the Genesee Avenue Widening projects, which have been integral elements of the University Community Plan ("UCP") and the City's General Plan for decades – with fundamental goals of the UCP and the General Plan, as well as with other adopted plans, including the Climate Action Plan, and the Regional Air Quality Strategy, and the regional Sustainable Communities Strategy. And importantly, the DPEIR fails to address the potential consequences for future development in the City of the Project's inconsistency with those plans and regional strategies.
- Another critical shortcoming of the DPEIR is its legally and factually flawed analysis of alternatives to the Project, as well as the DPEIR's inconsistent and contradictory statements as to whether the Project or one of its alternatives – "No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative"-- is the "environmentally superior alternative."

Citizens-2-1

Citizens-2-2

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Citizens-2-1

As discussed in Section 4.1, Land Use, of the Draft PEIR, "the determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in physical changes to the environment that could result in the creation of secondary environmental impacts considered significant under CEQA." CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision makers should address. A project is considered consistent with the provisions of the identified regional and local plan if it meets the general intent of the plans, and would not preclude the attainment of the primary intent of the land use plan or policy. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, but is largely consistent with the land use goals of that plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. In addition, inconsistency with specific objectives or policies of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment."

As discussed in Section 4.1, Land Use, subsection 4.1.4, Impact Analysis, the Project would not conflict with the environmental goals,

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objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans. Relevant goals and guidelines from the City of San Diego General Plan and the UCP were compared against the compatibility of the goals of the Project. Implementation of the Project would maintain existing conditions. As discussed in Section 4.1.4.2, Significance of Impacts, because the Project would result in a community plan amendment, the Project would no longer be inconsistent with the UCP and UCP Transportation Element. Further, this portion of the Project would not conflict with any goals, objectives, and recommendations of the City of San Diego General Plan, the North City LCP, or any coastal regulations. Impacts would be less than significant.

Section 4.4, Air Quality, subsection 4.4.4.1, Impact Analysis, discussed potential conflicts or obstruction to the implementation of applicable air quality plans. As discussed, the air quality plans for the SDAB, at the time of this analysis, include the CO maintenance plan, the federal 2012 maintenance plan for the ozone NAAQS, and the RAQS (SDAB is in nonattainment for state ozone standards). While the SDAB is designated as a nonattainment area for the state PM₁₀, and PM_{2.5} standards, the California CAA does not require preparation of attainment plans for these pollutants, and no such plans have been prepared. There are no other air quality attainment plans or maintenance plans for the SDAB. As stated in subsection 4.4.4.2, Significance of Impacts, “Because the Project would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS, the Project would conflict with or obstruct implementation of the applicable air quality plan.” Therefore, impacts related to criteria pollutant and precursor emissions compared to the current assumptions in the RAQS would conflict with or obstruct implementation of the applicable air quality plan and would be significant and unmitigated at the program level.

Citizens-2-2 Please see response to comment FRC-1-10.

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- In view of the CEQA Guidelines statements on the limitations of ‘tiering,’ the environmental impacts of the 23 mitigation measures included in two designated measures, TRA-1 and TRA-2, should have been evaluated as part of the DPEIR rather than being deferred to some future date if and when they may be funded.
- The analysis of the Project’s impacts on Transportation/Circulation is flawed and incomplete in numerous respects, including (a) its use of an outdated Highway Capacity Manual methodology and a superseded SANDAG traffic model; (b) its failure to address potential transportation/circulation impacts of the Project on areas south of the Project area, e.g., in the Clairemont community that would be connected to the UCP area by the Regents Road Bridge; (c) its acknowledgment that vehicle miles traveled will increase significantly, coupled with its illogical conclusion that the Project will have no impact on energy use and conservation; and (d) its admitted failure to “include all vehicle travel and operations in the area as a result of the Project.”
- Inclusion of a grade-separated intersection at Genesee Avenue and Governor Drive in the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” renders that alternative inconsistent with CEQA’s requirements that alternatives selected for analysis reduce significant environmental impacts and are feasible. Related to these shortcomings, the alternatives analysis fails to comply with CEQA’s requirement to describe the rationale for selecting the alternatives considered and for rejecting alternatives considered during the scoping process.

Citizens-2-3

Citizens-2-4

Citizens-2-5

Citizens-2-6

Citizens-2-3 Please see response to comment GJB-1-3.

Citizens-2-4 Please see responses to comments Citizens-2-46 through Citizens-2-50.

Citizens-2-5 Please see response to comment GJB-1-4. In addition, the commenter is concerned with the environmental impacts related to the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR). CEQA Guidelines Section 15126.6 (d) discusses the requirements for evaluating alternatives:

“Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1).”

Before detailing each of the above significant flaws in the DPEIR (which will be followed by a series of comments on numerous provisions of the DPEIR), it is noteworthy that the very first document published with the DPEIR – the eight-page summary of the DPEIR issued by the Planning Department and mailed to dozens of individuals who asked to be notified when the DPEIR was released (hereinafter, “Summary”) – contains a serious error. That document, included as Attachment A, is printed on the Planning Department’s letterhead, summarizes the DPEIR and was distributed to advise potentially interested parties of its availability.¹ At the bottom of the first page is the “Environmental Determination,” which is of great significance to those to whom the summary was provided, i.e., potentially interested parties. If the statements in the Environmental Determination as to the Project’s potential impacts on particular resource areas are not of interest to a recipient of the Summary, then they may not take the time to obtain the DPEIR and review it. Here, the error is the Summary’s omission from the Environmental Determination of an entire set of significant impacts of the proposed Project: namely, the omission of the DPEIR’s conclusion that the Project would have significant and unmitigated impacts to police service and fire and emergency service response times. (See DPEIR, pages 4.13-15 through 4.13-20, and page 8-7.) This omission is particularly egregious, as one of the four stated “Project Objectives” was to “Consider the effects of the Project on the General Plan City of Villages strategies related to

¹ Those parties are identified on pages 3 through 7 of the Summary.

As addressed in Chapter 9.0, Alternatives Analysis, the Project alternatives analysis complied with CEQA Guidelines Section 15126.6, which requires a comparative evaluation of the Project with alternatives to the Project, including a No Project Alternative. Consistent with CEQA Guidelines Section 15126.6, this section focuses on alternatives to the Project that are capable of avoiding or substantially reducing any

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significant adverse impacts associated with the Project, despite the possibility that the alternatives may impede attainment of Project objectives or prove less cost efficient. In addition, implementation of a project alternative may potentially result in new impacts that would not have resulted from the Project. Table 9-1 of Chapter 9.0, Alternatives Analysis, provides a matrix displaying the major characteristics and significant environmental effects of each alternative. The State CEQA Guidelines require that the analysis of project alternatives provide sufficient information about each alternative in order to allow meaningful evaluation, analysis, and comparison with the Project. Chapter 9.0, Alternatives Analysis, is consistent with these requirements.

As revised in Section 9.3, Environmentally Superior Alternative, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon and would not involve improvements outside of the existing Genesee Avenue right-of-way. This would consist of restriping the existing four-lane roadway to a six-lane roadway within the existing right-of-way and potentially involve modification of the existing median. Lastly, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative seeks to provide transportation improvements that would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due to greater capacity when compared to the Project. Based on the discussion provided above, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative among the other proposed alternatives. Please refer to the Clarifications and Modifications section for text revisions.

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emergency access ...” (DPEIR, page 3-2). Thus, one of the express, principal reasons the DPEIR was undertaken was to consider the Project’s effects on emergency access. Yet, the summary of the Environmental Determination – the DPEIR’s bottom line – omitted any reference to how the Project would significantly impact emergency access. This critical omission alone is grounds for recirculation of the draft DPEIR and a revised Summary.

Citizens-2-6
cont.

With respect to procedure, Citizens requests that the public review and comment period be extended by at least an additional 60 days. The 45-day public review and comment period is the bare minimum required under CEQA. By contrast, the EIR for the University City North/South Transportation Study that was before City Council in July 2006 had been circulated for public review and comment for almost five months (from November 23, 2004 through April 16, 2005).² The error regarding the Summary noted above, as well as some of the more blatant errors and omissions in the DPEIR noted below (including identifying two alternatives as *the* environmentally superior alternative and admitting that the greenhouse gas emissions “does not include all vehicle travel and operations in the area as a result of the Project”)³ are apparently a result of efforts to speed review and action by City Council for purely political reasons. Accuracy, completeness and quality have suffered as a result, and the consequence is that the purposes of CEQA as articulated by the courts – informed decision making and public participation⁴ – are not well served.

Citizens-2-7

Finally, because the DPEIR is deficient in the respects identified herein, the DPEIR needs to be revised to address the errors and omissions, and the revised DPEIR recirculated for public review and comment.

Citizens-2-8

II. THE DPEIR IGNORES OR DOWNPLAYS THE PROJECT’S INCONSISTENCY WITH ADOPTED CITY AND REGIONAL PLANS AND ENVIRONMENTAL IMPROVEMENT STRATEGIES

A. The DPEIR Ignores the Conflict Between the Project and Numerous Goals and Policies of the General Plan

Even the incomplete and flawed analysis of the Project’s Transportation/Circulation impacts identified in the DPEIR indicates that the Project would conflict with two of the five overriding goals for the street and freeway system set forth in the Mobility Element of the General Plan. Those two goals are (a) “[a]n interconnected street system that provides multiple linkages within and between communities” and (b) “[v]ehicle congestion relief.” (ME-21). These two goals are reinforced by a number of policies stated in the Mobility Element: “Provide adequate

Citizens-2-9

² See Report to City Council (Report No. 06-102), July 26, 2006, at page 5.

³ See DPEIR, at pages 4.5-15 and 5-14.

⁴ The courts have repeatedly stated that informed decision making and public participation are fundamental purposes of the CEQA process. (See, e.g., *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810 (purpose of an EIR is not only to protect the environment but also to demonstrate to the public that it is being protected).

Citizens-2-6

The commenter is correct in that the Summary document of the Draft PEIR issued by the Planning Department contained an error in omitting that the Project would have significant and unmitigated impacts to public services and facilities under “Environmental Determination.” The Summary document of the Final PEIR to be issued by the Planning Department will be updated to correctly state that the Project would result in significant and unmitigated impacts to the topic areas of transportation/circulation, air quality, greenhouse gas (GHG) emissions, noise, and public services and facilities. The Draft PEIR did correctly discuss that the Project would result in significant and unmitigated impacts to public services and facilities in ES.4 and Section 4.13, Public Services and Facilities.

CEQA Guidelines Section 15087 provides:

(a) The lead agency shall provide public notice of the availability of a draft EIR at the same time as it sends a notice of completion to the Office of Planning and Research....Notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures:

- 1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
- 2) Posting of notice by the public agency on and off the site in the area where the project is to be located.
- 3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.

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Pursuant to CEQA Guidelines Section 15087, a Public Notice of the Draft PEIR was prepared and publicly distributed on June 17, 2016. Consistent with CEQA Guidelines Section 15087(a), the Public Notice was posted on the City of San Diego Planning Department website, posted on the City Clerk website, and published in the San Diego Daily Transcript. Additionally, the Public Notice was mailed to state, regional, and local agencies; to those who previously provided comment on the IS/NOP or otherwise requested to receive a Public Notice. Under “Recommended Finding,” the Public Notice did correctly state that the Project would result in significant and unmitigated impacts to public services and facilities. As such, the Draft PEIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the error in the Summary document of the Draft PEIR does not trigger recirculation.

Citizens-2-7

Pursuant to CEQA Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by State Agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft PEIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft PEIR was available for public review from June 17, 2016 through August 1, 2016, a 45-day time frame consistent with the public review period requirements under CEQA. As such, the requisite public review period was fulfilled pursuant to the CEQA Guidelines.

Further, in accordance with San Diego Municipal Code §128.0307, Requests for Additional Public Review Time on the Draft Environmental Document, “The Planning Director may approve a request from the affected officially recognized community planning group or interested party if there is no officially recognized community planning group for an additional review period not to exceed 14

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capacity and reduce congestion for all modes of transportation on the street and freeway system.” (ME-23), and “Design an interconnected street network within and between communities” Including “[i]dentify[ing] locations where the connectivity of the street network could be improved through the community plan update and amendment process” (ME-24).

Citizens-2-9
cont.

The Project, by removing the construction of the Regents Road Bridge, would remove an important street segment linkage between the Central Subarea of the UCP and the South University Subarea of the UCP, and between the UCP community and the Clairemont community to the South. And, the DPEIR admits that the Project would result in significantly greater congestion than the No Project Alternative. (See, e.g. DPEIR, at page 4.2-52 (“Even with implementation of the mitigation measures, significant traffic impacts would still result and would present increased difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds, and other traffic-related delays.”); see also DPEIR at page 4.4-23 and Table 4.2-10 (identifying nine intersections that would operate at unacceptable (LOS E or F) operating conditions that would operate at acceptable operating conditions (LOS D or better) if Regents Road Bridge were constructed and Genesee Avenue were widened) and Table 4.2-10 (identifying 21 intersections that would operate at LOS E or F under the No Project Alternative but at which operational conditions would be significantly worse if the Regents Road Bridge and the Genesee Avenue widening were not constructed) and page 4.2-36 (even after incorporation of unfunded Mitigation Measures TRA-1 and TRA-2, the Project would result in significant negative impacts along 13 roadway segments.) Despite these facts set forth in the DPEIR, which establish that the Project would clearly conflict with these important goals and policies of the General Plan’s Mobility Element, the DPEIR says nothing about that conflict. The DPEIR notes that “[t]he Project requires an amendment to the General Plan ...” (DPEIR, at 4.4-16.)⁵ An amendment to the General Plan that would reconcile the Project with the referenced General Plan Mobility Element goals and policies would presumably need to admit that those goals and policies do not apply within the University Community Planning Area. The DPEIR must be revised to address these conflicts.

Citizens-2-10

B. The DPEIR Ignores the Conflict Between the Project and Numerous Important Goals of the UCP

As with the General Plan, the DPEIR’s analysis shows that the Project conflicts with important goals of the UCP. Yet, the DPEIR does not discuss these conflicts. For example, the Project would conflict with two transportation goals of the UCP: “1. Develop a transportation system designed to move people and goods safely and efficiently within the community, including linkages with other communities, and with due consideration for energy conservation.”; and “3. Provide pedestrian paths and bikeways to accommodate the community and complement the citywide systems.” (UCP, at page 18.) The DPEIR establishes that the Project would not advance

Citizens-2-11

⁵ It should be noted that although the Planning Department has provided a markup of changes to the UCP that would need to be made if City Council were to adopt the Project, it does not appear that a markup showing changes that would need to be made to the General Plan has been put forward for public review.

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calendar days. The additional time for review shall not extend the time for action beyond that required under law.” The University Community Planning Group, as “the affected officially recognized community planning group” did not request an additional review period beyond the 45-day comment period occurring between June 17, 2016 and August 1, 2016.

Please see response to comment FRC-1-6 with regard to air quality and GHG emissions associated with vehicle travel.

Citizens-2-8 Comment noted.

Citizens-2-9 Please see response to comment Citizens-2-10.

Citizens-2-10 Comment acknowledged. The Project includes removal of the Regents Road Bridge, which is identified as one of two north/south vehicular, bicycle and pedestrian connections in the UCP. Mitigation Measures TRA-1 and TRA-2 include improvements to the Genesee Avenue corridor to address vehicle congestion and improve existing linkages for vehicles, bicycles, and pedestrians within the community.

Citizens-2-11 Please see responses to comments Citizens-2-10 and Citizens-2-50.

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the UCP’s goal of moving people and good efficiently (see citations to section 4.2 of the DPEIR in Section II.A. above). Moreover, the Project would remove a pedestrian path and a bikeway across Rose Canyon, which bikeway is included not only in the UCP and General Plan, but in the City’s Bikeway Master Plan. In addition, as discussed above in Section II.A., the Project would delete an important linkage between two subareas of the University City Planning Area which has been a part of the UCP since it was first adopted in December 1959,⁶ and an equally important connection between the University City Planning Area and the Clairemont Community Planning Area. And, although the DPEIR concludes that the Project would not have any adverse impact on energy conservation, that conclusion flies in the face of statements in the DPEIR that VMT will increase. (See Section V. below.)

Citizens-2-11
cont.

In addition to the referenced conflict between the Project and two of the transportation goals in the UCP, the Project would conflict with a “Community Environmental Goal” in the UCP, namely, “Limit traffic conditions which produce congestion and air pollution.” The DPEIR conclusions regarding the Project’s significant contribution to “difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds and other traffic-related delays” are supported by data in the DPEIR cited in Section II.A. above. As to air pollution, the DPEIR concludes that due to its traffic and circulation impacts, the Project would have significant, unmitigated impacts to air quality. (See DPEIR, at pages 4.4-20 and 4.4-21 (the Project would result in exceedance of annual thresholds of significance for nitrogen oxides (a precursor of ozone or smog) and carbon monoxide, and therefore the Project could violate an ambient air quality standard and the impact would be significant).) The DPEIR does not address the inconsistency between the Project’s congestion and air quality impacts and the UCP’s goal with respect thereto.

Citizens-2-12

C. The DPEIR Downplays the Project’ Inconsistency with the City’s Climate Action Plan, the Regional Sustainable Communities Strategy, and the Regional Air Quality Strategy

Although the DPEIR begrudgingly acknowledges that the Project is inconsistent with the City’s Climate Action Plan (“CAP”), the Regional Sustainable Communities Strategy (“SCS”), and the Regional Air Quality Strategy (“RAQS”), it downplays the significance of these conflicts.

Citizens-2-13

Citizens-2-12 As stated in the comment, the Project would result in a significant impact with regard to criteria pollutant emissions and would conflict with or obstruct implementation of the applicable air quality plan.

Citizens-2-13 This comment restates findings from the Draft PEIR, but includes additional description that implies some degree of significance not indicated in the 2006 DEIR. No further response is required.

⁶ See Report to City Council (Report No. 06-102), July 26, 2006, at page 3 (City adopted the first Master Plan for the University Community in December 1959; Figure 3 of that master plan showed two connections across Rose Canyon along the general alignments of Regents Road and Genesee Avenue).

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1. **Contrary to the DPEIR's Statement that the CAP Does Not Include Any Goals or Measures that Directly Relate to the Project, In Fact the Project Directly Conflicts with the CAP's Strategy 3 and Several Implementing Goals and Measures**

With respect to the Project's conflict with the CAP, the DPEIR includes a blatant misstatement, namely, "The CAP does not include any goals or measures that directly relate to the Project or transportation infrastructure projects." (DPEIR, at page 4.5-17.)

In fact, however, the Project would result in conflicts with at least four specific goals or measures in the CAP. First, the CAP includes a goal to promote reduction in VMT (see CAP at page 23), and therefore the CAP does in fact include a goal or measure that relates to the Project, because the DPEIR admits that "overall VMT is projected to increase as a result of the Project..." and "the overall increase in VMT [caused by the Project] is not consistent with the goals of the CAP." (DPEIR, at page 4.5-17.)

Second, of the five strategies comprising the CAP, Strategy 3 is described as follows: "Transportation strategies cover a broad range of activities that aim to reduce vehicle miles traveled (VMTs), improve mobility, and enhance fuel efficiency." (CAP, at page 23.) As discussed below in Section V., because VMT will increase as a result of the Project, the DPEIR's conclusion that the Project will not enhance fuel efficiency or energy conservation goals: the increased number of miles driven as a consequence of the Project will obviously result in greater fuel consumption.

Third, as covered in detail in Section II.A., the Project will not improve mobility, but rather will degrade mobility. (See DPEIR, at page 4.2-52: "Even with implementation of the [unfunded] mitigation measures, significant traffic impacts would still result and would present increased difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds, and other traffic-related delays.")

Fourth, the CAP's Strategy 3 is labeled "Bicycling, Walking, Transit & Land Use," and includes a goal to "increase commuter bicycling opportunities." The action identified in the CAP to achieve that goal is to "[i]mplement the City of San Diego's Bicycle Master Plan ..." (CAP, at page 38.) Another supporting measure for Strategy 3 of the CAP is to "[i]dentify and address gaps in the City's pedestrian network and opportunities for improved pedestrian crossings, using the City's Pedestrian Master Plan ..." (CAP, at page 39.) The DPEIR's statement that the CAP does not include any goals or measures that directly relate to the Project fails to acknowledge that the Project, by removing Regents Road Bridge, will directly conflict with Strategy 3 and the City's Bicycle Master Plan, which includes a Class II (Bike Lane) crossing Rose Canyon on Regents Road. Similarly, the DPEIR's conclusion that the CAP does not include any goals or measures that directly relate to the Project fails to acknowledge that the removal of Regents Road Bridge

Citizens-2-14

Citizens-2-15

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Citizens-2-17

Citizens-2-14 The CAP includes measures that indirectly relate to the Project as stated in subsequent responses. For example, the comment references page 23 of the CAP with a goal to promote reduction in VMT. However, Strategy 3 of the CAP includes actions to increase mass transit, implement the Bicycle Master Plan, and support transit-oriented development. These actions, and other measures, do not directly relate to the removal of a planned improvement from the UCP.

Citizens-2-15 The discussion on page 23 of the CAP is a general description of Strategy 3. The actual measures related to reducing vehicle fuel consumption are Actions 3.4 and 3.5, which relate to the implementation of Traffic Signal and Roundabouts Master Plans of the CAP and aim to reduce VMT and promote effective land use by implementing transit-oriented development within Transit Priority Areas. As such, the Project does not relate to transit-oriented development and, thus, the CAP does not directly pertain to roadway projects.

Citizens-2-16 Comment noted.

Citizens-2-17 Please see response to comment Citizens-2-14. The comment correctly states that the removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon. As discussed in Section 4.5 of the Draft PEIR, the Project was conservatively assumed to not be consistent with the City of San Diego CAP. The Final PEIR has been revised to include additional discussion of Strategy 3. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

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will directly conflict with the City’s Pedestrian Master Plan’s inclusion of a pedestrian crossing linking the north-south connection across Rose Canyon.⁷

Citizens-2-17
cont.

2. Although the DPEIR Acknowledges that the Project is Inconsistent with the CAP and the Regional SCS for Greenhouse Gas Emission Reduction, It Downplays the Potential Impacts of that Inconsistency for Future City-Approved Development Projects

The DPEIR admits that the Project is inconsistent with the City’s Climate Action Plan and with the regional plan for demonstrating reductions in greenhouse gas (“GHG”) emissions (SANDAG’s Sustainable Communities Strategy) in compliance with AB 32 and SB 375, and that “[n]o feasible mitigation is available for greenhouse gas emissions.” (See DPEIR, at pages 4.5-15 and 10-1.)

The DPEIR does not acknowledge, however, the potential consequences of the City’s approval of the Project on the ability of future public and private development projects to avoid burdensome analysis and mitigation by relying on a project’s consistency with an approved SCS that demonstrates compliance with applicable GHG emission reductions meeting the mandates of AB 32 and SB 375. Private-sector project proposals requiring the City’s discretionary approval, as well as public projects using state or federal funds, are required to demonstrate consistency with applicable GHG emission reduction plans that satisfy the GHG emission reductions mandated by AB 32 and SB 375 and, if located within the City of San Diego, with the City’s adopted CAP. If such a project cannot demonstrate that it is consistent with those GHG reduction plans meeting those standards, then the burden falls entirely on the individual project proponent (private developer or public agency) to demonstrate that the proposed project is consistent with AB 32, SB 375 and the CAP. The time and money required to analyze those impacts, and to provide mitigation at the individual project level, can be huge. This is particularly the case where, as the DPEIR concluded, “[n]o feasible mitigation is available for [the Project’s] greenhouse gas emissions.” (DPEIR, at page 10-1.)

Citizens-2-18

Citizens-2-18 Comment noted. This comment states that the Draft PEIR does not acknowledge the consequences of the City’s approval of the Project on future public and private development projects. Per CEQA Legislation 15121(a), the purpose of a Draft PEIR is to inform decision makers and the public of the significant environmental effects of a project. It is not the purpose of the Draft PEIR to analyze either the consequences on future projects or any financial impacts on future projects; thus, no further response is required.

Thus, if the Project’s GHG emissions were to be of a magnitude to cause the SCS and the CAP to fall out of compliance with AB 32’s and SB 375’s emission reduction mandates, then the referenced burdens would fall upon individual project proponents, both public and private. The DPEIR does not specifically address whether the magnitude of the increase in GHG emissions caused by the Project is sufficient to cause the SCS and CAP to be noncompliant with the referenced GHG emission reduction mandates.⁸ The DPEIR is therefore incomplete and inadequate. Moreover, in the absence of that analysis and given the DPEIR’s express conclusion that the Project is inconsistent with the SCS and CAP, subsequent development projects would be placed in jeopardy of successful legal challenge if the City were to rely on those future projects’

Citizens-2-19

Citizens-2-19 Please see responses to comments Citizens-2-18 and Citizens-2-22.

⁷ It should be noted that the DPEIR does acknowledge, in a different section, that the Project conflicts with the City’s Bicycle Master Plan (see DPEIR at page 4.2-54) but does not acknowledge that that conflict is a conflict with “goals and measures [of the CAP] that directly relate to the Project or transportation infrastructure projects.”

⁸ As noted above, the DPEIR simply “punts” by stating that that burden will fall to SANDAG as it updates its SCS.

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consistency with the SCS and CAP as demonstrating compliance with GHG emission reduction mandates.

Citizens-2-19
cont.

3. Although the DPEIR Acknowledges that the Project is Inconsistent with the Regional Air Quality Strategy, It Downplays the Potential Impacts of that Inconsistency for Future Development Projects Requiring the City's Approval of Discretionary Entitlements

The DPEIR admits that "the transportation network changes as a result of the Project have not been included in the regional emissions analysis of the RAQS" and that the approval of the Project "would increase the total regional VMT compared to the adopted UCP" and that "the increase in VMT as a result of the Project has not been accounted for in the current RAQS." (DPEIR, at page 4.4-16.) The DPEIR goes on to state that this inconsistency will be addressed by future updates to SANDAG's RAQS. See DPEIR, at page 4.4-16 ("Any changes to the transportation network and the General Plan as a result of the Project would be incorporated in the updates to future air quality attainment plans.").

Citizens-2-20
cont.

And although the DPEIR admits that "the Project would conflict with or obstruct implementation of the applicable air quality plan" and that this impact would be "significant" (DPEIR, at page 4.4-16), the DPEIR does not acknowledge the potential consequences of the City's approval of the Project on the ability of future public and private development projects to avoid burdensome analysis and mitigation by relying on a project's consistency with an approved RAQS that demonstrates compliance with applicable air quality standards. Private-sector project proposals that generate pollutant emissions above certain thresholds and that require the City's discretionary approval, as well as public projects using state or federal funds, are required to demonstrate consistency with an air quality plan demonstrating attainment of and compliance with applicable state and federal standards. For projects located in San Diego County, that air quality plan is SANDAG's RAQS. If a proposed project generating emissions above those threshold levels cannot demonstrate consistency with the RAQS which in turn demonstrates countywide compliance with applicable air quality standards, then the burden falls entirely on the individual project proponent (private developer or public agency) to undertake time-consuming and expensive air quality modeling analysis to demonstrate that it would not cause or contribute to a violation of an applicable state or federal air quality standard.

Citizens-2-21

The DPEIR does not specifically address whether the magnitude of the Project's increase in nitrogen oxide and carbon monoxide emissions would be sufficient to cause the RAQS to fall out of compliance with achievement and maintenance of applicable air quality standards. The DPEIR is therefore incomplete and inadequate. Moreover, in the absence of that analysis and given the DPEIR's express conclusion that the Project is inconsistent with the RAQS, subsequent development projects would be placed in jeopardy of successful legal challenge if the City were to rely on those future projects' consistency with the RAQS as demonstrating that such projects would not cause or contribute to a violation of an applicable state or federal air quality standard.

Citizens-2-22

Citizens-2-20 The comment restates findings from the Draft PEIR, and the assumptions from the transportation network are used to estimate any mobile source emissions for the region. The Draft PEIR included a typo and should state "SDAPCD is currently developing an update to the RAQS," not SANDAG. The Final PEIR includes updates to that discussion. Refer to the Clarifications and Modifications chapter of the Final PEIR for revised text.

Citizens-2-21 Please see responses to comments Citizens-2-18 and Citizens-2-22.

Citizens-2-22 The comment makes several assumptions in that the emissions from one project would "cause the RAQS to fall out of compliance" with the applicable air quality standards, subsequent projects would rely on consistency with that "out of compliance" RAQS, and then those development projects would be subject to the effects of successful legal challenge. There is no basis to assume any of those actions would occur. The impact related to the increase in criteria pollutant emissions is based on mass emissions (e.g., pounds per day) consistent with CEQA Guidelines and standard practices. And, as stated in the City of San Diego CEQA Guidelines, "there are no state recommended models for assessing regional ozone concentrations or local PM₁₀ concentration from mobile sources." In addition, the Project would not be anticipated to result in traffic volumes that would cause a CO hotspot. Therefore, the findings in the Draft PEIR are consistent with program-level requirements and supported by a complete analysis.

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III. THE DPEIR'S SUMMARY ANALYSIS OF ALTERNATIVES TO THE PROJECT AND ITS INCONSISTENT CONCLUSIONS THAT BOTH THE PROJECT AND THE "NO CONSTRUCTION OF REGENTS ROAD BRIDGE AND WIDENING OF GENESEE AVENUE ALTERNATIVE" ARE *THE* "ENVIRONMENTALLY SUPERIOR ALTERNATIVE" ARE FLAWED

A. The DPEIR Is Internally Inconsistent, Identifying Both the Project and one of the Alternatives as *the* "Environmentally Superior Alternative"

The DPEIR is flawed and internally inconsistent in that within Chapter 9 (Alternatives Analysis), it identifies *both* the Project and one of the alternatives -- "No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative" as *the* "environmentally superior alternative." At page 9-6, the DPEIR states as follows:

Based on the evaluation presented below, it was determined that the Project is the environmentally superior alternative.... The "No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative" was determined to be the environmentally superior "build" alternative.

But, at the end of Chapter 9, the DPEIR reaches a different conclusion:

Based on this CEQA guidance [CEQA Guidelines Section 15126.6(e)(2)] and the analysis further detailed in Section 9.0 of the PEIR, the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative would be considered environmentally superior

Citizens-2-23

DPEIR, at page 9-48.

As between the two contradictory statements within Chapter 9, the DPEIR's Executive Summary went with the second-identified "environmentally superior alternative," parroting the same language used at the end of Chapter 9. (*See* DPEIR, at ES-11.)

This significant inconsistency must be resolved in a revised DPEIR to be recirculated for public review and comment. The contradictory and confusing statements as to which alternative is determined to be "environmentally superior" cannot provide the basis for certification of an EIR or for City action in approving a project pursuant to Public Resources Code section 21081.

4850-6124-8821.2

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Citizens-2-23 Comment acknowledged. The last paragraph under Section 9.2, Alternatives Considered, has been revised to clarify that the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR) is the environmentally superior alternative. Refer to the Clarifications and Modifications section of the Final PEIR for revised text. Further, Section 9.3, Environmentally Superior Alternative, states that No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is the environmentally superior alternative.

An evaluation and response to comments received on the Draft PEIR is included in this document, which has been prepared pursuant to CEQA Guidelines Section 15088. CEQA Guidelines Section 15088.5 provides:

- a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring

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recirculation includes, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

In accordance with Section 15088 of the CEQA Guidelines, the City of San Diego as the lead agency has evaluated the comments received during the 45-day public review period from June 17, 2016 through August 1, 2016. The Final PEIR includes the Public Comment Letters and Responses and Clarifications and Modifications section that includes errata, clarifications, and additions to the Draft PEIR. None of the clarifications or amplifications set forth herein change the significance conclusions presented in the Draft PEIR or substantially alter the analysis presented for public review. Furthermore, the Draft PEIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the clarifications provided in these Public Comment Letters and Responses and Clarifications and Modifications sections do not constitute significant new information that might trigger recirculation.

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B. The DPEIR’s Analysis of Alternatives Is Flawed and Inadequate in that It Does Not Assess Whether Alternatives’ Impacts that Are Alleged to be “Greater” than the Project’s Are “Significant”

1. The Legal Standard

CEQA is only concerned with *significant* impacts. (Pub. Res. Code § 21002.1(a)-(c).) This applies not only to an assessment of a proposed project’s impacts, but to the alternatives analysis required under CEQA. The purpose of the required analysis of alternatives is to determine if there are feasible alternatives which would “avoid or substantially lessen” the “*significant* environmental effects of such projects ...” (Pub. Res. Code § 21002 (emphasis supplied).) The CEQA Guidelines specify that “[a] matrix displaying the major characteristics and *significant* environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more *significant* effects in addition to those that would be caused by the project as proposed, the *significant* effects of the alternative shall be discussed ...” (14 Cal. Code Regs. § 15126.6(d) (emphasis supplied).)

Citizens-2-24

Despite these requirements of an alternatives analysis under CEQA, the DPEIR fails to identify, either on Table 9.1 or in Chapter 9, whether the impacts of alternatives alleged to be “greater” than that of the Project are *significant*. This is detailed with respect to the No Project Alternative in the following subsections.

2. The Analysis of Alternatives Does Not Support a Conclusion that the No Project Alternative Would Result in “Greater than Project” Land Use Impacts

a. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in “Greater than Project” Land Use Impacts

The land use impacts of the No Project Alternative are claimed to be simply “Greater than Project.” (Table 9-1.) The discussion of those impacts asserts that the No Project Alternative’s impacts on land use would result in a “loss of habitat” with the construction of the Rose Canyon Bridge and in “impacts to vegetation communities as well as fringes of habitat that occur along the existing Genesee Avenue alignment” with the widening of Genesee Avenue. (DPEIR, at page 9-6.) But nowhere in Chapter 9 does the DPEIR address whether these alleged impacts on habitat and vegetation communities would be *significant*. Under the CEQA Guidelines, the DPEIR’s one-paragraph analysis of the land use impacts of the No Project Alternative, which does not address whether the asserted “greater impacts” would be *significant*, fails to comply with CEQA.⁹

Citizens-2-25

⁹ It should also be noted that the land use impacts evaluated are to a large extent duplicative of the discussion of the impacts to biological resources elsewhere on Table 9-1 and in Chapter 9. This amounts to “double-counting” of the same impacts as both “land use” and “biological resources” on Table 9-1 and in Chapter 9 more generally, in that the treatment overemphasizes those impacts.

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Citizens-2-24 Chapter 9.0, Alternatives Analysis, of the Draft PEIR, including Table 9-1, has been revised to reflect the magnitude of significance (LS = less than significant, NS = no significant impacts, SU = significant and unmitigated, or SM = significant but mitigable) rather than “Greater than Project” for impacts in the alternatives analysis. The affected subsections are described in further detail in the responses to comments Citizens-2-25 through Citizens-2-36 below. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

Citizens-2-25 Section 9.2.1.1 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant impacts (SM) to Land Use as compared to the Project. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

In addition, while the land use impacts discussion has been called into question as being duplicative and a “double-counting” of the biological resources impacts analysis discussion, it should be noted that impacts in the land use section are analyzed in response to the Land Use questions in the City’s CEQA Significance Determination Thresholds (Initial Study Checklist question #3 on page 45, Significance Threshold #6 on page 46), as derived from Appendix G, Land Use and Planning question “c” (“applicable natural community conservation plan”) of the CEQA Statute and Guidelines.

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Accordingly, consistent with CEQA, Table 9-1 should not show that the No Project Alternative has "greater" land use impacts than the Project.

Citizens-2-25
cont.

- b. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Construction-Related Air Quality Impacts

Table 9-1 indicates that the No Project Alternative would have construction-related air quality impacts "greater" than the Project. The discussion of these claimed impacts in Chapter 9 fails to discuss whether or not these construction-related air quality impacts would be *significant*. As CEQA, including its alternatives analysis, is concerned only with *significant* impacts, the DPEIR's assessment of the construction-related air quality impacts of the No Project Alternative is deficient.

Citizens-2-26

Citizens-2-26 Section 9.2.1.4 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant construction-related impacts (SM) to Air Quality as compared to the Project. However, the impacts of the No Project Alternative would be less than significant when implemented at the project level. Table 9-1 has also been revised to reflect less than significant (LS) impacts to air quality plans and criteria pollutants for the No Project Alternative rather than "Less than Project," and no significant impacts (NS) for construction has been added to Table 9-1 for the Project.

- c. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Energy Impacts

Table 9-1 identifies the No Project Alternative as having energy impacts "greater than Project." Here, the discussion of construction-related energy impacts suggests that the impacts would be insignificant ("it is anticipated that the construction phase would not result in wasteful, inefficient, and unnecessary consumption of energy"), but the analysis simply fails to state whether the construction-related energy impacts would be significant. If the analysis does not support a determination that the alleged impacts of an alternative are significant, it has no relevance under CEQA and Table 9-1 should not state that the No Project Alternative's construction-related energy impacts would be "greater than Project."

Citizens-2-27

Citizens-2-27 Section 9.2.1.6 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have less than significant (LS) construction and operation impacts to Energy.

The discussion of the No Project Alternative's energy impacts also concludes summarily that the "[o]perational impacts of the No Project Alternative would result in greater energy demand as [sic] the Project as the No Project Alternative would modify or construct new transportation facilities." (DPEIR, at page 9-15.) The only explanation given for this conclusion is that "[t]he No Project Alternative would require additional electrical power to accommodate traffic signal modifications and street lighting." (*Id.*¹⁰) There is absolutely no discussion as to whether the

¹⁰ The DPEIR (including Appendix C) makes no mention of whether the transportation model assumed an increase in VMT as a result of the addition of new roadway capacity (i.e., Regents Road Bridge and widening of Genesee Avenue). The DPEIR should be revised to discuss whether this so-called "induced demand" was factored into the model used in the Transportation/Circulation analysis. It should be noted that the Governor's Office of Planning and Research, in its latest proposal to update the CEQA Guidelines for evaluating transportation impacts to implement SB 743 has cautioned that although "[f]or some large projects, analysis of induced demand may be appropriate. But there should be reasonable limits.... Not every transportation improvement will induce travel" (See OPR's "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA," January 20, 2016.) Surely the addition of a bridge 0.28 mile in length and the limited Genesee Avenue Widening would not fall within the scope of "some large projects" as to which OPR concedes that analysis of induced travel demand may be appropriate.

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claimed increase in electrical demand caused by traffic signal modification and street lighting would be significant. The one-sentence explanation for the conclusion that the No Project Alternative results in additional energy demand certainly suggests that the impacts are not significant; it defies common sense to conclude that a few street lights on the Regents Road Bridge and some unspecified traffic signal modification would result in "significant" increase in consumption of electrical power.

Citizens-2-27
cont.

Moreover, as discussed in Section V, although the DPEIR admits that the Project would result in greater VMT than the No Project Alternative,¹¹ it utterly fails to address the energy consumption impacts of that greater VMT. This is a major failing of the DPEIR, since it is obvious that the Project's increase in VMT will result in greater consumption of transportation fuel. For these various reasons, the DPEIR's conclusion that the No Project Alternative would have "greater" energy impacts than the Project is entirely unsupported and inconsistent with CEQA's requirement to consider only *significant* impacts. Table 9-1 should not assert that the No Project Alternative would have "greater" energy impacts than the Project. If the energy consumption impacts of the Project's higher VMT had been analyzed, it would surely show that the increase in transportation fuel consumption would outweigh the minimal increase in electrical consumption due to a few street lights added to Regents Road Bridge under the No Project Alternative.

Citizens-2-28

d. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Noise Impacts

Table 9-1 states that the No Project Alternative would have noise impacts "greater than Project" with respect to construction activities and with respect to post-construction of the Regents Road Bridge. Here again, the discussion of these impacts fails to state whether the construction-related noise impacts will be significant.¹²

Moreover, the DPEIR concedes the following regarding the noise impacts of the Genesee Avenue Widening that is part of the No Project Alternative:

[T]he widening of Genesee Avenue in the No Project Alternative would result in reduced operational noise impacts when compared to the Project.... Therefore the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Unlike the No Project Alternative, this is a potentially significant impact under the

Citizens-2-29

Citizens-2-28 Please see response to comment Citizens-2-27.

Citizens-2-29 Section 9.2.1.7 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant construction-related impacts (SM) to Noise as compared to the Project. Table 9-1 has also been revised to reflect significant (SM) impacts to established standards (operational noise) with construction of the Regents Road Bridge, and less than significant impacts to established standards (operational noise) with the Genesee Avenue Widening. However, the significant impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

For the Project, Table 9-1 has been revised to clarify significant and unmitigated (SU) for established standards (operational noise) with the Genesee Avenue Widening only, and less than significant (LS) impacts has been added for established standards (operational noise) with construction of the Regents Road Bridge. No significant impacts (NS) has also been added for construction for the Project.

¹¹ See DPEIR at page 4.5-17 and Table 4.5-3, and page 4.4-16.

¹² The discussion states that the No Project Alternative "could potentially result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors during construction activities ..." But, this statement is speculative ("could result").

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Project... [I]mpacts to operational noise would remain significant and unmitigated at the program level under the Project.

DPEIR, at page 9-16.

With respect to the operational noise impacts of Regents Road Bridge, the DPEIR's conclusion shows that the analysis is purely speculative: "However, impacts under the No Project Alternative are anticipated to expose people to noise levels that exceed City standards." (DPEIR, at pages 9-16 and 9-17.)

Despite the fact that the text of Chapter 9 concedes that the noise impacts of the Project's removal of the Genesee Avenue Widening project would be significant even after mitigation, and the fact that the Chapter 9 discussion of the noise impacts of Regents Road Bridge, both construction and operational, is vague as to magnitude and, importantly, whether it would be *significant*, Table 9-1 (a) omits any reference to the admittedly significant operational noise impacts of the Project's removal of the Genesee Avenue Widening, and (b) inexplicably and without any basis in the Chapter 9 analysis concludes that the No Project Alternative will have "greater than Project" noise impacts. This omission and this conclusion are wholly unsubstantiated and contradictory to the analysis in Chapter 9. As many interested parties reviewing the DPEIR will focus principally on Table 9-1, the inexcusable omission from Table 9-1 of the significant operational noise impacts of the Project due to removal of the Genesee Avenue Widening, and its unsupported conclusion that the No Project Alternative will have "Greater than Project" impacts with respect to construction and operation of the Regents Road Bridge without any reference to whether those impacts would be *significant*, warrants revision and recirculation of a corrected Table 9-1.

Citizens-2-29
cont.

- e. *There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Impacts on Historical Resources*

With respect to Table 9-1's claim that the No Project Alternative would have impacts on historical resources "Greater than Project," there is nothing but speculation to support this statement. The discussion in Chapter 9 states only that because "[h]istorical and prehistoric resources are known to exist within the UCP Area, specifically within the Genesee Avenue and Regents Road Corridors. Therefore the No Project Alternative has the potential to result in significant direct and/or indirect impacts to cultural resources." (DPEIR, at page 9-17.)

Citizens-2-30

This statement does not address the obvious fact that if the No Project Alternative were implemented, mitigation measures could and would be imposed to reduce any impacts to historical resources to below a level of significance. There is no basis to conclude that there would be *significant* impacts to historic resources under the No Project Alternative, and therefore Table 9-1 should not assert that the No Project Alternative would have impacts on historic resources "greater than Project."

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Citizens-2-30 Section 9.2.1.8 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant impacts (SM) to Historical Resources as compared to the Project. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

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- f. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Impacts on Biological Resources

Table 9-1 concludes that the No Project Alternative would have "Greater than Project" impacts on biological resources. The discussion of those relative impacts discusses the No Project Alternative's impacts on MHPA compatibility impacts, but this is not consistent with the DPEIR's statement that the Multiple Species Conservation Program allows roads and utility lines in the City's MHPA, as long as they adhere to the stated planning policies and design guidelines. (DPEIR, at 4.1-18 and 4.1-19.)

The DPEIR further notes that, with respect to both the Regents Road Corridor and the Genesee Avenue Corridor, "[t]he UCP Area is currently in compliance with the guidelines stated in the MSCP for development within and adjacent to the MHAP." (DPEIR, at pages 4.1-18 and 4/1-19.) As the UCP plan currently includes both the Regents Road Bridge and the Genesee Avenue Widening, these statements in the DPEIR certainly support a conclusion that the No Project Alternative is consistent with the UCP and would not have a significant impact on biological resources. Moreover, the only statement in the discussion in Chapter 9 of the biological impacts of the No Project Alternative that refers to any impact being "significant" is as to the widening or Genesee Avenue over Rose Canyon. (DPEIR, at page 9-17.) None of the other alleged impacts of the No Project Alternative to biological resources discussed refer to any impacts being "significant." Therefore, Table 9.1 should be revised to indicate that the No Project Alternative would have "Greater than Project" impacts on biological resources only as to the Genesee Avenue Widening element of the No Project Alternative.

Citizens-2-31

- g. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Impacts on Geological Conditions

As to geologic resources, Table 9-1 states that the No Project Alternative would have impacts "Greater than Project." However, the discussion in Chapter 9 indicates that such statement is speculative: "Implementation of the No Project Alternative has the potential to result in significant impacts related to geologic hazards. The UCP Area contains geologic conditions that would pose significant risks for discretionary development if not properly addressed at the project level." (DPEIR, at pages 9-17 to 9-18.) The mere potential for geologic hazards before consideration of mitigation does not support a finding of significant impacts, even at the programmatic level. Therefore, Table 9.1 should not indicate that the No Project Alternative would have "Greater than Project" impacts to geological resources.

Citizens-2-32

Citizens-2-31 The City's Multiple Species Conservation Program (MSCP) Subarea Plan permits utility lines and roads, provided they are conditionally compatible with the biological objectives of the MSCP and are in compliance with the policies in Section 1.4.2 on page 45 of the Subarea Plan. Specifically, Construction and Maintenance Policy #2 states that, "All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required." Policy #4 states that "Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved..." Due to the No Project Alternative involving construction of the Regents Road Bridge and the reconfiguration of Genesee Avenue across Rose Canyon as compared to the Project (no construction), there is the potential for significant environmental impacts to biological resources, which will require mitigation.

Section 9.2.1.9 and Table 9-1 of the Draft PEIR have been revised to clarify that both the construction of the Regents Road Bridge and the widening of Genesee Avenue components of the No Project Alternative would have significant impacts (SM) to Biological Resources as compared to the Project, including jurisdictional habitats as is analyzed in Section 4.9.1.2 on page 4.9-8 and Section 4.9.1.3 on page 4.9-21. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

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h. *There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Impacts on Paleontological Resources*

Concerning paleontological resources, there is no basis whatsoever to conclude, as does Table 9-1, that the No Project Alternative would result in "Greater than Project" impacts to paleontological resources. The discussion of the matter in Chapter 9 says only that "the No Project Alternative may result in adverse impacts to paleontological resources. However, even though these geologic units have a recognized resource potential, no specific areas within the UCP Area are known to have produced significant paleontological resources. The planning area has been almost entirely developed; thus the potential for finding new resources is limited under the No Project Alternative." The last two sentences in the quoted material essentially dismiss the possibility of paleontological impacts as essentially theoretical. The quoted material cannot possibly provide substantial evidence to support the conclusion, even at the programmatic level, that the No Project Alternative would have "significant" impacts on paleontological resources as compared to the Project. As discussed above in Section III.B.1, in the required alternatives analysis under CEQA, only "significant" impacts are relevant.

Citizens-2-33

i. *There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in "Greater than Project" Impacts on Hydrology and Water Quality*

With respect to hydrology and water quality, as with paleontological resources, there is no basis to conclude in Table 9-1 that the No Project Alternative would result in "Greater than Project" impacts to hydrology and water resources. The discussion observes that "[r]unoff during storm events and non-storm water flows (such as over irrigation) would transport these pollutants via storm drain systems and would negatively affect surface water quality *if not properly managed*." (DPEIR, at page 9-18 (emphasis supplied).) The emphasized qualifier is addressed two sentences below: "The No Project Alternative would be developed in compliance with applicable regulations, including the Municipal Permit ..., Construction General Permit ..., the City Storm Water Standards, and the Model BMP Design Manual The No Project Alternative would be required to maintain predevelopment hydrology and incorporate LID site design and/or treatment control BMPs." (*Id.*)

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The obvious conclusion to be drawn from the above excerpts is that because the No Project Alternative would be required to comply with a host of applicable regulations, and compliance is expected (because, among other reasons, violations will be subject to heavy penalties by the City and the Regional Water Quality Control Board), there is no reason to expect that the No Project Alternative would result in any impacts to hydrology or water quality, let alone *significant* impacts. Yet, without explanation, immediately following the above-quoted material, this section concludes with the wholly unsupported statement "As such, hydrology and water quality impacts would be greater under the No Project Alternative when compared to the Project." (DPEIR, at page 9-19.) Even if the last-quoted sentence were supported by the discussion (which it is not),

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Citizens-2-32 Due to nature of the No Project Alternative involving construction (the Regents Road Bridge and the widening of Genesee Avenue) as compared to the Project (no construction), and the Impact Analyses provided in Sections 4.10.4, 4.10.5, and 4.10.6, there is the potential for significant environmental impacts to Geologic Conditions, which would require mitigation. Section 9.2.1.10 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant impacts (SM) to Geologic Conditions as compared to the Project. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

Citizens-2-33 Section 9.2.1.11 and Table 9-1 of the Draft PEIR have been revised to clarify that the No Project Alternative would have less than significant (LS) impacts to Paleontological Resources.

Citizens-2-34 Due to very nature of the No Project Alternative involving construction (the Regents Road Bridge and the widening of Genesee Avenue) as compared to the Project (no construction), the potential for significant environmental impacts to Hydrology and Water Quality would be greater than the Project. However, the construction of the two components of the No Project Alternative would require compliance with the Municipal Permit, the City's Storm Water Standards, and the Model BMP Design Manual to maintain predevelopment hydrology, as well as the implementation of avoidance and minimization measures, which incorporate LID site design and treatment control BMPs. Because compliance with these regulations is mandatory, impacts to Hydrology and Water Quality from the No Project Alternative would be less than significant. Section 9.2.1.12 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have less than significant impacts (LS) to Hydrology and Water Quality.

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there is absolutely nothing in the discussion of hydrology and water quality to support a conclusion that any impacts on hydrology and water quality from the No Project Alternative would be *significant*. As discussed above, CEQA generally and its required alternatives analysis considers only *significant* impacts. (See Pub. Res. Code § 21002.1(a)-(c); 14 Cal. Code Regs. § 15126.6(d).) Accordingly, Table 9-1 should not indicate that the hydrology and water quality impacts for the No Project Alternative are “Greater than Project.”

Citizens-2-34
cont.

- j. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in “Greater than Project” Impacts on Public Utilities

As to public utilities, here, too, there is no basis for the statement in Table 9-1 that the No Project Alternative would have impacts on public utilities “Greater than Project.” The two-sentence discussion of this environmental issue area in Chapter 9 states only that “[i]mplementation of the No Project Alternative would require public utilities ... installation, extension and some relocation of onsite utilities, which would not be required under the Project.” (DPEIR, at page 9-20.) This “explanation” fails to support the requirement under CEQA that the alternatives analysis consider only *significant* impacts. Therefore, Table 9-1 should not state that the public utilities impact of the No Project Alternative are “Greater than Project.”

Citizens-2-35

- k. There is No Basis to Support the Conclusion in Table 9-1 that the No Project Alternative Would Result in “Greater than Project” Impacts on Health and Safety

With respect to health and safety, there is no basis in Chapter 9 to conclude, as does Table 9-1, that the No Project Alternative would have “Greater than Project” impacts. The discussion notes that the No Project Alternative would “entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition” – a characterization that applies to most construction sites within the City – which could result in a temporary increase in the potential for accidental wildfires.” (DPEIR, at page 9-20.) But this statement, which fails to indicate that conditions which “could” result in a temporary increase in accidental wildfires – not a “significant” temporary increase in accidental wildfires – is followed by the statement that “[i]mplementation of the No Project Alternative would be required to adhere to brush management regulations, specifically the City’s Fire Prevention Bureau Policy B-08-1, Clarification of Brush Management Regulations and Landscape Standards and required preparation of a Brush Management Plan and Program in order to obtain discretionary, grading, and/or building permits” (Id. at pages 9-20 and 9-21.)

Citizens-2-36

There is nothing in this discussion to suggest that after compliance with the applicable regulations, the potential for accidental wildfires due to construction would be “significant.” The only other aspect of health and safety that could possibly support the characterization of the No Project Alternative’s relevant impacts as being “Greater than Project” is exposure to hazardous materials during construction activities. But, the discussion of this matter in Chapter 9 concludes

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Citizens-2-35 Section 9.2.1.14 and Table 9-1 of the Draft PEIR have been revised to reflect that the No Project Alternative would have significant impacts (SM) to Public Utilities as compared to the Project. Installation, extension, and relocation of on-site utilities would be required under the No Project Alternative. In addition, construction and demolition activities associated with the construction of the Regents Road Bridge and the widening of Genesee Avenue would generate solid waste that may require the preparation of a Waste Management Plan if the Project will generate 60 tons or more of solid waste. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

Citizens-2-36 Section 9.2.1.15 and Table 9-1 of the Draft PEIR have been revised to clarify that the No Project Alternative would have less than significant (LS) impacts to wildland fires, emergency plans, and AIAs, and a significant impact (SM) to hazardous materials for Health and Safety.

As stated in Section 4.15.1 on page 4.15-8, CAL FIRE’s Fire Hazard Severity Zone maps designate the northern portion of the UCP Area as “Very High.” In addition, the eastern portions of the UCP contain areas designated as “High” to “Very High.” Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as “Very High.” Due to these conditions, the No Project Alternative’s use of construction equipment, similar to any powered equipment or vehicle, can be a source of potential fire, due to electrical sparks and use of flammable materials that could ignite and spread quickly to surrounding areas and

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that the No Project Alternative would result in “greater” impacts than the Project because “exposure of hazards ... could be encountered during grading and/or construction-related activities.” (DPEIR, at page 9-21.) This discussion not only fails to support a conclusion that the CEQA-mandated “significance” threshold would be exceeded, but that statement is followed by an effective disclaimer: “Construction activities under the No Project Alternative are short term and would be subject to federal, state, and local health and safety requirements.” (*Id.*) Given that there is no reason to expect that construction activities would not comply with applicable health and safety requirements, and the absence of any reference to any resulting health and safety risks being “significant,” Chapter 9 provides no basis to conclude, as does Table 9-1, that the No Project Alternative would have “Greater than Project” impacts on health and safety.

Citizens-2-36
cont.

3. *The Analysis of Alternatives Does Not Support a Conclusion that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative Is Either the Environmentally Superior Alternative or the Environmentally Superior “Build” Alternative*

The DPEIR concludes, in Section 9.3, that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” is the “Environmentally Superior Alternative.” The stated basis for that conclusion is that “it would reduce impacts compared to the other proposed alternatives that preserve more open space, therefore, resulting in fewer impacts to transportation/circulation, air quality (operation), GHGs, and noise (operation).” (DPEIR, at 9-48.) This statement is a non sequitur: it is nonsensical to conclude, as does the quoted material, that because as compared to unidentified “other proposed alternatives that preserve more open space” it would have fewer impacts to transportation/circulation, air quality (operation), GHGs, and noise (operation). What are the “other proposed alternatives that preserve more open space”? The reader is forced to guess, and then is left in the dark as to why and, importantly, to what extent the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” has “fewer” impacts to transportation/circulation, air quality (operation), GHGs, and noise (operation) as compared to these unidentified “other proposed alternatives that preserve more open space”.

Citizens-2-37

Table 9-1 would have the reader conclude that as to three of the five “Environmental Issue Areas” as to which the Project is determined to have significant and unmitigated impacts – Transportation/Circulation, Greenhouse Gas Emissions and Noise – the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” has impacts “Less than Project.”¹³ But nowhere in Chapter 9 is there any indication as to whether that alternative’s impacts as to those three issue areas are significantly less than those of the Project.

¹³ In addition, Table 9-1 concludes that as to Air Quality, the comparative merits of the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” and the Project is a “mixed bag.” The former would have greater construction impacts, the same or similar impacts as the Project in terms of conflict/inconsistency with the adopted RAQS, but “reduced” impacts as to criteria pollutants, in that increases would not exceed thresholds. This “mixed bag” certainly does not lend support to a determination that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” is environmentally superior to the Project.

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fuel sources. Therefore, greater potential exists for exposure to wildland fires with the No Project Alternative as compared to the Project. However, the impacts of the No Project Alternative would be less than significant with adherence to the required brush management regulations, and preparation of a Brush Management Plan and Program at the project level.

In addition, due to the previous uses surrounding the Regents Road Bridge and Genesee Avenue Widening sites, unidentified areas of soil contamination may be encountered during construction of the No Project Alternative. Any contaminated soil or groundwater encountered within the confines of the construction areas or modification of groundwater monitoring wells during construction activities would be considered a significant impact. However, the impacts of the No Project Alternative would be less than significant with mitigation implemented at the project level.

Citizens-2-37

Consistent with CEQA Guidelines Section 15126.6, the objective of Chapter 9.0, Alternatives Analysis, of the Draft PEIR is to focus on alternatives to the Project that are capable of avoiding or substantially reducing any significant adverse impacts associated with the Project, despite the possibility that the alternatives may impede attainment of project objectives or prove less cost efficient. In addition, implementation of a project alternative may potentially result in new impacts that would not have resulted from the proposed project. The State CEQA Guidelines require that the analysis of project alternatives provide sufficient information about each alternative in order to allow meaningful evaluation, analysis, and comparison with the proposed project.

Consistent with the CEQA Guidelines, Draft PEIR Chapter 9.0 included a comparative evaluation of a range of project alternatives. According to CEQA, the goal of the project alternatives analysis is not to evaluate each and every potential alternative to the proposed project; instead, the overall aim of the alternatives analysis is to evaluate a range of feasible

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Moreover, we know from the discussion of transportation/circulation impacts in Appendix C and in Chapter 9 that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” will have significant impacts as to Transportation/Circulation that are almost identical to those of the Project. As displayed in Table A of the Attachment B (Letter dated July 25, 2016, from Brian Estrada, RK Engineering Group, Inc. (hereinafter, “RK Engineering Letter”), and as stated at pages 9-30 and 9-31 of the DPEIR, the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” will result in 29 intersections with significant impacts, as compared to 30 intersections with significant impacts under the Project. Similarly, under the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative,” 20 roadway segments will experience significant impacts under volume-based metrics, as compared to 21 under the Project. (See RK Engineering Letter., at page 2; see also DPEIR at pages 9-30 and 9-31.) In looking at roadway segments based on impacts to speed, the significant impacts of the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” are identical in number to those of the Project. (See RK Engineering Letter and Appendix C.) Similarly as to freeway segments and freeway ramp meters, there is no difference whatsoever between the significant impacts that would result under the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” and under the Project.

Citizens-2-38

There is no discussion in Chapter 9 as to whether the reduction in significant impacts by one intersection and one roadway segment is itself significant, when on all other measures the transportation/circulation impacts of the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” and the Project are essentially the same. Thus, the conclusion that the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” is superior to the “Project” in terms of Transportation/Circulation impacts is not supported by substantial evidence.

Citizens-2-39

Moreover, as the DPEIR makes clear, it is the significant Transportation/Circulation operational impacts that cause the significant impacts on Greenhouse Gas Emissions. So, if the Transportation/Circulation impacts of the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” are almost the same as those of the Project, then there is no basis to conclude that the Greenhouse Gas Emission impacts of the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” would be significantly reduced from those of the Project. Here again, the DPEIR’s analysis of alternatives falls short of what is required under CEQA: Table 9-1 and Chapter 9 conclude that the Greenhouse Gas Emissions from the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” will be “Less than Project,” but will the reduction result in Greenhouse Gas Emissions from the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” that are less than significant? If not, the difference is immaterial under CEQA. The DPEIR fails to address the magnitude of the difference.

Citizens-2-40

In contrast to the *three* “Environmental Issue Areas” as to which the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” purportedly results in “Less

Citizens-2-41

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project alternatives that could potentially reduce project impacts identified in the Draft PEIR. The Draft PEIR Chapter 9.0, Alternatives Analysis, is consistent with this goal.

Table 9-1 has been revised to reflect the magnitude of significance (LS = less than significant, NS = no significant impacts, SU = significant and unmitigated, or SM = significant but mitigable) rather than “Greater than Project” for impacts in the alternatives analysis.

When compared to the other proposed alternatives described in Chapter 9.0, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR) is considered the environmentally superior alternative because it would result in fewer impacts to transportation/circulation, air quality (operation), GHGs, and noise (operation) since this alternative would not result in the construction of a bridge structure. Further, the other proposed alternatives, which would result in the construction of either Regents Road Bridge or a Pedestrian Bike Bridge with Emergency Access, would preserve less open space and result in greater impacts to biological resources. Based on this analysis, both Table 9-1 and Section 9.3 have been revised to clarify the findings for the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR) as the environmentally superior alternative. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

Citizens-2-38 Comment noted.

Citizens-2-39 Please see response to comment Citizens 2-24. The environmentally superior alternative includes a comprehensive look at all factors evaluated in the PEIR and not solely transportation.

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than Project” impacts, Table 9-1 and Chapter 9 conclude that as to *ten* other “Environmental Issue Areas,” the “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” results in impacts “Greater than Project.” Those ten areas are as follows: land use; visual effects and neighborhood character; energy; historical resources; biological resources; geological conditions; paleontological resources; hydrology and water quality; public utilities; and health and safety. (DPEIR, at page 9-7.) The DPEIR’s conclusions that impacts are “Greater than Project” are deficient, in that (as discussed at length in Section III.B.), the DPEIR’s analysis fails to discuss whether, for those eleven “environmental issue areas” as to which the Project’s impacts are designated in Table 9-1 as being “LS” (less than significant) or “NS” (no significant impacts),¹⁴ the various alternatives’ impacts which are “Greater than Project” would be *significant*. If an alternative’s impacts as to one or more of those eleven environmental issue areas is “greater” than the Project but still not “significant” under CEQA, those “greater than Project” impacts are irrelevant under CEQA and certainly would not support a determination that one or more of the alternatives is “environmentally superior” under CEQA.

Citizens-2-41
cont.

C. When Table 9-1 is Corrected to Conform to the Chapter 9 Analysis and the CEQA Threshold of “Significant Impacts,” the Alternatives Analysis Supports a Conclusion that the No Project Alternative is the Environmentally Superior Alternative

As set forth in Section III.A., Table 9-1 and the comparison of alternatives in Chapter 9 provide no support cognizable under CEQA for the conclusion that the No Project Alternative’s impacts to the eleven following “environmental issue areas” would be “Greater than Project”: Land Use; Air Quality (construction impacts); Energy; Noise; Historical Resources; Biological Resources; Geological Conditions; Paleontological Resources; Hydrology and Water Quality; Public Utilities; and Health and Safety.

Once Table 9-1 is corrected to remove the 11 “environmental issue areas” as to which the Project is allegedly “superior” to the No Project Alternative (but as to which there is no showing that the No Project Alternative’s impacts would be “significant” under CEQA), Table 9-1 shows that the Project is “superior” to the No Project Alternative only as to one environmental issue area – Visual Effects and Neighborhood Character – while the No Project Alternative is “superior” to the Project as to four environmental issue areas – Transportation/Circulation; Air Quality; Greenhouse Gas Emissions; and Public Services and Facilities. Moreover, the DPEIR concludes that the Project’s impacts to Transportation/Circulation, Air Quality, Greenhouse Gas Emissions and Public Services and Facilities are significant and unmitigated. Accordingly, based on the DPEIR, there is no support for its conclusion that the Project is superior to the No Project Alternative in terms of environmental impacts.

Citizens-2-42

¹⁴ There is no explanation in the DPEIR as to what the distinction is between “less than significant” and “no significant impact.” Use of those two phrases without explanation is confusing to a reader and calls for a revision to the DPEIR and recirculation of a revised DPEIR.

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Citizens-2-40 Please see responses to comments Citizens 2-24 and Citizens 2-37.

Citizens-2-41 Please see responses to comments Citizens 2-24 and Citizens 2-37.

Citizens-2-42 Please see responses to comments FRC-1-10, Citizens 2-24, and Citizens 2-37.

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IV. THE ENVIRONMENTAL IMPACTS OF THE TWO SETS OF TRANSPORTATION MITIGATION MEASURES SHOULD BE EVALUATED AS PART OF THE PROGRAM EIR

The DPEIR concludes that the Project would have significant unmitigated environmental effects as to five environmental issue areas: transportation/circulation; air quality; greenhouse gas emissions; noise; and public services and facilities. The DPEIR concluded that there are no feasible mitigation measures for greenhouse gas emissions and for public services and public services and facilities. The sole mitigation measure identified to address noise impacts places the burden on future residential development in the Genesee Avenue Corridor to implement noise control measures. (See DPEIR, at page 10-11 to 10-12.) The remaining mitigation measures are directed primarily at the Project’s significant transportation/circulation impacts, which as a byproduct would also ameliorate the air quality impacts of the Project. (See *id.* at pages 10-10 and 10-11.)

Citizens-2-43 Please see response to comment Citizens 1-5.

The Project is an unusual one, as it involves removal of long-planned transportation facilities from a community plan and the general plan. Unlike most projects evaluated under CEQA, if the Project were approved, there would be no subsequent approvals necessary for its implementation. Under the usual case, the mitigation measures are assured of implementation because the project approved cannot move forward unless and until the mitigation measures are fully funded and approved for implementation, if not already fully implemented. Here, although the CEQA Guidelines require adoption of a mitigation monitoring and reporting program be adopted upon certification of an EIR to ensure that the mitigation measures are implemented, there is no project implementation to “drive” implementation of the mitigation measures. If the Project were adopted, the Regents Road Bridge and the Genesee Avenue Widening projects would each be removed from the UCP and the General Plan. Any follow up to implement any of the 23 transportation/circulation mitigation measures encompassed by the two sets of Transportation/Circulation Mitigation Measures, TRA-1 and TRA-2, would require inclusion in the University City Public Facilities Financing Plan, with identified funding sources.

Citizens-2-43

Nevertheless, as noted the CEQA Guidelines require the City to commit to implement the identified mitigation measures. The DPEIR acknowledges that implementation of the 23 measures comprising TRA-1 and TRA-2 would themselves have potentially significant environmental effects. For example, at pages 4.4-20 and 4.4-21, the discussion of potential mitigation of the air quality impacts caused by the Project suggests that the operational changes to the transportation system that comprise TRA-1 and TRA-2 could actually *increase* air quality impacts. (“these improvements to the transportation network would also affect criteria air pollutant emissions. Project-level analysis of the potential impacts of the proposed mitigation measures will be completed at such time a[s] the improvements are implemented.” (DPEIR, at page 4.4-21.)

Citizens-2-44 Please see response to comment Citizens-1-5.

Yet, despite this implicit acknowledgment that the implementation of TRA-1 and TRA-2 will worsen air quality (although improving traffic operations to some extent), the DPEIR

Citizens-2-44

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proposes to defer consideration of the air quality, greenhouse gas emission and other environmental effects of those 23 measures, most of which involve roadway widening, construction of new traffic lanes, and/or removal of on-street parking, until “such time the improvements are implemented.” (DPEIR, at page 4.2-52; see also pages 10-4 to 10-6.) Citizens believes that the environmental impacts of TRA-1 and TRA-2 should be evaluated as part and parcel of the Project, rather than deferred and evaluated individually under CEQA if and when they are programmed for implementation. This approach should be followed here, because the mitigation measures may have significant adverse environmental impacts, worse than the environmental impacts that are attributed (without support, as discussed in Section III.B.2.) to the No Project Alternative, or to the Project (including its significant unmitigated effects on five environmental issue areas). In short, the cure (in the form of TRA-1 and TRA-2) could be as bad or worse than the disease (i.e., the admitted significant and unmitigated impacts of the Project on transportation/circulation, greenhouse gas emissions, air quality, noise and public services and facilities). If subsequent environmental review of the 23 mitigation measures comprising TRA-1 and TRA-2 were to bear this out, the City would have to prepare and approve an Amended PEIR to find alternative mitigation measures, or to consider undoing the currently proposed amendment and restoring what is now the No Project Alternative. That would be an expensive and time-consuming process. It makes far more sense to explore those environmental impacts of the mitigation measures as part of the process of considering the Project, rather than to defer that analysis. Indeed, if TRA-1 and TRA-2 were evaluated as to their environmental impacts, it might change the evaluation of the project alternatives, such that the Project – or the “No Construction of Regents Road Bridge and Widening of Genesee Avenue, depending on which part of the DPEIR one reviews – may not be deemed the environmentally superior alternative (even using the flawed methodology adopted by the DPEIR).

Citizens-2-44
cont.

Evaluating TRA-1 and TRA-2 now, rather than deferring that evaluation is supported by the CEQA guidelines, which discusses the limitations of ‘tiering.’ “‘Tiering’ refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects” (14 Cal. Code Regs. §15152(b).) But, the CEQA guidelines admonish that “[t]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” (*Id.*) Deferral of detailed, site-specific information is allowed “as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.” (*Id.* §15152(c)). The public, in reviewing the proposed Project and its DPEIR, and City Council, when deciding whether to approve the Project, need to understand whether the environmental impacts of the 23 transportation mitigation measures, individually or collectively, may be of such consequence that there will be little likelihood of their being approved. Here, CEQA’s informational disclosure objectives are not satisfied by deferring the analysis of the 23 transportation mitigation measures.¹⁵

Citizens-2-45

Citizens-2-45 Please see response to comment Citizens-1-5.

¹⁵ See n.4.

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V. THE ANALYSIS OF THE PROJECT'S IMPACTS ON TRANSPORTATION/ CIRCULATION IS FLAWED AND INCOMPLETE IN MULTIPLE RESPECTS

Although the DPEIR concludes that the Project would have significant impacts on transportation/circulation that would remain unmitigated even after 23 unfunded mitigation measures with potentially significant environmental effects were implemented,¹⁶ the DPEIR's analysis of transportation/circulation impacts used outdated methodologies and admits that it does not include all the impacts of the Project on transportation/circulation. These methodological inadequacies must be corrected and missing data supplied, in order that CEQA's fundamental purposes of informed decision making and public participation are served.¹⁷

First, the intersection level of service analysis was based on the Highway Capacity Manual's ("HCM") 2000 methodology. (See RK Engineering Letter, at page 2.) This is contrary to the requirements of the City of San Diego's Traffic Impact Study Manual, which specifies that signalized intersection operational methodology should be based on the current version of the HCM. (See City of San Diego's Traffic Impact Study Manual, at page 17.) The current version of the HCM dates from 2010. The use of the superseded, outdated HCM methodology may have resulted in an underestimate of vehicle delay and, hence, an underestimate of significant impacts of the Project on the study area intersections. (See RK Engineering Letter, at page 2.) The HCM 2010 version also includes a methodology for calculating pedestrian and bicycle level of service, which was not employed in the transportation/circulation analysis of the Project. (See *id.* at pages 2-3.) Therefore, in keeping with adopted City requirements in its own Traffic Impact Study Manual, the traffic analysis should be revised using the current version of the HCM, and the DPEIR revised accordingly and recirculated for public review and comment.

Citizens-2-46

Second, the analysis of the Project's transportation/circulation impacts was based on an outdated SANDAG traffic model. Specifically, the analysis of alternatives in the DPEIR's traffic study are based on the SANDAG Series 12 traffic model. The current growth forecast model for the region is SANDAG Series 13, adopted in 2013. As the traffic study for the DPEIR was begun well after the SANDAG Series 13 traffic model was available, there is no reason that a superseded, outdated model was used here. Use of the superseded model, rather than the Series 13 model, may have underestimated trip generation and other relevant parameters in the traffic analysis. (See *id.* at page 3.) As a consequence, the DPEIR traffic analysis should be updated and the DPEIR revised accordingly and recirculated for public review and comment.

Citizens-2-47

Third, the DPEIR fails to explain the basis for the origin/destination method for assigning traffic to the roadway network under the Project and under each of the alternatives to the Project. How traffic is assigned under each alternative can significantly affect the outcome of the analysis. (See *id.*) The DPEIR should be revised to include a clear explanation of the methodology used for

Citizens-2-48

¹⁶ See, e.g., DPEIR at page 4.2-52 ("Even with implementation of the mitigation measures, significant traffic impacts would still result and would present increased difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds, and other traffic-related delays.")

¹⁷ See n.4.

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Citizens-2-46 Reasons for utilizing HCM 2000 Methodologies rather than 2010 Methodologies are included in Chapter 3 (page 3-5) of the Transportation Impact Study provided in Appendix C. There are currently no methods or significant thresholds established by the City of San Diego for evaluating pedestrian and bicycle by level of service, nor other metrics. With no set thresholds established, the lead agency has the right to decide how impacts are analyzed in a CEQA document. Nevertheless, pedestrian evaluations for this effort were qualitative, focusing on access to transit. Additionally, bicycle evaluations for this effort included a qualitative measure of a bicyclist's level of stress (BLTS).

Citizens-2-47 While Series 13 growth forecasts were adopted at the time this study was initiated, the model was not available for use by local agencies. Series 13 subarea modeling procedures had not been established nor performed at that time. Series 13 changed processes from a four-step model previously used in Series 12 to a new activity-based model and, therefore, requires new procedures and inputs to be developed and agreed upon at the subarea modeling level. These processes include land use assumptions, model calibration techniques, and traffic analysis zone (TAZ) modifications. The uncertainty of the Series 13 subarea model results and the timing of the necessary modeling work was determined to be insufficient for these efforts. Series 12 provided a level of confidence in its results due to past experience using its subarea modeling procedures and developing calibrated results.

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this step in the analytical process, and then the revised DPEIR should be recirculated for public review and comment.

Citizens-2-48
cont.

Fourth, the DPEIR's traffic study analyzed only two intersections along the Regents Road and Genesee Avenue corridors south of SR 52 in the Clairemont community planning area. Consistent with recommendations of the San Diego Regional Traffic Engineers' Council ("SANTEC") that all local roadway segments, intersections, and mainline freeway locations be analyzed where a project will add 50 or more peak hour trips be examined. The traffic study does not indicate whether it complied with this standard. The DPEIR and its traffic study should be revised to demonstrate that all significant impacts to potentially affected roadways, intersections and freeway segments are included, and then the revised DPEIR should be recirculated for public review and comment. (*See id.*)

Citizens-2-49

Fifth, the DPEIR draws illogical conclusions relative to the Project's potential impacts on energy use and conservation that are at odds with factual statements made with respect to the Project causing vehicle miles traveled ("VMT") to increase significantly. Specifically, the DPEIR concludes that the Project would significantly increase VMT as compared to the adopted University Community Plan. (*See* DPEIR, at page 4.4-16, based on the Transportation/Circulation analysis in Section 4.2 of the DPEIR.) Yet, a contradictory finding is made in the DPEIR's section on energy impacts, where it concludes that the Project "would not result in the use of excessive amounts of fuel or other forms of energy above those of existing conditions." (*See id.* at page 4.6-7.) Given that the DPEIR freely admits that the Project would increase VMT and vehicle emission levels, and the indisputable fact that the increase in VMT translates to increased consumption of transportation fuel, the quoted statement is incorrect and contradicted by other factual statements in the DPEIR. The DPEIR must be revised accordingly¹⁸ to make the finding that the Project would increase fuel consumption and energy usage and that such an impact would be significant. (*See* RK Engineering Letter, at page 3.)

Citizens-2-50

Sixth, the DPEIR admits that its analysis fails to "include all vehicle travel and operations in the areas as a result of the Project." (*See* DPEIR, at pages 4.5-15 and 5-14.) This is an astonishing admission, one that is completely at odds with CEQA's purposes of informed decision making.¹⁹ The DPEIR must be revised so that its Transportation/Circulation analysis – and its analysis of other environmental issue areas that derive at least in part from the transportation analysis, such as air quality, greenhouse gas emissions, and energy – do include all vehicle travel and operations. A revised DPEIR must then be circulated for public review and comment.

Citizens-2-51

¹⁸ Appendix F of the CEQA Guidelines states: "Potentially significant energy implications of a project should be considered in an EIR [to the extent relevant and applicable to the project]." *See also Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256 (holding that deficiency in EIR (in the form of failure to calculate energy impacts of additional vehicle trips) could not be cured by an Addendum, which was not subject to public comment).

¹⁹ *See* n.4.

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Citizens-2-48 Future traffic conditions were determined based on future SANDAG models. Method for determining future peak hour turning movements at the study intersections is included in Chapter 7 (page 7-1) of the Transportation Impact Study provided in Appendix C.

Citizens-2-49 Study area intersection selection criteria are included in Chapter 2 (page 2-1) of the Transportation Impact Study (Appendix C). The SANTEC recommendations are for project-level analysis. For regional level, per City of San Diego recommendations, study area intersections should be within the community boundary with the option to extend one TAZ farther from the boundary. The area south of SR-52 is within the Clairemont Community. The Clairemont Mesa Community Plan Update is currently underway.

Citizens-2-50 The commenter assesses that the Draft PEIR did not fully evaluate the impacts related to energy use and consumption in relation to VMT. As discussed in Section 4.4.4.1, Impact Analysis, of Section 4.4, Air Quality, the Project would increase the total regional VMT compared to the Adopted UCP. The commenter's assertion that the conclusion that the Project "would not result in the use of excessive amounts of fuel or other forms of energy above those of existing conditions," provided in Section 4.6.5.2 of Section 4.6, Energy, is incorrect. The Project differs from traditional projects in that it removes planned elements from the UCP. As discussed in Section 4.4.4.1, Impact Analysis, the Project does not include the construction of new residential or commercial buildings; therefore, it would not directly increase population or regional employment that would cause a net increase in regional VMT. However, the transportation network changes as a result of the Project have not been included in the regional emissions analysis of the RAQS. The Project requires an amendment to the General Plan and, as determined in this analysis (see Issue 2 in Section 4.2, Transportation/Circulation), would increase the total regional VMT compared to the Adopted UCP. Estimated VMT for the Project is essentially based on the current roadway network conditions demonstrated at a future year. As discussed in 4.4.5.1, Impact Analysis, this methodology was utilized to better

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VI. THE ANALYSIS OF ALTERNATIVES IS DEFICIENT IN FAILING TO DESCRIBE THE RATIONALE FOR SELECTION OF THE ALTERNATIVES, AND IN INCLUDING A GRADE-SEPARATED INTERSECTION AT GENESEE AVENUE AND GOVERNOR DRIVE IN THE “NO CONSTRUCTION OF REGENTS ROAD AND WIDENING OF GENESEE AVENUE ALTERNATIVE”

A. The DPEIR Fails to Comply with CEQA’s Requirements to Describe the Rationale for Selection of Alternatives and for Rejection of Alternatives Considered During the Scoping Process

The CEQA Guidelines require that an EIR “briefly describe the rationale for selecting the alternatives to be discussed.” (14 Cal. Code Regs., § 15126.6(c); *see also id.* at § 15126.6(a) (“The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.”) Although the DPEIR states that its “analysis of alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed” [DPEIR, at page 9-1], in fact no such description appears in Section 9.1 (which is entitled “Rationale for Alternative Selection”) or elsewhere in Chapter 9.

Rather than describe why the alternatives considered in Chapter 9 were selected, all that Section 9.1 does is recite the CEQA requirements for selection of alternatives: “consideration was given to each alternative’s ability to meet the basic objectives of the Project and to eliminate or reduce potentially significant environmental impacts” and make oblique reference to CEQA’s requirement that alternatives selected for analysis in an EIR be feasible. (*See* DPEIR, §9.1.3.) There is nowhere in Section 9.1, nor elsewhere in Chapter 9, CEQA’s required “brief discussion” explaining *why* the four alternatives, in addition to the No Project Alternative, were selected, i.e., *how* they met an initial screening indicating that they satisfy basic project objectives, reduce the environmental impacts of the Project, represent a reasonable range of alternatives, and are potentially feasible. (*See* 14 Cal. Code Regs. § 15126.6(b), (c) & (f).)

Citizens-2-52

Similarly, the CEQA Guidelines also provide that an EIR should identify the alternatives that the lead agency considered but rejected as infeasible during its scoping process and should briefly explain the reasons for its determination. (*See* 14 Cal. Code Regs. § 15126.6(c).) Here again, the DPEIR states that “this PEIR also provides a discussion on alternatives that were considered but rejected.” (DPEIR, at page 9-1.) However, as it did with respect to the CEQA requirement to describe the reasons it selected the alternatives for analysis, the DPEIR recites that it complied with this requirement but does not actually do so: there is absolutely no statement anywhere in Chapter 9 (or elsewhere in the DPEIR, for that matter) that includes the required identification of the alternatives that the City considered during the scoping process but rejected as infeasible.

Citizens-2-53

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account for increased roadway demands from cumulative planned growth that would affect traffic operations. As such, the Draft PEIR was correct in the determination that energy consumption associated with excessive amounts of fuel would not result in an increased reliance on fossil fuels above that which already exists under current roadway network conditions.

Citizens-2-51 Please see response to comment FRC-1-6.

Citizens-2-52 Commenter states that the Draft PEIR failed to describe the rationale for selecting alternatives to be discussed. As stated in Section 9.1, Rationale for Alternative Selection, “in developing the alternatives to be addressed in this chapter, consideration was given to each alternative’s ability to meet the basic objectives of the Project and to eliminate or reduce potentially significant environmental impacts.” Section 9.1.1 summarizes the significant impacts of the Project and states that the alternatives were first evaluated to see if they could reduce or avoid any or all significant impacts. Section 9.1.2 discusses the specific objectives of the Project and states that the objectives assisted the City in developing a reasonable range of alternatives. Sections 9.1.1 and 9.1.2, which precede the analysis of alternatives, meet the CEQA Guidelines Section 15126.6(c) by adequately describing the rationale for selecting the alternatives to be discussed.

Citizens-2-53 During the 30-day scoping process that began on December 2, 2015 and ended on January 4, 2016, there were no additional alternatives considered and rejected as infeasible. As such, page 1-6 of Chapter 1.0, Introduction and page 9-1 of Chapter 9.0, Alternatives Analysis, has removed any statement related to discussion of alternatives that were considered, but rejected. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

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B. Prior Environmental Analysis of Genesee Avenue Widening to Include Grade Separation at Governor Drive Showed that It Would Offer No Substantial Traffic Congestion Reduction and that Grade Separation Would Have Significant Unmitigated Impacts on Neighborhood Character/Aesthetics, on Landform Alteration and on Construction Traffic

The EIR for the University City North/South Transportation Corridor Study, which was finalized on June 13, 2006, considered seven alternatives: a Genesee Avenue Widening Alternative; a Regents Road Bridge Alternative; a Genesee Avenue/Governor Drive Grade Separation Alternative; a Genesee Avenue Widening and Regents Road Bridge Alternative; a Grade Separation and Regents Road Bridge Alternative; a Limited Roadway Changes Alternative; and a No Project Alternative. (See Final EIR for Project No. 27445 (hereinafter, "2006 FEIR") at pages 2-3.)

The 2006 FEIR included a chapter identifying "Alternatives Considered But Rejected." (See 2006 FEIR, Chapter 9.0.) It discusses alternatives that were determined to be infeasible for various reasons during the CEQA scoping process. (*Id.* at 9-1.) The first such alternative that was rejected was labeled "Grade Separation/Genesee Avenue Widening." As noted in the preceding paragraph, the 2006 FEIR considered as a separate alternative a project consisting only of constructing a grade-separated intersection at Genesee Avenue and Governor Drive, and as another separate alternative the widening of Genesee Avenue. The 2006 FEIR noted that the alternative of "Grade Separation/Genesee Avenue Widening" was rejected for further consideration during the scoping process "because it would offer no substantial traffic congestion reduction when compared with the alternatives evaluated in Section 4.0. **Genesee Widening by itself accomplishes the same benefits as a combination with grade separation.** Grade separation alone only provides for a better level of service at the intersection of Governor and Genesee...." (2006 FEIR, at 9-1 (emphasis supplied).)

The 2006 FEIR found that both the Genesee Avenue Widening Alternative and the Grade Separation Alternative would involve significant impacts to neighborhood character/aesthetics, by requiring 5,800 feet and 1,800 feet respectively of retaining walls and crib walls that would be constructed along both sides of the widened roadway, and by narrowing the median from 18 feet to 8 feet. That would require removal of large, mature trees within the median and along sidewalks that could not be replaced. The 2006 FEIR concluded that "the impact of the loss of landscaping along Genesee Avenue on the neighborhood character is considered significant and unmitigable." (2006 FEIR, at page 3.) A graphic depiction based on the Draft EIR for Project No. 27445 dated October 2004 is included as Attachment C.

The 2006 FEIR found that the Grade Separation Alternative would involve significant impacts in the form of landform alteration, in that it would require roughly 60,000 cubic yards of earthwork along a 2,400-foot-long segment of Genesee Avenue, and because it would include approximately 1,350 feet of retaining walls, create vertical slopes greater than 10 feet in height, and would impact natural slopes greater than 25 percent. (*Id.*) The 2006 FEIR concluded that

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Citizens-2-54 Comment noted.

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there were no mitigation measures available to reduce significant landform alteration impacts of these alternatives. (*Id.*) A graphic depiction of the truck traffic that would be generated by the earthwork required by the Genesee Avenue Widening and the Grade Separation alternatives based on the Draft EIR for Project No. 27445 dated October 2004 is included as Attachment D.

Citizens-2-54
cont.

Several observations are warranted in light of the above-referenced findings of the 2006 FEIR. First, given that the 2006 FEIR concluded that “Genesee Widening by itself accomplishes the same [traffic congestion reduction] benefits as a combination with grade separation[.]” and that the Genesee Avenue/Governor Drive Grade Separation Alternative would have significant and unmitigated impacts on neighborhood character/aesthetics, landform alteration, and construction traffic generation and associated impacts (e.g., congestion, air emissions), it is surprising that the DPEIR included, as a feature of the “No Regents Road Bridge and Genesee Avenue Widening Alternative, grade separation at the Genesee Avenue/Governor Drive intersection. Stated differently, why would the City incorporate a feature into an alternative that had been relatively recently evaluated and as to which the City had concluded, in a Final EIR, that the grade separation feature had no traffic congestion reduction benefits and had numerous, significant, unmitigated environmental impacts? It appears as if the City, in scoping the DPEIR, completely ignored the extensive and expensive process and product (including the input of the Public Working Group) involved in the University City North/South Transportation Corridor Study. Had the DPEIR complied with CEQA’s requirement to explain the City’s rationale in selecting the alternatives evaluated, and in rejecting the alternatives determined to be infeasible during the scoping process, perhaps this question would have been answered.

Citizens-2-55

Citizens-2-55 Please see responses to comments GJB-1-4 and Citizens-2-5.

Second, is noteworthy that the DPEIR does not address the impacts of the “No Regents Road Bridge and Genesee Avenue Widening Alternative” on (a) neighborhood character/aesthetics due to the extensive use of retaining walls and crib walls and the removal of large, mature trees that would be required under that alternative, or (b) landform alteration due to required earthwork, creation of extreme vertical slopes, and extensive changes to natural slopes, or (c) temporary traffic congestion and air quality impacts caused by the need to close a substantial section of Genesee Avenue to traffic during construction of the grade separation feature.

Citizens-2-56

Citizens-2-56 Sections 9.2.3.2, 9.2.3.3, and 9.2.3.4 have been revised within the Final PEIR to include the environmental topics noted by the commenter. It should be noted that Section 9.2.3.3 of the Draft PEIR already included discussion of retaining walls and crib walls related to visual effects and neighborhood character.

Third, given these findings of the 2006 FEIR, it is astonishing that the “No Regents Road Bridge and Genesee Avenue Widening Alternative” was selected as the “environmentally superior alternative” (or alternately, as the “environmentally superior build alternative” if one considers that the DPEIR identified the Project as the “environmentally superior alternative” at pages 9-6 and 9-48 of the DPEIR (*see* Section III.A. above)).

Citizens-2-57

Citizens-2-57 Please see responses to comments GJB-1-4 and Citizens-2-37.

VII. ADDITIONAL COMMENTS ON THE DPEIR

Citizens offers the following additional specific comments:

Page 2-8: The discussion of emergency services includes reference to Fire Station 9, located at 7870 Ardath Lane, which while barely in the UCP area, admittedly does not serve either

Citizens-2-58

Citizens-2-58 The commenter questions the inclusion of Fire Station 9 as part of the analysis in Section 4.13, Public Services and Facilities. The discussion incorporates the conclusions of the Transportation Impact Study (Appendix C). According to Chapter 14, Emergency Response (page 14-1), the City of San Diego Fire Department provided input regarding the existing response times specific to the Project area, which included the following three fire stations: Station 35, Station 27, and Station 9. The Draft PEIR included a discussion of all three fire stations in order to maintain consistency with the analysis provided in the Transportation Impact Study.

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the Genesee Avenue corridor or the Regents Road corridor. (See §2.1.3.7 (“Fire Station 35 and Fire Station 27 serve the Genesee Avenue Corridor.” and § 2.1.4.7 (“The emergency services for the Regents Road Corridor would be the same as those described for the Genesee Avenue Corridor.”) The DPEIR admits that the average response time for Fire Station 35 and Fire Station 27 was 8.82 and 8.05 minutes, respectively, both in excess of the City’s target average of 7.5 minutes. Yet, the DPEIR concludes its discussion of fire response times by noting that Fire Station 9 met the City’s target average response time for years 2014 and 2015. That fact has no relevance whatsoever to the Project, yet seems to be included gratuitously to create the impression that the existing level of service in the Project area is not as bad as it really is. The statement regarding the response time for Fire Station 9 is irrelevant to the discussion of the existing Environmental Setting and should be removed.

Citizens-2-58
cont.

Page 2-16: The statement is made that removal of the Regents Road Bridge from the UCP would be consistent with the Clairmont Mesa Community Plan. “A more detailed analysis of the project alternatives in the context of the CMCP is provided in Section 4.1 of this PEIR.” But there is no reference whatsoever in Section 4.1 regarding the Clairmont Mesa Community Plan. The DPEIR should be revised to discuss the relationship between the Project and its alternatives in the context of the Clairmont Mesa Community Plan.

Citizens-2-59

Citizens-2-59 Page 2-16 of the Final PEIR has been revised to remove the following sentence: “A more detailed analysis of the project alternatives in the context of the CMCP is provided in Section 4.1 of this PEIR.” Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

Page 4.1-18: This section contains the following statements: “Per Section 1.4.2 of the MSCP, roads and utility lines are allowed within the City’s MHPA, as long as they adhere to the stated planning policies and design guidelines.... The UCP Area is currently in compliance with the guidelines stated in the MSCP for development within and adjacent to the MHPA within the Genesee Avenue Corridor.” The same statements appear on page 4.1-19 regarding the Regents Road Bridge. These statements presumably mean that the existing UCP, with the Regents Road Bridge and the Genesee Avenue Widening, is in compliance with the MSCP. If that is the case, the DPEIR should be revised to state that clearly and unambiguously.

Citizens-2-60

Citizens-2-60 Please see response to comment Citizens-2-31.

Page 4.1-21: Under Issue 4, “Would the Project physically divide an established community?”, the discussion states that it would not do so. The discussion under this question should, however, indicate that the Project would remove a facility in the adopted UCP and General Plan that unites two communities, University City and Clairmont.

Citizens-2-61

Citizens-2-61 As discussed in Section 4.1, Land Use, of the Draft EIR, “the determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in physical changes to the environment that could result in the creation of secondary environmental impacts considered significant under CEQA.” CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision makers should address. A project is considered consistent with the provisions of the identified regional and local plan if it meets the general intent of the plans, and would not preclude the attainment of the primary intent of the land use plan or policy. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, but is largely

Page 4.2-37: This page consists of Table 4.2-11, “Future Year Roadway Segment Operation with Implementation of Mitigation.” The inclusion of this table with no discussion of it is very misleading. The only mention of the table follows a statement in section 4.2.4.2 as follows: “Deteriorated traffic conditions would result in significant impacts at 21 roadway segments with implementation of the Project in the future year.” Following that table is the only mention made of Table 4.2-11: “(Table 4.2-11 is provided for informational purposes.”) The content of Table 4.2-11, however, is far from self-explanatory. Why are only nine

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road segments included in this table, when the DPEIR elsewhere (including in the first sentence of section 4.2.4.2) admits that 21 roadway segments would experience deteriorated conditions as a result of the Project? (It should be noted that elsewhere in the DPEIR, the number of roadway segments significantly impacted by the Project is 18: four that would result in LOS E or F which would not be unacceptable if the Regents Road Bridge and Genesee Avenue Widening remain in the UCP, and an additional 14 segments that would be operating at LOS E or F even if Regents Road Bridge and Genesee Avenue Widening remain in the UCP, but as to which the conditions would become significantly worse if Regents Road Bridge and Genesee Avenue Widening are removed from the UCP. See page 4.2-32 and Table 4.2-10.) The column on the extreme right of Table 4.2-11 would lead the reader to understand that after mitigation, only three of the nine roadway segments would operate at unacceptable levels (LOS E or F). But that is not the case, as Table 4.2-13 indicates that even if the unfunded mitigation measures were implemented, 13 roadway segments would experience significant impacts as a result of the Project.

Citizens-2-62
cont.

Page 4.2-38 and 4.2-39: These pages display “Table 4.2-12: Future Year Intersection Operation with Implementation of Mitigation”. This table identifies 31 intersections (including freeway off-ramps) where LOS at the am and/or pm peak would be unacceptable (LOS E or F) with the Project, and then in the far-right column purportedly identifies the future year LOS after mitigation. But, for 18 of those 31 intersections, there is no mitigation proposed at all. Instead of displaying the LOS for those 18 intersections as being unchanged, i.e., either LOS E or F, Table 4.2-12 puts a dash. Similarly, for those 18 intersections, dashes are inserted under the “Delay” column. This is misleading, as the reader who wants to get to the “bottom line” will naturally gravitate to and focus on the column purportedly showing LOS after mitigation (and perhaps Delay as well). Instead of showing dashes for those 18 intersections for which there is no mitigation, the unacceptable LOS should be displayed. A reader could easily conclude by looking at Table 4.2-12 that there are only four intersections operating at LOS E or F after mitigation, when in fact, the number of intersections operating at LOS E or F after available mitigation is 22. Similarly, the reader could conclude that after mitigation, there is no delay at all at 18 intersections after mitigation. Accordingly, the two columns in Table 4.2-12 under the heading “Future Year After Mitigation” should not include dashes at all, but rather should reflect the values for Delay and LOS for “Future Year With Project” for the 18 intersections for which no mitigation measures are proposed.

Citizens-2-63

Page 4.2-45: Section 4.2.4.4 discusses “Significance After Mitigation”. This discussion is very misleading. It states “Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvement Program (CIP), and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.” This statement clearly

Citizens-2-64

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consistent with the land use goals of that plan and would not preclude the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. In addition, inconsistency with specific objectives or policies of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment.”

As discussed in Section 4.1, Land Use, subsection 4.1.4, Impact Analysis, the Project would not conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans. Relevant goals and guidelines from the City of San Diego General Plan and the UCP were compared against the compatibility of the goals of the Project. Implementation of the Project would maintain existing conditions. As discussed in Section 4.1.4.2, Significance of Impacts, because the Project would result in a community plan amendment, the Project would no longer be inconsistent with the UCP and UCP Transportation Element. Further, this portion of the Project would not conflict with any goals, objectives, and recommendations of the City of San Diego General Plan, the North City LCP, or any coastal regulations. Impacts would be less than significant.

Citizens-2-62 The following revisions will be made on the Final PEIR to provide further clarification. Table 4.2-11 (page 4.2-37) of the Final PEIR will be revised to add additional explanation regarding the Roadway Segment Discussion on page 4.2-36. In addition, Table 4.2-12 (page 4.2-37) of the Final PEIR will be revised to show all impacted roadway segments and "no improvement proposed" will be added on applicable segments that do not have feasible mitigation measures. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

Citizens-2-63 Please see response comment Citizens-2-62.

Citizens-2-64 Please see response comment Citizens-1-5.

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implies that if TRA-1 and TRA-2 were funded, the significant traffic impacts associated with the Project would be eliminated. But of course, that is not the case at all. For 18 intersections, there is no mitigation and the level of service due to the Project would be unacceptable (LOS E or F). Similarly, after available mitigation, 13 roadway segments would remain impacted as a result of the Project, as indicated by Table 4.2-13.

Citizens-2-64
cont.

Page 4.4-16: In the discussion of whether the Project would conflict with or obstruct implementation of the applicable air quality plan, the DPEIR admits that the Project “would increase the total regional VMT compared to the adopted UCP. SANDAG is currently developing an update to the RAQS and an ozone attainment plan for the 8-hour NAAQS. Any changes to the transportation network and the General Plan as a result of the Project would be incorporated in the updates to future air quality attainment plans. However, the increase in VMT as a result of the Project has not been accounted for in the current RAQS.” This statement, without more, represents a total abdication of the DPEIR’s obligation to assess the air quality impacts of the Project: it is saying, SANDAG will deal with the increase in VMT and any necessary additional control measures when it next updates the RAQS.

Citizens-2-65

Citizens-2-65 Please see response to comment Citizens-2-20. Contrary to the comment, the Draft PEIR does assess the air quality impacts of the Project. Although SANDAG will update regional VMT with future plans, the Draft PEIR also states that the Project would increase the total regional VMT compared to the Adopted UCP and "the increase in VMT and change in the roadway network as a result of the Project would not have been accounted for in the current RAQS." Therefore, the Project could conflict with or obstruct implementation of the applicable air quality plan.

Page 4.4-21: In the discussion of whether the Project would expose sensitive receptors to substantial pollutant concentrations, it states “The primary mobile-source pollutant of localized concern is CO.” This statement, and the remainder of the discussion of potential impacts to sensitive receptors, fails to address potential impacts to sensitive receptors (residences, schools, parks) to cancer-causing fine particulate emissions from cars and trucks (including but not limited to diesel-fueled cars and trucks). This is a significant omission in the DPEIR’s discussion of the Project’s potential air quality impacts. It is noteworthy that the City retained noise consultants to conduct ambient noise monitoring (see DPEIR, at page 4.7-9), but could not be bothered to conduct monitoring of levels of fine particulate levels at sensitive receptors along the Genesee Avenue corridor – e.g., Curie Elementary at 4080 Governor Drive, Standley Middle School at 6298 Radcliffe Avenue, University City Senior High at 6949 Genesee Avenue, Rose Canyon Open Space Park (eastern section near Genesee Avenue), Standley Recreation Center, Stanley Joint-Use Park located adjacent to Standley Middle School – that would be heavily impacted by increased traffic if the Project were implemented, and then conduct modeling of the resulting increase in emission levels of fine particulate levels.

Citizens-2-66

Citizens-2-66 Please see responses to comments Citizens-1-7 and Citizens-1-8.

Page 4.5-15: The DPEIR admits that its analysis of the Project’s impact on greenhouse gas emissions is incomplete, by its statement that “the analysis does not include all vehicle travel and operations in the area as a result of the Project, and additional vehicle travel and congestion, similar to the overall trend identified in this analysis, could further increase the Project’s estimated change in GHG emissions. These changes would be analyzed during the next update to the 2015 RTP/SCS for consistency with the long-term GHG reduction goals in AB 32 and SB 375.” The DPEIR’s analysis *should* “include all vehicle travel and

Citizens-2-67

Citizens-2-67 Please see responses to comments FRC-1-6 and FRC-1-19.

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operations in the area as a result of the Project ...” and its failure to do so renders the DPEIR inadequate under CEQA.

Citizens-2-67
cont.

Page 4.5-18 and Page 8-6: In the discussion of the significance of the Project’s impacts on greenhouse gas emissions, the DPEIR states as follows: “Given the increase in VMT and GHG emissions from mobile sources, the Project would not be consistent with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP. Therefore, the Project **could** conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The impact would be significant and unmitigated at the program level.” (emphasis added). The use of the term “could” renders the statement meaningless and inadequate under CEQA. The DPEIR should be based on the analysis required under CEQA so that the public and decision-makers will understand whether or not the Project would be in conflict with the RTP/SCS, Climate Action Strategy and Climate Action Plan. As set forth elsewhere in the DPEIR, and as noted elsewhere in these comments, it is clear that the analysis that has been done demonstrates that the Project **would be inconsistent with the RTP, SCS, Climate Action Strategy and Climate Action Plan**. Accordingly, the DPEIR should be revised by substituting “would” for “could” in the above-quoted passage, and the DPEIR recirculated for public comment.

Citizens-2-68

Citizens-2-68 Please see response comment Citizens-2-14 and 2-17.

Page 4.5-18: In the discussion of “Significance After Mitigation,” it states, “Discretionary projects implemented in accordance with the UPC [sic] shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions...” It is not clear whether this statement means that if the Project were to be approved and the UCP and General Plan amended accordingly, consistency with the UCP will not mean consistency with the CAP, the SCS and AB 32. Clarification of the meaning of this statement is required.

Citizens-2-69


Citizens-2-69 Please see response comment Citizens-1-5.

VIII. CONCLUSION

For all of the reasons stated above, the comment period should be extended and the DPEIR is deficient and requires revisions. The revised DPEIR should then be circulated for additional public review and comment.

Citizens-2-70

Citizens-2-70 Comment noted.

Sincerely,

Evelyn F. Heidelberg

EFH/pat

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT A

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ATTACHMENT TO COMMENT LETTER CITIZENS-2
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**DRAFT
PROGRAM ENVIRONMENTAL IMPACT
REPORT**

SCH No. 2015121011

SUBJECT: UNIVERSITY COMMUNITY PLAN AMENDMENT: CITY COUNCIL APPROVAL AND ADOPTION of an amendment to the City of San Diego General Plan Mobility Element, an amendment to the University Community Plan Transportation Element, and an amendment to the North University City Public Facilities Financing Plan.

The City of San Diego is proposing to amend the 1987 University Community Plan (UCP) and, in particular, the UCP Transportation Element in order to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of development without the construction of the Genesee Avenue Widening and the Regents Road Bridge. The 2008 City of San Diego General Plan Mobility Element would be amended to be consistent with the amended University Community Plan, and an amendment to the North University City Public Facilities Financing Plan, last updated in 2012, would also be required.

The UCP can be found on the Planning Department's website at:

<https://www.sandiego.gov/planning/community/profiles/university>

University Community Plan Amendment

PROJECT LOCATION: The University Community Planning Area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchinson, Topeka, and Santa Fe Railroad, MCAS Miramar, and Interstate 805 (I-805) on the east; State Route 52 (SR-52) on the south; and Interstate 5 (I-5), Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west. Neighboring communities include Torrey Pines, Mira Mesa, Clairemont, and La Jolla. The planning area contains two state-controlled properties - UCSD and Torrey Pines State Reserve - which lie outside the land use jurisdiction of the City.

PROJECT DESCRIPTION: Specifically, this PEIR analyzes the potential impacts related to removing the Genesee Avenue Widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element, as well as five (5) project alternatives. The project would amend the City of San Diego General Plan Mobility Element, amend the UCP Transportation Element, and amend to the North University City Public Facilities Financing Plan with a new Impact Fee Study (IFS) for the plan area. These actions together form the project analyzed in this PEIR. Discretionary actions by other agencies will include the California Coastal Commission.

Applicant: City of San Diego Planning Department

ENVIRONMENTAL DETERMINATION:

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA). The analysis conducted identified that the project could result in significant and unmitigated impacts to the following issue area(s): **Transportation/Circulation (Load and Capacity,**

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LETTER

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Congestion, Existing or Planned Systems, Traffic Circulation, Alternative Modes), Air Quality (Air Quality Plan, Criteria Pollutants), Greenhouse Gas Emissions (Increased Emissions, Applicable Plan or Policy), and Noise (Traffic).

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Planning Department, or purchased for the cost of reproduction.

United States Government

Federal Aviation Administration (1)
Environmental Protection Agency (19)
U. S. Fish and Wildlife Service (23)
Army Corps of Engineers (26)

State of California

Caltrans District 11 (31)
Department of Fish and Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A)
Native American Heritage Commission (56)
California State Parks, San Diego Coast District (40A)
California Department of Parks and Recreation, Southern Service Center (40B)

San Diego County

Air Pollution Control Board (65)
Planning and Land Use (68)
Department of Environmental Health (76)

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Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

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City of San Diego

Office of the Mayor (91)
Council President Lightner, District 1
Councilmember Zapf, District 2
Councilmember Gloria, District 3
Councilmember Cole, District 4
Councilmember Kersey, District 5
Councilmember Cate, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Council President Pro Tem Emerald, District 9

City of San Diego

Office of the City Attorney
Shannon Thomas

Planning Department

Jeff Murphy, Director
Tom Tomlinson, Assistant Director
Nancy Bragado, Deputy Director
Alyssa Muto, Deputy Director
Brian Schoenfisch, Program Manager
Melissa Garcia, Project Manager - Long Range Planning
Dan Monroe, Senior Planner - Long Range Planning
Myra Herrmann, Senior Planner
Susan Morrison, Associate Planner
Rebecca Malone, Associate Planner
Kristy Forburger, Senior Planner - MSCP
Samir Hajjiri, Mobility Planning
George Ghossain, Mobility Planning
Jeff Harkness, Park Planning
Scott Mercer, Facilities Financing
Frank January, Facilities Financing

Environmental Services Department
Lisa Wood, Senior Planner

Development Services Department
Helene Deisher, Project Manager

Public Utilities Department
Keli Balo

Public Works Department
James Nagelvoort, Director

Park and Recreation Department
Herman Parker, Director
Andrew Field

Fire-Rescue Department
Chief Brian Fennessy
Chief Rick Wurts

Police Department
Chief Shelley Zimmerman

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Transportation & Storm Water Department

Kris McFadden, Director
Andrew Kleis
Ruth Kolb
Linda Marabian
Mark Stephens

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

City Advisory Boards or Committees

Park and Recreation Board (83)
Community Forest Advisory Board (90)
Historical Resources Board (87)
Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A)
University Community Branch Library (81JJ)
North University Branch Library (81JJJ)

Other City Governments

San Diego Association of Governments (108)
San Diego Unified Port District (109)
Metropolitan Transit System (112/115)
San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (125)

Community Planning Groups or Committees

University City Community Planning Group (480)

Community Councils

La Jolla Village Community Council (489)

Other Agencies, Organizations and Individuals

San Diego Chamber of Commerce (157)
Building Industry Association (158)
UCSD Physical & Community Planning (482)
Sierra Club (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Jim Peugh (167A)
Environmental Health Coalition (169)
California Native Plant Society (170)
San Diego Coastkeeper (173)
Citizens Coordinate for Century 3 (179)
Citizens for the Regents Road Bridge
Endangered Habitats League (182 & 182A)
League of Women Voters (192)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego History Center (211)

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LETTER CITIZENS-2

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

San Diego Archaeological Center (212)
San Diego Highway Development Association
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown - Inter-Tribal Cultural Resource Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society Inc. (218)
Kuumeaay Cultural Heritage Preservation (223)
Kuumeaay Cultural Repatriation Committee (225)
Native American Distribution
Barona Group of Capitan Grande Band of Mission Indians (225A)
Campo Band of Mission Indians (225B)
Ewilaapaayp Band of Mission Indians (225C)
Inaja Band of Mission Indians (225D)
Jamul Indian Village (225E)
La Posta Band of Mission Indians (225F)
Manzanita Band of Mission Indians (225G)
Sycuan Band of Mission Indians (225H)
Viejas Group of Capitan Grande Band of Mission Indians (225I)
Mesa Grande Band of Mission Indians (225J)
San Pasqual Band of Mission Indians (225K)
Ipaí Nation of Santa Ysabel (225L)
La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (225O)
Pechanga Band of Mission Indians (225P)
Rincon Band of Luiseno Indians (225Q)
San Luis Rey Band of Luiseno Indians (225R)
Los Coyotes Band of Mission Indians (225S)
The Guardian, UCSD (481)
MCAS Miramar Air Station (484)
Marian Bear Natural Park Recreation Council (485)
University City Community Association (486)
Friends of Rose Creek (487)
Shute Mihaly & Weinberger LLP (490)
Chamber of Commerce (492)
Alice Buck
Alice Tana
Alison Barton
Amy Freiburger
Andrea & Carl Ito
Andrew Wiese
Angela Nesta
Ann & Jerry Wavelich
Anu Delouri
Ariane Jansma
Ash Nasser
Austin Speed
Avril Butbul
Barbara Bry
Barbara Fitzsimmons
Barbara Gellman
Barbara & Edward Reiger
Barry Bernstein
Barry & Rachel Savin
Betsy & Mike Pelling
Bill Collellato

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Billy Paul
Bob Vilven
Bronwyn Groves
Bruce Rainey
Caran Cronin
Carol Stultz
Carole Pietras
Carolyn Holiday
Carolyn Quinney
Caryl Lees Witte
Chanelle Hawken
Charles Herzfeld
Chris O'Connell
Chris Wahl
Dan Wolfson
Danielle Lindsay
Darrell Reich
David Malmuth
Debbie Anderson
Deborah Knight
Diana Meisenholder
Diane Ahern
Diane Speed
Dolores Duarte
Donna Andonian
Earl & Rosemary Vikander
Eileen & Tony McCoy
Elinor & Robert Jacobs
Eric Cohen
Erik Ruehr
Fay Arvin
Fay Shultz
Glenda and Glenn Stangel
Glenn Martin
Gregory J. Barnes, Esq.
Harold Levene
Harry Mathis
Helen & Barry Lebowitz
Howard Hackworth
Isabelle Kay
James DeShazo
Jan & Jim Hawkins
Jane Gibson
Janet Bishop
Janay Kruger
Jason Moorhead
Jeanne Hoey
Jerry Fitzsimmons
Joan T. Oxsale
Joe Colborn
Joe LaCava
John Bassler
John Lewis
Judith Domingos-Porter
Julie Meier Wright
Juan Lias
Karen Lin
Karin Zirk

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Kathryn & Louis Rodolico
Keith Jenne
Kevin Wising
Kimberly Ho
Kristin Camper
Kristopher Kopensky
Krysl, Peter
LaRu DeKock
Laurel L. Impett
Linda & Richard Quinonez
Linda Scott
Lisa Sutton
Liz & Scott Jones
Lorraine Stein
Magda Remillard
Marcia & Robert Munn
Margaret & Walker Fillius
Margaret Jensen
Marlene & Tom Petrie
Marilyn Kobrak
Mary Ann Guerra
Mary Beth Zopatti
Mary Croft
Mary Kersting
Mary McGuirk
Matt Wuest
Meagan Beale
Megan Bryden
Melvin Michaluk
Mona Kuczenski
Morgan Wazlaw
Nan Madden
Nancy Frederich
Nancy Groves
Nancy & Bill Powell
Nancy & Gerald Sturm
Nigel Crawford
Paul Goldsten
Paula & Gary Krahn
Peter Hekman
Petr Krysl
Phyllis Speer
Pia Mantovani-Sud
Rebecca Robinson Wood
Richard Pietras
Robert Starkey
Roger Cavanaugh
Ron Kuczenski
Russ Craig
Ryan Perry
Sally Arceo
Sam Strong
Sean Karafin
Shelley Plumb
Susan Freler
Susan Traganza
Thomas Hekman
Valerie Ramey

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Virginia Prutow
William Griswold
William H. Beck
William Mitchell
Yvonne Brown

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- () Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Alyssa Muto, Deputy Director
Planning Department

June 17, 2016
Date of Draft Report

Date of Final Report

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Analyst: Susan Morrison, AICP

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT B

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traffic engineering • transportation planning
acoustical engineering • parking studies
air quality & greenhouse gas analysis

July 25, 2016

Ms. Evelyn Heidelberg
CROSBIE, GILNER, SCHIFFMAN, SOUTHARD & SWANSON, LLP
12750 High Bluff Drive, Suite 250
San Diego, CA 92130

Subject: University Community Plan Amendment Traffic Impact Review Letter

Dear Ms. Heidelberg,

Introduction

The Citizens for the Regents Road Bridge has requested that RK Engineering Group Inc. review the University Community Plan (UCP) Amendment Transportation Impact Study, dated June, 2016, prepared by Kimley-Horn., Inc (Traffic Study) and the UCP Amendment Draft Program Environmental Impact Report (DPEIR), dated June 2016, prepared by AECOM.

The purpose of this traffic impact review letter is to discuss the scope of the analysis, identify traffic impacts associated with the different build/no-build alternatives, review mitigation recommendations, and comment on the adequacy of the transportation impact assessment.

The University Community Plan (UCP) Amendment proposes to remove the Genesee Avenue Widening and Regents Road Bridge projects from the UCP Transportation Element. The Traffic Study analyzed the impacts associated with different network alternatives in the UCP area and the DPEIR identifies the potential environmental effects of the project.

Significant impacts

The DPEIR identifies the environmentally superior alternative to be the "No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative" (see pages ES-11 and 9-48). The Traffic Study shows that the environmentally superior alternative results in just one fewer significant impact at an intersection, and just one fewer significant impact on roadway segments, than does the Project. The following table summarizes the significant impacts identified for the environmentally superior alternative and the Project alternative:

4000 Westeryly place, suite 280
newport beach, california 92660
tel 949.474.0809 fax 949.474.0902
www.rkengineer.com

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

Citizens-2-71 Comment noted.

Citizens-2-71

Citizens-2-72 Please see response to comment FRC-1-10.

Citizens-2-72

Table A
Summary of Significant Impacts

Facility	Number of Locations with Significant Impacts	
	"No Construction of Regents Road Bridge and Widening of Genesee Avenue"	"Project" Alternative
Intersections	29	30
Roadway Segments (volume based)	20	21
Roadway Segments (speed based)	3	3
Freeway Mainlines	8	8
Freeway Ramp Meters	8	8

Citizens-2-72
cont.

As shown in the Table above, the environmentally superior alternative results in just one fewer significant impact at an intersection, and just one fewer significant impact on roadway segments, than does the Project. Furthermore, it is shown that the majority of intersections and roadway segments will continue to operate at unacceptable levels of service after the implementation of the recommended mitigation measures.

The level of service impacts and mitigation recommendations for the environmentally superior alternative are shown in Table 11-3 (intersections), 11-5 (roadway segments – volume based), and 11-7 (roadway segments – speed based) of the Traffic Study. RK has included these tables in Attachment A for reference.

Comments

The following comments are provided for the University Community Plan Amendment Transportation Impact Study.

1. The intersection level of service analysis performed in the Traffic Study is based on the Highway Capacity Manual (HCM) 2000 methodology. The City of San Diego Traffic Impact Study Manual requires that signalized intersection operational methodology be based on the current version of the HCM (page 17), which is now the HCM 2010. The use of the older version of the HCM may underestimate vehicle delay, and as a result, significant impacts may be underestimated as well. HCM 2010 also provides methodology for calculating pedestrian and bicycle level of

Citizens-2-73

Citizens-2-73 Please see response to comment Citizens-2-46.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

service which would typically be considered when evaluating multi-modal transportation impacts.

Citizens-2-73
cont.

2. Future traffic projections for the Traffic Study alternatives are based on the SANDAG Series 12 traffic model. The current growth forecast model in the region is SANDAG Series 13, adopted in 2013. Use of the older version of the model may not include the latest area-wide development plans and growth projections, and thus, future forecasts may not include all reasonably foreseeable projects.

Citizens-2-74

Citizens-2-74 Please see response to comment Citizens-2-47.

3. The basis of the Origin/Destination method for assigning traffic to the roadway network for the different alternatives is not clearly described. How traffic is assigned for each alternative can significantly affect the outcome of the analysis and further detail should be provided explaining this methodology.

Citizens-2-75

Citizens-2-75 Please see response to comment Citizens-2-48.

4. It appears that the majority of the study area is within the University Community area, and only two intersections are analyzed along Regents Road and Genesee Avenue south of the 52 Freeway ramps in the Clairemont area. There may be potential for areas south of the 52 Freeway to experience significant fluctuations in future traffic as a result of not building the Regents Road Bridge. The San Diego Regional Traffic Engineers' Council (SANTEC) recommends that all local roadway segments, intersections, and mainline freeway locations where a project will add 50 or more peak hour trips be examined. The analysis should demonstrate that all potentially significant roadways and intersections are included in the analysis.

Citizens-2-76

Citizens-2-76 Please see response to comment Citizens-2-49.

5. The DEIR makes the finding on page 4.4-16 that, based on analysis in section 4.2., Transportation/Circulation, the project would increase vehicle miles traveled (VMT) compared to the adopted UCP and the impact would be considered significant. Yet, a contradictory finding is made on pages 4.6-6 and 4.6-7 which states that the Project would not use excessive amounts of fuel or other energy and no significant energy conservation impacts would occur. Given that the Project would increase VMT, and thus, increase vehicle emission levels, the DEIR should also make the finding that the Project would also increase fuel consumption and energy usage and a significant impact would result.

Citizens-2-77

Citizens-2-77 Please see response to comment Citizens-2-50.

Conclusions

RK Engineering Group, Inc. has completed a review the Transportation Impact Study for the University Community Plan Amendment. Several of the key findings identified in this letter include the following:

Citizens-2-78

Citizens-2-78 Please see responses to comments Citizens-2-46, Citizens-2-49, and Citizens-2-50.

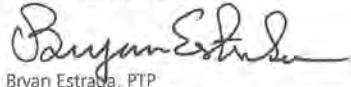
LETTER

1. The Traffic Study has used outdated HCM analysis methodology and traffic model data.
2. The Traffic Study may have underestimated impacts by not analyzing all potentially impacted intersections and roadway segments in the Clairemont community.
3. The DEIR concludes that the Project would not use excessive amounts of fuel or other energy, yet shows that the Project would increase VMT.

Citizens-2-78
cont.

RK appreciates the opportunity to work with CROSBIE, GILNER, SCHIFFMAN, SOUTHARD & SWANSON, LLP, and if you have any further questions please do not hesitate to contact us at (949)474-0809.

Sincerely,
RK ENGINEERING GROUP, INC.



Bryan Estrada, PTP
Senior Transportation Planner

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

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LETTER

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

Attachment A

Alternative C Level of Service Analysis Tables

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Table 11-3 Intersection Analysis for Alternative C Recommended Network

ID	Intersection	Peak Hour	Future All C - Before Improvements			Future All C - After Recommended Improvements			Description
			Control	Delay (s)	LOS (B)	Control	Delay (s)	LOS (B)	
1	Gonzalez Ave & N. Toney Plaza Rd	AM	Signal	22.5	C				
		Mid		21.3	C				
		PM		29.3	D				
7	Gonzalez Ave & John Hopkins Dr (S)	AM	Signal	115.9	F	Signal	20.7	C	Convert 1 of the westbound through lanes on Gonzalez Avenue to a right turn lane
		Mid		48.5	D		40.8	D	
		PM		30.4	D		33.5	D	
4	Gonzalez Ave & Science Center Dr	AM	Signal	17.4	B				
		Mid		8.4	A				
		PM		15.1	B				
6	Gonzalez Ave & I-5 EB Ramps	AM	Signal	30.5	D				
		Mid		20.4	C				
		PM		35.3	D				
8	Gonzalez Ave & I-5 NB Ramps	AM	Signal	49.7	D				
		Mid		35.2	D				
		PM		29.9	C				
9	Gonzalez Ave & Sophia Hopkins	AM	Signal	81.3	E				Improvements not recommended
		Mid		62.2	E				
		PM		72.6	E				
7	Gonzalez Ave & Campus Park Dr	AM	Signal	40.0	D				
		Mid		31.7	C				
		PM		43.6	D				
8	Gonzalez Ave & Regents Road	AM	Signal	24.8	D				
		Mid		12.3	B				
		PM		28.0	C				
9	Gonzalez Ave & Eastside Mall	AM	Signal	53.3	D				
		Mid		37.6	D				
		PM		37.4	D				
10	Gonzalez Ave & Executive Dr	AM	Signal	23.6	C				
		Mid		20.4	D				
		PM		31.1	D				
11	Gonzalez Ave & Executive Square	AM	Signal	14.6	B				
		Mid		12.2	C				
		PM		43.1	D				
12	Gonzalez Ave & La Jolla Village Dr	AM	Signal	119.7	F				Improvements not recommended
		Mid		61.4	D				
		PM		59.0	E				

Notes:
 (1) All LOS values are based on the probability of delay to the 95th percentile (95th percentile delay) and not on the 50th percentile (50th percentile delay).
 (2) LOS values are based on the probability of delay to the 95th percentile (95th percentile delay) and not on the 50th percentile (50th percentile delay).
 (3) LOS values are based on the probability of delay to the 95th percentile (95th percentile delay) and not on the 50th percentile (50th percentile delay).

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University City Traffic Impact Study
 Final June 2016

ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Table 11-3 Intersection Analysis for Alternative C Recommended Network (continued)

ID	Intersection	Peak Hour	Future AM C - Before			Future AM C - After			Description
			Control	Delay (s)	LOS (B)	Control	Delay (s)	LOS (B)	
12	Genesee Ave and Eastman Ct	AM	Signal	49.0	C				Improvement not recommended
		MID		37.0	F				
		PM		103.4	F				
14	Genesee Ave & Nobel Dr	AM	Signal	36.2	C				Improvement not recommended
		MID		39.7	D				
		PM		310.0	F				
15	Genesee Ave & Dixon St	AM	Signal	28.7	C	Signal	21.9	C	Signal installed and established right turn lanes for Dixon Street
		MID		18.8	B		15.7	B	
		PM		194.1	F		118.8	F	
16	Genesee Ave & Governor Square	AM	Signal	85.8	E				Improvement not recommended
		MID		9.9	A				
		PM		20.0	C				
17	Genesee Ave & Governor Dr	AM	Signal	145.8	F	Signal	82.7	D	Consider a grade-separated intersection, removing conflicting movements through separate lane configurations and a dedicated through lane on the eastbound side of the intersection.
		MID		40.0	D		26.7	C	
		PM		142.9	F		84.0	D	
18	Genesee Ave & CR-52 WB Ramps	AM	SSPC	40.0	E	Signal	17.1	B	Signal installation may require additional utility placement within the Northbound WB Ramps. Consider a Signal System and associated traffic control timing study.
		MID		15.1	C		7.4	A	
		PM		718.4	F		38.1	D	
19	Genesee Ave & CR-52 EB Ramps	AM	Signal	82.2	E				Improvement not recommended
		MID		45.3	D				
		PM		97.8	D				
20	Genesee Ave & Algonquin St/Lafayette Dr	AM	Signal	188.0	F				Improvement not recommended
		MID		54.9	C				
		PM		87.0	E				
21	La Jolla Village Dr & Toney Street Rd	AM	Signal	52.9	D	Signal	23.0	C	Move the pedestrian crossing away from the west end of the signal to left of the intersection and modify the signal timing.
		MID		31.1	C		21.7	C	
		PM		174.8	F		92.1	D	
22	La Jolla Village Dr & La Jolla Street Dr	AM	Signal	53.1	D				
		MID		16.2	B				
		PM		44.0	D				
22a	La Jolla Village Dr WB & Clinton Dr	AM	Signal	17.2	B				
		MID		12.0	B				
		PM		20.1	C				
23b	La Jolla Village Dr EB & Clinton Dr	AM	SSPC	17.4	C	Signal	18.6	B	Install the intersection and create a priority right-of-way for the eastbound through traffic. Signal timing study to be completed to determine a signal system and all associated signage.
		MID		12.8	B		10.5	B	
		PM		284.5	F		24.8	C	
24	La Jolla Village Dr & Villa La Jolla Dr	AM	Signal	125.2	F	Signal	54.4	F	Add a second eastbound right turn lane from La Jolla Village Drive to Villa La Jolla Drive.
		MID		124.4	F		37.1	F	
		PM		329.0	F		310.2	F	

Notes:
 1. Delay values include intersection approach at LOS E or F.
 2. LOS C = Fair Street Stop Control.
 3. LOS D = Fair Street Stop Control.
 4. LOS E = Fair Street Stop Control.
 5. LOS F = Fair Street Stop Control.
 6. LOS G = Fair Street Stop Control.
 7. LOS H = Fair Street Stop Control.
 8. LOS I = Fair Street Stop Control.
 9. LOS J = Fair Street Stop Control.
 10. LOS K = Fair Street Stop Control.
 11. LOS L = Fair Street Stop Control.
 12. LOS M = Fair Street Stop Control.
 13. LOS N = Fair Street Stop Control.
 14. LOS O = Fair Street Stop Control.
 15. LOS P = Fair Street Stop Control.
 16. LOS Q = Fair Street Stop Control.
 17. LOS R = Fair Street Stop Control.
 18. LOS S = Fair Street Stop Control.
 19. LOS T = Fair Street Stop Control.
 20. LOS U = Fair Street Stop Control.
 21. LOS V = Fair Street Stop Control.
 22. LOS W = Fair Street Stop Control.
 23. LOS X = Fair Street Stop Control.
 24. LOS Y = Fair Street Stop Control.
 25. LOS Z = Fair Street Stop Control.

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ATTACHMENT TO COMMENT
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Table 11-3 Intersection Analysis for Alternative C Recommended Network (continued)

ID	Intersection	Peak Hour	Future Alt C - Before Improvement			Future Alt C - After Recommended Improvement			Development
			Control	Delay (s)	LOS (B)	Control	Delay (s)	LOS (B)	
23	La Jolla Village Dr & I-80 SB Off-Ramps	AM	Signal	49.5	D			Improvement not recommended	
		MD	Signal	61.7	E				
		PM	Signal	59.3	E				
26	La Jolla Village Dr & I-80 NB Off-Ramps	AM	Signal	47.4	C				
		MD	Signal	50.2	C				
		PM	Signal	54.5	C				
27	La Jolla Village Dr & Ledon Dr	AM	Signal	34.5	C				
		MD	Signal	30.4	C				
		PM	Signal	34.0	D				
28	La Jolla Village Dr & Regents Rd	AM	Signal	72.3	F			Improvement not recommended	
		MD	Signal	58.8	D				
		PM	Signal	133.3	F				
29	La Jolla Village Dr & Executive Way	AM	Signal	79.0	F			Improvement not recommended	
		MD	Signal	547.9	F				
		PM	Signal	755.2	F				
30	La Jolla Village Dr & Towne Center Dr	AM	Signal	154.9	F			Improvement not recommended	
		MD	Signal	48.6	D				
		PM	Signal	150.3	F				
31	La Jolla Village Dr & I-80 SB Ramps	AM	Signal	152.6	F			Improvement not recommended	
		MD	Signal	23.9	C				
		PM	Signal	38.0	C				
32	La Jolla Village Dr & I-80 NB Ramps	AM	Signal	39.8	D				
		MD	Signal	21.5	C				
		PM	Signal	15.6	B				
33	Miramar Rd & (I-80) Dr	AM	Signal	42.5	D				
		MD	Signal	22.1	C	Signal	21.9		C
		PM	Signal	43.2	D	Signal	47.9		D
34	Miramar Rd & Encinitas Mall	AM	Signal	22.1	C			Safety for Encinitas Mall Approach to have four lanes, ramp and one right turn lane	
		MD	Signal	43.2	D				
		PM	Signal	21.3	C				
35	Miramar Rd & Miramar Mall	AM	Signal	25.1	C				
		MD	Signal	21.3	C				
		PM	Signal	21.1	C				
36	Miramar Rd & Miramar Plaza	AM	Signal	12.1	B				
		MD	Signal	12.1	B				
		PM	Signal	12.1	B				

Notes:
 (a) Data were collected from the intersection covering all LGV E, A, F.
 (b) Delay refers to the average control delay for the overall intersection. Intersection delay performance is based on the average delay performance. Delay refers to the overall intersection.
 (c) LOS is based on the average delay for the overall intersection. LOS is based on the average delay performance. Delay refers to the overall intersection.

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ATTACHMENT TO COMMENT
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Table 11-3 Intersection Analysis for Alternative C Recommended Network (continued)

ID	Intersection	Peak Hour	Future Alt C - Before Reopening			Future Alt C - After Recommended Improvement			Description
			Control	Delay (s)	LOS (B)	Control	Delay (s)	LOS (B)	
17	Morrisee Rd @ Columbia Blvd/Fr	AM	Signal	44.5	D			Improvement not recommended	
		PM		124.9	F				
		AM		19.9	B				
38	Nobel Dr S. Villa La Jolla Dr	MID	Signal	21.7	C				
		PM		27.5	D				
		AM		36.5	C				
30	Nobel Dr S. La Jolla Village Square Dr	MID	Signal	205.3	F			Improvement not recommended	
		PM		145.4	F				
		AM		2.6	A				
40	Nobel Dr S. I-5 SB On Ramp	MID	Signal	31.5	C			Improvement not recommended	
		PM		121.8	F				
		AM		19.6	B				
41	Nobel Dr & University Center Ln/L & NB On Ramp	MID	Signal	22.4	D				
		PM		36.1	D				
		AM		14.5	B				
43	Nobel Dr & Camino Plaza Center	MID	Signal	13.8	B				
		PM		21.1	C				
		AM		28.1	C				
43	Nobel Dr & Landon Dr	MID	Signal	21.4	C				
		PM		35.4	D				
		AM		35.5	D				
44	Nobel Dr & Virginia Rd	MID	Signal	30.2	C			Improvement not recommended	
		PM		96.8	F				
		AM		36.8	D				
45	Nobel Dr & Castle Verde Blvd/Cargill Ave	MID	Signal	47.3	D				
		PM		42.5	D				
		AM		15.1	B				
46	Nobel Dr & Lombard Place	MID	Signal	24.9	C				
		PM		92.7	D				
		AM		28.6	C				
47	Nobel Dr & Towne Center Dr	MID	Signal	23.8	C				
		PM		45.2	D				
		AM		42.7	D				
48	Nobel Dr & Channing Dr	MID	Signal	21.3	D				
		PM		40.5	D				
		AM		14.4	B				
48	Nobel Dr & Judicial Dr	MID	Signal	13.6	B				
		PM		28.7	C				
		AM							

#18 values include minor delay at LOS E or F.
 All Delay values are the average control delay for the minor approaches. Values are in seconds per vehicle. All control delay values are based on the peak hour.
 LOS calculations are based on the methodology outlined in the ILLINOIS Highway Capacity Manual and referenced in Exhibit 11.1.

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Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

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Table 11-3 Intersection Analysis for Alternative C Recommended Network (continued)

ID	Intersection	Peak Hour	Future AM C - Before Improvement			Future AM C - After Recommended Improvement			Description
			Control	Delay (s)	LOS (d)	Control	Delay (s)	LOS (d)	
63	Regents Rd & Lind Ave	AM PM	Signal	55.3	D				Improvement Not Recommended
64	N. Torrey Pines Rd & UCSD Northside Dr	AM PM	Signal	35.9	C				
65	N. Torrey Pines Rd & Pangea Dr	AM PM	Signal	19.0	A				
66	N. Torrey Pines Rd & Pangea Dr	AM PM	Signal	29.9	C				
68	N. Torrey Pines Rd & La Jolla Village Dr	AM PM	Signal	42.5	D				Improvement Not Recommended
69	N. Torrey Pines Rd & La Jolla Village Dr	AM PM	Signal	187.3	F				
67	N. Torrey Pines Rd & Revelle College Dr	AM PM	Signal	23.0	C				
68	Gilman Dr & Villa La Jolla Dr	AM PM	Signal	24.9	C				
69	Gilman Dr & US 80 Ramps	AM PM	Signal	48.7	D	Signal	11.7	B	Convert area of intersection through lanes to a second intersection
70	Gilman Dr & US 80 Ramps	AM PM	Signal	76.6	B		32.5	C	
71	Gilman Dr & US 80 Ramps	AM PM	Signal	31.7	C				
72	Gilman Dr & US 80 Ramps	AM PM	Signal	7.2	A				
73	Gilman Dr & US 80 Ramps	AM PM	Signal	7.3	A				
74	Palmita Dr & Landon Dr	AM PM	Signal	7.1	A				
75	Palmita Dr & Landon Dr	AM PM	Signal	6.1	A				
76	Towne Centre Dr & Eastgate Mall	AM PM	Signal	31.3	C	Signal	30.9	C	Add second eastbound left-turn lane from Eastgate Mall to Towne Centre Drive
77	Towne Centre Dr & Eastgate Mall	AM PM	Signal	11.3	B		31.5	D	
78	Towne Centre Dr & Executive Dr	AM PM	Signal	24.5	C				
79	Towne Centre Dr & Executive Dr	AM PM	Signal	31.4	D				
80	Towne Centre Dr & Executive Dr	AM PM	Signal	13.9	B				
81	Towne Centre Dr & Executive Dr	AM PM	Signal	18.3	B				
82	Towne Centre Dr & Executive Dr	AM PM	Signal	17.1	B	Signal	21.8	C	Study eastbound left-turn lane from the governing jurisdiction instead of parking
83	Towne Centre Dr & Executive Dr	AM PM	Signal	355.6	F		95.8	D	Study eastbound left-turn lane from the governing jurisdiction instead of parking
84	Towne Centre Dr & Executive Dr	AM PM	Signal	33.6	C	Signal	41.7	D	Study eastbound left-turn lane from the governing jurisdiction instead of parking
85	Towne Centre Dr & Executive Dr	AM PM	Signal	70.7	B		48.1	D	
86	Governor Dr & I-05 NB Ramps	AM PM	SSSC	12.7	B				
87	Governor Dr & I-05 NB Ramps	AM PM	SSSC	16.2	B				
88	Governor Dr & I-05 NB Ramps	AM PM	SSSC	9.0	A	Roundabout		B	Install Roundabout
89	Governor Dr & I-05 NB Ramps	AM PM	SSSC	72.5	B				

Notes:
 1. All values are based on a 1000-vehicle per hour traffic volume.
 2. All values are based on a 1000-vehicle per hour traffic volume.
 3. All values are based on a 1000-vehicle per hour traffic volume.
 4. All values are based on a 1000-vehicle per hour traffic volume.
 5. All values are based on a 1000-vehicle per hour traffic volume.

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 University City, Traffic Impact Study, Final June 2016

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Table 11-5 Volume-Based Roadway Segment Analysis for All Alternatives Recommended Network

Table with 15 columns: ROADWAY SECTION ID, ROADWAY CLASSIFICATION, LOE, F, Capacity, Volume, LOR, LOS, Volume, LOR, LOS, Volume, LOR, LOS, Volume, LOR, LOS. Rows include various roadway sections like Highway 210, Highway 210, etc.

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Table 11-7 Speed-Based Corridor Analysis Summary - Alternatives C and D Recommended Network

Alternative	Segment	Typical Cross-Section	Year	A/C				B/C				D/C				E/C			
				Before Improvements				After Recommended Improvements				Before Improvements				After Recommended Improvements			
				TRF (V)	TRF (D)	LOS (B)	LOS (C)	TRF (B)	TRF (C)	LOS (B)	LOS (C)	TRF (B)	TRF (C)	LOS (B)	LOS (C)	TRF (B)	TRF (C)	LOS (B)	LOS (C)
University Ave	M-100 to 10th St	4-lane	40 mph	A/C	1,200	1,272	E	1,171	1,274	E	1,789	1,800	E	1,583	1,679	F	1,510	1,620	F
				B/C	797	26.14	E	788	20.28	E	876	16.77	E	870	19.34	F	870	19.34	F
				D/C	867	19.84	E	868	20.57	D	974	13.26	E	972	16.10	D	972	16.10	D
University Ave	10th St to 20th St	4-lane	40 mph	A/C	876	19.17	E	927	19.93	D	885	19.92	E	929	19.78	E	893	19.78	E
				B/C	775	22.15	D	743	23.92	D	773	21.92	D	771	21.28	D	771	21.28	D
				D/C	1,372	11.80	F	1,388	10.24	D	1,629	9.84	F	1,576	10.85	D	1,576	10.85	D
Le Jolie Village Dr	20th St to 30th St	4-lane	40 mph	A/C	886	17.43	E	794	18.24	E	818	14.23	E	828	14.10	E	828	14.10	E
				B/C	483	16.04	E	543	15.45	E	484	16.02	E	484	16.47	F	484	16.47	F
				D/C	1,212	8.73	F	1,208	8.52	F	1,293	8.71	F	1,289	9.02	F	1,289	9.02	F
University Ave	30th St to 40th St	4-lane	40 mph	A/C	1,383	9.98	F	1,405	10.08	F	1,508	9.86	F	1,478	10.25	F	1,478	10.25	F
				B/C	626	13.30	F	672	13.52	F	678	13.45	F	680	13.50	F	680	13.50	F
				D/C	929	10.99	E	934	10.50	E	988	10.50	E	984	10.50	E	984	10.50	E
University Ave	40th St to 50th St	4-lane	40 mph	A/C	713	20.17	D	712	20.11	D	728	19.02	D	778	16.92	D	778	16.92	D
				B/C	680	23.17	D	682	19.17	D	685	21.00	D	680	21.20	D	680	21.20	D
				D/C	1,212	8.73	F	1,208	8.52	F	1,293	8.71	F	1,289	9.02	F	1,289	9.02	F
University Ave	50th St to 60th St	4-lane	40 mph	A/C	612	24.50	D	615	24.95	D	617	24.57	D	617	23.88	D	617	23.88	D
				B/C	587	22.44	D	587	25.14	D	598	21.01	D	598	21.81	D	598	21.81	D
				D/C	933	25.10	C	933	20.14	D	948	24.84	C	948	24.84	C	948	24.84	C
University Ave	60th St to 70th St	4-lane	40 mph	A/C	494	19	F	498	19	F	497	19	E	493	19	F	493	19	F
				B/C	292	34	E	287	34	D	287	34	E	287	34	D	287	34	D
				D/C	678	23	E	678	19	D	708	19	E	708	19	D	708	19	D
University Ave	70th St to 80th St	4-lane	40 mph	A/C	271	15	E	311	15	D	326	15	D	326	15	D	326	15	D
				B/C	212	19	E	217	19	D	216	18	E	216	18	E	216	18	E
				D/C	478	15	E	478	15	D	480	15	F	470	15	F	470	15	F
University Ave	80th St to 90th St	4-lane	40 mph	A/C	215	20	D	201	27	D	204	24	C	208	26	C	208	26	C
				B/C	178	31	E	169	34	E	181	30	E	182	32	E	182	32	E
				D/C	226	26	C	188	39	E	224	29	C	227	24	C	227	24	C
University Ave	90th St to 100th St	4-lane	40 mph	A/C	154	27	C	171	30	D	161	30	D	161	30	D	161	30	D
				B/C	139	37	C	147	37	D	143	37	C	144	38	D	144	38	D
				D/C	241	25	D	238	29	D	238	29	D	238	29	D	238	29	D

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

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Attachment B

RK Resumes

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ATTACHMENT TO COMMENT
LETTER CITIZENS-2

Qualifications Statement

RK engineering group, inc. uniquely combines engineering expertise and professionalism with creative thinking and innovative problem solving. The result is an extraordinary transportation engineering firm that possesses the requisite expertise as well as the ability to look across disciplinary boundaries for solutions others may overlook.

This innovative approach is evident by the breadth of services available to RK engineering group, inc.'s diverse clientele that includes regional governments, counties, cities, special districts, school districts, community associations, private developers and contractors, engineering and planning firms. Each client receives what RK engineering group, inc. is known for...on time, on target, on budget professional service.

The Complete Range of Transportation Engineering Expertise

RK engineering group, inc. is a complete transportation engineering firm offering the full range of services including:

- Transportation Planning
- Traffic Engineering
- Traffic Impact Studies
- Circulation Elements
- Transit/Pedestrian Systems
- Parking Studies
- Traffic Signal and Signing/Striping Plans
- Traffic Control Plans
- Street Lighting Plans
- Community Traffic Calming
- Traffic Signal Timing

RK engineering group, inc. also integrates transportation, air quality and noise impacts into environmental engineering services including:

- Acoustical Studies
- Sound Barrier Analysis
- Noise Elements
- Noise Ordinance Compliance
- Air Quality Studies

The Right Personnel for the Job

RK engineering group, inc.'s staff represent more than 70 years of cumulative experience in traffic engineering and related disciplines.

Beyond this experience, RK engineering group, inc. personnel are recognized leaders in the fields of transportation planning, traffic impact analysis, circulation planning, multi-modal planning, parking studies, and environmental engineering.

The combination of this experience and expertise means that major program assignments and small technical studies are all successfully completed to the satisfaction of RK engineering group, inc.'s clientele.

Quality Work Attracts Quality Clients

Perhaps the best measure of a firm's capabilities is the quality of the clientele it attracts. RK engineering group, inc. is pleased to count among its satisfied clientele the Orange County Transportation Authority, and the Transportation Corridor Agencies as well as the counties of Orange and Riverside.

Municipal clients have included the cities of Canyon Lakes, Huntington Beach, Irvine, Mammoth, Mission Viejo, Moreno Valley, Murrieta, Newport Beach, Perris, Rancho Santa Margarita, and San Juan Capistrano. Institutional clientele have included a range of school districts as well as respected institutions like the University of California, Irvine; Pomona College, Western State University College of Law, and California Baptist College. Community Association clients include the C2 Master Association in Coto de Caza, Aliso Viejo Community Association and numerous other associations.

RK engineering group, inc.'s client list also includes more than 500 private sector companies ranging from developers and engineers to urban planners.

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Qualifications Statement

Traffic Impact Analysis

RK engineering group, inc. staff have prepared several hundred traffic impact studies throughout Southern and Central California, as well as Southern Nevada, Arizona and Colorado. Work products provided by the firm includes conceptual planning/feasibility studies or detailed design recommendations. The firm can evaluate both existing conditions and the effects of future development upon infrastructure requirements. RK engineering group, inc. staff have prepared numerous studies in compliance with Congestion Management Program (CMP) requirements.

RK engineering group, inc. responsibilities can include representing clients at Board of Supervisors, City Council and Planning/Traffic Commissions meetings, serving as a liaison with company/public agency representatives on technical matters involving traffic impacts; working with County, regional and state agencies to secure government approvals and funding for projects; and interfacing with other firms to provide coordination of engineering/planning and design of projects.

Circulation Planning

RK engineering group, inc. has a broad range of experience including city general plan circulation elements, specific plans, traffic control assessments for special attractions or major events, site access evaluations, traffic management plans and fee program studies.

RK engineering group, inc. services include the preparation of neighborhood traffic management plans to reduce volumes on residential streets, minimize vehicle speeds, and address "cut through" traffic issues. Traffic calming solutions which have been addressed are based on design and management strategies that aim to allow safer neighborhoods for residents. These solutions include roundabouts, street closures, speed humps, chokers, and access restrictions.

RK engineering group, inc. also provides services for school districts. These services include, but are not limited to sidewalk improvements, pedestrian and bicycle crosswalks, traffic control devices as well as diversion of traffic. Also, other services may include reviewing and recommending feasible school circulation as well as parking lot design for designation of "pick-up" and "drop-off" parking zones. This service is intended to provide a safe route of travel and a safe traffic environment for children attending schools.

Transportation Demand Management

Transportation demand management (TDM) strategies designated for local government action have taken on increased importance in light of federal conformity requirements. Many local governments have adopted trip reduction ordinances to comply with the state and federal mandates. RK engineering group, inc. has prepared TDM plans for industrial, office, retail and residential projects throughout Southern California. RK engineering group, inc. services include the determination of appropriate transportation control measures as well as project-specific implementation and monitoring strategies.

Transit Planning

The increasingly intermodal aspects of regional and local transportation are being addressed by RK engineering group, inc. on an integratable basis. RK engineering group, inc. staff have prepared detailed studies of on-road and rail transit services, including corridors and stations.

RK engineering group, inc. has provided assessments of the location, design and travel patterns associated with commuter rail stations in Orange County, San Bernardino County and Kern County. Accommodations for public transportation services, such as bus turnouts and pedestrian access linkages, have been incorporated into many large and small development projects based upon RK engineering group, inc. inputs.

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Qualifications Statement

Parking Studies

RK engineering group, inc. has completed a number of parking studies for residential, commercial and industrial developments. Studies have included evaluating existing parking demand and the assessment of "shared parking" through the use of ULI shared parking evaluation procedures. Parking management plans have been developed to control parking for high parking generators (i.e. large institutional uses and special events including raceways and concerts).

RK engineering group, inc. develops creative and innovative methods for maximizing the efficiency of available parking resources.

Re-evaluating existing parking facility designs to improve circulation, safety, modify control operations and maximization of parking spaces is also a specialty of the company.

Environmental Engineering

As communities continue to evolve and develop, environmental noise and air quality impacts are a potential by-product of community expansion. RK engineering group, inc. services include EIR air/noise studies, noise contour analysis, noise exposure maps (NEM), air/noise impact studies, community and environmental air/noise planning and noise mitigation design. The effects of traffic on noise and air quality are a significant by-product of roadway design. Robert Kahn, P.E. a Certified Acoustical Engineer (No. 112-88) in the County of Orange and is supported by Michael Dickerson, INCE (Institute of Noise Control Engineers) member. RK engineering group, inc. services include acoustical studies, truck mix studies, noise control assessments and noise mitigation design.

RK engineering group, inc. uses "state of the art" computer modeling to project noise impacts and also has the equipment to perform field measurements.

Traffic Engineering

RK engineering group, inc. provides a full range of traffic engineering capabilities including the design of traffic signals, signing and striping, street lighting and worksite traffic control plans. RK engineering group, inc. also provides studies for traffic signal warrants, weaving analysis, intersection safety studies and many other traffic engineering services that also include, but are definitely not limited to, pedestrian/bicycle studies, warrant analysis, CA MUTCD compatibility and sight distance reviews. Work products provided by the firm can include concept plans, improvement plans, construction documents, traffic safety/traffic control studies and recommendations with respect to evaluating traffic control devices and other roadway design features. Traffic design plans are prepared using AutoCAD software to easily interface with other project plans. RK engineering group, inc. can prepare engineering studies to identify appropriate speed limits based upon radar speed surveys. Field review of existing conditions is an important element of the RK engineering group, inc. design process.

RK engineering group, inc. provides services for traffic signal timing and coordination in linking traffic signals along a corridor. The goal of traffic signal coordination is to safely optimize driver travel times and traffic flow along arterial corridors. This efficient method of operating traffic control systems not only benefits public safety but also benefits air quality resulting from lower emissions from decreased start-and-go traffic. Traffic signal timing and coordination is a beneficial and cost effective method that increases driver mobility while also reducing air pollution. By providing traffic signal and coordination services, RK engineering group, inc. continues to aid cities and agencies in effectively reducing traffic congestion delay and air pollution.

RK engineering group, inc. responsibilities can also include providing complete traffic engineering plans, specifications and cost estimates; evaluating existing traffic conditions, including traffic control devices; recommending appropriate speed limits based upon radar speed studies, accident history and existing physical conditions; reviewing the need for traffic control devices; sight distance evaluations; including before and after project implementation; evaluation of the need for speed humps as an appropriate roadway design feature and other traffic engineering functions.

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Bryan Estrada, P.T.P.

Senior Transportation Planner

Areas of Expertise

Transportation and Environmental Planning
 Transportation Demand Management
 Traffic Impact Analysis
 Parking Studies
 Air Quality Impact Studies
 Greenhouse Gas Impact Studies
 Acoustical Reports
 PTV Vistro, Synchro and Traffic (Traffic Analysis Software)
 California Emissions Estimator Model (CalEEMod)
 Computer Aided Drafting (AutoCAD)
 Geographic Information Systems (GIS)

Education

University of California, Irvine
 B.A., Urban Studies

Professional History

RK Engineering Group, Inc.
 Transportation Planner
 2010 - Present

RK Engineering Group, Inc.
 Engineering Aide
 2007 - 2010

City of San Clemente
 Planning Intern
 2010

Affiliations

Urban Land Institute (ULI)

Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their physical, economic, and environmental impacts on urban areas. Mr. Estrada continues to be committed to solving problems related to sustainable community development and environmental design.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He performs analyses of traffic study areas and works on the development of mitigation measures to improve level of service and traffic operation within the surrounding areas. Mr. Estrada has helped to craft innovative solutions to mitigate traffic impacts and reduce greenhouse emissions throughout project development communities.

Mr. Estrada's experience includes traffic impact reports, parking studies, air quality and greenhouse gas impact studies, and acoustical studies. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has been involved in both the public and private sector, and has experience working with city staff and elected officials. While at the City of San Clemente, he gained experience in the municipal permit application processes and worked on a General Plan update of a new Bicycle and Pedestrian Circulation Plan. Mr. Estrada has obtained the Professional Transportation Planner (P.T.P.) certification granted by the Transportation Professional Certification Board.

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References

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Jon Gillespie

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Steve Libring

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Ali Moghadam
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Fernando Saldivar

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Nacho Ochoa (714) 837-3484
Harry Persaud (714) 834-3669
Grant Anderson (714) 834-5034

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Juan Perez
Lawrence Tai

SAN BERNARDINO
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Robert Wirtz

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Habib Mollagh
Eric Staugset

UNIVERSITY OF CALIFORNIA, IRVINE
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401 Berkeley Place, Suite 350
Irvine, CA 92715
(949) 856-7058
Richard Demerjian

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LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT C

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Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

**Number of Trees Removed
With Each Project**

1 Tree = 10 Trees

Build Regents Road Bridge = No Trees Removed

Grade Separation = 106 trees



Citizens-2-79

Genesee Avenue Widening = 200 trees



Citizens-2-79 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

ATTACHMENT D

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Citizens for the Regents Road Bridge, Inc. (August 1, 2016)

The Number of Truck Trips Needed for Each Project to Haul Away Dirt.

Another reason constructing the Regents Road Bridge first makes sense!

Most of the dirt required for the Regents Road Bridge is available directly adjacent to the construction site, so it will not have to be hauled away. Truck traffic will be minimal and always on Regents Road, slightly-used four-lane arterial.

All truck traffic for both the Genesee Avenue Widening and Grade Separation would be on Genesee Avenue, the *only* north-south arterial through University City.

1 Truck = 100 Trips	22 cubic yards per truckload
------------------------	------------------------------------

Build Regents Road Bridge = 364 trips



Genesee Avenue Widening = 1,910 trips



Grade Separation = 5,456 trips



Citizens-2-80

Draft Environmental Impact Report,
10/04, Section 4.7.2.1

Calculations submitted by Daniel Aulio, PE.

Mr. Aulio is a licensed civil engineer with 21 years experience designing large scale infrastructure and public improvements projects.

LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

From: Deborah Knight <dknight3@san.rr.com>
Sent: Monday, August 01, 2016 4:49 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, Project No. 480286/SCH No. 2015121011 - Email 1
Attachments: FRC CPA DEIR Comments .pdf; 1-FEIR - Project EIR.pdf; 2-FEIR Fig 4.3-7.pdf; 3-FEIR Fig. 4.3-5A.pdf; 4-REGENTS Cut and Fill UCNSTCS.pdf

Susan,
Enclosed are DEIR comments from Friends of Rose Canyon, along with 4 attachments - 3 more attachments to follow.
Please confirm receipt.

Thank you.
Deborah Knight

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LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

Friends of Rose Canyon – UCP Amendment DEIR Comments

Friends of Rose Canyon
PO Box 221051, San Diego, CA 92192-1051
858-597-0220 • rosecanyon@san.r.c.com

August 1, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101

Submitted via email: PlanningCEQA@sandiego.gov

Re: University Community Plan Amendment
Project No. 480286/ SCH No. 2015121011

Dear Ms. Morrison:

Friends of Rose Canyon has long opposed the Regents Road bridge project. I would like to express our strong support for the Community Plan Amendment. Assuming the Regents Road bridge project is deleted, we strongly support deleting the Genesee Avenue Widening as well.

We also strongly support the Project Objective to "Minimize impacts to biological resources at Rose Canyon." And we thank the City for moving forward with this Project.

You have already received comments on our behalf from Shute, Mihaly & Weinberger. In this letter, we reiterate and expand on two issues raised in that letter

1. The FEIR must state in the Executive Summary that the Project is the Environmentally Superior Alternative

The DEIR states on p. 9-6 that the Project is the Environmentally Superior Alternative. We concur. It also identifies "No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative" as the environmentally superior of the "build" alternatives. The Executive Summary (ES-11) must identify the Project as the Environmentally Superior Alternative.

2. The DEIR does not accurately describe the "Regents Road Bridge" project.

a. The FEIR must clarify that the Regents Road Bridge project is not just a bridge

FRC-2-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
FRC-2-1
FRC-2-2 Please see response to comment FRC-1-10.
FRC-2-2
FRC-2-3 The commenter states that the original Regents Road Bridge design as described in Section ES.1.2 and Section 3.2.2, which consisted of constructing "two separate, parallel two-lane bridge structures across Rose Canyon to connect the south and north ends of Regents Road" is erroneous. The commenter mentions that this concern was brought to the City's attention in a letter from D. Knight to S. Morrison dated January 4, 2016. The commenter claims that to connect the 1,472-foot span between the north and south Regents Road termini on either side of the canyon, the construction of a new 600-foot road within Rose Canyon Open Space Park would be required. This comment is acknowledged.
FRC-2-3

LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

Friends of Rose Canyon – UCP Amendment DEIR Comments

The Regents Road Bridge Project is widely misunderstood as consisting of a bridge that “connects the two existing road ends.” This inaccuracy is reflected throughout the Draft EIR. In reality, the Regents Road bridge project requires construction of 700’ of new cut and fill roadway from Lahitte Court north through Rose Canyon before the bridge portion of the project begins. The bridge portion of the project is about 870’ long. Thus the new cut and fill roadway would be over 40% of the distance between the two existing road ends.

b. For example, in ES-1.2, the DEIR states: “The planned Regents the Regents Road Bridge design consisted of two separate, parallel two-lane bridge structures to be constructed across Rose Canyon, connecting the south and north ends of Regents Road that currently terminate near Lahitte Court on the south and Caminito Cassis on the north. The bridge was originally designed to be 870 feet long.” This description gives an accurate length for the bridge, but leaves out the 700’ of new cut and fill roadway. This error is repeated throughout the DEIR and needs to be corrected throughout the document.

c. I raised this issue in my Scoping Comments and submitted documents to make the cut and fill roadway portion clear. Yet the DEIR still misrepresents the Regents Road Bridge project as a bridge connecting the two existing road ends.

The following pages from the 2006 University City North South Transportation Corridor Study provide documentation of the cut and fill roadway:

- Attachment 1

2006 University City North South Transportation Corridor Study EIR

This EIR was a Project Level EIR. As stated in the FEIR on p. 1-2, 1.1.1: “This document has been prepared as a Project EIR pursuant to Section 15161 of the CEQA Guidelines: each of the alternatives is studied at this same focused level of detail.”

The UCNSTCS EIR did contain some inaccurate descriptions of the Regents Road bridge project (See FEIR p. 3-38: The Regents Road Bridge Alternative “would include the bridge across Rose Canyon to connect the existing ends of Regents Road.”) However, the following pages from the FEIR include descriptions and aerials of the cut and fill road:

- Attachment 2

UCNSTCS FEIR Figure 4.3-5A: The area outlined in red represents the permanent impacts from the cut and fill roadway segment of the project. It ends on the north end where the bridge abutment would be. The red circles beyond that represent the bridge supports.

- Attachment 3

UCNSTCS FEIR Figure 4.3-7: Again, the area outlined in red represents the permanent impacts from the cut and fill roadway.

- Attachment 4

Aerial of Cut and Fill Roadway and bridge (submitted with my Scoping Comments)
This aerial shows in different color gray the cut and fill roadway and the bridge span. It also differentiates the cut from the fill with different shades of green. This aerial was created by

FRC-2-3
cont.

FRC-2-4

Section 3.2.2, Removal of Regents Road Bridge, in Chapter 3.0, Project Description, provides details of all features of the Regents Road Bridge construction, including the four-lane road that would have been built by filling of a tributary canyon and cutting through a ridge. The preliminary design for the Regents Road Bridge as originally described in the University City North/South Transportation Corridor Study EIR (SCH#2004031011) prepared by the City of San Diego in 2006 was a product of extensive evaluation by the City to serve as a basis for assessing the environmental consequences as well as feasibility. The description of Regents Road Bridge provided in Section 3.2.2 of the Draft PEIR is consistent with the description provided in the University City North/South Transportation Corridor Study EIR.

FRC-2-4

Please see response to comment FRC-2-3.

LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

Friends of Rose Canyon – UCP Amendment DEIR Comments

Project Design Consultants, who prepared the UCNSTCS EIR. They used it at a community presentation and emailed to me afterwards at my request. As can be seen in the document description, it was created by PDC engineer Tony Dos Santos on 12/10/04.

- Attachment 5

Pages 3-14 and 3-15 from the UCNSTCS FEIR first describe the bridge structures as connecting the two existing road ends, but then go on to contradict that description when by disclosing that actually bridge portion would be 870' long and the new cut and fill roadway would be 700' long.

- Attachment 6

UCNSTCS FEIR, p. 3-16 – Again, describes the cut and fill roadway (“As noted above, a new, four-lane road would be constructed ...”)

- Attachment 7

UCNSTCS FEIR, p. 3-19, provides detail of the amount and extent of cut and fill required for the new roadway: “Construction of the bridge and the connecting roadway would involved grading of approximately 88,000 cubic yards, comprised of 46,000 cubic yards of cut, and 42,000 cubic yards of fill. The majority of the grading would occur on the small ridge in order to construct the connecting roadway and bridge ends.... etc.”

The FEIR and all appendices should contain throughout an accurate description of the Regents Road bridge project that includes the cut and fill roadway. All references to the inaccurate description of it as bridging the two existing road ends should be deleted.

Thank you.

Sincerely,

Deborah Knight
Executive Director

Attachments

- App. 1 – Project EIR
- App. 2 – FEIR Fig. 4.3-7
- App. 3 – FEIR Fig. 4.3-5A
- App. 4 – Regents Cut and Fill UCNSTCS
- App. 5 – FEIR p. 3-14, 3-15
- App. 6 – FEIR p. 3-16
- App. 7 – FEIR p. 3-19

FRC-2-4
cont.

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1.1 CEQA REQUIREMENTS

1.1.1 CEQA COMPLIANCE

The California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code Section 21000 et. seq.) requires the preparation of an EIR or other environmental analysis for any project that a Lead Agency determines may have a significant impact on the environment. According to Section 21002.1 of CEQA, "The purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project and to indicate the manner in which those significant effects can be mitigated or avoided." CEQA also establishes mechanisms whereby the public and decision-makers can be informed about the nature of the project being proposed, and the extent and types of impacts that the project and its alternatives would have on the environment if they were to be implemented. This EIR complies with all criteria, standards and procedures of CEQA, the State CEQA Guidelines (California Administrative Code, Section 15000, et. seq.) and the City of San Diego's EIR Guidelines (Revised 2002). This document has been prepared as a Project EIR pursuant to Section 15161 of the CEQA Guidelines; each of the alternatives is studied at this same focused level of detail.

1.1.2 INITIAL STUDY, NOTICE OF PREPARATION AND SCOPING MEETING

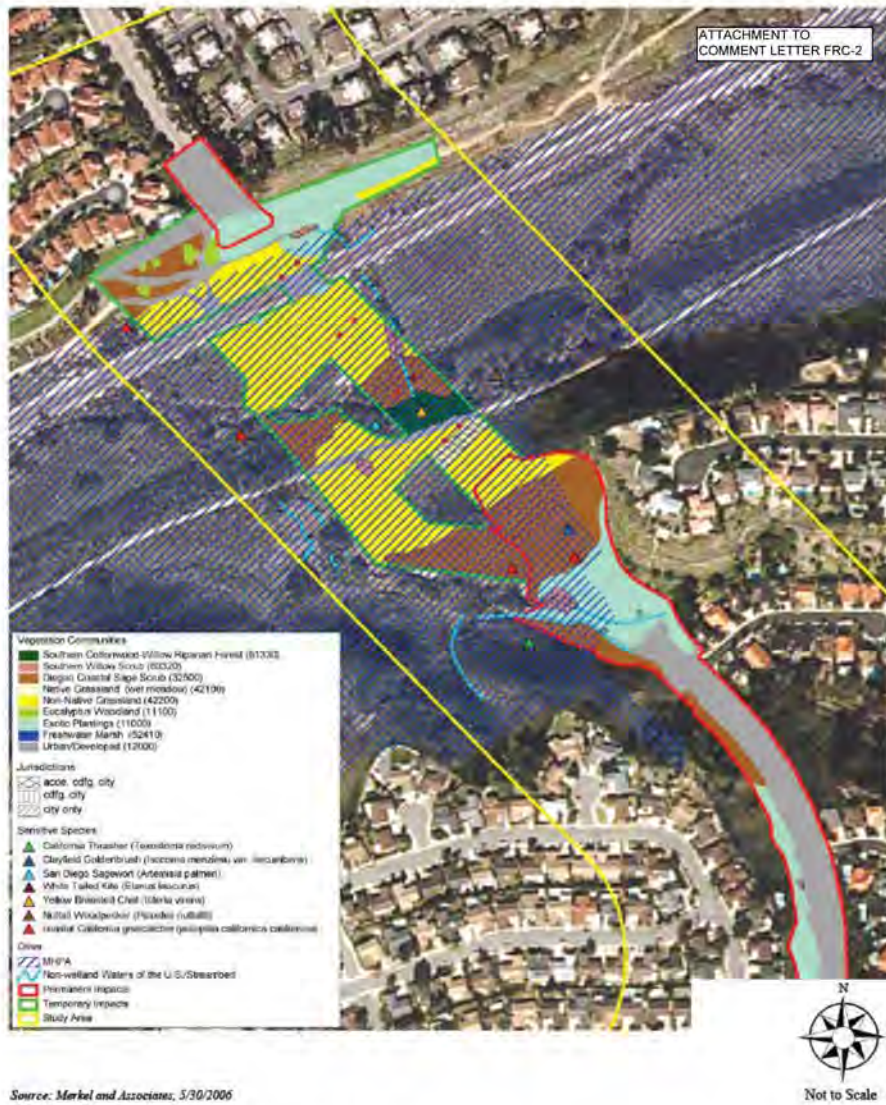
The scope of analysis for this EIR was determined by the City of San Diego in a scoping letter dated February 27, 2004, as well as a result of responses to the Notice of Preparation (NOP) dated February 27, 2004, and a Scoping Meeting held October 23, 2003. The NOP and associated responses are included in Appendix A.1 of this document. Comments received at the Scoping Meeting or in response to the scoping meeting are contained in Appendix A.2. The following issues were determined to be potentially significant and are addressed in this EIR:

Land Use and Planning	Recreation
Transportation and Circulation	Hydrology/Water Quality
Biological Resources	Human Health and Public Safety
Air Quality	Neighborhood Character/Aesthetics
Noise	Historical Resources
Landform Alteration	Paleontological Resources
Geology/Soils	

Pursuant to Section 21083.9(2) of CEQA, the City held a public scoping meeting on October 23, 2003, to provide a brief overview of the alternatives and further solicit input on the environmental issues associated with them. Over 100 members of the public attended the scoping meeting.

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Friends of Rose Canyon (August 1, 2016)



Source: Merkel and Associates, 5/30/2006

Regents Road Bridge Impact Area _____ Figure 4.3-7

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Friends of Rose Canyon (August 1, 2016)



Source: Meritt and Associates, 5/19/2009

ACOE, CDFG, and City of San Diego Jurisdictional Wetlands and Waterways, Regents Road Corridor (Rose Canyon) Figure 4.3-5A

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LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

ATTACHMENT TO
COMMENT LETTER FRC-2



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LETTER

RESPONSE

Friends of Rose Canyon (August 1, 2016)

From: Deborah Knight <dknight3@san.rr.com>
Sent: Monday, August 01, 2016 4:53 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, Project No. 480286/SCH No. 2015121011 - Email d
Attachments: 5-FEIR p. 3-14, 3-15.pdf; 6-FEIR p. 3-16.pdf; 7-FEIR p. 3-19.pdf

Susan,

Here is the 2nd email with the remaining 3 attachment to our comments. Not all pages are fully shown, as only relevant portions are included.

Deborah Knight
Friends of Rose Canyon

FRC-3-1

FRC-3-1

Commenter provides revisions to the University City North/South Transportation Corridor Study EIR (SCH#2004031011) prepared by the City of San Diego in 2006. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

- Construction of a temporary siltation basin at the downstream end of the construction zone in Rose Canyon and/or San Clemente Canyon to capture sediment; and
- Implementation of a routine maintenance plan during construction to keep the affected area clear of debris.

Special measures would be developed to control erosion from soil stockpiles, if excess material were held onsite for project construction. Permanent erosion protection measures would be designed for any exposed slopes, and energy dissipation structures would be installed at outlets of new/modified drainage facilities. The plans and specifications for the selected alternative would include permit conditions from regulatory agencies, including the U.S. Army Corps of Engineers, California Department of Fish and Game, and RWQCB.

In alternatives where groundwater may be of concern, a focused dewatering test program would be conducted for structures that would be placed in areas of potentially high groundwater. The potential quantity of groundwater that would need to be pumped to maintain dry working conditions would be estimated, groundwater quality would be tested, and the appropriate disposal location and method (e.g., nearby sewer or surface water system) would be identified.

Requirements of the RWQCB will be followed for discharge of dewatering water if disposal is not to a sewer. These requirements may include preparation of a Report of Waste Discharge to address quality and quantity of groundwater that would need to be discharged to waters of the State (e.g. Rose Creek) to accomplish construction. Treatment of dewatering water may be required prior to discharge.

Landscaping

Existing trees in the median and close to the edge of the road would be eliminated by the road widening. Landscaping along the widened roadway would be replaced with plantings appropriate for the reduced width of the central median and parkways along each side.

3.3.1.2 Regents Road Bridge

Two separate, parallel two-lane bridge structures would be constructed across Rose Canyon to connect the south and north ends of Regents Road that currently terminate near Lahitte Court on

RESPONSE

Friends of Rose Canyon (August 1, 2016)

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work have been identified on both sides of the bridge and on either side of the railroad tracks. All staging areas that would be temporarily disturbed would be revegetated with native vegetation. Staging areas and active construction areas would also be fenced to contain disturbance, control access, and provide security. However, no construction fencing would be located over railroad tracks, trails, or the creek within Rose Canyon. Adherence to the City's Noise Abatement and Control Ordinance would limit construction to between the hours of 7:00 am and 7:00 pm Monday through Saturday.

Bridge construction would begin with the substructure, or foundations. A large auger drill rig would be used to drill the more than nine-foot in diameter holes for each pile. A temporary steel casing would keep groundwater and surface water out of each hole, and prevent soil from caving into each hole. With the substructure in place, the "falsework" or framing for the bridge girders would be erected. Then the bottom slab and girders would be formed, cast in concrete, and prestressed, followed by the bridge deck. Falsework would be removed after the superstructure is completed.

As during construction of the 60-inch diameter Rose Canyon Trunk Sewer in the canyon from 1994 to 1995, signs would be posted noting that access to the main trail and other canyon areas would be limited, and warning pedestrians to stay clear of project materials, vehicles, heavy equipment and trenching operations.

Approach Roadway Modifications

Roadway modifications would be made to each end of Regents Road. On the south terminus of Regents Road, the existing roadway has a cross section that includes two 13-foot wide travel lanes (one in each direction) and a 6-foot-wide bike lane on one side. This alternative would widen the section of Regents Road that extends from approximately 400 feet north of Governor Drive to Lahitte Court, a distance of 950 feet. The proposed cross section along this length would consist of two travel lanes in each direction, a 6-foot-wide striped bike lane and 10-foot-wide parkway along each edge, and a 14-foot-wide center median. No parking would be allowed. Widening would occur along the west (southbound) side of the existing road. A retaining wall 200 feet long and a maximum of 5 feet high would be needed from Millikin Avenue to the south along the new west edge. A retaining wall 300 feet long and a maximum of 7 feet high would be needed along the new west edge from Lahitte Court south.

As noted above, a new, four-lane road would be constructed by filling a portion of a tributary canyon and cutting through a ridge for 700 feet north of Lahitte Court, before the bridge spans the canyon. This road would have the same cross section as described for widened Regents Road.

At roughly the same location as the existing trailhead, just north of the present terminus of Regents Road on the south side of Rose Canyon, a new 12-space parking lot with a van/disabled space would be constructed to provide parking for persons accessing Rose Canyon from an existing trail. The parking area would be located on the west side of Regents Road at the south end of the bridge. The portion of the existing trail that would be displaced by road grading would be replaced to the point where the existing trail would be unaffected by the roadway

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the parking lot would be from the southbound (west) side of Regents Road only. A deceleration construction. The reconstructed trail would be ADA compliant to the extent possible. Access to lane would be provided for traffic to slow down and turn right into the lot. Drivers would have to exit the lot to the south only (right turn only). Northbound traffic, for example drivers traveling north on Regents Road from Governor Drive, would have to cross the bridge and make a U-turn at Porte de Merano on the north side of Rose Canyon, then cross back over the bridge to use the deceleration lane and enter the trail head parking lot.

On the north terminus of Regents Road, approximately 250 feet of the existing roadway from the edge of the canyon northward already encompasses the basic four-lane cross section needed for a compatible transition to the analyzed bridge. The roadway surface, however, would need to be resurfaced.

Architecture/Landscaping

Final architectural and landscaping plans have not been prepared. However, aesthetic features of this alternative could include decorative retaining wall facades, and landscaping along the parkway and in the median on the affected/new roadways, and for the bridge, concrete treatments on the bridge columns and decorative railings on the parallel bridge structures. Manufactured slopes would be planted with native vegetation pursuant to City requirements and guidance of the permitting agencies. Final design of project features, including aesthetic treatments and landscaping, would occur after selection of an alternative by the City Council.

Grading

Construction of the bridge and the connecting roadway would involve **grading of approximately 88,000 cubic yards, comprised of** 46,000 cubic yards of cut, and 42,000 cubic yards of fill. The majority of the grading would occur on the small ridge in order to construct the connecting roadway and bridge ends. A 2:1 cut slope would be created, which would extend to a maximum height of 30 feet. At the base, the cut slope would cover 250 linear feet. A 2:1 fill slope would be created south of the ridge and north of Lahitte Court. This fill slope would reach a maximum height of 40 feet and have a length of 450 feet along the top of the slope. Grading for this Regents Road Bridge element would affect approximately six acres.

3.3.1.3 Grade Separation

This project alternative would involve the construction of a grade separation structure at the intersection of Genesee Avenue and Governor Drive. The two inside lanes of Genesee Avenue (one in each direction) would be lowered to pass under Governor Drive without traffic controls. The grade separation is expected to take approximately 18 months to complete.

Approach Roadway Modifications

The length of construction along Genesee Avenue would be 2,400 feet (see Figure 3.3-4). The two outside lanes would be separated from the two through lanes and would be maintained at existing grade through the Governor Drive intersection. Additional lanes, on Genesee Avenue, would be required at the intersection, resulting in two lanes in each direction approaching the

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LETTER

RESPONSE

Reiger, Ed (June 26, 2016)

From: [ereiger](#)
To: [P.N. Bannigan, PEIA](#)
Cc: [Barbara Seeger](#)
Subject: University Community Plan Amendment #480286
Date: Sunday, June 26, 2016 4:22:57 PM

My comments are as follows;

The Bridge SHOULD be removed from the plan for the following reasons.

Building the bridge will increase surface street traffic through the neighborhood, creating several sever environmental, safety and quality of life impacts.

The bridge would simply drive single occupancy auto drivers onto surface streets in the community.

Viable alternatives are now in the process of being developed. First running the Trolley line through to UC with its strategic stops, will give commuters to the area an environmentally friendly way to get in and out of UC.

Second, completion of the HOV lanes on I-5 and I-805 surrounding the community will give drivers incentive to Carpool

and reduce the number of cars commuting.

Future improvements should include adding an HOV lane on route-52 from I-5 to I-15 as well as

HOV connectors between I-5 and Route -52 as well as I-805 and Route-52.

The goal should be to direct commuters to Trolley and HOV around the community proper.

Adequate emergency response time will be met by the additional fire stations and community emergency response vehicles.

An important point here is to think outside of the box and begin to place more emergency rescue squads and

ambulances at rental units in the UC community (or any community) with 2 , 12 hour shifts, and put less resources into

ER-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ER-1-1

LETTER

larger and more complex 24 hour shift fire stations. where the majority of response calls that truck companies respond to are for

the medical staff not the fire fighting apparatus. Money saved in this transition of service delivery could be used for additional

Rescue squads and Ambulances. This would also address all the fear mongering from the bridge proponents over safety and response times.

As for the proposed changes. I am for NO Bridge and NO widening of Genesee, either or both would only reward undesired behavior.

Thank you,

Ed Reiger,
3031 Renault Street
San Diego CA 92122

ER-1-1
cont.

RESPONSE

Reiger, Ed (June 26, 2016)

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LETTER

RESPONSE

Hugh McCutchen Jr. (July 4, 2016)

From: [Hugh McCutchen, Jr.](#)
To: [PLAN_PlanningCEQA](#)
Subject: University Community Plan Amendment No. 480286 / SCH No. 201512101
Date: Monday, July 04, 2016 11:36:46 AM

Susan Morrison,

I have just read the article in the July 2016 Clairemont Times on the Regents Road Bridge and Governor to I-5 connector. It is very difficult for me to imagine sufficient reasons to not make these two road connections. Our road system's function is to allow traffic to get to its destination with the minimum waste of time and fuel. These two connectors are completely obvious as projects that need to be completed when looking at a Google satellite map of the area and when fighting the traffic on Genesee. One of your functions surely must be to look at the larger problems and benefits to larger numbers of people and not simply at some local disturbances of projects. Please complete these two connectors.

Hugh McCutchen, Jr.
 5028 Brillo Street
 San Diego, CA 92117-1253
 858-274-7196
huis58@gmail.com

HM-1-1

HM-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Larry Tucker (July 12, 2016)

From: [Larry Tucker](#)
To: [PLN_PlanningCEQA](#)
Subject: Regents Road Bridge
Date: Tuesday, July 12, 2016 1:26:53 PM
Attachments: [DOC_00143.pdf](#)

Attn: Susan Morrison

Re: Project No. 480286 / SCH No. 2015121011

Attached please find a comment letter on the above referenced Draft Program Environmental Impact Report. An original of the letter will be mailed to Ms. Morrison.

Larry Tucker

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LETTER

RESPONSE

Larry Tucker (July 12, 2016)

Larry Tucker
P.O. Box 7974
Newport Beach, CA 92658

July 11, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101

Re: Project No. 480286/ SCH No. 2015121011

Dear Ms. Morrison,

I have reviewed the Draft Program Environmental Impact Report for the proposed University Community Plan Amendment and have the following comments and questions:

1. In Section 9.2 at Page 9-6, a conclusory statement is made that "Based upon the evaluation below it was determined that the Project is the environmentally superior alternative." Table 9-1 sets forth a Comparison of Project Alternatives with respect to a series of Environmental Issue Areas. Yet in several areas, including what are often the areas of most importance, Transportation/Circulation, Air Quality (operational), Greenhouse Gas Emissions and Public Services and Facilities, the Project has greater impacts than many of the other alternatives, including the No Project alternative.

So while there are more areas in which the Project would have fewer impacts than the No Project Alternative, there are very important areas where the Project impacts would be greater than the No Project Alternative. Yet, no explanation is set forth as to how "it was determined" that the areas where the impacts of the Project would be less, are more important than areas where the impacts would be greater. Surely the basis is not just a numerical count, but what is it? Please note that the impacts on 21 important intersections would be "significantly worse" if the Project were implemented. So the response to this comment should explain what benefits the Project bestows and why those benefits would outweigh the detriments of having significantly worse traffic at that many important intersections, as well as worse air quality operationally, more greenhouse gas emissions and poorer emergency response times.

2. If the Project is deemed the environmentally superior alternative, then one of the other alternatives must be identified as an environmentally superior alternative among the non-Project alternatives. The No Construction Regents Road Bridge and Widening of Genesee Avenue was selected in the DPEIR, but again, it is not clear what is the basis for that conclusion. For instance, no analysis was included that compares the difference in the impacts to intersections between the No Project Alternative and the No Construction Regents Road Bridge and Widening of Genesee Avenue Alternative. If the decision-makers were to decide that the Project is not the environmentally superior alternative, it would likely be because of its impacts on the four areas I have identified above. In that event, the analysis between the

LT-1-1 Please see response to comment Citizens-2-24.

LT-1-1

LT-1-2 Please see response to comment FRC-1-10.

LT-1-2

LETTER

RESPONSE

Larry Tucker (July 12, 2016)

No Project Alternative and the No Regents Road Bridge and Widening of Genesee Avenue Alternative should have more details as to exactly how different the traffic impacts would be between those two choices. If it is determined that they are both better than the Project, how they compare with each other should have been analyzed.

LT-1-2
cont.

3. When development densities are established in land use plans, circulation roads are designed to accommodate the traffic generated by those densities. If a planned road is not built, then the traffic that was intended to go on that segment of road will have to go to other roads or means of transportation. If the other alternative roads or means of transportation are not there or are not sized to carry the extra trips, then that is a recipe for perpetually unacceptable levels of service (aka, a twice a day traffic jam). If either (or both) the Regents Road Bridge or the Genesee Widening are eliminated from the Community Plan, does that mean that the City is willing to accept unacceptable levels of service that will become significantly worse than they would have under the No Project Alternative (because that is what the PDPEIR says will happen)? Is it the intention of the City to lower density in the areas that were expected to use the Regents Road Bridge and a widened Genesee in order to avoid further circulation degradation? Or does the City just intend that the public live with the consequences of elimination of these long planned traffic improvements that have been assumed in justifying countless land use intensifications over the past few decades. In other words, please explain in plain English what will happen with the traffic over the long haul if the Regents Road Bridge and/or the Genesee Widening are eliminated.

LT-1-3

Thank you for the opportunity to comment on the DPEIR.

Very truly yours,



Larry Tucker

LT-1-3

The commenter questions what would occur if the Project is implemented. As discussed in Section 4.2, Mitigation Measures TRA-1 and TRA-2 would reduce impacts to the circulation network of the UCP Area that are associated with the Project. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP and, thus, cannot be guaranteed at this time. If implemented, Mitigation Measures TRA-1 and TRA-2 would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element.

LETTER

RESPONSE

Lisa Sutton (July 13, 2016)

From: Lisa Sutton
To: UCR Planning/CEQA
Subject: University Community Plan Amendment No. 480286 / SCH No. 2015121011
Date: Wednesday, July 13, 2016 4:41:23 PM

I have been a long-time resident of University City and I am writing today to express my concern that the findings of the PEIR will be obscured by the opponents of the Regents Road Bridge. I would like to refute several of the arguments about the need to remove the bridge from the community plan. Then I will argue that the analysis has identified that the removal of the bridge could result in highly undesirable impacts.

LS-1-1

LS-1-1 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

I have heard the members of the community planning group argue that the bridge would be unsafe near Zeta Doyle Elementary School. The school is a full block off of Regents Road at the end of a cul-de-sac. This is a distance that is comparable to the distance from Genesee Avenue to Curie Elementary, Standley Middle School and UC High School. If the distance for these three schools is sufficient, so should the distance to Doyle Elementary. Further, the speed limit in the area (along Regents Road) is currently low and it could be maintained across the bridge to further allay fears for safety of pedestrians in the area.

LS-1-2

LS-1-2 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

I have heard the argument that property values would be reduced. I maintain that these values had already been reduced with the bridge merely in the planning phase since that had to be disclosed to all buyers. Further, I would maintain that values could actually be increased if the bridge were built since there would be a very walkable and safe alternative to cross Rose Canyon from either side. The Farmers Market would be a bigger draw with easier access, and many people view the availability of these markets to be a valuable neighborhood amenity. Businesses on both sides of the canyon could enjoy more robust foot traffic in their stores. I suspect that with even slightly reduced traffic load on Genesee, the businesses there could see more traffic as well, since it should be less odious to re-enter the traffic flow if one exited to do some shopping.

LS-1-3

LS-1-3 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

I have also heard that the canyon would be permanently damaged by building a bridge. This has not been the case in Marian Bear Park to the south and the crossings at Regents and Genesee are through the canyon floor. Rose Canyon has been more damaged by the recent work the rail line has done than it would be by adding a bridge across Regents Road.

LS-1-4

LS-1-4 Comment acknowledged. As discussed in Section 9.2.1.9 on page 9-17 of the Draft PEIR, impacts under the No Project Alternative would be greater than those identified for the Project because less land would be preserved in open space. The proposed changes at Rose Canyon would result in greater impacts related to Tier I, II, IIIA, and IIIB habitats and greater impacts to aquatic resources including vernal pools and wetlands compared to the Project.

Transportation/Circulation (Load and Capacity, Congestion, Existing or Planned Systems, Traffic Circulation, Alternative Modes), already at unacceptable levels, will only increase as the ALREADY APPROVED EXPANSIONS at Costa Verde and UTC are completed. This has not even touched the expansion and new building that is approved for the business parks as well as UCSD expansion in the area. The UCPG cannot have it both ways: they complain loudly about the "trips" that will be added for new development but don't want anything to do with mitigating that traffic.

LS-1-5

LS-1-5 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Air Quality and Greenhouse Gas Emissions (Increased Emissions) are not even considerations for the UCPG. The pollution that is entering the high school grounds as well as the canyon itself is not a trivial matter. Tailpipe emissions are known to be very detrimental to our young people as well as the natural world in the canyon. The ACTUAL air quality should be measured at several points along the congestion route to make any final statement about said effects.

LS-1-6

LS-1-6 The changes in air pollutants were estimated for the Project using standard and accepted models. The CEQA Guidelines do not require monitoring of actual air quality conditions for the EIR. In addition, it is not possible to monitor impacts of changes to planned projects at the time of the analysis.

Noise (Traffic) when moving at moderate pace would be reasonably reduced if there were two arteries connecting north to south University City. I have already noticed that there is traffic turning right onto Governor Drive from Genesee Avenue that proceeds to Regents Road and turns south from there. One could argue that traffic on Governor Drive could be reduced (with the Regents Road connector); traffic that passes directly in front of Spreckels Elementary and Standley

LS-1-7

LETTER

RESPONSE

Lisa Sutton (July 13, 2016)

Middle School. Doyle Elementary is still a block away from Regents Road traffic.

In review, the purpose of this letter is to implore you to keep the Regents Road Bridge in the community plan and begin construction of the bridge as soon as possible. It is needed to mitigate projected and significantly increased traffic that is already at unacceptable levels.

Sincerely,

Lisa Sutton

LS-1-7
cont.

LS-1-8

LS-1-7

As discussed in Section 9.2.1.7 on page 9-16 of the Draft PEIR, impacts under the No Project Alternative are anticipated to expose people to noise levels that exceed City standards. As shown in Table 4.7-2, Future Year With Project in comparison to Future Year With Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor would substantially decrease by more than half. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases by 43 to 69 feet to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). However, impacts under the No Project Alternative are anticipated to expose people to noise levels that exceed City standards. As such, the No Project Alternative would require mitigation measures to be determined at the project level.

LS-1-8

Comment acknowledged.

LETTER

RESPONSE

Feroza Ardeshir (July 17, 2016)

From: [Feroza Ardeshir](#)
To: [PLN_Dennison_EIR](#)
Subject: University Community Plan Amendment, No. 460266/ SCH No. 2015121011
Date: Sunday, July 17, 2016 3:34:42 PM

I want to thank the city for moving to delete two out of date projects from the University Community Plan: The two projects to be deleted are the Regents Road Bridge, and the widening of Genesee Avenue in University City.

I STRONGLY SUPPORT the DELETION of BOTH the bridge and the Genesee Avenue widening, particularly the bridge project, as it would be very damaging to Rose Canyon, one of our last remaining open spaces in an increasingly congested area.

As an educator, I have seen the enormous benefit to young students of exposure to Nature, and have accompanied several classes into Rose Canyon for bird-watching, ecology lessons and docent led field trips. The bridge project would greatly interfere with these enjoyable educational opportunities for children from all over San Diego, including those with very few other chances to experience Southern California's amazing biodiversity. Rose Creek Canyon is habitat for native wildlife, and the Creek flows into Mission Bay, where wetlands restoration is in progress. Building the bridge would be extremely harmful to water quality, and would degrade the habitat quality as well. Also, I am personally attached to the canyon as a natural haven for walking, hiking and observing wildlife, without even getting into my car!

The Draft EIR states that both these projects would pull traffic off area freeways and into our neighborhoods, adversely impacting schools, increasing pollution and noise, and making walking and biking more dangerous and thus less likely. All these impacts work against the City of San Diego's Energy Plan for a Sustainable Future, which seeks to emphasize the use of public and alternative transport modes, rather than individuals driving cars.

Sincerely,

Feroza Ardeshir PhD

Retired Teacher
Mission Bay Montessori Academy

Home address: 6350 Dennison Street
San Diego CA 92122

FA-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

FA-1-1

LETTER

RESPONSE

Barbara Franklin (July 17, 2016)

From: barbara@ovinfo.ca.th
To: [P.N. Bannings/ E13](#)
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 17, 2016 4:57:08 PM

Dear Planning Board

I am writing to support deleting the Regents Road Bridge project from the University Community Plan. I strongly believe that the proposed Regents Road Bridge would ruin our community, putting children and adults of all ages at risk, not only for traffic accidents but also for increased respiratory illness and cancers from air pollution as well as stress from noise pollution. It would draw traffic from proper roads, such as highways 5 and 805, into our presently safe, pleasant, clean neighborhood, turning it into a dangerous, dirty neighborhood -- in short, it would ruin our neighborhood, just to save a few minutes travel time for people who insist on driving single passenger cars to and from work to reach their own (unruined) neighborhoods! As the homeowner of a property adjacent to Regent's Road, this seems very very wrong to me.

This is my most immediate objection, but there are others. The bridge would also damage Rose Canyon, a precious natural resource and one of the few remaining natural canyons in this part of the city, making it inhabitable to wildlife and ruining chances for enjoyment of this natural environment for us, and for our children and our children's children. It would also contribute to pollution of Rose Creek, which flows into the bay.

Most of all, this is an outdated solution to urban traffic problems. San Diego needs to move to modern rapid transit that would move people cleanly and quickly, not using roads, but making use of monorails or other state-of-the-art transport options. We need to get away from this dependence on roads and single passenger cars and bring San Diego into the 21st century.

I want to thank the City for taking the initiative to remove this outdated project from the city plan. Please continue to do so.

Please feel free to contact me directly if there are any questions about my email.

Sincerely,

Barbara A.K. Franklin, PhD
7994 Caminito Dja # 1
San Diego, CA 92122

BF-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BF-1-1

LETTER

RESPONSE

Tom Remillard (July 17, 2016)

From: [Tom Remillard](#)
To: [PLN_Regional_CDA](#)
Cc: trm@scac.ca.gov
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 17, 2016 2:33:04 PM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods increasing the amount and speed of traffic through our community (schools, pedestrians, biking, walking, noise). The bridge will create a very dangerous intersections at Lehitte Ct and at the east end of Millikin Ave. Most disturbing will create a hazardous condition during drop and pick up period at Doyle Elementary.

The Regents Road bridge project would be especially damaging to Rose Canyon. Deleting it would protect Rose Canyon. The bridge project would interfere with recreational, educational, and visual enjoyment of Rose Canyon.

Tom Remillard
 3255 Millikin Ave
 San Diego, Ca 92122

TR-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

TR-1-1

LETTER

RESPONSE

Hallie Burch (July 18, 2016)

From: [Hallie Burch](#)
To: [PLN_PlanningCEJA](#)
Cc: [Friends of Rose Canyon](#)
Subject: University Community Plan Amendment, No. 480286/SCH No.2015121011
Date: Monday, July 18, 2016 10:25:26 AM

> I want to thank the city so very much for the deletion of the Regents Road Bridge and the Widening of Genesee Avenue from the University City Plan.
> Rose Canyon needs to be protected because of the habitat for wildlife, the movement of wildlife and the wetlands. This area is also a great area for educational purposes. More of these types of areas in San Diego need to be protected.
>
> Hallie Burch
> 2667 Angell Avenue
> San Diego, CA 92122

HB-1-1

HB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Michael Duffey (July 18, 2016)

From: Michael Duffey
To: PLN_Banning@CFJA
Subject: Regents Road Bridge
Date: Monday, July 18, 2016 10:33:34 AM

I strongly oppose the Bridge project for the following reasons:

Re-directs traffic off of existing free-ways and onto neighborhood streets. Would severely impact Doyle Elementary School and present unsafe condition for Young children and parents dropping off children. Environmental health associated with idling car exhaust into the air.

Would impact Rose Canyon with noise. run off from bridge into canyon.

Traffic through neighborhoods creating noise, pollution, safety issues wait times for Ingres/egress from HOA would create noise, pollution and serious safety issues for residents.

Witness the traffic and congestion from UCSD medical complex now on Regents, it is a mess!!! Really poor planning, shame on UCSD and City Planners for the horrible traffic gridlock even before Jacobs is open, bad for neighborhoods . Don't make the same mistake with an outdated bridge over a protected urban open space.

Sent from my iPhone new phone 858-255-9277

MD-1-1

MD-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Walker Fillius (July 18, 2016)

From: Walker
To: Ed Danning/UCJA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Monday, July 18, 2016 8:47:38 PM

Dear Sirs:

This is a GOOD PROJECT. The elimination of the plan to build a bridge on Regents Road and to widen Genessee Ave will protect Rose Canyon from terrible damage, and assure the neighborhood of a recreational outlet there where people and nature can meet and find calm away from stresses of frantic lives. Though the canyon is not pristine, it still provides a haven for a wonderful variety of birds, beasts, creepy-crawlies, water creatures, insects, native plants -- and walkers, runners, and bikers too. The DEIR expects environmental impacts from the project, but all the alternatives would cause WORSE environmental impacts in the canyon and in our neighborhoods. A bridge and/or a wider Genessee Ave would bring more outside traffic through the neighborhood. Tens of thousands more of cars and trucks would go through the residential part of University City from north to south and back each day. We don't want to be an alternate route for commuters; we want to remain a neighborhood. It is a wise move to revise the University City Community Plan in this manner, and a credit to the city's government leaders who have endorsed this amendment.

Walker Fillius
6737 Welmer Street
San Diego, CA 92122

WF-1-1

WF-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genessee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Jan and Jim Hawkins (July 18, 2016)

From: [Jim and Jim Hawkins](#)
 To: [E.N. Blarney@UCSD](#)
 Cc: [Jan Hawkins](#)
 Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
 Date: Monday, July 18, 2016 1:08:40 PM

From: Jan and Jim Hawkins

3233 Wellesly Ave.

San Diego, CA 92122

Date: July 18, 2016

Re: University Community Plan Amendment No. 480286/ SCH No. 2015121011

We love University City and have lived in the same home here for 40 years. One of the reasons we love living here is that we can access Rose Canyon from Regents Road and walk, run, and take real hikes from our front door. We marvel at the wildlife that lives nearby. The area would be destroyed by the construction of a cut and fill road and bridge. In spite of the burgeoning population of San Diego, our local canyons still provide us a sense of being people of the natural world.

We believe our lives and neighborhoods will be respected and preserved by deleting the Regents Road bridge and the widening of Genesee projects from the UC Community Plan and we strongly support this deletion. The bridge project would harm our natural ecosystem and both the bridge and the widening of Genesee would harm the safety of adults and children alike as well as the integrity of the neighborhood communities.

Both the projects will draw most traffic off 15 and 1805 and through our neighborhoods. We do not want this additional traffic, especially FAST traffic, running alongside our school children walking or riding their bikes.

Thank you for putting an end to this outdated plan.

Regards,

Jan and Jim Hawkins

JJH-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JJH-1-1

LETTER

RESPONSE

Andrea and Carl Ito (July 18, 2016)

From: Andrea
To: [E.N. Barnino/CEQA](#)
Subject: Removing the bridge
Date: Monday, July 18, 2016 8:49:44 PM

We appreciate your vote in removing the Regents Road bridge from the plan. The residents of UC, both present and future, thank you for protecting this natural resource.

Andrea and Carl Ito
5864 Carnegie street
San Diego, CA. 92122

Sent from my iPhone.

ACI-1-1

ACI-1-1

Comment acknowledged. Commenters express support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Richard Quinonez (July 18, 2016)

From: Richard Quinonez
To: E.A. Blanning/PEIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Monday, July 18, 2016 11:13:05 AM

Hello,

I am writing to say that I wholeheartedly support the amendment to remove the Regents Road Bridge and the widening of Genesee Avenue from the University City Community Plan. I cannot express my gratitude to the city for taking a positive step in the right direction by thinking outside the box and moving forward in deleting these two unnecessary and obsolete items. THANK YOU.

We are now in a new era where the merging of technology, environmental awareness and concern for our future generations has become significant enough in our lives that cementing over and over building is no longer the best way to solve traffic issues. We can solve traffic issues and preserve our precious canyons at the same time. We live in an amazing country, society and culture of thinkers. Building new roads over pristine land must stop. You are showing great leadership in your actions by removing these two destructive projects. They would have not solved a thing. They would have just made cut through traffic worse in a community filled with families, children, bicyclists and pedestrians.

Rose Canyon is a wonderful asset to University City. To lose one more inch of it to roadways or any type of development would be tragic. My grandchildren beg me to take them to the canyon every time they come over. Rose Canyon is a big part of our lives and we hope it will be that way for many generations to come.

Please come and spend time in that beautiful canyon. It is a haven of nature, peace and calm in a city bustling with constant growth and movement. By preserving Rose Canyon you are giving many more people a place to go to relax, forget about stress and city life for a while. In a world of unrest, over population and climate uncertainty, our children deserve a place like Rose canyon.

Having a place like Rose canyon to escape to is a blessing. I thank you for helping us keep our canyon.

Sincerely,

Richard Quinonez
3171 Ducommun Avenue
San Diego, Ca. 92122

RQ-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RQ-1-1

LETTER

RESPONSE

Tama Becker-Varano (July 19, 2016)

From: Tama Becker-Varano
To: PL Planning EIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Tuesday, July 19, 2016 3:09:59 PM

To Whom It May Concern,

I strongly support the deletion of the Regents Road Bridge project and the deletion of the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete both road projects.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. Creating another thoroughfare for more cars is antiquated in these times, the future demands better public transportation and neighborhoods that promote walking, bicycling, carpooling, and more.

Every resident in UC is fortunate to be able to walk out their front door and within minutes arrive at the entrance of a canyon where they can take a hike, ride a bike, or simply enjoy the peaceful serenity among wildlife. It is imperative that we preserve what's left of our open spaces, we cannot continue to pave over our natural world. Another loud, polluting, heat-attracting concrete eyesore will rob current and future generations of the beauty of nature and its ability to provide balance and harmony to an increasingly dense and overpopulated planet. It denies nature its ability to simply be.

Sincerely,

Tama Becker-Varano
6135 Radcliffe Dr.
San Diego, CA 92122

TBV-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

TBV-1-1

LETTER

RESPONSE

Tracy Gratteau (July 19, 2016)

From: Tracy Gratteau
To: PLN_PlanningCEQA
Subject: PROJECT NAME: University Community Plan Amendment, PROJECT No. 460286 / SCH No. 2015121011 - Please support construction of the Regents Road Bridge!
Date: Tuesday, July 19, 2016 11:48:01 AM

City of San Diego Planning Department,

Re: PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011

After reading Logan Jenkins' column in the San Diego Union Tribune last week about the fate of the Regents Road Bridge Project, I felt compelled to write. As a 27 year resident of south University City, I have seen our traffic woes go from bad to worse to nightmarish as north University City/UTC was developed. My husband worked at nearby Scripps Memorial Hospital La Jolla for 25 years. A four mile commute sounds like a dream to most folks, but as traffic became more and more gridlocked, that daily commute turned into a 45 minute hell-ride. When the traffic became too much, he transferred to Scripps Mercy Hospital, and even though the commute is triple the distance, the drive time is only 10-12 minutes.

TG-1-1

TG-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Things have only gotten worse as the ill-advised decision was made to take away one of the three southbound lanes on Genesee near UTC and devote it to non-existent bicyclists. I looked at the plans, and see much emphasis is placed on bicycle routes. University City is surrounded by steep hills and canyons, making cycling to work or shopping an unlikely choice of transport. How are you supposed to carry your groceries home on a bicycle? Plus with the aging population, I think you have over-estimated the likelihood of this becoming a bicycle-prevalent community.

TG-1-2

TG-1-2 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

University City already has one of the slowest response times in the city for fire and paramedics due to the traffic tie ups and lack of fire stations. In addition, we are surrounded by canyons, San Clemente Canyon to the south, Rose Canyon in the middle, plus many finger canyons, creating an extreme fire hazard. If the east or west end of San Clemente Canyon were to catch fire, the only escape route would be Genesee Avenue to the north. Having been trapped by the Poinsettia Fire in Carlsbad in 2014, I know firsthand how chaotic a fire evacuation can be, especially when there is only one way out. We need an alternate route for just such an emergency.

TG-1-3

TG-1-3 As discussed in Chapter 9.0, Alternatives Analysis, impacts to emergency services under the No Project Alternative would be slightly improved when compared to the Project in the future year. However, as with the Project, the No Project Alternative would result in operational deterioration as shown in Table 9-2 when compared to the City's target average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the No Project Alternative would remain significant and unmitigated at the program level.

I understand the consensus is leaning toward the wishes of the well-organized NIMBY folks to kill the Regents Road bridge project. I urge each city planner and council member to come visit the UTC mall on a weekday afternoon and see how poorly traffic flows through the area. Even the relatively new option, Nobel Drive on-ramp to I-805 South, backs up and can take as long as 18 minutes just to get onto the freeway in the afternoon (I know, I've timed it). I am asking city council members and planners to put more consideration into this issue, and vote to complete the Regents Road bridge, a route that has been in the plans since the 1960's. Much of the focus of your community plan seems focus on the dense, northern areas. It seems the older, established area of south U.C. has very little emphasis in the new plans. From what I discern from the current plan, if I were to travel from eastern Governor Drive to Scripps Memorial Hospital for an appointment, for example, I would need

TG-1-4

TG-1-4 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

to walk nearly one mile to the nearest bus stop, ride that bus one mile to UTC, then transfer to a different bus for the final two miles to Scripps Hospital. I think I'd take my chances and sit in traffic.

Please build the Regents Road bridge!

Thank you,

Tracy Gratteau

Operations/Office Management

Specialty Food Manufacturing

Accounting * Human Resources * Purchasing * Logistics

(760) 792-7485 Mobile

(858) 457-7951 Home

tgratteau@outlook.com

TG-1-4
cont.

RESPONSE

Tracy Gratteau (July 19, 2016)

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LETTER

RESPONSE

Petr Krysl (July 19, 2016)

From: Petr Krysl
To: PLN_Blogging@CFIA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Tuesday, July 19, 2016 10:29:31 AM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. These road projects will increase the amount and speed traffic through our community, which will negatively impact the residents, and especially the children since we have two primary schools next to Regents Road at this point. This increased traffic will also negatively impact the environment by additional noise and exhaust pollution, and it will degrade recreation opportunities in the Rose Canyon.

The bridge project would interfere with recreational, educational, and visual enjoyment of Rose Canyon. The project would harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon, and the water quality in Rose Creek could be degraded which would negatively impact all sites downstream, including the Mission Bay.

I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

Petr Krysl

4013 Camino Lindo
San Diego, CA 92122

PK-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

PK-1-1

LETTER

RESPONSE

Lisa Smith (July 19, 2016)

From: Lisa Smith
To: P.N. Planning/CEQA
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2013121011
Date: Tuesday, July 19, 2016 2:36:27 PM

Dear Ms. Morrison,

I am sure that you are getting a number of emails on this subject, but as a tax paying citizen of San Diego, I would like to add my opinion to the mix. As a resident of North University City, it is impossible to get to South University City between 3:30pm and 7pm without experiencing the Genesee backup. When I moved to San Diego, 13 years ago, the backup still existed, but it was more an annoyance, as it was still possible to get through to Governor Dr from Nobel Dr in 15 minutes, 20 maximum.

In the past 13 years, as you know, there has been more new offices, etc. built in North University City, which has compounded the problem. Now it takes 20 minutes to be able to turn left onto Genesee from Nobel, if you are lucky. And, if you are unlucky enough to be coming down Nobel going west, the backup starts 3 blocks before the street. If you are unlucky enough to be going east on Nobel, you may have to sit 2-3 light cycle to continue going east through the Genesee intersection as there are so many people that run the light and block the intersection in their desperation to finally turn. I understand rush hour traffic is never fun, but to not be able to move in either direction at an intersection for upwards of 15 minutes seems to warrant some sort of intervention.

I know that there are a number of people that are concerned regarding the open space of Rose Canyon, but in reality, there is a train that runs down the middle of it a number of times a day, so to add a few pilings to the mix to support the bridge seems that it would have minimal impact.

I have read the PEIR that came out, and it said that removing the widening and bridge from the community plan will have a number of significant NEGATIVE impacts.

While I am thrilled the trolley is coming to UTC, I fear that will be too little too late, and would be a too roundabout way for people going to East County via 52 or south the Clairemont to get home.

Therefore, please consider not removing the bridge or the widening of Genesee from the community plan, and actually moving forward with one or both of these options to alleviate the gridlock.

Thank you for your time and consideration,
Lisa Smith

- LSM-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
LSM-1-1
LSM-1-2 Comment acknowledged. As discussed in Section 9.2.1.9 on page 9-17 of the Draft PEIR, impacts under the No Project Alternative would be greater than those identified for the Project because less land would be preserved in open space. The proposed changes at Rose Canyon would result in greater impacts related to Tier I, II, IIIA, and IIIB habitats and greater impacts to aquatic resources including vernal pools and wetlands compared to the Project.
LSM-1-2
LSM-1-3 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
LSM-1-3
LSM-1-4 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
LSM-1-4
LSM-1-5 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
LSM-1-5

LETTER

RESPONSE

Shelley Plumb (July 20, 2016)

From: [Shelley Plumb](#)
 To: [Z.N. Bergman/CF16](#)
 Subject: University Community Plan Amendment, Project No. 460286/ SCH No. 2015121011
 Date: Wednesday, July 20, 2016 1:24:54 PM

I am writing to voice my support for the removal of the proposed Regents Road bridge and the widening of Genesee Ave. from the University Community Plan. It is definitely time to remove these outdated projects. University City does not need more traffic being pulled off the freeways and shooting through our community. Rose Canyon Open Space Park is a beloved space to hike, bike, saunter and get away from civilization for a while. It is a resource - not only for University City - but for all San Diegans to enjoy. The bridge would destroy the park and be detrimental to flora and fauna as well as increasing traffic, noise and pollution. My son and his friends rode their bikes and played in the canyon throughout their childhood. He lives in Brooklyn now. Every time he comes home, the first thing he wants to do is walk in Rose Canyon. It is something we treasure doing. I urge you to take the steps necessary to remove the bridge and widening from the community plan in order to protect our quality of life and what little open space and wildlife we have left.

Thank you.

Sincerely,

Shelley Plumb
 5952 Scripps Street
 San Diego, CA 92122

SP-1-1

SP-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Sandra S. Goldsmith (July 21, 2016)

From: Sandy
To: PL Planning/CEQA
Subject: University Community Plan Amendment , No. 480286/SCH No. 2015121011
Date: Thursday, July 21, 2016 5:00:01 PM

I strongly support the City in deleting both the Regents Road Project and the proposal to widen Genesee Avenue from the University Community Plan. The City has shown leadership in making efforts to remove these two out of date road projects from ongoing consideration.

The Regents Road Bridge Project would significantly damage Rose Canyon. Adding concrete supports in addition to use of heavy equipment in development of the bridge would destroy existing habitat and limit the movement of wildlife and birds throughout the canyon.

For generations, citizens of University City have used the canyon in multiple ways. I have heard testimony of bicyclists using the canyon to travel to or from work or simply for recreational purposes. Teachers, parents and friends have taken children out in the canyon to learn about nature and the necessity of preserving the green and natural areas we have. I have 4 grandchildren who are currently moving through the UC school system and whom have spent time in Rose Canyon from early ages. We adults learn too about the trees, animals and birds we encounter when we venture out into Rose Canyon. My dogs benefit from the exercise I am able to give them in that beautiful area.

I have heard testimony that if the Rose Canyon is damaged, it will never be possible to return it to its natural state. The birds I see around my home give me pause to experience the beauty and joy in their songs. These add to my own state of calm and relaxation and cause me to reflect on the true meaning and value of nature. If Genesee Road were to be widened, the medians would be destroyed, as I understand it. This potentially could increase the number of cars accidentally veering in opposite directions. The number of accidents affecting our young people and others moving to and from one area of Genesee to another might well be increased as would the noise level, which is another form of pollution. The air quality would be affected if the number of cars, trucks and other motorized vehicles were to increase. Breathing problems and allergies might well be compounded. Traffic would also affect the quality of our water by adding airborne and other pollutants to the runoff.

I beg you to delete both of these harmful projects from an outdated plan, so that the citizens of University City might feel some degree of satisfaction for their efforts.

Sincerely,

SG-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

SG-1-1

LETTER

RESPONSE

Sandra S. Goldsmith (July 21, 2016)

Sandra S. Goldsmith

Sandra Goldsmith
5825 Carnegie Street
San Diego CA 92122
Phone 858 395 0559

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LETTER

RESPONSE

Karen Liu (July 22, 2016)

From: Karen Liu
To: UC Planning/EIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Friday, July 22, 2016 10:22:07 AM

To Whom it may concern:

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project

I understand from listening to traffic engineers that adding capacity doesn't reduce traffic congestion, it encourages more drivers. As someone who contributes to congestion by driving to work alone in my car, I applaud any efforts to increase public transportation or carpooling. I commute daily to Carlsbad, and I would love to take the Coaster if I could get from the Carlsbad station to my job 4 miles inland. Filling in these missing links would be the best way to get cars off the roads and would be a lot cheaper than building a bridge from scratch or widening existing roads.

In addition to the above argument, I also understand that:

The Regents Road bridge project would be especially damaging to Rose Canyon. Deleting it would protect Rose Canyon.

- the bridge project would interfere with recreational, educational, and visual enjoyment of Rose Canyon
- the bridge project would harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon
- the bridge project could degrade the water quality in Rose Creek, which flows into Mission Bay

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods.

- Keeping commuters on the freeway reduces noise, congestion and pollution in the neighborhood

Sincerely,

Karen Liu
2535 San Clemente Terrace
San Diego, CA 92122

KL-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KL-1-1

LETTER

RESPONSE

Sam Strong (July 22, 2016)

From: [Sam](#)
To: [PLN_Planning/FOA](#)
Subject: University Community Plan Amendment No.480286/SCH No.2015121011
Date: Friday, July 22, 2016 2:50:19 PM
Attachments: [UCP.doc](#)

Susan Morrison,

Please see attachment.
Sam Strong

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LETTER

Samuel O. Strong
Helga Martin Strong
3008 Curie St.
San Diego, CA 92122
(858) 452-8167

RESPONSE

Sam Strong (July 22, 2016)

July 22, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200 MS 413
San Diego, CA 92101

Dear Susan:

Please accept the following comment on the University Community Plan Amendment:

After pursuing the University Community Plan Amendment I found it to be very lengthy and complex. It probably cost the city over \$500,000 to have it prepared. I consider this a horrible waste of tax payer dollars. There is no need for the amendment. The Plan should NOT be amended. The Regents Road Bridge was included in the original plan, it was approved by the City Council and should be built. It is needed and there is no logical reason not to proceed with plans and construction. Build it now.

Sam Strong

SS-1-1

SS-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Laurel Barile (July 23, 2016)

From: lbarile@pacbell.com
 To: Bill_Diamond@ucsd.edu
 Subject: University Community Plan Amendment, No. 460286/ SCH No. 2015121011
 Date: Saturday, July 23, 2016 4:54:13 PM

Please add my voice to support of the permanent deletion of the Regents Road Bridge project as well as the Widening of Genesee Avenue from the University Community Plan. My reasoning? 1) The Bridge would destroy the invaluable little wilderness that is Rose Canyon so vital to the health of our community. 2) Questions of emergency service response time are answered by the Quick Response Team on Governor Drive and, to concerns about wildfire evacuation, University City was *not* among the communities the city deemed ill prepared. 3) Widening Genesee Avenue below Nobel to Route 52 would add unnecessarily to its traffic load when there are two excellent highway routes --805 and 5-- able to sustain it. 4) Moreover, increased traffic would adversely affect safety at the intersection of Governor and Genesee where many neighborhood pedestrians and cyclists travel every day.

Laurel R Barile
 UC resident since 1988
 3602 Governor Drive, SD 92122

LB-1-1

LB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Mackenzie Forgey (July 23, 2016)

From: Mackie Forgey
To: PUA Planning/CPA
Cc: rosecanyon@ucsd.edu, rt.com
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Saturday, July 23, 2016 9:13:52 PM

Mackenzie Forgey
 3577 Wellesly Ave, San Diego, CA, 92122

I strongly support the removal of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I am appreciative that the City has already shown opposition to these two road projects, especially the costly and environmentally damaging Regents Road Bridge project.

My primary concern is that the Regents Road bridge project would irreversibly damage the ecological integrity of Rose Canyon. We are so lucky to still have beautiful and biologically functional open space in our community and this proposed project would bring about clear and abrupt fragmentation of the ecological community through its subsequent air quality effects. GHG emissions, construction consequences, altered hydrologic function and noise pollution. Fragmentation not only affects the wildlife in Rose Canyon but also the wildlife in the connected canyon areas, as habitat connectivity is imperative for larger migratory animals, bobcats and coyotes in particular to have adequate resource availability. These negative effects are clear in the draft EIR as stated in the Environmentally Superior Alternative section. There is also much research on the effectiveness of mitigation projects which largely shows that they fail because inevitably funding runs out before adequate monitoring periods show environmental objectives are met and because they simply are engineered environments that do not have the right soil, climactic, or successional parameters that would constitute a functional ecosystem.

I admit I am not knowledgeable enough to argue well enough for or against the Widening of Genesee Bridge in respect to its environmental impact and effects on traffic congestion and emergency response time. I am still opposed because I believe the traffic congestion has never impeded my ability to move easily throughout UC and the surrounding area and it seems unnecessary to spend so much money to further degrade habitat, but I know I have no facts upon which to corroborate my opinion. However I am very confident that the Regents Road Bridge Project would do much more harm than good. The environmental impacts are varied and irreversible, while the proposed benefits of traffic relief on Genesee come with their own set of complications, including safety concerns for families nearby and further noise and environmental pollution on our already small community.

Thank you for your consideration,
 Mackenzie Forgey

MF-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

MF-1-1

LETTER

RESPONSE

Richard M. Larsen (July 23, 2016)

From: [Richard Larsen](#)
To: [PLN Planning/CPA](#)
Cc: [rosocanyon@ucsd.edu](#)
Subject: University Community Plan Amendment, No. 480286/SCH No. 2015121011
Date: Saturday, July 23, 2016 3:48:19 PM

Ladies and Gentlemen:

The Regents Road bridge would permanently harm Rose Canyon and it, along with the widening of Genesee Avenue, would harm our community in general. I wish to thank our City leaders for their help in deleting these ill-advised projects from the University Community Plan.

RL-1-1

RL-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Best regards,
 Richard M. Larsen
 3863 Camino Lindo
 San Diego, CA 92122

LETTER

RESPONSE

Kim Morch (July 23, 2016)

From: kmorch@gmail.com on behalf of [Kim Morch](#)
To: [PLN_Design@UCSD](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Saturday, July 23, 2016 4:58:09 PM

Dear Susan Morrison, Environmental Planner, City of San Diego Planning Department,

Regarding the draft PIER for the University Community Plan Amendment, Project 480286/ SCH No. 2015121011:

I strongly support the findings in the draft report to cancel the widening of Genesee and addition of a bridge at Regents Road. These projects would negatively impact our community in the following ways:

- 1) it would result in excess traffic through residential areas that many pedestrians travel along (especially students when school is in session)
- 2) it would cause irreparable damage in Rose Canyon, which acts as a natural wildlife habitat, a teaching venue for area schools, and lovely hiking/biking paths for all
- 3) it would increase noise and emissions, impacting the health of people such as myself who bike to/from work each day.

KM-1-1

Thank you.

Kim Morch, Area Resident
4215 Karesue Ave, San Diego 92122

KM-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Bill and Joan Breher (July 24, 2016)

From: Bill Breher
To: PLN Planning/UCP
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 24, 2016 3:41:11 PM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

I feel that increasing the size and extent of surface roads is not the solution to traffic congestion. This is a very shorted sited solution which will only lead to more dense housing and shopping centers being built along Regents Road. This will rapidly return us to the current congested situation in addition to all the added congestion during construction of said surface roads and soon to follow dense housing and shopping centers (think Sprouts shopping center rebuilt to something closer to UTC type density.) You cannot fight development once better access is available.

I personally walk with my daughter in the morning on Saturdays and Sundays right under where the bridge would go. Can't imagine the difference in quality time spent with her with a bridge overhead. My wife and I frequently bike across Regents Road along Governor Drive because of the small number of drivers on the West end of Governor. Mostly we avoid Genesee crossing because of the large number of drivers. Putting the bridge through would just diminish the quality of that bike ride in that portion of UC.

Though I no longer ride a mountain bike, several of my neighbors enjoy the canyon on theirs. Again, loss of quality time.

I really feel connecting North UC to highway 52 with more surface roads is not the solution to the unrelenting urban growth in North UC.

There was a deal made ages ago that North UC would have high density and South UC low density. Connecting the two communities with better roadways just spreads the high density disease to a broader area.

South UC needs an approach that says we don't want the high density traffic problems caused by high density housing.

In this same vein, folks looking for the best traffic route will naturally look to Governor drive to criss cross from Regents to Genesee and vice versa.

There is a grade school along that path (Governor) and a city park with recreational facilities that don't need proximity to an increased number of drivers trying to find the fastest route to their destination.

Governor will turn into a speedway despite the lights currently in place. That's asking for increased odds of a child injury or casualty.

Thank you for the opportunity to give input for my family. We have lived in UC since 1975.

Bill (and Joan) Breher
3295 Welmer Place

BJB-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BJB-1-1

LETTER

RESPONSE

Bill and Joan Breher (July 24, 2016)

San Diego, CA 92122

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LETTER

RESPONSE

Randy Fillat (July 24, 2016)

From: Randy Fillat
To: Citizens for the Regents Road Bridge; carole.cfrb@gmail.com; PLN_PlanningCEQA; CouncilMember Marti Emerald; Ly. John
Subject: Re: Website Update Announcement
Date: Sunday, July 24, 2016 5:25:29 PM

REF. PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University

I have not seen this point brought up by either side at it relates to the Regent's road bridge. Damn brief hlstory:
In 1988 the City closed South Mission Blvd during the storm severely limiting the ability of people to get out of the area. They said it was to allow emergency vehicles and I saw 2 maybe 3 during the entire storm and they were only looking around at the waves.

When there was a fuel spill on I-15 at Mercy Road northbound nobody could figure out how to direct traffic on to the 'carpool' lanes.....consequently, the backups were to Highway 94 probably all the way to Rosarito Beach.

Rather than more examples of the completely inadequate coordination of agency people in the area
County, City, Calfire, Caltrans, etc.

I offer this: There are FOUR gas stations on the corners of Governor and Genesee. There are two schools a 1/2 block away going east and west on Governor. Of course, the high school and the Rec Ctr / athletic fields all contributing to potential problems. IF OR WHEN there should there be any kind of issue, explosion, accident, fuel spill and that intersection was CLOSED.....well OMG

SIR MAYOR – I can not believe you got sucked up into this decision and as to you Council woman
your legacy will be tainted for years to come....as soon as the first_____

I've only been in University City for a brief stint and will be moving soon so I have no 'ax to grind'

On Sun, Jul 24, 2016 at 4:03 PM, Citizens for the Regents Road Bridge <contactus@citizensfortheregentsroadbridge.org> wrote:



RF-1-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RF-1-1

Randy Fillat (July 24, 2016)

ATTACHMENT TO
COMMENT LETTER RF-1

ANNOUNCEMENT: Website Updates! Also PDEIR Comment Deadline Reminder

Dear Bridge Supporter:

For those of you who could make it, thanks for attending our meeting last Wednesday. There were some suggestions for website updates and I finally got the time to get those implemented. Two things have been added to the website:

1. **DOWNLOAD A PETITION FORM:** The PETITION page on our website has a button for downloading a copy of the Petition form for anyone who wants to support our petition effort. If you run out you can print one in a pinch. You may also email Carole Pietras at carole.cfrfb@gmail.com to ask for more copies. There is a "Download a Petition Form" button on the following page:

<http://www.citizensfortheregentsroadbridge.org/petition.html>

1. **GUIDANCE FOR WRITING EMAILS AND LETTERS:** A new set of pages has been implemented under Writing Emails & Letters main menu selection. The main page there is encouraging people to write letters on the Draft PEIR. The two pages under that menu selection are **Writing Ideas**, and **Writing Addresses and Information**.

The **Writing Ideas** page has examples of subjects that can be written about the City's Draft Program Environmental Impact Report (Draft PEIR). You may copy these ideas and use them in your own letters and emails. **(Please do a little rewriting so they are not used exactly word for word).**

<http://www.citizensfortheregentsroadbridge.org/writing-email-letters.html>

CITY DRAFT PEIR COMMENT SUBMISSION DATE COMING UP: Finally, the deadline for sending comments on the Draft PEIR is fast approaching - technically August 1, 2016 - a week from tomorrow. We recommend getting your comments on by Friday, July 29th.

If you haven't had a chance to download the Draft Program Environmental Impact Report (PEIR) yet then you can do that at the following URL:

<https://www.sandiego.gov/planning/programs/ceqa>

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LETTER

ATTACHMENT TO
COMMENT LETTER RF-1

This Draft PEIR is the document that will be used to justify the elimination of the Regents Road Bridge from the University Community Plan.

The Draft PEIR is a lengthy document with a number of appendices. If you haven't been reading it yet, you may want to download it and take a look at the table of contents to find one or two areas to focus on.

We would love to see many people sending in single issue emails. Long complex emails may not be dealt with or interpreted correctly, but if you are passionate and want to write something lengthy please be our guest.

One other suggestion: You can send in your comments to the City Planning Department and then wait a week to a month before sending comments to the Mayor and the City Council. You would be informing them of the email you sent to the City Planning Department and perhaps adding more criticism about the whole process.

ADDRESS INFORMATION

Comments to the City Planning Department will be sent to Ms. Susan Morrison:

To send by email address the text to Susan Morrison, Environmental Planner, City of San Diego Planning Department at the following email address

PlanningCEQA@sandiego.gov

If you are sending a letter please get it in soon to the following address:
Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010 Second Avenue, East Tower, Suite 1200, MS 413, San Diego, CA 92101

PROJECT ID: Also please note in the heading or first paragraph of your letter or email the specific identification of the project we are writing about:

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. [2015121011](#)

COMMUNITY AREA: University

COUNCIL DISTRICT: 1 (Lightner)

Thanks to you all for your enthusiasm and support. We're doing well.

DONATIONS: One last plea, please consider a donation. We're getting some pretty big bills for legal and traffic engineering work and could use a little more help.

RESPONSE

Randy Fillat (July 24, 2016)

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LETTER

RESPONSE

Randy Fillat (July 24, 2016)

ATTACHMENT TO
COMMENT LETTER RF-1

There are two basic ways to donate:

(1.) Send a check made payable to **CFRRB, CFTRRB, or Citizens for the Regents Road Bridge** to our address: 4079 Governor Dr. #165, San Diego CA 92122

(2.) For your convenience, use our secure credit card donation capability via PayPal at the DONATE button on this page. (Using PayPal does incur some small transaction costs and for donations under \$20 it is recommended that you use the "send a check" option.)

Thanks everyone. Talk to you soon.

Sincerely,

Austin Speed, President
Citizens for the Regents Road Bridge

©2016 Citizens for the Regents Road Bridge | 4079 Governor Dr. #165, San Diego, CA 92122

[Web Version](#) [Forward](#) [Unsubscribe](#)

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Thank You.

RANDY FILLAT

Devil's Advocate Consulting Group
| information |

LETTER

RESPONSE

William G. Griswold (July 24, 2016)

From: [William Griswold](#) on behalf of [William G. Griswold](#)
 To: [E.N. Baconing@UCSD](#)
 Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
 Date: Sunday, July 24, 2016 12:34:03 PM

As a 25-year resident of University City, I strongly support the Draft EIR's identification of the Project (i.e. No Regents Road bridge, No widening of Genesee Ave.) as the environmentally superior alternative.

The Regents Road bridge project would be especially damaging to Rose Canyon. My family and I are regular users of Rose Canyon for walking, biking, and enjoying the quiet and the wildlife. Deleting the Regents Road bridge project from the Community Plan would protect Rose Canyon, preserving our experience and the wildlife of this wonderful park.

The Draft EIR says that the projects would draw traffic off the freeways and into our neighborhood. My children attend Standley Middle School, and would be subject to this traffic when crossing Regents Road at Governor. Already this intersection is intimidating and dangerous, and it would become much worse with the added traffic.

I thank the City for moving to delete the obsolete the Regents Road bridge and Genesee widening projects.

Sincerely,

William G. Griswold
 2769 Schenley Terrace
 San Diego, CA 92122

WG-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

WG-1-1

LETTER

RESPONSE

Jan Hawkins (July 24, 2016)

From: [Jim and Jan Hawkins](#)
To: [PLN_Banjo@UCJH](#)
Cc: [Friends of Rose Canyon](#)
Subject: Important to delete Regents Road Bridge
Date: Sunday, July 24, 2016 10:28:54 AM

Deleting the bridge from the community plan is an important antidote to Nature Deficit Disorder. See front page article in Sunday, July 24th Union Tribune.

Jan Hawkins
3233 Wellesly Ave.
San Diego, CA 92122

JH-1-1

JH-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Christopher Nielsen and Dr. Paula M.D. Fitzgerald (July 24, 2016)

From: Chris Nielsen
To: PLN Planning/EIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 24, 2016 8:52:42 AM

To the Planning Department of the City of San Diego:

We strongly support the deletion of the Regents Road bridge project and the widening of Genesee Avenue from the University Community Plan. We want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road bridge project.

The deletion of the bridge from the community plan will help protect Rose Canyon from environmental damage, which has been impacted by recent railroad construction in the canyon and will recover slowly. The bridge would damage water quality in Rose Canyon, adding petroleum products to the water that flows into Mission Bay, particularly during periods of heavy rain. The constant noise from cars travelling on the bridge would degrade the experience and enjoyment of Rose Canyon as a park. The bridge would disrupt the movement of wildlife in the Canyon. Please delete the bridge project from the Plan.

The draft EIR states that both the bridge and the widening of Genesee will draw freeway traffic to our local streets, increasing road speeds and posing a danger to pedestrians, school children, and bicycle riders. The widening should be deleted from the Plan.

Deletion of these two projects will free up the funds that have been tied up in these unwise projects for use in other important community projects.

Thank you for your consideration.

Christopher Nielsen
Dr. Paula M.D. Fitzgerald

4225 Caminito Cassis
San Diego, CA 92122

NF-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

NF-1-1

LETTER

RESPONSE

Sam Strong (July 24, 2016)

From: [Sam](#)
To: [PLN PlanningCEQA](#)
Subject: RE: University Community Plan Amendment No.480286/SCH No.2015121011
Date: Sunday, July 24, 2016 5:23:37 PM
Attachments: [UCP \(1\)V2.doc](#)

Susan Morrison,

Please see [revised](#) attachment.
Sam Strong

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LETTER

Samuel O. Strong
Helga Martin Strong
3008 Curie St.
San Diego, CA 92122
(858) 452-8167

RESPONSE

Sam Strong (July 24, 2016)

July 22, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200 MS 413
San Diego, CA 92101

Dear Susan:

Please accept the following comment on the Draft Program Environmental Impact Report (Draft PEIR) which addresses the project recommended by the University Community Plan Amendment:

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

After pursuing the Draft PEIR I found it to be very lengthy and complex. It probably cost the city over \$500,000 to have it prepared. I consider this to be a horrible waste of tax payer dollars. There is no need for this Draft PEIR or the amendment, for that matter. The Plan should NOT be amended.

The Regents Road Bridge was included in the original plan, it was approved by the City Council and should be built. The bridge is needed and there is no logical reason not to proceed with plans and construction.

Build it now.

Sincerely,

Sam Strong

SS-2-1

SS-2-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Diane Ahern (July 25, 2016)

From: [Diane Ahern](#)
To: [PLN Planning/CEQA](#)
Subject: Project Name "University Community Plan Amendment" and Number "No. 480286"
Date: Monday, July 25, 2016 7:14:37 AM

Comment:

Based on the - **Recommended Finding:** *The draft PEIR concludes that the proposed project would result in significant and unmitigated environmental impacts in the following areas: Transportation/Circulation, Air Quality, Greenhouse Gas Emissions, Noise, and Public Services and Facilities. All other impacts analyzed in this draft PEIR were found to be less than significant - I feel the the Regents Road Bridge and the Genesee Avenue Widening projects should NOT be removed from the plan. These projects should remain in the plan as options to improve Transportation/Circulation, Air Quality, Greenhouse Gas Emissions, Noise, and Public Services and Facilities in the affected areas.*

DA-1-1

DA-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. Commenter also reiterates the Project's significant and unmitigated environmental impacts and that the No Project Alternative would result in fewer impacts than the Project, similar to what is discussed in Table 9-1. Please see response to comment Citizens-2-24 as Table 9-1 has been revised in the Final PEIR.

Diane Ahern
aherndiane@gmail.com
C 630-254-0912
H 858-246-6064

LETTER

RESPONSE

Dan Gertler (July 25, 2016)

From: Dan Gertler
To: PLN_Planning_CEOs
Subject: University Community Plan Amendment Project No. 480286 / SCH No. 2015121011
Date: Monday, July 25, 2016 2:23:43 PM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Susan,

Please keep the Regents Rd Bridge in the UC Community Plan. Many residents wish it to be built, however their voices are drowned by the artificially noisy anti-bridge crowd. I understand the Draft PIER wants to eliminate the bridge but it should remain in the plan for the following reasons:

1. Bridge construction provides a multitude of local jobs.
2. Traffic congestion is already obscene in UTC and desperately needs relief. Many of us work full time and don't want to spend our free time sitting in traffic.
3. People have more enjoyment, more productivity, better health, and spend more money in the local economy when they spend less time in their cars.
4. Rose Canyon is by no means a pristine wilderness--it already has a sewer line and a railroad track in it, with plans for more railroad tracks.
5. An enormous majority of the bridge's opponents cite false reasons to back their stance when the true reason is pure selfish NIMBYism.

Please keep the bridge in the plan and give it the chance it deserves.

Thank You,
Dan Gertler

DG-1-1

DG-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Cynthia Jenson-Elliott (July 25, 2016)

From: [Cynthia Jenson-Elliott](#)
 To: [P.N. Bagnino/213](#)
 Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
 Date: Monday, July 25, 2016 10:35:56 PM

Dear City Planners,
 I STRONGLY support the effort to wipe the Regents Road extension bridge over Rose Canyon, and the widening of Genesee Avenue through Rose Canyon off of any and all plans for the city. These projects are so damaging to a canyon that is a treasure for our community. I have been to many city council meetings to show my support for getting rid of these damaging plans, and have spoken publicly, as have my children, against the Regents Road bridge and the widening of Genesee. We have so many roads and so little open space, that it is time the city made a complete commitment to saving our Rose Canyon open space and completely wiped these plans from the books. Thanks for listening. If you have any questions, please feel free to contact me.
 Sincerely,
 Cynthia Jenson-Elliott
 2615 Luna Ave.
 San Diego, CA 92117
 858-270-3757.

CJE-1-1

CJE-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

E.L. Lotecka (July 25, 2016)

From: E.L. Lotecka
To: PN_PlanningCEQA
Subject: Issue 1: Long-Term Public Reliance on Community Plan
Date: Monday, July 25, 2016 5:06:19 PM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

The University Community Plan was adopted by the City Council on July 7, 1987. <https://www.sandiego.gov/planning/community/profiles/university/plan> Fees have been collected from developers and deposited into the Facility Benefits Assessment (FBA) fund to pay for the infrastructure improvements, including the Regents Road Bridge.

Funding and sequencing of the projects are prescribed in the FBA Financing Plan, which has been updated and approved annually by every City Council since the establishment of the FBA. Businesses and residents, making important choices about their future, have relied on funding of the Bridge for crucial access. That reliance should be considered a contract to be honored, not breached.

ELL-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ELL-1-1

LETTER

RESPONSE

Elisa Parker (July 25, 2016)

From: [Elisa Parker](#)
To: [B.N. Planning/CEQA](#)
Subject: Comments on Genesee Widening and Regents Bridge
Date: Monday, July 25, 2016 4:44:47 PM

We have lived in UTC for almost 16 years and have seen the tremendous increase of traffic on Genesee after 3pm going south. If I have to go to just the store, I cannot get across either way east or west. Cars stop in the middle of the intersection and go through red lights. Our church is on Governor so any activities or services during the week are almost impossible to attend. If I try to go to the 805, the wait time to get on the freeway can be 20 minutes or more to go south. They are building more housing here and I only see this situation getting worse.

The politicians who support taking the expansion of Genesee and building the bridge out of the plan, do not live here or have to deal with the situation. It is very dangerous. My husband has health issues and to get an ambulance here is also difficult.

I am asking that the plan remain with at least the bridge so there is another north/south route.

Thank you
Elisa Parker

Sent from my iPad

EP-1-1

EP-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Katie Rodolico (July 25, 2016)

From: [Katie Nelson Rodolico](#)
To: [PlN Planning/CEQA](#)
Subject: University Community Plan Update / Project No. 480286
Date: Monday, July 25, 2016 8:51:33 PM

Ms Morrison -

In the course of reviewing information on the University Community Plan Draft PEIR I noticed that the UPTOWN community plan is also under Draft EIR comment period.

However, that draft EIR was published 7 days earlier(6/10/2016 vs 6/17/2016), and has a comment period going 7 days later (8/8/2016, vs UCP's deadline of 8/1/2016). In other words, the Uptown community plan EIR is being given 2 additional weeks, compared to the University community plan.

Why is the University community plan being given a shorter public comment period?

Katie Rodolico

KR-1-1

KR-1-1

Commenter is asking why the University Community Plan Amendment PEIR was given a shorter public comment period of 45 days compared to the Uptown Community Plan Update EIR's 60-day public comment period. Pursuant to CEQA Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by State Agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft PEIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft PEIR was available for public review from June 17, 2016 through August 1, 2016, a 45-day timeframe consistent with the public review period requirements under CEQA. As such, the requisite public review period was fulfilled pursuant to the CEQA Guidelines.

In accordance with San Diego Municipal Code §128.0307, Requests for Additional Public Review Time on the Draft Environmental Document, "The Planning Director may approve a request from the affected officially recognized community planning group or interested party if there is no officially recognized community planning group for an additional review period not to exceed 14 calendar days. The additional time for review shall not extend the time for action beyond that required under law." The University Community Planning Group, as "the affected officially recognized community planning group" did not request an additional review period beyond the 45 day comment period occurring between June 17, 2016 and August 1, 2016.

LETTER

RESPONSE

Katie Rodolico (July 25, 2016)

From: [Katie Nelson Rodolico](#)
To: [PLN Planning/CEQA](#)
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Monday, July 25, 2016 11:37:49 AM

Dear Ms. Morrison:

Will the University Community Plan Amendment trigger the use of the CAP checklist that is posted on the CEQA website? I ask because the checklist was instigated following a City Council vote on July 12th, and the DRAFT PEIR for the UCP amendment was released on June 17th. Are the amendment and DRAFT PEIR grandfathered in to a pre-CAP Checklist environment.

KR-2-1

I'd appreciate your response.

Thank you,

Katie Rodolico
858-774-3041
ktnelson@yahoo.com

KR-2-1

The CAP Consistency Checklist is applicable to new land use development projects. As such, the Project is not considered new land use development; therefore, completion of the CAP checklist is not required.

LETTER

RESPONSE

Katie Rodolico (July 25, 2016)

From: [Katie Rodolico](#)
To: [PLN PlanningCEQA](#)
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Monday, July 25, 2016 2:03:37 PM

Attn Ms. Susan Morrison:

The University Community Plan calls for building the Regents Road bridge. The DRAFT PEIR looks at the impact of removing the bridge from the community plan.

The community needs the bridge built. It is clear in the PEIR that the community is harmed if the bridge is removed from the community plan. Increased traffic on Genesee, SR52, I-5, and freeway 805 would cause significant increases to greenhouse gas emissions. We live surrounded by these freeways and breathe this air. Providing additional paths would allow cars to move more freely, less idling at stop lights, and lower greenhouse gas emissions.

The community was built concurrent with the UCSD campus development. Streets in University City are named after Nobel Prize winners and college themes. But the major route to reach UCSD from south University City has been blocked from being built by people who would rather their neighbors spend more time in traffic and have longer commute times.

The bridge was re-affirmed in 2006, then killed in a committee. The need for the bridge never went away. This report clearly shows how important it is to build the Regents Road bridge.

We need to build it to prevent increased pollution, to provide a better path for bicycles and pedestrians, to improve public safety, and to provide a good infrastructure basis for the job centers in North UTC.

I love our city and our neighborhood. I love our open spaces and want to see better access to Rose Canyon. Building the bridge would allow another entry point to the canyon.

Katie Rodolico

KR-3-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KR-3-1

LETTER

RESPONSE

Katie Rodolico (July 25, 2016)

From: [Katie Nelson Rodolico](#)
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: University Community Plan Amendment; PROJECT No. 480286 / SCH No. 2015121011
Date: Monday, July 25, 2016 11:22:45 AM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Susan Morrison, Environmental Planner
City of San Diego Planning Department,
1010 2nd Ave, East Tower, Suite 1200, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

I am writing to state my opposition to the proposed University Community Plan Amendment based on the data in the DRAFT PEIR, issued on 6/17/2016.

The community of University City needs the connection across Rose Canyon. Providing a bridge above the canyon provides a bike and pedestrian friendly path to cross between the North and South parts of our community. Families that are in the Doyle Elementary boundaries would be able to walk or ride bikes to Spreckels Elementary - where many are being sent due to overcrowding at Doyle. Having a bike or pedestrian friendly path that does not drop to the bottom of the canyon makes alternative transportation more accessible for people looking to avoid the significant grades that exist on Genesee.

Rose Canyon is a great resource for the community, similar to Marian Bear Park in San Clemente Canyon. Marian Bear is more utilized, however, because there is access and parking. Rose Canyon is limited in its use because people can only park at UCHS when school is not in session. I regularly walk and bike in Rose Canyon - and am usually the only person in the canyon. Contrast that to San Clemente canyon, Marian Bear park, where I regularly see runners, bikers, hikers, and families enjoying nature.

The community NEEDS the Regents Road Bridge completed. For environmental reasons and community reasons. Please don't let a vocal few harm the community at large.

Katie Rodolico, long time resident of University City, alumni of Curie Elementary.

KR-4-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KR-4-1

LETTER

RESPONSE

Katie Rodolico (July 25, 2016)

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Susan Morrison, Environmental Planner
City of San Diego Planning Department,
1010 2nd Ave, East Tower, Suite 1200, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

This letter is in response the Draft PEIR issued on June 17, 2016.

It is clear to me, and anyone who reads this document, that the **environmental benefit of BUILDING the Regents Road Bridge is overwhelming**. The project is defined as NOT building the bridge. The project should **not** be allowed to move forward.

- The project, as described in the CEQA document, will worsen air quality.
- The project, not building the bridge, will cause unacceptable levels of service for emergency response that is not mitigatable.
- The project, not building the bridge, will increase noise levels on the Genesee corridor.
- The project, not building the bridge, will create unacceptable levels of service for traffic on Genesee, 805, 52, and 5.

The city recently passed the Climate Action Plan. This CAP calls for the city to reduce greenhouse gas emissions. (See pg 17 of the CAP). The Draft makes it clear that if you eliminate the bridge GREATER greenhouse gas emissions will occur due to cars idling in traffic. If the city is to comply with the CAP, it is required that they look at the PEIR and reduce emissions when possible. That would mean NOT approving the project.

Additionally, building the bridge will provide a route that is better for pedestrians and bicycles wishing to cross Rose Canyon. This is sorely needed since the Genesee route across Rose Canyon dips all the way into the canyon – which makes it unfriendly to bicycles and pedestrians who don’t want to have significant elevation changes. Having bike and pedestrian friendly routes will help the city meet its goals outlined in the Climate Action Plan for alternative transportation.

One of the mitigations mentioned is to convert the 4 lane section of Genesee to 6 lanes, *without widening Genesee*. The only way this mitigation could occur is if bike lanes and sidewalks were removed or narrowed. This is in direct conflict with the stated goals of the CAP to improve alternative transportation. This mitigation makes the problem worse, rather than better, for the community at large.

The University Community Plan amendment should be denied outright. It is bad for the environment, bad for the community, bad for the city as a whole. Please don’t let a vocal few harm the community for NIMBY reasons. The data is clear – the amendment should not be allowed and the bridge should be built.

Katie Rodolico
5906 Dirac Street, San Diego, 92122.
Resident of University City since 1966.



KR-5-1	Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
KR-5-1	
KR-5-2	As discussed in response to comment KR-2-1, the Project is not considered a land use development project. In addition, as discussed in Section 4.5 of the Draft PEIR, the Project was conservatively assumed to not be consistent with the City of San Diego CAP. That finding does not affect the approval of the Project.
KR-5-2	
KR-5-3	
KR-5-3	Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
KR-5-4	
KR-5-4	Please see response to comment Citizens-1-5.
KR-5-5	Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Marcia Munn (July 25, 2016)

July 25, 2016

PROJECT NAME: University Community Plan Amendment

PROJECT NO. 480286 / SCH No.2015121011

COMMUNITY AREA: University

COUNCIL DISTRICT: 1 (Lightner)

Susan Morrison, Environmental Planner:

My Comments regarding the Draft Program Environmental Impact report (PEIR) document:

This document indicates some of the problems of connectivity between South and North University City. As 46-year residents of South UC, residing near Genesee Avenue, my husband and I are disappointed that existing significant traffic problems in this community are not adequately addressed. This "rushed to finish" report appears to have one goal: Solve the dilemma by removing the one piece of infrastructure that was always planned to make the community work: The Regents Road Bridge!

In 2006, following an exhaustive 2-year EIR which studied 6 possible alternatives for tackling the traffic issue, the City Council voted 6-2 to build the **Regents Road Bridge**. The Bridge would have provided us with four additional traffic lanes, two northbound and two southbound, one designated bike lane, and 1 designated pedestrian lane in each direction. Traffic flow would be shared by Genesee Avenue and Regents Road. Law suits and political weakness have prevented this common sense solution from being realized. (FBA funds will finance the construction of the Regents Road Bridge).

This report begins by pointing out the obvious. South University City suffers from lack of connectivity and traffic congestion which increases yearly.

PEIR Report: No adequate public transportation, existing or planned, for South U.C.

My comment:

1. South UC residents have minimal bus service to businesses, mega medical facilities (Scripps Memorial, UCSD Medical Center, Scripps Green and many satellite medical offices springing up throughout the northern sector), University Town Center, and UCSD, which continues to expand.
2. These above-mentioned institutions attract thousands of employees, clients, shoppers, and patients every day, commuting by automobile.
3. Only scant intra-community bus service exists on Governor Drive, even with the planned increase of apartment buildings at the east end of Governor.
4. The proposed trolley will not link with South UC.

The Regents Road Bridge will improve access for South UC residents to the proposed trolley in North UC, by bus, bicycle, walking, as well as by automobile.

PEIR REPORT: Lack of protected bike lanes and resulting accidents.

MM-1-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

MM-1-1

MM-1-2

Updates have been made to Draft PEIR Section 2.1.2 (page 2-4), Section 2.1.3.5 (page 2-7), Section 2.1.4.5 (page 2-12), and Section 4.2.1.2 (page 4.2-10) to add additional text discussing the existing public transit in the South University Area. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

MM-1-2

MM-1-3

Comment acknowledged. Section 4.2.8 of the Draft PEIR discusses alternative transportation. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

MM-1-3

LETTER

RESPONSE

Marcia Munn (July 25, 2016)

My comment: The only existing bike route between North and South UC is Genesee Avenue which is already extremely impacted with traffic generated by conditions mentioned in my first comment. Also the steep hills in both directions make that route a challenge for even young and "fit" bikers.

MM-1-3
cont.

The Regents Road Bridge will provide designated bike lanes and encourage many adults as well as school children to safely use them. Elimination of the bridge will terminate any possibility of meaningful bicycle transportation in this community.

PEIR REPORT: Walkability is difficult and often dangerous.

My Comment: Walking is a challenge especially for school children attempting to reach or depart 4 public schools located practically on or near the hazardous intersection of Governor Drive and Genesee Ave.: **UC High, Standley Middle School, Curie Elementary, and Spreckels Elementary.**

MM-1-4

Comment acknowledged. This comment does not address the adequacy of the Draft PPEIR, but is part of the administrative record and will be considered by the City during the decision-making process.

Because of concern that South UC parents have for the perilous Governor/Genesee intersection, **many drive their kids to school, thus increasing traffic at morning and afternoon rush hour.**

MM-1-4

Next year, due to overcrowding at **Doyle Elementary School in North UC**, overflow students also will be attending schools in South UC. The Regents Road Bridge would provide a safe, alternate route to Genesee Ave

PEIR REPORT: Does not adequately address the safety issues in South University City.

MM-1-5

The Draft PPEIR includes analysis of public services and facilities. As discussed on page 4.13-19 of the Draft PEIR, the Project would result in an increase in projected traffic in the future year. The impact on police and fire and emergency service response times would be significant. Mitigation Measures TRA-1 and TRA-2 would result in improvements to intersection and road segment operations, and traffic conditions would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Further, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP and, thus, cannot be guaranteed at this time. Therefore, impacts to emergency service providers associated with the Project would remain significant and unmitigated at the program level.

My Comment: The one fire station that serves our community is located in North UC. During peak traffic hours, these vehicles cannot reach emergency destinations in South UC, medical or fire, without crossing the median on Genesee Avenue and traveling against the north-bound traffic. When Genesee is shut down because of accidents, etc., residents are left without emergency service except from stations in other communities. Patients must be transported to more distant hospitals.

MM-1-5

Our District 1 Council Rep. attempted to address this situation by renting a house on the west end of Governor Drive for a medical emergency truck and team. This may work for people who live on the west end, but it's not very effective when a crisis occurs east of Genesee Avenue at rush hour.

SUMMARY:

The most stunning conclusion extracted from this PEIR Report is that there's one adequate solution to the traffic morass in University City: **Connecting Regents Road with a lofty bridge spanning Rose Canyon.** The irony is that the best solution (**The Bridge**) is the one The City of San Diego wants to eliminate.

MM-1-6

Respectfully submitted,

Marcia Munn

6255 Radcliffe Drive, San Diego, CA 92122 (858-453-4563)

MM-1-6

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Marcia Munn (July 25, 2016)

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LETTER

RESPONSE

Virgil Elliott (July 26, 2016)

July 26, 2016

Ms. Susan Morrision
Environmental Planner
City of San Diego Planning Department
1010 Second Ave
East Tower, Suite 1200
M.S. 413
San Diego, CA 92101

Reference: DRAFT ENVIRONMENTAL IMPACT REPORT (PEIR) I.O. 21003841

Comment No. 1 Regents Road Bridge :

How is it possible to eliminate a critical transportation element between two communities, (which has been planned for years with approach roads already started on each end) from the community plan without a concurrent process covering both planning areas affected? I realize the bridge link falls solely in the University City planning area but your removal of the bridge surely negates previous studies that were relied upon for approved housing elements in the Clairemont Mesa planning area based on the bridge being construction in the future.

VE-1-1

VE-1-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Comment No. 2 Financial Payment Previously Collected:

Please identify all residential units in both University City/Clairemont planning areas built since 1970 that may have been required to make a per unit payment specifically for the Regents Road Bridge. How will the City of San Diego reimburse the housing unit land owners that made payments for the bridge if it is removed from the plan and will interest be included in the reimbursement?

VE-1-2

VE-1-2

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Comment No. 3 Traffic Studies vs Planning Area Studies

It seems to me that if one planning area could possibly eliminate such a major transportation link from their plan; a serious precedence is being entertained in this PEIR . The residents of the Clairemont Mesa deserve an equal process.

VE-1-3

VE-1-3

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Submitted By: Virgil Elliott
5228 Biltmore Street
San Diego, CA 92117



LETTER

RESPONSE

E.L. Lotecka (July 26, 2016)

From: E.L. Lotecka
To: PLN PlanningCEQA
Subject: Issue 2: Regents Road Bridge will reduce greenhouse gas (GHG) emissions
Date: Tuesday, July 26, 2016 9:28:06 AM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

By placing a greater priority on long-term greenhouse gas (GHG) reductions to align with state goals and regional equity, San Diego can ensure the region will attract maximum federal and state revenues and drive economic growth and overall sustainability.

"With the passage and continuing implementation of AB 32 and SB 375, the focus of transportation planning is increasingly centered on reducing GHGs, improving equity and health, and achieving long-term sustainable economic growth. SB 375 requires regions to reduce emissions by providing efficient and affordable transportation choices and smart innovative land use policies that will allow Californians to drive less. This can be achieved by investments in expanding public transportation, increasing biking and walking, and reducing the distance in between key destinations such as job centers, housing, education, and healthcare." <http://www.circulatesd.org/transnettoday>

ELL-2-1 Comment noted.

ELL-2-1

LETTER

RESPONSE

Susan Breisch (July 27, 2016)

From: Susan Breisch
To: PLAN_Banning@CFIA
Subject: #480286/2015121011
Date: Wednesday, July 27, 2016 9:51:41 AM

Project Name: University Community Plan Amendment

I am writing in strong support of deleting the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan. The city's leadership in moving to delete these two costly, unnecessary and environmentally damaging projects is appreciated.

The project would negatively impact the water quality of Mission Bay by degrading Rose Creek as it flows into the bay. In addition, our enjoyment of the wonder and peace within Rose Canyon would suffer. Deleting the projects will protect Rose Canyon for generations of school children and adults who seek calm and inspiration from nature.

Susan Breisch
4735 Mt. Ashmun Drive
San Diego, 92111

SB-1-1

SB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Robert Byrnes and Theresa Fassel (July 27, 2016)

From: [L.H.](#)
To: [City of Bismarck, ND](#)
Subject: University Community Plan Amendment, No. 460266/SCH No. 2015121011
Date: Wednesday, July 27, 2016 2:15:56 PM

I strongly support the deletion of the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

Rose Canyon Open Space Park needs to be preserved without further degradation.

Robert Byrnes and Theresa Fassel
4018 Nobel Drive Unit 305
San Diego, CA 92122
(858) 750-3943

RBTF-1-1

RBTF-1-1 Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

James DeShazo (July 27, 2016)

From: James a DeShazo
To: PLN_Planning/CEQA
Subject: For Susan Morrison, Environmental Planner,
Date: Wednesday, July 27, 2016 9:19:08 PM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Comments on UC Draft EIR---Regents Road Bridge

From the Draft EIR-

Section 9.3 Environmentally Superior Alternative

Paragraph 1 in this section is not logical or to the point! It compares the "No Construction of the bridge to building a Emergency/Bicycle bridge across the canyon—the issue is Regents Road bridge or no bridge!

JD-1-1

JD-1-1

As discussed in Chapter 9.0, Alternatives Analysis, on page 9-1 of the Draft PEIR, CEQA requires that a discussion of alternatives to the project be provided. Specifically, Section 15126.6(a) of the CEQA Guidelines states that an EIR shall, "[d]escribe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states, "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." This is defined in the same section of the CEQA Guidelines as not meaning every conceivable alternative to the project, but only a reasonable range of potentially feasible alternatives.

Paragraph 2 in this (section 9.3) -Promises the " no bridge option" will fulfill "three" Project Objectives—but only gives one—"biological resources". This implies providing partial shade for some -TIC- filled weeds is more of an environmental problem- than traffic impact on Genesee!

JD-1-2

Paragraph 3 (section 9.3) is not supported by traffic analysis—EIR states otherwise in many sections and does not take into consideration growth of the UC are, closing of Doyle school, UC expansion, new residential towers etc. Also Para 10 states traffic is still a significant issue—this Para is completely false as stated in the EIR.

JD-1-3

JD-1-4

James DeShazo
3660 Syracuse CT
San Diego 92122
University city resident since 9/1969

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

Therefore, the alternatives identified in the Draft PEIR analysis considered (1) significant impacts from the Project that could be reduced or avoided by an alternatives, (2) project objectives, and (3) feasibility of the alternatives available. The alternatives presented in the Draft PEIR are in accordance with CEQA Guidelines.

LETTER

RESPONSE

James DeShazo (July 27, 2016)

JD-1-2 The No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative is now the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative in the Final EIR.

As revised in Section 9.3, Environmentally Superior Alternative, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon and would not involve improvements outside of the existing Genesee Avenue right-of-way. This would consist of restriping the existing four-lane roadway to a six-lane roadway within the existing right-of-way and potentially involve modification of the existing median. Lastly, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative seeks to provide transportation improvements that would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due to greater capacity when compared to the Project. Based on the discussion provided above, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative among the other proposed alternatives. Please refer to the Clarifications and Modifications section for text revisions.

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JD-1-3 Please see response to comment JD-1-2.

JD-1-4 Comment noted.

LETTER

RESPONSE

James DeShazo (July 27, 2016)

From: James a DeShazo
To: PLN PlanningCEQA
Date: Wednesday, July 27, 2016 9:19:27 PM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Section 9.3 Environmentally Superior Alternative

Paragraph 1 in this section is not logical or to the point! It compares the "No Construction of the bridge to building a Emergency/Bicycle bridge across the canyon—the issue is bridge or no bridge!

JD-2-1

JD-2-1

See response to comment JD-1-1 above.

Paragraph 2 in this section-Promises no bridge will fulfill "three" Project Objectives—but only gives one—"biological resources". This implies providing partial shade for some -TIC- filled weeds is more important than traffic impact on Genesee!

JD-2-2

JD-2-2

See response to comment JD-1-2 above.

Paragraph 3 is not supported by traffic analysis—EIR states otherwise in many sections and does not take into consideration growth of the UC are, closing of Doyle school, UC expansion, new residential towers etc.

JD-2-3

JD-2-3

See response to comment JD-1-3 above.

Jim DeShazo
3660 Syracuse CT
San Diego 92122
University city resident since 9/1969

LETTER

RESPONSE

Lynda Gilgun (July 27, 2016)

From: lgilgun@cox.net
To: [PLN_Blog@nrc.ca.gov](#)
Subject: University Community Plan Amendment, No. 480266/SCH No. 2015121011
Date: Wednesday, July 27, 2016 8:02:17 PM

I strongly support the deletion of the Regents Road Bridge project from the University Community Plan. As a Chula Vista resident, I have enjoyed visiting Rose Canyon and taking bird walks in the quiet canyon. I believe that a bridge would disrupt the wildlife and its movement through Rose Canyon. As an educator, I also realize the importance of having quiet, natural settings available for our children.

I would like to thank the City of San Diego for its leadership in deleting the bridge project so that the beautiful Rose Canyon can be preserved for all of the county residents to enjoy.

Thank you,
Lynda Gilgun
925 Monterey Court
Chula Vista, CA 91911

LG-1-1

LG-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Chiwei Hung (July 27, 2016)

From: Chiwei Hung
To: P.N. Bagnino/CF16
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Wednesday, July 27, 2016 11:34:04 AM

Dear Madam/Sir,

My name is Chiwei Hung and I moved to University City in 2015. When my partner and I moved to this lovely community, we are very intrigued to the beauty of the Rose Canyon. Walking my dog in the canyon after work has been a bless every day. The Rose Canyon will not be the same if the city allows the expansion of Genesee Ave and the construction of Regents Road Bridge.

I fully support the amendment to delete the Regents Road Bridge project and the widening of Genesee Ave from the University City Community Plan. I would like to express my gratefulness to the city mayor and council members for their support regarding the amendment to remove the outdated and ineffective projects.

Best Regards,

Chiwei Hung
3861 Camino Lindo, San Diego, CA 92122

CH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CH-1-1

LETTER

RESPONSE

Ariane Jansma (July 27, 2016)

From: Ariane Jansma
To: E.N. Bannister, PEIR
Subject: University Community Plan Amendment, No. 480266/SCH No. 2015121011
Date: Wednesday, July 27, 2016 2:22:31 PM

This is my official comment regarding the Amendment referenced above:

I want to begin by stating that I strong support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I very much appreciate the City for its leadership in moving to delete these two antiquated and unnecessary road projects.

It has been shown repeatedly that these two projects will not solve the traffic situation on Genesee. Instead, Regents Road Bridge and Genesee Widening would only pull traffic from the freeway, resulting in additional cars coming into our neighborhood. The widening of Genesee will mean that cars drive extremely fast the majority of the day when there is no traffic. Having a road that wide immediately in front of a high school where there are multiple children walking to and from school each day is hazardous and I fear since my son will one day attend UC High.

The Regents Road Bridge would not only bring more drivers and more cars, but will be devastating to Rose Canyon. This bridge would harm habitat for wildlife, wetlands and degrade water quality in Rose Creek.

My family and I have been living East of Genesee for almost a decade. Our son will begin Kindergarten at Curie Elementary this coming fall and we very much value our community. We love hiking and enjoying the beautiful natural resource that is Rose Canyon.

Again, I support the deletion of the two projects referenced above from the city plans. Thank you to our forward-looking leaders who recognize the need to develop efficient road projects while at the same time protect our natural resources. Thank you.

Ariane Jansma
4312 Huggins Street
San Diego, CA 92122
Mobile: 619-990-4539

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Ariane

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Ariane Jansma, Ph.D.
Assistant Professor, Chemistry
Point Loma Nazarene University
3900 Lomaland Drive
San Diego, CA 92106
Phone: 619-849-2623
Email to ajansma@pointloma.edu

AJ-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

AJ-1-1

LETTER

RESPONSE

E.L. Locteka (July 27, 2016)

From: [E. L. Locteka](#)
To: [PLN_PlanningCEQA](#)
Subject: Issue 3: Major developments magnify second north-south connection need
Date: Wednesday, July 27, 2016 9:37:23 AM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

Delay is increasing the pressure exponentially for Genesee Avenue arterial relief, especially with more than two dozen additional developments scheduled. An alternate route to Genesee is clearly necessary for alleviating severe congestion, frequent emergencies and anticipated closures due to construction on Genesee -- there must be another north-south community connector during inevitable trolley and lane additions.

As explicated in the PEIR: "Without the bridge, operating conditions of the Regents Road would continue to be impacted by ongoing growth and associated increases in traffic volumes,... elimination of the planned Regents Road Bridge would continue to exclude the ability of travelers to access the opposite side of Rose Canyon via Regents Road, thus reducing access provided to and from the community" Page 4.3-14

ELL-3-1

ELL-3-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

E.L. Loctecka (July 27, 2016)

From: E. J. Loctecka
To: PLN Planning/CEQA
Subject: Issue 4: Regional impacts of Regents Road Bridge Blockage
Date: Wednesday, July 27, 2016 4:55:57 PM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

The lack of Regents Road Bridge, (and subsequent Genesee Avenue expansion and trolley line from Old Town to UTC, VA Hospital and UCSD campus) impedes critical transportation as described in the PEIR. Notably, traffic flows on highways I-5, I-805, and CA-52 are unnecessarily overloaded by inefficiently diverted traffic.

Extensive areas north, south, east, and west are uneconomically affected by longer and slower trips. The area most directly affected by the Regents Road gap is Claremont neighborhoods as evidenced in their community newspaper: <http://clairemonttimes.com/2016/02/10/a-new-look-at-a-regents-rd-bridge/>

ELL-4-1

ELL-4-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

Louis A. Rodolico
5906 Dirac Street
San Diego, CA 92122
858-625-4453

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413, San Diego, CA 92101
PlanningCEQA@saniego.gov

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University

PUBLIC COMMENT

While driving my son to little league we were both witness to a middle school student being hit by a car and thrown onto the sidewalk like a ragdoll. We had been waiting in our car at the overburdened intersection of Governor and Genesee. Immediately adults came to the side of the child and were on their cell phones summoning assistance. The kid needed assistance to sit up and was obviously disoriented. Also, the neighbor of one of my co-workers was killed there on his bicycle in 2010.

We need to get serious about building this bridge, the risk is unacceptable and is even harder to accept given the bridge was paid for many years ago with Development Impact Fees.

With 30 or so ongoing projects, development in University continues unabated, yet we continue to talk about removing planned roads. There is a rush to get the Regents Road Bridge off the plan before several thousand new trips hit our community." The Project" does not resolve the problem by removing yet another planned road. We need the Regents Road Bridge and the Genesee widening should only be considered after the Regents Road Bridge is in service for several years. If we are serious about the Climate Action Plan the west termination of Governor should have at least a Class 1 bike path and pedestrian path to Gillman, with a small bridge spanning the railroad tracks.

I agree with the Executive Impact Synopsis on Table ES-1 of the DPEIR:

Transportation/Circulation

Issue 1: The Project (Not Building the Regents Road Bridge etc.) would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.

Issue 2: The Project (Not Building the Regents Road Bridge etc.) would result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp and the impact would be significant.

- LR-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
- LR-1-2 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
- LR-1-3 Comment acknowledged. Commenter opposed the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
- LR-1-4 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
- LR-1-5 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

Issue 3: The Project (Not Building the Regents Road Bridge etc.) would result in a substantial impact upon existing or planned transportation systems and the impact would be significant.
Issue 4: The Project (Not Building the Regents Road Bridge etc.) would result in a substantial impact to present circulation movements, including effects on existing public access areas and the impact would be significant.
Issue 5: The Project (Not Building the Regents Road Bridge etc.) would conflict with adopted policies, plans, or programs supporting alternative transportation modes identified in the Bicycle Master Plan and the impact would be significant.

Air Quality

Issue 1: The Project (Not Building the Regents Road Bridge etc.) would conflict with or obstruct implementation of the applicable air quality plan.
Issue 2: The Project (Not Building the Regents Road Bridge etc.) would cause a violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Greenhouse Gas Emissions

Issue 1: The Project (Not Building the Regents Road Bridge etc.) would increase greenhouse gas emissions compared to the Adopted UCP.
Issue 2: The Project (Not Building the Regents Road Bridge etc.) would conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions, including the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP.

LR-1-5
cont.

Noise

Issue 1: The Project (Not Building the Regents Road Bridge etc.) would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan as the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases.

Public Services and Facilities

Issue 1: The Project (Not Building the Regents Road Bridge etc.) would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police service response times and fire and emergency service response times would be significant.

The conclusion of the Executive Summary is clear, building the Regents Road Bridge will benefit the community. Removing the Regents Road Bridge would have significant negative impacts on: public safety, other planned infrastructure, transportation, emergency response times, conflagration egress, air quality and noise. Section 9.3 The Environmentally Correct Option is a qualitative fact free opinion that flies in the face of the Executive Summary on Table ES-1

Community Dynamic and why the City should not support this project:

Houses flanking Regents Road were purchased at a discount because of the looming bridge. These property owners have been lobbying for years to remove the bridge to increase their property values. Properties with large frontages can be divided, yielding these owners half a million dollars or more.

LR-1-6

LR-1-6

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

2/3 of the community wants the bridge but none of them can get a board seat on the University Community Planning Group. The word community does not apply here. During elections the board calls on seniors and tells them the bridge will bring crime but somehow not police, that the bridge will bring those people from the other side of UTC while not bringing better travel times to the hospitals. The University community remains physically segregated and bitterly divided over the bridge.

LR-1-6
cont.

In stark contrast to the Clairemont Times, the UCCA paper will not publish any articles favoring the bridge but UCCA gives substantial free "public service" coverage to all parties opposed to the bridge. Another misuse of the word community.

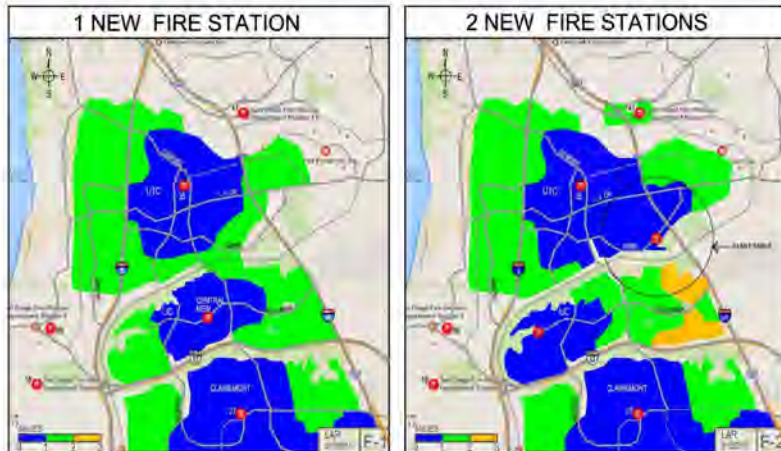
The Friends of Rose Canyon say the bridge will destroy the environment while simultaneously ignoring the climate action plan and refusing to acknowledge the 10 million pounds of CO2 the extra traffic pumps into the air each year. Much of the FORC funds are paid to its director and not for improvements to the canyon. Rose canyon has no parking, water or bathrooms. The canyon is poorly accessible and remains a quasi-private back yard.

LR-1-7

LR-1-7

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Resident observations on emergency response and travel times to hospitals.



The illustration F1 above left shows where the new fire station should be located. The current plan, which is under review, shows two fire stations (illustration F2) instead of one central fire station. The central fire station has better response times for the entire community. But the center of political power in our community is in west UC. As a result the west has granted itself it's own fire station F-2 which is too far from the east of the community with the rapidly expanding 55+ community.

LR-1-8

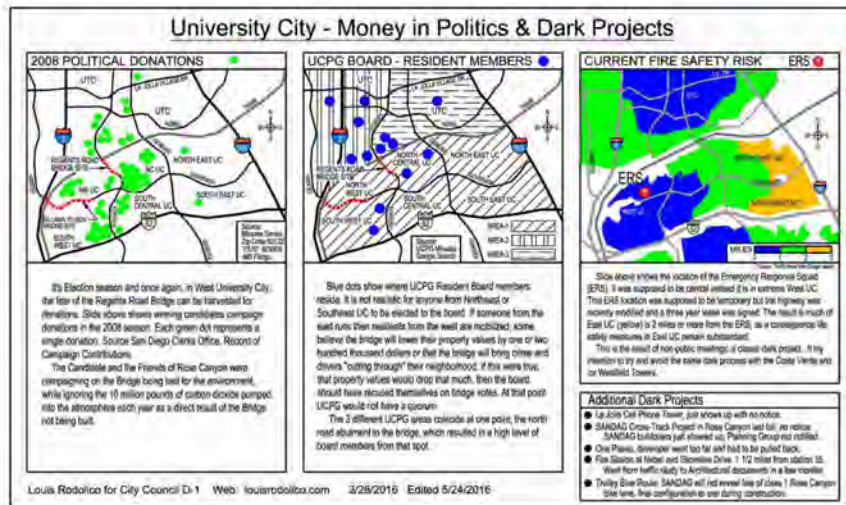
LR-1-8

Comment acknowledged. Commenter discusses the addition of a new fire station in the UCP area, which is not related to the Project. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Currently East UC residents or anyone who wants the Regents Road bridge built have very little say about these things, but they still have to pay taxes for them.

For calculations see: <http://clairemonttimes.com/2016/03/07/university-city-one-fire-station-or-two/>

Louis A. Rodolico (July 27, 2016)



The illustration above demonstrates the reality of money in politics and political power in University. Council person Lightner has driven a wedge through the center of the University community. Benefits like firehouses go to West UC and those of us in East UC can only stand by and watch as our liabilities pile up. Benefits like; the new West UC firehouse on slide F2 on the previous page as well as the current ERS above are both in West UC. The East always ends up with poor service times

What I find to be very disturbing is the request for anonymity from people including emergency personnel. There is an overriding fear of reprisal if individuals are identified with their opinion. So I offer anonymity as a matter of course.

Figure 4.2-6 does not match the traffic patterns on the Genesee Corridor.

Council should consider conflagration egress, safety for 3500 students, ambulance travel times, noise, pollution and 14 million dollars each year which is paid for by all 9 council districts.

It is my hope that those of us who live in East UC will not be pushed to the side once again. I urge all city agencies to vote for the Regents Road bridge and against "The Project"

Louis Rodolico

LR-1-9

LR-1-10

LR-1-11

LR-1-12

LR-1-9

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LR-1-10

The commenter assesses that Figure 4.2-6 does not match the traffic patterns on the Genesee Corridor. Figure 4.2-6 displays the Existing Roadway Segments Level of Service (LOS). Each roadway segment in the study area was evaluated by comparing the average daily traffic (ADT) volume (based on ADT counts conducted in May 2015) with the roadway's theoretical capacity based on its classification. This is a volume-to-capacity comparison and is a planning tool used to determine the general traffic demand on a segment. For more information on roadway segment LOS, refer to page 3-7 of the Transportation Impact Study (Appendix C).

LR-1-11

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LR-1-12

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Louis A. Rodolico (July 27, 2016)

Additional Resident Comment for the Record

From Louis A. Rodolico

Because of a lack of alternative routes, the traffic on the Genesee corridor creates an increased danger. This document contains information from community members, publications and my own observations. It tries to take a fresh look at Traffic & Fire issues. In Philadelphia I have served as a pro-bono community advocate for transportation projects in the 300 million dollar range and have been a resident of UC since 2001.

Planning is a centuries old art, the number of houses and businesses in this area were planned around the completion of the Regents Road Bridge and the extension Governor Drive West to Gilman Drive. The Governor extension to Gilman was removed from the plan decades ago. Climate Change and the intensity of recent fires points to a fresh look at this decision.

Over the next century, building the bridge will save the region about 1.4 billion dollars and result in about 1500 fewer traffic accidents involving, property damage, injury and death. All this loss so a few UC properties can gain a property value increase and or a more pristine view of the canyon, at the risk and expense of everyone else.

LR-1-13 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LR-1-13



Illustration 01 shows where there are no secondary north-south roads which are utilized for inter-community trips. We can see why so much traffic is funneled thru Genesee, it has the landfill and Marine Base to the east and two uncompleted roads to the west all placing additional north-south traffic on Genesee corridor.

The Interstates are primary roads that are also burdened by the incompletion of the bridge. Governor to Gilman was removed from the plan decades ago, and now the Regents Road Bridge is in jeopardy. Failing to build these arteries gives us the congestion and high accident rate we have today.

Carving out a private enclave in West UC puts additional load on the Genesee corridor and raises the accident and mortality rate for the community at large. No one is against living in a gated private community but it makes no sense to create one by carving out a hole in the planned urban road

LR-1-13 cont.

Conflagration & Fire Storms

With Climate Change, wildfires are an ever increasing risk. Many areas of the UC community currently have only one way out. It is sober safety practice to have multiple ways out. If there is another conflagration, like in 2003, then most if not all the roads are more likely to become grid locked. East UC residents will be directed away from the Genesee gridlock and east into the conflagration. Ironically the west residents, who are fighting the bridge, will receive the best route out. This puts emergency personnel in an impossible position. Instead of protecting persons

Louis A. Rodolico (July 27, 2016)

and property their priority becomes traffic and the added difficulty of positioning emergency equipment. Emergency responders have given up waiting for the Regents Road Bridge and are implementing other strategies, like the one year pilot rapid response team based in West UC. However the rapidly growing senior community is in Southeast UC.

Emergency equipment availability and access is something insurance company underwriters recognize when determining fire insurance rates. Governor to Gillman provides an excellent escape route and a means to bring equipment in from the north. The new bridges can also provide an area of refuge as shown in illustration 05.

The image to the right illustrates a new line of recently installed fire hydrants on Regents Road. The new line of hydrants will act as a fire barrier as a fire runs west through UC and the San Clemente Canyon. This is an effective way to keep Regents Road South open, for all of UC, during a conflagration. The new fire hydrant line will demand alot of water and equipment, it will remain necessary until the Regents Road bridge is built. Once the bridge is built Regents Road will be an un-manned exit. The fire line, equipment and manpower can all move to 805 thereby protecting all of UC as well as San Clemente Canyon. Once again not building the Regents bridge pits UC neighborhoods against eachother. West UC recieves a higher level of fire protection with more time to exit the area and lower fire insurance rates. This feeds into the narrative that West UC is a privileged enclave and the center of political power in UC.

LR-1-13 cont.

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Loss of Life

There are three schools, *Curie Elementary, Standley Middle, and UCHS*, with 3,500 students near the Genesee and Governor Intersection. It's a disgrace that any community would hold itself and their school children in such low regard. Pedestrians need to be extremely careful when crossing over-congested intersections on the Genesee corridor even if they have the right of way.

By having all the north south traffic meant to be shared by Governor to Gillman, Regents and Genesee funneled thru the Genesee corridor there is greater overall risk for the community. The deaths and injuries are a matter of record. If the bridge is not built, the next century will result in about 1,500 additional accidents involving property damage, injury and death.

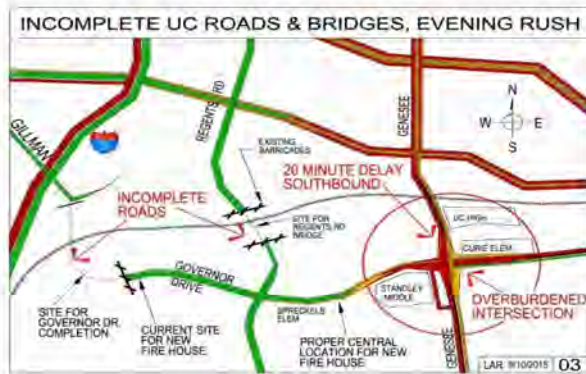
Unfortunately when there is a tragedy on the Genesee corridor those who do not want the Regents Road Bridge built find a way to blame the victims. As a community we need to recognize that failing to complete the Regents Road Bridge and Governor Drive to Gillman is the biggest part of the problem

New Firehouse:

South UC has one of the slowest emergency response times. Currently rescue vehicles on Genesee are forced to head southbound on the north bound lanes during the evening rush hours of 3Pm to 7PM. The 2016 firehouse ballot attempts to compensate for not putting in these roads by adding two additional firehouses. One of the ballot proposed locations is at Stresemann and Governor which is extreme West UC. This location will improve response times and lower the fire insurance rates for West UC but in order to provide for East UC a second firehouse is proposed at Judicial and Nobel. Benefits of the fire house radiate out from it. If we build the bridge we only need one new firehouse centrally located near the Standley Rec Center. According to the ballot a new single engine firehouse costs \$232 million a century.

<http://clairemontimes.com/2016/03/07/university-city-one-fire-station-or-two/>

Louis A. Rodolico (July 27, 2016)



Actuarial Traffic Calculation:

If Genesee were to have a third of its traffic diverted to Regents Road the accident rate at Genesee would drop to 44% of the current rate. Using the probability of thirds the risk of accidents can be represented by: 1-1, 1-2, 1-3, 2-1, 2-2, 2-3, 3-1, 3-2, & 3-3. If 1&2 are assigned to Genesee the accident rate here drops to 4/9 or 44% of the current rate. Regents would be 3-3 so it would be 11% of the current Genesee rate. When Regents Bridge is built residents in West UC will have less need for the Genesee /Governor intersection.

New Market Shopping Center:

This shopping center at Regents and Governor was intended to be hooked into the North extension of Regents Road and have access to additional customers thru Gillman. Years ago this center, like others, paid for the roads to be built and they have struggled due to their incompleteness.

Traffic Man Hours:

Citizens sitting in idling vehicles represent a loss of productivity. It can take 20 minutes longer to get thru the Genesee-Governor intersection during the rush hours, 1/3 hour x 15,000 cars x 250 work days equals more than one million man hours wasted each year. At \$20 per hour average = \$20 million in lost wages each year. Building the bridge would cut these times in half or One Billion Dollars over the next century.

Take a simple thing like the current overcrowding at Doyle Elementary. Approximately 300 students from North UC will now need to commute on the Genesee corridor each day. Averaging an additional 7 minutes a day would yield 2100 minutes or an additional 35 man hours a day. At \$20.00 per hour works out to \$700 per day, at 250 days a year equals \$175,000 a year or \$17.5 million over the next century. That would pay for a third of the cost of the bridge. One could easily justify doubling or tripling that number if they consider all the additional miles the community and emergency vehicles would need to drive because the bridge is not there.

Gasoline & Pollution:

Idling cars consume about a gallon of gasoline an hour. So using the calculation above a million gallons of gasoline wasted each year. \$3.50 per gallon equals \$3.5 Million Dollars per year. Pay these expenses out over time and the Regents Road Bridge and the Governor Drive Connection to Gillman could already have been built several times over. Thousands of idling cars and all the pollution associated with it. Are the groups opposed to the bridges concerned about the environment? Cutting drive times in half saves us \$175 Million over the next century.

Where the Local Community Anger Comes From:

Advocates who do not want the Regents Road Bridge built have this talking point: "how can you wish that traffic and the danger it represents on "US" The "US" in their mind is West UC. The "them" is East of Genesee.

LR-1-13
cont.

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LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

Taxpayers on the East side of UC are not advocating danger on anyone. East UC wearily awaits the planners intended balance.

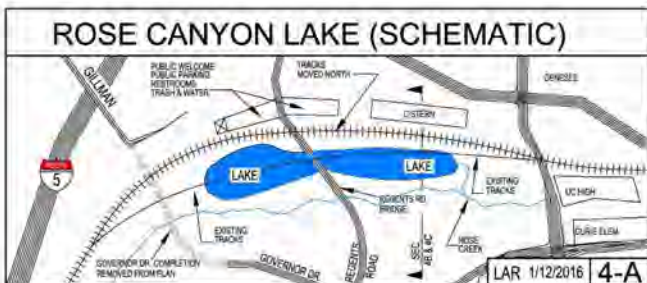
It's devolved into a tale of two cities. In theory the extra lanes at Genesee are to be taken out of the plan but once all the road approaches have been eliminated at Regents the right of ways will still exist to add additional lanes at Genesee. They could be put back in the plan with the stroke of a pen.

LR-1-13
cont.

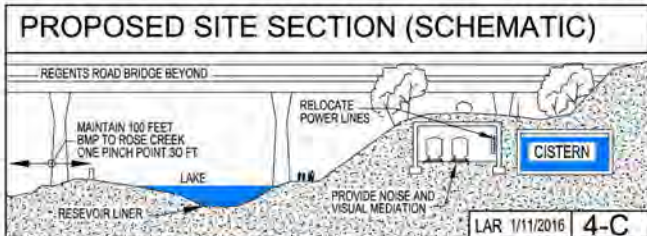
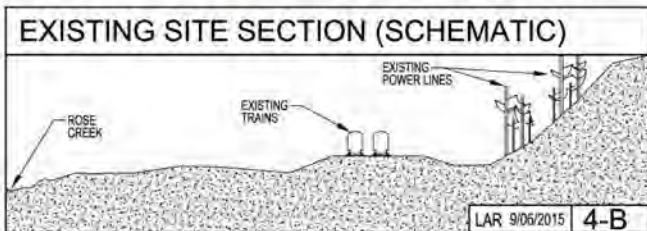
UCPG Presentation trying to bring together several issues:

See Illustrations 4A, 4B & 4C below. A linear lake could get us buy in from Fire Agencies since they could have multiple helicopter's simultaneously drawing water in fire emergencies. The lake becomes a savior of life and property when humans are in tragedy. The water department could use the lake as a linear bio-filter. A ten acre lake with an average depth of 5 feet could bio-filter over 270,000 gallons a day with a 12 day cycle. These could be two good partners.

LR-1-13
cont.



It would also be feasible to have a maintenance road next too or between the two tracks or place a trolley line underground next to the relocated tracks. We could then have a teardrop trolley loop that went underground somewhere in the vicinity of the UTC mall, remaining under Genesee heading south, cross underground west through Rose Canyon until it came out of the tunnel somewhere near Gillman. This might give us another partner to help with the project. Possibly trolley stops at UC High and Regents. UC high could have a bridge or tunnel for safe cross at Genesee. Regents could have a commuter parking lot.



All this would eventually be determined by an Engineering Review. UCPG, UCCA or the Friends of Rose Canyon will not support burying the train or building the Regents Road Bridge.

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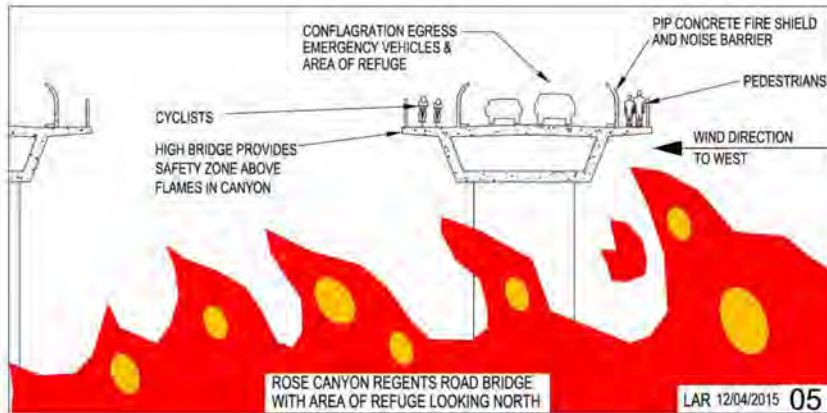
Louis A. Rodolico (July 27, 2016)

Developer Impact Fees:

Developers had to hand over million dollars in the 60's to pay for these road improvements. These funds are currently being spent down. How much was spent needs to be explained. If Regents Road Bridge is off the plan, where does the money go then? So much has been spent to date and we lost a buy in with the trolley project, we should consider additional partners. We could also consider upgrading Rose Canyon much like San Clemente which welcomes the public with parking, trash, bathrooms and water.

The Regents Road Bridge Site is public property. An elevated bridge will suffice to satisfy reasonable naturalist concerns, with substantially less interference than the existing belching, clanging & screaming 300 ton Iron Horse making its way through the canyon on a regular basis.

LR-1-13 cont.



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With global warming, droughts and subsequent fires we should consider building the Governor extension to Gillman as an ambulance route and egress road during a conflagration. More egress options equals better odds. This road is ideal for fire equipment positioning during a conflagration.

LR-1-13 cont.

Hopefully there is public will and funds to improve Rose Canyon by building the bridges, mitigating the train, possibly adding a body of water, provide public access, parking, water and bathrooms. I am hopeful that the community will come to its senses on this issue. Drivers should not have to circumvent the community, via interstate, to move within the community and they should not be directed by police to turn east into a conflagration in order to escape it. Not building the Bridge represents an unfunded liability for San Diego see illustration 06 at right. Also we certainly do not want it to come to a victims naming ceremony for the completed Regents Road Bridge.

LR-1-13 cont.



LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

It is ironic that the Mayor, who is all about jobs, has allied himself with UC leaders who push jobs out of UTC because of traffic. These are the same leaders who are fighting the bridge. For now we just wait for the next inevitable tragedy. Death and injury on the Genesee corridor has devolved into a wedge issue; when there is a tragedy on the Genesee corridor those who do not want the Regents Road Bridge built find a way to blame the victims. As a community we need to recognize that failing to complete the Regents Road Bridge and Governor Drive to Gillman is the biggest part of the problem.

LR:1-13
cont.

Conclusion:

So one billion a century for lost man hours, add gas and we're at \$1.175 billion. According to CityGate a second firehouse costs \$232 million per century. So adding it all up not building the bridge cost the taxpayers about \$1.4 billion over the next century, or 14 million a year. Let's not forget the thousands of additional accidents involving; property damage, injury and death. The Regents Road Bridge should remain in the plan and the Regents Road Bridge EIR should be funded.

With all the trials of trying to provide safety and health care for our families some government officials are party to twisting environmental laws to eliminate a critical road, a road that would improve emergency travel times in an area with some of the lowest times in the city, all the while silently diluting the impact by distributing the cost to the taxpayers in all 9 San Diego City Districts.


Louis Rodolico

louisrodolico.com

July 27, 2016

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LETTER

RESPONSE

Louis A. Rodolico (July 27, 2016)

ATTACHMENT TO
COMMENT LETTER LR-1

Index to Supporting Articles

2016-02-07 Regents Road Bridge-Who Pays?

https://issuu.com/theclairemonttimes/docs/clairemont_times_february_2016/8

2016/02/10 A-new-look-at-a-regents-rd-bridge

<http://clairemonttimes.com/2016/02/10/a-new-look-at-a-regents-rd-bridge/>

2016/03/07 University-city-one-fire-station-or-two

<http://clairemonttimes.com/2016/03/07/university-city-one-fire-station-or-two/>

2016-05/10 Ambulance Placement

https://issuu.com/theclairemonttimes/docs/clairemont_times_may_2016/12

2016/06/01 Why-does-rose-canyon-remain-undeveloped

<http://clairemonttimes.com/2016/06/01/why-does-rose-canyon-remain-undeveloped/>

2016/05/07/ Why-the-regents-road-bridge-is-key-to-health-wealth-and-our-environment

<http://timesofsandiego.com/opinion/2016/05/07/why-the-regents-road-bridge-is-key-to-health-wealth-and-our-environment/>

2016/05/21/ How-and-why-regents-road-bridge-promises-were-broken

<http://timesofsandiego.com/opinion/2016/05/21/how-and-why-regents-road-bridge-promises-were-broken/>

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UNIVERSITY CITY
3298 GOVERNOR DR
SAN DIEGO
CA
92122-9996
0667510122
07/27/2016 (800)275-8777 8:34 AM
=====
Product Description Sale Qty Final Price
Mail 1 $1.36
Large Envelope
(Domestic)
(SAN DIEGO, CA 92101)
(Weight: 0.15 (2.60 Oz))
(Expire: 07/27/2016)
(Priority 07/29/2016)
=====
Total $1.36
Cash $5.00
Change ($3.64)
=====
Bill #: 840-5920088-4-255394-1
Clerk: 16

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LETTER

RESPONSE

Heather K. Rogers (July 27, 2016)

From: [Heather Rogers](#)
To: [PLN_Planning/ECA](#)
Subject: University Community Plan Amendment
Date: Wednesday, July 27, 2016 9:55:00 PM
Attachments: [480286-Sch No. 2015121011 Las Palmas Resident.docx](#)
Importance: High

Please see attached letter

Thank you,
Heather K Rogers
Las Palmas Community Homeowner

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LETTER

RESPONSE

Heather K. Rogers (July 27, 2016)

EMAIL: PlanningCEQA@sandiego.gov

July 25, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
East Tower, Ste. 1200
San Diego, CA 92101

RE: University Community Plan Amendment# 480286/SCH No. 2015121011

As a resident of Las Palmas Condominium Association ("Association") I strongly support the amendment to the Transportation Element of the University Community Plan which deletes the construction of the Regents Road Bridge and the widening of Genesee Avenue.

I believe now, as I did in 2006 when the Regents Road Bridge was last considered, that the construction and completion of the Bridge will negatively impact the health, safety, comfort and/or general welfare of the nearby communities, and, in particular, our residents here in Las Palmas, as our community directly borders Regents Road south from Arriba almost to Rose Canyon.

Further, I believe that the construction and completion of the Regents Road Bridge will likely cause noise, air pollution, traffic circulation and other negative impacts within the Association's 218-unit community, and, even further negatively affect those units facing, and closest, to Regents Road, as well as the units and recreational area on the Porte de Merano cul de sac.

Back in 2006 it was uncertain as to the extent the City of San Diego could mitigate issues under the California Environmental Quality Act ("CEQA"); these matters remain unresolved ten years later in 2016.

In addition, I believe that the removal of the Regents Road Bridge and Genesee Avenue widening maximizes the long-term health, safety, and quality of life in North and South University City and creates the greatest community benefit by:

- Minimizing the re-routing of highway traffic through residential neighborhoods, including the Las Palmas community, Doyle Elementary School (over 900 enrolled students), and Doyle Recreation Park.
- Providing for a safer neighborhood for walking and biking everywhere.
- Maintaining a level of acceptable noise in residential interiors and exteriors.
- Allowing for current residential parking on Regents Road and safer ingress/egress to the Las Palmas community along Regents Road and Porte de Merano.

HR-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

HR-1-1

LETTER

- Preventing the deterioration of our neighborhood aesthetics and the environment of our nearest natural resource, Rose Canyon.
- Maintaining the habitat of Rose Canyon for wildlife, wetlands, and the water quality in Rose Creek, which flows into Mission Bay.
- Improving transit and transportation based on the traffic engineering studies in the Project Findings.

We want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road Bridge.

Sincerely,

Heather K Rogers
4250 Porte De Palmas #58
San Diego, CA 92122

RESPONSE

Heather K. Rogers (July 27, 2016)

HR-1-1
cont.

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LETTER

RESPONSE

Phoenix Von Hendy (July 27, 2016)

From: tpoc@cityofsd.net
To: rt.r.diamond@ucpr.ca
Subject: University Community Plan Amendment, No. 480266/ SCH No. 201512101
Date: Wednesday, July 27, 2016 1:37:38 PM

I am writing regarding the Draft EIR for the University Community Plan Amendment, No. 480266/ SCH No. 201512101. I strongly support this project.

I am a Certified Tracker/Naturalist with the San Diego Tracking Team, currently serving as Vice President of the organization. The San Diego Tracking Team conducts quarterly wildlife surveys on designated Transects throughout San Diego County, and our list of surveyed Transects includes one in Rose Canyon. The Rose Canyon Transect was established in October 2003 and proceeds along 1 mile of the main trail, starting at the Genesee Avenue entrance and heading west. The Transect also includes two short spur trails that head off of the main trail. Along with five other transect surveys that I lead every quarter, I have been co-leading the Rose Canyon Transect twice each year since November 2010.

On our surveys, we regularly see signs showing the presence of Bobcat, Coyote, Raccoon, Striped Skunk and Woodrat throughout the length of the Transect, along with ample evidence of Cottontail, California Ground Squirrel, and many species of small rodents. We also see sign of Gray Fox regularly in certain areas of the Transect and occasionally find sign of Opossum and Black-tailed Jackrabbit. Mule Deer seem to be infrequent visitors to this area of Rose Canyon west of Genesee, although we have recorded deer tracks in 2008 and 2010, and we were thrilled to find deer tracks and other sign on May 26 of this year, after not seeing any clear evidence of them these past five years. A list of wildlife we have recorded in Rose Canyon since 2003, along with a partial list of the native plants I have seen there are included at the end of this letter. Native plants are clearly dominant in the riparian areas of Rose Canyon and in the City's wetland and upland mitigation sites, comprising 75 - 80% of the vegetation. The non-natives are primarily the ubiquitous mustard, non-native grasses, and invasive thistle species.

The reason we established the Rose Canyon Transect is that Rose Canyon is an important wildlife corridor in an area where other corridors, and much wildlife habitat, have been lost to development. Rose Canyon has a year-round water supply and supports a wide variety of native plants, providing food and cover for local wildlife. The Preserve has faced a number of threats over the years, chief among them being the proposed Regents Road extension through the middle of the canyon. If built, this bridge would likely have a significant negative affect on the movement of wildlife through Rose Canyon.

I am very much in support of the project objective to "minimize impacts to biological resources at Rose Canyon". I sincerely thank you for your vision in working to protect Rose Canyon by eliminating the threat of the Regents Road bridge and the widening of Genesee through their removal from the Community Plan. Building the bridge and widening Genesee would serve mostly to draw traffic off of the freeways onto those streets, whereas the legacy of your vision in proposing this project will be clearly written in the continued survival in Rose Canyon of our local fauna and flora, and in the continued enjoyment of Rose Canyon by all San Diegans who choose to walk, run or bike in this beautiful Preserve.

Animals: Bobcat, Coyote, Gray Fox, Raccoon, Striped Skunk, Woodrat, Mule Deer, Kangaroo Rat, Roadrunner, Black-tailed Jackrabbit, Cottontail, California Ground Squirrel, Pocket Gopher, Deer Mouse, Harvest Mouse, Black Rat, Meadow Vole.

Plants: Coast Live Oak, Sycamore, Willow, Elderberry, Toyon, Scrub Oak, Laurel Sumac, Mule Fat, Coyote Bush, Broom Blackberry, Buckwheat, White Sage, Sagebrush, Poison Oak, Jimson Weed, Sow Thistle, Coyote Gourd, Malibu Poppy, Pearly Everlasting, Monkey Flower, Curly Dock, Plantain, Wild Radish, Wild Celery, Nightshade, Morning Glory, Evening Primrose, Chamomile, Fasciated Tar Plant, Heliotrope, California Sunflower, Goldenbush, Helianthus.

Regards,

Phoenix Von Hendy
13510 Acton Avenue

PVH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

PVH-1-1

LETTER

4245-95 Porte de Merano
San Diego, California 92122
27 July 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
East Tower, Ste. 1200
San Diego, CA 92101

RE: University Community Plan Amendment# 480286/SCH No. 2015121011

As a resident of Las Palmas Condominium Association (“Association”) I strongly support the amendment to the Transportation Element of the University Community Plan which deletes the construction of the Regents Road Bridge and the widening of Genesee Avenue.

I believe now, as I did in 2006 when the Regents Road Bridge was last considered, that the construction and completion of the Bridge will negatively impact the health, safety, comfort and/or general welfare of the nearby communities, and, in particular, our residents here in Las Palmas, as our community directly borders Regents Road south from Arriba almost to Rose Canyon.

Further, I believe that the construction and completion of the Regents Road Bridge will likely cause noise, air pollution, traffic circulation and other negative impacts within the Association’s 218-unit community, and, even further negatively affect those units facing, and closest, to Regents Road, as well as the units and recreational area on the Porte de Merano cul de sac.

Back in 2006 it was uncertain as to the extent the City of San Diego could mitigate issues under the California Environmental Quality Act (“CEQA”); these matters remain unresolved ten years later in 2016.

In addition, I believe that the removal of the Regents Road Bridge and Genesee Avenue widening maximizes the long-term health, safety, and quality of life in North and South University City and creates the greatest community benefit by:

- Minimizing the re-routing of highway traffic through residential neighborhoods, including the Las Palmas community, Doyle Elementary School (over 900 enrolled students), and Doyle Recreation Park.
- Providing for a safer neighborhood for walking and biking everywhere.
- Maintaining a level of acceptable noise in residential interiors and exteriors.

RESPONSE

R.G. Wilkins (July 27, 2016)

RGW-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RGW-1-1

LETTER

- Allowing for current residential parking on Regents Road and safer ingress/egress to the Las Palmas community along Regents Road and Porte de Merano.
- Preventing the deterioration of our neighborhood aesthetics and the environment of our nearest natural resource, Rose Canyon.
- Maintaining the habitat of Rose Canyon for wildlife, wetlands, and the water quality in Rose Creek, which flows into Mission Bay.
- Improving transit and transportation based on the traffic engineering studies in the Project Findings.

We want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road Bridge.

Sincerely,



R. G. Wilkins

RGW-1-1
cont.

RESPONSE

R.G. Wilkins (July 27, 2016)

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LETTER

RESPONSE

Valerie Crane and Robert Cox (July 28, 2016)

From: Carstones@apl.com
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Thursday, July 28, 2016 1:40:49 PM

Comments concerning:

- PROJECT NAME: University Community Plan Amendment
- PROJECT No. 480286 / SCH No. 2015121011
- MAJOR CONCERN: PUBLIC SAFETY

My husband and I are long-term residents of University City; he since 1962 when he moved into this new community as a young teenager, with his parents, and me, since 1972. We raised two children here, who attended local schools, and now have two young grandsons and their parents also living in the neighborhood. We are both conservationists, enjoying camping, hiking, and other outdoor activities. Our yard is a wildlife habitat; each year, I raise more than 100 Monarch butterflies, and provide water and plants for numerous species of birds, butterflies, bees, possums, raccoons, and skunks.

I included the above preamble so that all parties to this discussion will understand that we treasure nature, and do not see a conflict between it and building the Regent's Road Bridge, a promise made to the community as far back as 1962 when my in-laws first purchased their home in the West End of University City. I also welcome the advent of additional public transportation options, having ridden the bus or participated in carpools for the 20 years I worked in downtown San Diego.

We have one concern and one concern only.... PUBLIC SAFETY.

Many of us were here in 2003 for the devastating Cedar Fire, which started in the Cleveland National Forest and quickly raced out of control, fueled by Santa Ana winds. Community, after community, were given the order to evacuate. Approximately 250,000 county residents (many within San Diego City limits) were told to get in their cars and evacuate.

As a report by San Diego State notes, "Extreme fire behavior sent walls of flames down upon communities too fast for many people to get out of the way... At the peak of the burning, the Cedar Fire grew at a rate of 12,000 acres per hour... In the first few hours thirteen civilians perished as the fire trapped and over ran both civilians and the responding emergency personnel. It would not be stopped."

In 2003, University City would have been the next area given the mandatory evacuation order, but fortunately our community was spared..... THAT TIME. In 2003, we had fewer residents, fewer commercial buildings, fewer senior citizen complexes, and fewer business establishments. We can hope and pray that we never have a similar fire happen again. But this would be naive. We have a burgeoning population and still only one North-South access road, Genesee Avenue. We are also surrounded by dry canyons, despite our somewhat more normal recent winter.

CC-1-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CC-1-1

LETTER

RESPONSE

Valerie Crane and Robert Cox (July 28, 2016)

Suppose the next fire requires an evacuation of the entire 92122 population (roughly 50,000 residents, plus countless employees, visitors, UTC shoppers, and others) late afternoon on a Friday. Parents will be rushing from their work locations throughout the county to gather up their children from home or daycare. Businesses will send their employees home; shops, restaurants, libraries, will close... and ALL THESE PEOPLE will be trying to navigate their way into or out of University City, all on a single North-South road. No one will be walking to a bus stop to get on public transportation. Meanwhile, how many fire trucks and other emergency vehicles will be able to access our community and provide protection, rescues, and support?

CC-1-1
cont.

A painful reminder of the difficulty of reaching parts of our area surely took place with the crash of the Miramar jet on Huggins Street on December 8, 2008. Our son lives 6 houses from the crash site, and like many others in his neighborhood, was working from home that day. Traffic was not heavy that day, nothing like it is much of the time now, and still it took the fire department more than 15 minutes to reach the doomed houses. I know this as I was one of the first of many to call 911 and reached our son's house well before the first emergency unit.

I found the Draft PEIR to be quite convoluted and contradictory at times so I am not clear about the proposal to add lanes to Genesee Avenue. In addition to strongly supporting the Regent's Road Bridge, we are opposed to changing the structure of Genesee to permit more traffic. It seems that adding lanes (without actually widening the road) would require that existing lanes be made more narrow, and that bike lanes and sidewalks be significantly changed or potentially eliminated. With all the students at UC High and those biking to UCSD for classes or work, such a plan would surely increase already-existing SAFETY ISSUES.

CC-1-2

Comment acknowledged. Commenters oppose the removal of the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

I know this response has been long, but in closing, we ask everyone involved in recommending or deciding the matter of the Regent's Road Bridge and the addition of lanes on Genesee Avenue to get in your car and drive down Genesee from the entrance of the 5 to the 52 on a Friday afternoon at 4 pm and then turn around and retrace your drive. Please be thinking of all the people that depend on you to keep them safe when the next emergency happens...a fire, earthquake, or some other natural or man-made disaster. No one can know what the emergency will be. We only know that there will be one... and will this community be ready? BUILD THE BRIDGE!

CC-1-2

Valerie Crane

Robert Cox

6094 Zenako Ct. 92122

LETTER

RESPONSE

James DeShazo (July 28, 2016)

From: [James a DeShazo](#)
To: [PLU Planning/CFOA](#)
Subject: For Susan Morrison, Environmental Planner,
Date: Thursday, July 28, 2016 11:44:31 PM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Comments on UC Draft EIR---Regents Road Bridge

The Draft EIR does not define how this project will contribute to the City of San Diego "Climate Action Plan" (CAP) goal of -increased Bicycle riding as a method of transportation!

JD-3-1

JD-3-1

James DeShazo
3660 Syracuse CT
San Diego 92122
Member of 4 local bicycle organizations

The removal of Genesee Avenue Widening from the UCP would not eliminate any plans to expand the bicycle facilities along the roadway. The Class II Bike Lane would remain in place along Genesee Avenue. The removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon. As discussed in Section 4.5 of the Draft PEIR, the Project was conservatively assumed to not be consistent with the City of San Diego CAP.

LETTER

RESPONSE

C. Faye Duggan (July 28, 2016)

From: cfae@faye.duggan.com
To: Z.N. Duggan@ucsd.edu
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Thursday, July 28, 2016 2:32:39 PM

I whole-heartedly support the deletion of the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

I love to hike in Rose Canyon and enjoy the birds, the flowers, and the tranquility. It is our neighborhood refuge from some of our daily stress.

It especially concerns me that the bridge would harm the wetlands and the water from Rose Creek that flows into Mission Bay.

Many proponents of the bridge think it would ease traffic. I have lived in major cities such as Dallas, Phoenix, and Orlando; believe me, every city has rush hour traffic no matter how many bridges or added highways they have.

Rose Canyon is one of the natural beauties of San Diego and needs to be preserved!

Thank you.
C. Faye Duggan
5861 Haber Street
San diego, CA 92122

CFD-1-1

CFD-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Marty Eberhardt (July 28, 2016)

From: Marty Eberhardt
To: PLN_Banning/EG
Subject: University Community Plan amendment #4802861 SCH# 2015121011
Date: Thursday, July 28, 2016 11:27:28 AM

To All This May Concern:

I strongly support the removal of the Regents Road Bridge and the Genessee Widening from The U.C. Community Plan. I have worked to make this removal a reality for the sixteen years that I have lived in San Diego. I am so pleased that the City leadership is moving to support the deletion of these projects, especially the Regents Road Bridge.

Many projects that made sense decades ago no longer make sense. As the City moves to combat the worst effects of climate change, adding roads that go through the heart of neighborhoods as this one does - increasing traffic and pollution - MUST be a thing of the past. Decreasing wildlife corridors, recreational opportunities, and scenic viewsheds, as the Regents Road Bridge threatens to do, MUST be a thing of the past.

I moved to this neighborhood partly because of the proximity of a fine open space park. Rose Canyon has kept me here. I look forward to enjoying Rose Canyon in its present state for many years to come. I look forward to sharing it with my grandchildren.

Marty Eberhardt
5761 Carnegie St.
San Diego, CA 92122

ME-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genessee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ME-1-1

LETTER

RESPONSE

Phil Hastings (July 28, 2016)

From: [Phil Hastings](#)
To: [PLN_Banning/CEIA](#)
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Thursday, July 28, 2016 4:04:50 PM

To Whom It May Concern,
I support the elimination of the Regents Road Bridge project and the Widening of Genesee Avenue from the University City Community Plan. This costly project is long since out of date, and numerous studies have indicated that it will not significantly improve traffic flow in the area. Instead it is clear that this project would negatively impact one of the few open-space areas (Rose Canyon) in the region and further harm the down-stream habitat of Mission Bay. Please put an end to this mis-guided project by removing it permanently from the community plan.
Thank you.
Phil Hastings
5761 Carnegie St.
San Diego CA 92122
philhastings@earthlink.net

PH-1-1

PH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Dorothy V. Jahn (July 28, 2016)

From: [Leni Jahn](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Thursday, July 28, 2016 5:48:42 PM

To Whom It May Concern:

As a resident of University City since 1972, and as a former teacher at Standley Junior High and University City High School, I am IN FAVOR of the Regents Road Bridge.

I wrote the disaster plan for Standley many years ago, and a major concern, especially for earthquakes, was the isolation of this community. In a quake, access for emergency vehicles is potentially unavailable on nearly all entrances to the UTC area because of potential bridge collapses. With only Genesee Ave. to connect the northern and southern sections of the community, fire, paramedic and police might be unavailable to the four public schools, one private school and two preschools south of the railroad tracks.

Regents Road is the logical and planned-for extra link necessary for public safety.

I wouldn't like the extra traffic, but I would hate to think of a quake or a wildfire or a terrorist who endangered our children where emergency personnel couldn't get to them because Genesee was blocked.

Sincerely,
Dorothy V. "Leni" Jahn
6758 Dennison St.
San Diego, CA 92122

DJ-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DJ-1-1

LETTER

RESPONSE

John W. and Anna Lewis (July 28, 2016)

From: [John Lewis](#)
 To: [BLN_Planning/CEQA](#)
 Cc: contactus@citizensfortheregentsroadbridge.org
 Subject: PROJECT NAME: University Community Plan Amendment PROJECT No: 480286 / SCH No: 2015121011
 COMMUNITY AREA: University COUNCIL DISTRICT: 1 (Lightner)
 Date: Thursday, July 28, 2016 11:23:15 AM

John W. Lewis
 4006 Calgary Avenue
 San Diego, CA 92122-2507
 858-453-1124

July 26, 2016

To: Susan Morrison, Environmental Planner

PROJECT NAME: University Community Plan Amendment
 PROJECT No. 480286 / SCH No. 2015121011
 COMMUNITY AREA: University
 COUNCIL DISTRICT: 1 (Lightner)

Ms. Morrison,

I write to express my opposition to many of the facts contained in the Draft PEIR LO. No.: 21003841.

First and foremost, why is this even being discussed again? I've lived at the above address since 1976. Genesee Ave. and the Regents Rd. Bridge have been brought up numerous times at UCPG sessions, City Council meetings, local group meetings etc. etc. The construction funds were collected and allocated when UC was first built in the early 60's. There seems to be a small group of residents opposed to the bridge, most if not all living on or near the existing Regents Rd. dead end or at the other end of the proposed bridge in North UC.

These residents have expressed great concern about the impact on Rose Canyon, to me that is a moot point. The canyon is a near desolate place as far as human use is concerned. My wife walked there for many years but has since stopped due to the transients living there, trash, and lack of wild life. The small animals may have departed due to a lack of water and the numerous trains going through hourly. We used to hear coyotes at howling at night, and once in a while hear them catching dinner (skunks, squirrels, rabbits etc.). The coyotes are gone as their food source is gone. Bridge supports would have little or no impact on the canyon or it's inhabitants. In my opinion it might even improve the canyons over all appearance.

Widening Genesee is not a realistic alternative for some of the following reasons. It will just

JAL-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JAL-1-1

JAL-1-2

JAL-1-2 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

John W. and Anna Lewis (July 28, 2016)

encourage more traffic with people going to and from North UC businesses (existing and many more to come), medical and educational facilities. Much of this traffic is due to people avoiding the metered ramps to I-805 at La Jolla Village drive and Nobel Dr. They use Genesee Ave. to gain access to the entrance ramps for 52 east and westbound.

JAL-1-2
cont.

The Genesee “grade separation” (tunnel) alternative is ludicrous, the cost, traffic disruption and visual impact would all be much worse than building a simple bridge at Regents Rd.

JAL-1-3

UC High School does not need to be on a “freeway”. The posted speed limit is 25 mph during school hours, kids today dart across Genesee to and from the MTS bus stops before and after school, the existing 4 lanes is dangerous, 6 lanes (and with no median) would be much worse.

JAL-1-4

Coincidentally, widening Genesee would entail removing the existing trees and median north of Governor Drive. That median is required by a mitigation agreement entered into by local residents and Angalucci Development when the apartments were first built on the north and south side of Genesee north of Governor Drive.

JAL-1-5

In summary, please review the CEQA carefully; there are many inaccurate, misleading and incorrect assumptions, i.e. Transportation, Health and Safety, Environmental etc.

JAL-1-6

The Regents Rd Bridge is needed and desired by a great majority of both north and south UC residents.

Sincerely,

John and Anna Lewis

JAL-1-3

Comment acknowledged. The impacts mentioned by the commenter are discussed in the Draft PEIR in Chapter 9.0, Alternatives Analysis. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JAL-1-4

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JAL-1-5

Commenter is referring to Condition 27 of the Planned Residential Development Permit (PRD No. 84-0314) for the University Terrace development, which per Exhibit “A” required Angelucci Development, Inc. to install landscaping as part of the design in the median of Genesee Avenue, just north of Governor Drive and adjacent to the project, as a condition of their permit. Subdivision Board Resolution No. 3968 initially required the developer to extend the existing median to prevent left turns to northbound Genesee Avenue. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JAL-1-6

Comment acknowledged. Commenters oppose the removal of the Regents Road Bridge project from the UCP. Commenter also states that many assumptions in the Draft PEIR are inaccurate, misleading, and incorrect, but does not go into depth on what those are. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Glenn Martin (July 28, 2016)

From: Glenn Martin
To: Morrison, Susan
Cc: Schoenfish, Brian; Muroty, Jeff; Blake, Martha; Bragado, Nancy; Hermann, Myra; Garcia, Melissa; Monroe, Daniel
Subject: Re: University City Community Plan PEIR Comments
Date: Thursday, July 28, 2016 9:38:06 AM
Attachments: PEIR_Review_comments_dtl_072816.pdf

Susan Morrison, Environmental Planner:

My Comments regarding the Draft Program Environmental Impact report (PEIR) document:

This document indicates some of the problems of connectivity between South and North University City. As a native of University City my family and I are extremely disappointed that existing significant traffic problems in this community are not adequately addressed. This "rushed to finish" report appears to have one goal: To remove one piece of vital infrastructure that was always planned to make the community work: The Regents Road Bridge!

In 2006, following an exhaustive 2-year EIR which studied 6 possible alternatives for tackling the traffic issue, the City Council voted 6-2 to build the Regents Road Bridge. The Bridge would have provided us with four additional traffic lanes, two northbound and two southbound, one designated bike lane, and 1 designated pedestrian lane in each direction. Traffic flow would be shared by Genesee Avenue and Regents Road. Law suits and political weakness have prevented this common sense solution from being realized. (FBA funds will finance the construction of the Regents Road Bridge).

This report begins by pointing out the obvious. South University City suffers from lack of connectivity and traffic congestion which increases yearly.

PEIR Report: No adequate public transportation, existing or planned, for South U.C.

My comment:

- 1. South UC residents have minimal bus service to businesses, mega medical facilities (Scripps Memorial, UCSD Medical Center, Scripps Green and many satellite medical offices springing up throughout the northern sector), University Towne Centre, and UCSD, which continues to expand.
2. These above-mentioned institutions attract thousands of employees, clients, shoppers, and patients every day, commuting by automobile.
3. Only scant Intra-community bus service exists on Governor Drive, even with the planned increase of apartment buildings at the east end of Governor.
4. The proposed trolley will not link with South UC.

The Regents Road Bridge will improve access for South UC residents to the proposed trolley in North UC, by bus, bicycle, walking, as well as by automobile.

PEIR REPORT: Lack of protected bike lanes and resulting accidents.

My comment: The only existing bike route between North and South UC is Genesee Avenue which is already extremely impacted with traffic generated by conditions mentioned in my first comment. Also the steep hills in both directions make that route a challenge for even young and "fit" bikers.

The Regents Road Bridge will provide designated bike lanes and encourage many adults as well as school children to safely use them. Elimination of the bridge will terminate any possibility of meaningful bicycle transportation in this community.

PEIR REPORT: Walkability is difficult and often dangerous.

GM-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

GM-1-1

GM-1-2 Updates have been made to Draft PEIR Section 2.1.2 (page 2-4), Section 2.1.3.5 (page 2-7), Section 2.1.4.5 (page 2-12), and Section 4.2.1.2 (page 4.2-10) to add additional text discussing the existing public transit in the South University Area. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

GM-1-2

GM-1-3 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

GM-1-3

GM-1-4 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

GM-1-4

LETTER

RESPONSE

Glenn Martin (July 28, 2016)

My Comment: Walking is a challenge especially for school children attempting to reach or depart 4 public schools located practically on or near the hazardous intersection of Governor Drive and Genesee Ave.: **UC High, Standley Middle School, Curie Elementary, and Spreckels Elementary.**

Because of concern that South UC parents have for the perilous Governor/Genesee intersection, **many drive their kids to school, thus increasing traffic at morning and afternoon rush hour.**

Next year, due to overcrowding at **Doyle Elementary School in North UC**, overflow students also will be attending schools in South UC. The Regents Road Bridge would provide a safe, alternate route to Genesee Ave.

PEIR REPORT: Does not adequately address the safety issues in South University City.

My Comment: The one fire station that serves our community is located in North UC. During peak traffic hours, these vehicles cannot reach emergency destinations in South UC, medical or fire, without crossing the median on Genesee Avenue and traveling against the north-bound traffic. When Genesee is shut down because of accidents, etc., residents are left without emergency service except from stations in other communities. Patients must be transported to more distant hospitals.

Our District 1 Council Rep. attempted to address this situation by renting a house on the west end of Governor Drive for a medical emergency truck and team. This may work for people who live on the west end, but it's not very effective when a crisis occurs east of Genesee Avenue at rush hour.

CONCLUSION:

I find it very interesting that even the 3rd party professional consultants hired by the City of San Diego state within the PEIR that not completing Regents Road will increase traffic and congestion. See Below

"[T]he overall VMT is projected to increase as a result of the Project. ... [T]he Project could affect commute routes for local residents by increasing future trip distances as a result of rerouting trips to other existing local arterials. Therefore, it is conservatively assumed that the overall increase in VMT is not consistent with the goals of the CAP."

The quote came, as I understand it, from Page 4.5-17 of the Transportation/Circulation section of the PEIR.

The most stunning conclusion extracted from this PEIR Report is that there's one adequate solution to the traffic morass in University City: Connecting Regents Road with a bridge spanning Rose Canyon. The irony is that the best solution (The Bridge) is the one The City of San Diego wants to eliminate.

Respectfully,
Glenn Martin

GM-1-4
cont.

GM-1-5 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

GM-1-5

GM-1-6 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

GM-1-6

From: Morrison, Susan <SMorrison@sandiego.gov>
Sent: Tuesday, December 15, 2015 1:26 PM
To: Morrison, Susan
Cc: Schoenfish, Brian; Murphy, Jeff; Blake, Martha; Bragado, Nancy; Herrmann, Myra; Garcia, Melissa; Monroe, Daniel
Subject: University City Community Plan Amendment Scoping Period

LETTER

ATTACHMENT TO
COMMENT LETTER GM-1

RESPONSE

Glenn Martin (July 28, 2016)

Good Afternoon:

Thank you for your comments regarding the Environmental Impact Report (EIR) to be prepared for the University Community Plan Amendment. The Notice of Preparation (NOP) you received and scoping meeting are just the beginning of the public input process for this environmental review document. There will be other opportunities for you to become involved throughout the project.

The scoping meeting to be held on December 16, 2015 is designed to get as much public input as possible on areas that need to be addressed in the EIR. This meeting will focus on environmental impacts the public would like thoroughly analyzed in the project's environmental document, rather than discuss the merits of the project, debate the various alternatives, or answer questions. We will simply be noting and recording comments on potential environmental impacts to the community as a result of the project.

While the NOP states a 30-day deadline for the receipt of comments, we will continue to accept any comments from the public throughout the EIR process. In addition, there will be additional opportunities to provide comment on the project, such as during public review of the draft environmental document and any public hearings. We will keep your name on our contact list so that we may contact you and continue to provide you with notices.

Thank you for your interest in this project.

Susan I. Morrison, AICP

Associate Planner

City of San Diego, Planning Department - Environmental

1010 2nd Avenue, MS 614C

San Diego, CA 92101

(619) 533-6492

SMorrison@sandiego.gov

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LETTER

ATTACHMENT TO
COMMENT LETTER GM-1

RESPONSE

Glenn Martin (July 28, 2016)

July 28, 2016

PROJECT NAME: University Community Plan Amendment

PROJECT NO. 480286 / SCH No.2015121011

COMMUNITY AREA: University

COUNCIL DISTRICT: 1 (Lightner)

Susan Morrison, Environmental Planner:

My Comments regarding the Draft Program Environmental Impact report (PEIR) document:

This document indicates some of the problems of connectivity between South and North University City.

As a native of University City my family and I are extremely disappointed that existing significant traffic problems in this community are not adequately addressed. This "rushed to finish" report appears to have one goal: To remove one piece of vital infrastructure that was always planned to make the community work: The Regents Road Bridge!

In 2006, following an exhaustive 2-year EIR which studied 6 possible alternatives for tackling the traffic issue, the City Council voted 6-2 to build the **Regents Road Bridge**. The Bridge would have provided us with four additional traffic lanes, two northbound and two southbound, one designated bike lane, and 1 designated pedestrian lane in each direction. Traffic flow would be shared by Genesee Avenue and Regents Road. Law suits and political weakness have prevented this common sense solution from being realized. (FBA funds will finance the construction of the Regents Road Bridge).

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LETTER

ATTACHMENT TO
COMMENT LETTER GM-1

My comment: The only existing bike route between North and South UC is Genesee Avenue which is already extremely impacted with traffic generated by conditions mentioned in my first comment. Also the steep hills in both directions make that route a challenge for even young and "fit" bikers.

The Regents Road Bridge will provide designated bike lanes and encourage many adults as well as school children to safely use them. Elimination of the bridge will terminate any possibility of meaningful bicycle transportation in this community.

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CONCLUSION:

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The most stunning conclusion extracted from this PEIR Report is that there's one adequate solution to the traffic morass in University City: Connecting Regents Road with a bridge spanning Rose Canyon. The irony is that the best solution (The Bridge) is the one The City of San Diego wants to eliminate.

Respectfully,

Glenn Martin

RESPONSE

Glenn Martin (July 28, 2016)

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LETTER

RESPONSE

Lisa G. Medeiros (July 28, 2016)

From: Lisa Medeiros
To: B.N. Blanning/UCP
Subject: University Community Plan Amendment No. 480266/ SCH No. 2015121011
Date: Thursday, July 28, 2016 10:35:37 AM

July 27, 2016

Dear University Community Planning Group:

I wish to officially state that I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two **out-of-date** road projects, especially the unnecessary, costly, dangerous - and environmentally damaging Regents Road bridge project.

The Draft EIR clearly indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. This change in traffic flow would endanger the safety of the residents in all our neighboring communities, including - but not limited to - pedestrians, bikers, walkers, joggers, school children, college commuters, and the elderly.

As a long time resident of the Las Palmas Condominium Association, immediately adjacent to Regents Road, we as a community previously expressed concerns in 2006 regarding the increased noise, air pollution, traffic circulation and other negative effects of building the Bridge. **These concerns have only increased and would likely remain unmitigated today,** including noise and vibration - both exterior and interior to our homes - elimination of neighborhood parking on Regents Road, safe ingress/egress to our community along Regents Road, a devaluation of our property values, and detrimental environmental effects to our recreation area in nearby Rose Canyon.

Once more, thank you for this serious consideration in cancelling once and for all the above projects; along with the numerous above negative effects, far outweighing any minimal positive effects, we must all know very little green/open space remains in our high density living area for us, our families and future generations to enjoy and appreciate — **and once destroyed, these green spaces can very rarely be renewed.**

With much gratitude and sincerity,

Lisa G. Medeiros
4145 Porte De Merano, #129
San Diego, CA 92122

LGM-1-1

LGM-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Ramona Partow (July 28, 2016)

Dear Susan,

Thank you for bringing this issue before our community again.

When I open my front door for my granddaughter to walk to school in the morning at 7AM we smell exhaust fumes from cars sitting on Kenesee waiting for the light to change. So I don't complain if she ask me to drive her to school. I also sometimes drive other grand children to classes in Clavmont at 9AM while traffic is still sitting on Kenesee waiting, backed up, backed up all the way past Clavmont toesa Blvd. At that point I usually take Regente Rd home to avoid the wait in traffic even though it is a longer way home. Many of my neighbors drive to Regente to get on the freeway east because of traffic backed up going south on Kenesee in the after noon. The pollution covers my outdoor furniture with soot, the same air we breathe.

As the trains travel through Rose Canyon and the wildlife are not bothered by it. An additional bridge like the one in Balboa Park, would add beauty to that canyon and likewise would not scare away the wild life. The freeway runs through the middle our San Clemente Canyon and the birds and wildlife still come to my back yard.

Thank you for your time

Ramona Partow

RP-1-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RP-1-1

"It's not who you are or where you've been, it's where you're going that counts."

LETTER

RESPONSE

Robert Schlaug (July 28, 2016)

From: Robert Schlaug
To: PLN_PlanningCEQA
Cc: Mayor Kevin Faulkner; Councilmember Sherril Lightner
Subject: University City Community Plan Amendment/Project No. 480286/SCH No. 201512011
Date: Thursday, July 28, 2016 9:21:11 PM

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower
Suite 1200, MS 413
San Diego, CA 92101

Comments on the Regents Road Bridge PEIR

I support construction of the Regents Road Bridge because it would complete a major arterial road that has been planned since the 1960's.

RS-1-1

RS-1-1

Comment acknowledged. Commenter expresses opposition to the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Suggested Addition to the PEIR

To remove the option for drivers using the bridge to cut through the adjacent residential area in south University City, I propose the following:

RS-1-2

RS-1-2

- Install a barrier on Millikin Street at Regents Road that could only be opened by emergency responders.

Comment acknowledged. Analysis did not reveal the need to barricade Millikin Street. If cut through traffic is a problem in the future, residents of the neighborhood can put a request through traffic operations to have a Traffic Calming Study completed. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

This barrier could be similar to the removeable barrier in Linda Vista at the end of Brosnan Street that prevents traffic from going through the Park Mesa Way condo complex to Genessee Avenue.

RS-1-3

RS-1-3

Please see response to comment RS-1-2.

Another option is an automated gate similar to the one in Carlsbad on Mira Monte Drive at Foothill Avenue that forces traffic to Calaverà Hills Elementary School from Oceanside to use Lake Boulevard and College Avenue.

RS-1-4

RS-1-4

Please see response to comment RS-1-2.

Installation of a barrier at the end of Millikin Street should mitigate some of the traffic impacts of the Regents Road Bridge on the residents of south University City.

Submitted by:

Robert Schlaug
3705 Sioux Avenue
San Diego, CA 92117

LETTER

RESPONSE
Cheryl Stigall (July 28, 2016)

From: Cheryl Stigall
To: PLN Planning/EG
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Thursday, July 28, 2016 11:07:26 AM

I'm writing to express my strong support for both the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

I am a pediatric social worker and 20 year resident of University City. My husband and I have raised 2 children in this community. Weekend treks through Rose Canyon were a central part family time over the years. Both kids benefited greatly from organized activities in the canyon; Emily planting oak trees with her Girl Scout troop, Friends of Rose Canyon activities, middle and high school science class field trips, and Dan's cross country running, every day, that summer before 10th grade.

As a pediatric social worker I recognize the value of San Diego open spaces, and believe we have an obligation to protect and enhance our canyons for future generations! There is a ton of research supporting benefits of regular exposure of children to nature, positively impacting physical and emotional health, and even intellectual development! We need to get our kids off of their social media and into the physical world. Desire to protect our canyons is the OPPOSITE of NIMBYism!!

I'm so pleased, and impressed, by the support of Mayor Faulconer and members of the City Council for removing the Regents Road Bridge and widening of Genesee Avenue from the community plan. I hope you will continue to support the amendment so that we can, finally, put this issue behind us and know that the future of Rose Canyon is secure for generations to come.

Sincerely,
Cheryl Stigall
6822 Fisk Ave.
San Diego, CA 92122

CS-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CS-1-1

LETTER

RESPONSE

Emily Troemel (July 28, 2016)

From: [Emily Troemel](#)
To: [City Planning/PEIR](#)
Subject: University Community Plan Amendment, No. 400280/ SCJ No. 2015121011
Date: Thursday, July 28, 2016 2:29:58 PM

To Whom It May Concern,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project. The Regents Road bridge project would be especially damaging to Rose Canyon. Deleting it would protect Rose Canyon.

Rose Canyon is one of the few green spaces left in the city, and I think that the only development allowed through this space should be dedicated bike paths or walking paths, and absolutely no motorized traffic should be allowed. One of the biggest problems for San Diego is the take-over of the city by cars, and by building a bridge for cars through Rose Canyon, we only perpetuate that problem. Similarly, widening Genesee would make this road vastly less safe to bicyclists. As a regular bicyclist who uses this road, it would dramatically reduce my quality of life, as well as the quality of life of many people who live along this road. Overall, San Diego needs to put more focus on making the city pedestrian and bike-friendly, and improving green space!

Sincerely,
Emily Troemel

ET-1-1

ET-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Barry Bernstein (July 29, 2016)

From: [barry](#)
To: [P.N. Planning@EDA](#)
Subject: University Community Plan Amendment No. 480286/SCH No. 2015121011
Date: Friday, July 29, 2016 9:58:55 AM

TO: San Diego City Planning Department
FROM: Barry Bernstein, 6482 Edmonton Ave. SD 92122
SUBJECT: DRAFT PEIR comments
DATE: July 29, 2016

After reading portions and perusing most of the draft PEIR, I must first acknowledge the the enormity of the document and the complexity of the task of presenting the issue in a factual understandable manner.

As a resident of South University City since 1967, I feel my perspective and opinion related to the findings reflect most of South University City residents.

In your department's document; I.O. No. 21003841, the significant recommended "findings" indicate a number of categories with "significant" unmitigated impact. That only tells part of the story !

With the current and projected growth in our area, it appears there is an obvious need to provide an alternate route through University City. Particularly if there should be a natural catastrophe/canyon fire, or traffic mishap on Genesee. In my opinion, the idea of removing the two most agreed upon partial solutions, (Regents Road Bridge and Genesee Widening) should not be considered for removal from the University Community Plan at this time. Thank you.

BB-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BB-1-1

LETTER

From: wcolbur1@san.rr.com
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment, 480286/SCH No. 2015121011
Date: Friday, July 29, 2016 12:30:07 PM
Attachments: [Regents 20160719B.pdf](#)

Attached please find my comments supporting COMPLETION of the Regents Road bridge.

Bill Colburn

RESPONSE

Bill Colburn (July 29, 2016)

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LETTER

RESPONSE

Bill Colburn (July 29, 2016)

PLEASE BUILD THE BRIDGE...

The Regents Road bridge has been part of the master planning process for decades. It has been funded by development dollars through the years, and more recently, approved by a prior city council. To now allow a small, but vocal minority to reverse this process because the bridge project may not align with their personal interests is a travesty, not to mention a breach of contract to the many, many residents who have contributed to this project indirectly through development fees. In addition, recent development north of Rose Canyon was predicated and permitted based on plans that the bridge would be completed.

To anyone who has to travel Genesse Avenue on a weekday afternoon, it's very obvious that this artery is overloaded. To anyone who bought a home in the UC area, it should be equally obvious that, since Regents Road ends rather abruptly north of Governor Drive, and continues again north of Rose Canyon, a bridge connecting these two roads is probably in the works.

The notion that completion of the bridge will "ruin" Rose Canyon is getting pretty tired, not to mention being complete nonsense. I don't recall Mission Trails Park being "ruined" when Highway 52 was extended to the east, and directly adjacent to the park. Rose Canyon already hosts train tracks, high tension power lines, and most likely, a large sewer main. It is far from pristine wilderness today, and any signs of bridge construction will be erased by nature over the course of 3-4 years. Any hiking options that are available today will continue to exist once the bridge is complete.

I implore the city to stay on course with the original plan, and build the bridge. It is desperately needed by residents of University City, and the surrounding communities. Traffic congestion, pollution, and emergency response times will all benefit from the completion of Regents Road.

Bill Colburn

Clairemont resident since 1987

BC-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BC-1-1

LETTER

RESPONSE

Peter Dragin (July 29, 2016)

From: Peter Dragin
To: P.N. Diemling, PEIR
Subject: University Community Plan Amendment, no. 480286/ SCA no. 2015121611
Date: Friday, July 29, 2016 7:19:32 PM

I write to thank the committee for cancelling the plans for both the Regents Avenue bridge over Rose Canyon, and the proposal to widen Genesee Ave. through the canyon to three lanes. I encourage you to stand firm on those cancellations.

I live 2 blocks from Rose Canyon along Regents road. I see small children crossing Regents with their parents headed for the school and recreational facilities on the other side at Doyle Park. Increased volume and rate of traffic along this corridor would make access to these facilities substantially less safe. This also a consideration as regards University High School on Genesee.

As a 50 year resident of San Diego who has seen most of the corridor along Interstate 5 developed from open country, I especially revere the diversity of plant and animal life that remains in Rose Canyon. I hope Rose canyon will continue to host the wildlife and plants in a secure habitat. That opportunity grows more precious with each passing year.

Yours truly, Peter Dragin
8308 Regents Rd. #1F
San Diego Ca. 92122

peter7588@ATT.net

PD-1-1

PD-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Anne-Marie Groves (July 29, 2016)

From: Anne-Marie Groves
To: B. N. Benjamin, et al.
Subject: University Community Plan Amendment, No. 460266/SCH No. 2015121011
Date: Friday, July 29, 2016 4:09:41 PM

July 28, 2016

Dear Sirs,

I first want to thank Mayor Faulconer and the city for implementing the Climate Action Plan and striving to encourage the design of more walkable and transit-friendly neighborhoods. To encourage this, updating the community plans and maintaining open space are essential. The mayor and the city council are reviewing plans to remove the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan. These two projects are costly and environmentally damaging to our community.

We need to protect our neighborhood open space: the Regents Road bridge project would be especially damaging to Rose Canyon. Our children and the entire neighborhood walk here and observe nature. Rose Canyon enhances our quality of life in its recreational, educational, and visual enjoyment. The bridge project would harm habitat for wildlife, wetlands, and the movement of wildlife through Rose Canyon. The bridge project, as some would have us think, does not just sail over the entire canyon, a good portion of the canyon would be bulldozed with a road running through much of the canyon in order to connect both sides of a very wide canyon. Rose Creek also flows through the canyon and to build roads through it could degrade the water quality which flows into Mission Bay.

The Draft EIR shows that both the bridge project and the widening project would simply draw more traffic off the freeways and through our local neighborhoods. Doyle school and recreation center are both situated at the proposed north end of the bridge project with children crossing constantly to the rec. center or school. Pulling more north U.C. commuters onto the road/bridge just to reach 52 would bring more traffic, noise, and pollution through our U.C. residential neighborhoods. I moved to south U.C. for the walkability of the neighborhood with a grocery store, post office, Starbucks, within walking distance and not having to fight with the traffic to walk in my neighborhood.

With the new trolley line coming north to UTC, SANDAG freeway lane improvements, and the advent of "smart traffic analytics" to ease the flow of traffic, there is really no reason to advance the costly, and environmentally damaging bridge project or the widening of Genesee (six lanes between Nobel and 52). It is for these many reasons that I strongly support the deletion of the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan.

Anne-Marie (Nancy) Groves
2955 Renault Place
San Diego, CA 92122
858-453-6486

AMG-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

AMG-1-1

LETTER

RESPONSE

Lane and Marilyn Hauck (July 29, 2016)

From: Marilyn Hauck
To: E.N. Blomquist
Subject: University Community Plan Amendment, No. 490286/ SCH No. 2015121011
Date: Friday, July 29, 2016 11:06:08 AM

We are strongly in support of the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. The natural open space in Rose Canyon must be protected for generations to come, for our children and grandchildren. Hikes in the canyon teach our children to respect the flora and wildlife found in the canyon and it teaches them to become stewards of the environment.

The widening of Genesee and the building of the Regents Road Bridge will draw more traffic into our local community. As many in our community age, and lose the convenience of driving, more and more seniors are walking and biking. Their safety, along with the safety of our children as they walk to and from school and to recreational activities, will become an issue.

Forty three years ago I worked to preserve Tecolote Canyon as open space. Neighbors bordering the canyon, those living across the street from the canyon, and those living two blocks from the canyon had to agree to an assessment, the amount depending on their home's proximity to the canyon. Neighbors working with neighbors, led by Marion Bear, prevented builders from filling in the canyons and building homes. Try to imagine Clairemont now with out the fingers of open space running throughout the area. We must protect Rose Canyon as we protected Tecolote. (I was bitten in the rear end by a dog belonging to an owner of a home on Mt. Alifan as I canvassed for support. As a Great Dane leaped through a screen door about to land on my baby sitting in a stroller, I blocked the baby with my body. The dog bit me and the owners did not sign the petition to support the assessment. I took one for the team!)

We are grateful to the City in providing the leadership to delete these two out-of-date projects from our community plan. Thank you for protecting our environment.

Sincerely,
Lane and Marilyn Hauck
5346 Bragg Street
San Diego CA 92122

LMH-1-1

LMH-1-1 Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Andrea and Carl Ito (July 29, 2016)

From: Andrea Ito
To: UCSD Planning/CEQA
Subject: University Community Plan Amendment, No. 400266/ SCJ No. 2015121011
Date: Saturday, July 30, 2016 5:41:04 PM

Dear Madames/Sirs,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. Construction of the bridge would damage Rose Canyon, a natural resource and habitat for local wildlife. The planning group demonstrated much needed environmental concern and foresight by removing it.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. There are students walking to school, pedestrians, and cyclists who require a safe and quiet environment. The bridge and the widening would greatly endanger their safety.
Sincerely,

Andrea and Carl Ito
5864 Carnegie Street
San Diego, CA 92122

ACI-2-1

ACI-2-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Katherine Lazzaro (July 29, 2016)

From: [Katherine Lazzaro](#)
To: [PLN Planning/CPA](#)
Cc: [rosamys@pln.org](#)
Subject: University Community Plan Amendment, No.480286/SCH No. 2015121011
Date: Friday, July 29, 2016 5:53:45 PM

Dear Members of the Planning Commission:

I am writing this email to voice my support for the DELETION of the Regents Road Bridge project as well as the widening of Genesee Avenue from the University Community Plan. I wish to thank you for your leadership in moving to delete these two projects as they are NOT NECESSARY for our region. The bridge would have gone DIRECTLY in front of Doyle Elementary School as well as a Recreational Center used by the students for after-school care. Having taught elementary school for 36 years I have seen countless near-misses when small children run out into the street after seeing their parent park across the street from the school. Small children are innocent and do not think about cars that might run them down; their only thought is to get to their parent. If Regents Road were to have the bridge built it would encourage many more drivers to use that route and that would add hundreds more cars to the street on which the school and the Recreation Center sit. It would be an "a terrible accident waiting to happen!" I urge you to think of the children whose lives you will save by deleting the Regents Road Bridge. Since University High School opens onto Genesee Avenue there, too, is the likelihood that students wanting to cross that street in order to reach their bus stop to board a bus home will try to cross the street amid a growing number of cars with drivers whose thoughts will NOT be on looking out for students. I know that you must share my concern about the very negative impacts that these two projects would have had on our children were they to come to fruition.

Please lend your support in deleting BOTH of these projects. Thank you very much.

Sincerely,

Katherine Lazzaro
 5890 Honors Drive
 San Diego, CA., 92122

KLA-1-1

KLA-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

E.L. Lotecka (July 29, 2016)

From: E.L. Lotecka
To: PLN_PlanningCEQA
Subject: Issue 5: Provision of multimodal safe access over Rose Canyon
Date: Friday, July 29, 2016 5:54:04 AM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

A Regents Road Bridge would allow walking, biking, and ADA mobility over the canyon. Currently, all Middle School children from the north side of canyon must get to the south side to attend their Middle School (Standley). Children on the south side of canyon do not have this barrier to get to Standley Middle School.

At the bottom of Rose Canyon, there is no legal safe crossing from one side to the other due to double-track fast trains. And the number of trains along this very busy train corridor is increasing : "Amtrak and NCTD plan on increasing the number of passenger trains along the LOSSAN corridor".
http://www.sandag.org/uploads/publicationid/publicationid_1845_17414.pdf

ELL-5-1

ELL-5-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

E.L. Lotecka (July 29, 2016)

From: E.L. Lotecka
To: PLN Planning/CEQA
Subject: Issue 6: Case study of NIMBY-financed power vs. wide community benefits
Date: Friday, July 29, 2016 10:13:33 AM

University Community Plan Amendment PROJECT No. 480286 / SCH No. [2015121011](#)

With all the community benefits* on one side of the social justice scale, it has taken a heavy finger on the other side to tip the balance and skew compliance. There are many points for case studies and projects in law and graduate schools. Descriptions of manipulative **strategies** are in San Diego news media -- examples include: <http://www.sandiegouniontribune.com/news/2016/jul/14/uc-bridge-appears-too-far/> and <http://www.sandiegouniontribune.com/news/2015/aug/28/la-jolla-bridge-regents-road-university-city/>. Red-herrings used by bridge deniers have been discussed, such as pretending Rose Canyon is a popular natural preserve (refuted by observations of the distressed marginal Canyon conditions).

Indications are that wider social media such as Facebook and YouTube may show photos/videos of Regents Road streets oddly blocked, extensive traffic jams, numerous beautiful high-span canyon bridges, slogans such as "Connect Our Community!", and links to educational videos like *Biases in Beliefs and Decisions*: <https://youtu.be/o7JzTCB4NE0>

*Summary of community needs and benefits:

1. Long-term public reliance on community plan
2. Reduction of greenhouse gas (GHG) emissions
3. Major developments necessitate second north-south connection
4. Regional impacts of Regents Road Bridge blockage
5. Provision of multimodal safe access over Rose Canyon

How many people are adversely affected by Bridge blockage? Every day, arguably tens of thousands of residents, workers, students, shoppers, travelers, and other people are impeded: <http://www.citizensfortheregentsroadbridge.org/home.html>

Bridge simulation from PEIR draft:

ELL-6-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ELL-6-1

LETTER

RESPONSE

Harry Mathis (July 29, 2016)

From: [Harry Mathis](#)
To: [PLN PlanningCEQA](#)
Subject: Comments: Draft DEIR for University Community Plan Amendment, Project #480286/SCH #2015121011 Attn: Susan Morrison
Date: Friday, July 29, 2016 7:32:54 PM
Attachments: [PEIR Harry.docx](#)

Dear Ms. Morrison, please see the attached letter consisting of my comments on the Draft DEIR. Please acknowledge receipt by return e-mail.. Thank you,

Sincerely,

Harry Mathis

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LETTER

RESPONSE

Harry Mathis (July 29, 2016)

Harry L Mathis
San Diego City Councilmember, District 1, 1993-2000
5640 Sandburg Avenue
San Diego, CA 92122-4132
858-457-2508, Cell 858-945-1233

July 29, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200
MS 413
San Diego, CA 92101

Re: DEIR for University Community Plan Amendment, Project #480286/SCH #2015121011

Via E-mail (PlanningCEQA@sandiego.gov)

Dear Ms. Morrison:

As a concerned 46-year resident and homeowner in a neighborhood above Regents Road in Southwest University City, I am submitting the following comments on the Draft PEIR for the above named proposed amendment to the University Community Plan (UCP). Please acknowledge receipt by return e-mail. I will parallel this e-mail with a signed letter via U.S. Mail or by hand on Monday, August 1. Thank you.

Comments on University City Community Plan Amendment Draft PEIR:

Page 4.2.1 Traffic Study Area: Traffic does not respect political boundaries. Therefore, the traffic impacts of the study area should be selected to make sure that all significant traffic impacts of the project are analyzed, even if they are outside of the UCP area.

Figure 4.2.1 Traffic Study Area: The segment of I-5 between La Jolla Village Drive and SR 52 is not shown in the study area. This roadway runs parallel to Regents Road and it is the first through north-south roadway connection immediately west of Regents Road. It is not possible to have a complete understanding of the traffic impacts of the deletion of Regents Road without analyzing traffic conditions on this segment of I-5.

Table 4.2.7 Existing Freeway LOS: The segments analyzed in this table are inconsistent with the segments shown in Figure 4.2.1. The entire length of I-5 from Genesee Avenue to SR 52 needs to be analyzed in order to have a complete understanding of the traffic impacts of the project.

Section 4.2.2 Regulatory Framework: SB 743 is missing from the list of relevant regulations. It seems that this legislation would be relevant to the analysis of traffic impacts for the project since it will change the way that transportation studies are done under CEQA. A Vehicles Miles Travelled (VMT) analysis should be included. A discussion of VMT increases, which may be caused by the re-routing of traffic caused by the acknowledged out-of-direction travel that would occur with the potential removal of the Regents Road Bridge, must be provided.

HMA-1-1 Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

HMA-1-1

HMA-1-2 The commenter discusses his concerns with the traffic study area. A study area intersection selection criterion is included in Chapter 2 (page 2-1) of the Transportation Impact Study (Appendix C). The SANTEC recommendations are for project-level analysis. For regional level, per City of San Diego recommendations, study area intersections should be within the community boundary with the option to extend one traffic analysis zone (TAZ) farther from the boundary. The area south of SR-52 is within the Clairemont Mesa Community. The Clairemont Mesa Community Plan Update is currently underway.

HMA-1-2

HMA-1-3

HMA-1-4

HMA-1-3 As requested by the commenter, Figure 4.2-1, Traffic Study Area Roadway and Freeway Segments, of the Final PEIR has been revised to highlight I-5 between La Jolla Village Drive and SR-52 and highlight SR-52 between I-5 and I-805.

HMA-1-5

HMA-1-4 The commenter contends that the segments analyzed in this table are inconsistent with the segments shown in Figure 4.2.1. Please see Table 4.2-7, Existing Freeway Segments with Unacceptable LOS, of the Final PEIR.

LETTER

RESPONSE

Harry Mathis (July 29, 2016)

Table 4.2.9 Future Roadway Segment Analysis: The roadway segment analysis for Genesee Avenue ends at Lehrer Drive, just south of SR 52. However, it would be logical to conclude that the project would create significant traffic impacts on Genesee Avenue south of Lehrer Drive that have not been documented in the project’s Draft EIR. Based on the results of Table 4.2.9, the V/C ratio for the segment of Genesee Avenue between the SR 52 EB Ramp and Lehrer Drive without the project is 0.928. With the project, the V/C ratio on this same roadway segment is 0.96. Therefore, the project adds 0.032 to the V/C ratio for this roadway segment. Based on the thresholds shown in Table 4.2.8, the allowable increase in V/C ratio due to a project is 0.02. Since Lehrer Drive carries a relatively small amount of traffic, the conditions along Genesee Avenue north and south of Lehrer Drive would be similar. Therefore, it would be logical to conclude that significant traffic impacts would occur on the segment of Genesee Avenue between Lehrer Drive and Clairemont Mesa Boulevard. This roadway segment should be analyzed and the resulting significant impact should be documented for public review in a re-circulated version of the Draft EIR.

Table 4.2.10 Future Intersection Analysis: The intersection analysis for Genesee Avenue ends at Lehrer Drive, just south of SR 52. However, it would be logical to conclude that the project would create significant traffic impacts on Genesee Avenue south of Lehrer Drive that have not been documented in the project’s Draft EIR, particularly at the intersection of Genesee Avenue and Clairemont Mesa Boulevard. Based on the results of Table 4.2.10, the average delay in the AM peak hour at the intersection of Genesee Avenue and Lehrer Drive without the project is 166.2 seconds. With the project, the average delay at this same intersection is 184.1 seconds. Therefore, the project adds 17.9 seconds of delay to this intersection in the AM peak hour. Based on the thresholds shown in Table 4.2.8, the allowable increase in intersection delay due to a project is 1.0 second. Since Lehrer Drive carries a relatively small amount of traffic, the conditions along Genesee Avenue north and south of Lehrer Drive would be similar. Therefore, it would be logical to conclude that significant traffic impacts would occur at intersections along Genesee Avenue south of Lehrer Drive, including the intersection of Genesee Avenue and Clairemont Mesa Boulevard. This intersection should be analyzed and the resulting significant impact should be documented for public review in a re-circulated version of the Draft EIR. It should be noted that a similar situation occurs in the PM peak hour where the average delay without the project is 60.9 seconds, the average delay with the project is 66.4 seconds, the increase in delay with the project is 5.5 seconds, and the allowable increase in delay is 2.0 seconds.

Page 4.2-54 Bicycle Facilities: Regents Road would have provided an important connection for bicyclists between the north portion and the south portion of the UCP area. Deletion of this connection should be considered to be a significant impact, especially in a city such as San Diego that is working very hard to promote bicycle travel.

The traffic study appendices do not seem to have included either the existing city of San Diego timing sheets or the synchro HCM reports so that the existing condition analysis could be verified similar to other conditions. This information is critical to a public understanding of full potential impacts and verification of results and should be provided. A check of other recent EIR’s produced by the City of San Diego show this information included in an appendix to the EIR traffic study (e.g. Uptown CP update).

The analysis does not provide any comparison to the existing community plan. This comparison should be evaluated to fairly determine the impact of removing certain community plan elements and mitigation for impacts caused by the removal of planned road network improvements should be disclosed. Instead, the EIR only compares the road network alternatives to the existing baseline and discloses impacts that result largely from increased traffic from cumulative projects unrelated to the proposed project.

HMA-1-6

HMA-1-7

HMA-1-8

HMA-1-9

HMA-1-10

HMA-1-5

HMA-1-6

HMA-1-7

HMA-1-8

HMA-1-9

HMA-1-10

The commenter requests incorporation of SB 743 in the list of relevant regulations as discussed in Section 4.2.2, Regulatory Framework, in Section 4.2, Transportation/Circulation. At the time of the preparation of the Draft PEIR, SB 743 had not been implemented and, therefore, was not included as a relevant regulation. Please refer to the Governor’s Office of Planning and Research for further updates on SB 743.

Please see response to comment HMA-1-2.

Please see response to comment HMA-1-2.

Comment noted.

As requested by the commenter, Appendix E of the Transportation Impact Study has been updated to add existing Synchro worksheets and other existing references.

The commenter expresses concern that the traffic analysis does not include any comparison to the existing community plan. As discussed in Section 4.2.4.1, the Future Year with Adopted UCP assumes that the Adopted UCP and all the transportation improvements associated with the current plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). In addition, Future Year Conditions, as described on page 2-7 of the Transportation Impact Study (Appendix C), includes future community build-out conditions based on land use and network assumptions within the University Community Plan area and superimposed on the SANDAG 2035 regional model.

LETTER

The EIR traffic study states that cumulative other projects were included in the traffic model. However, no list of other projects seems to have been included precluding any verification or definitive listing of other projects. Additionally, traffic model plots have not been provided as is customary for traffic studies in the region (e.g. Serra Mesa community plan amendment EIR). Without both of these sources of information, no verification of the list of other projects or information about traffic conditions on streets surrounding the study area could be conducted. It is industry standard to provide this information in the environmental document. Not providing this information prohibits an adequate understanding of traffic conditions and effects or impacts, which may be caused by the project.

HMA-1-11

Several other projects appear to be missing from the analysis. For example, three turn lanes are currently being constructed at the intersection of La Jolla Village Drive and Towne Centre Drive. These projects do not appear in either the existing or future lane configuration graphics in the EIR traffic study. This intersection analysis should be revised. It is likely that these changed lane configurations will change the level of service and therefore the impact conclusions in the EIR. The list of other projects as well as the lane configuration should be checked at all locations.

HMA-1-12

Reviewing future synchro sheets shows peak hour factors both above and below the allowable range listed in the City of San Diego, Traffic Impact Study Manual. These peak hour factors should be revised to be within the allowable range.

HMA-1-13

Reviewing the future synchro sheets shows maximum splits shorter than the available green time. These results should be double checked and adjusted.

HMA-1-14

Thank you for your attention to the above comments.

Sincerely,

Harry Mathis

RESPONSE

Harry Mathis (July 29, 2016)

HMA-1-11 Existing lane configurations at intersections were verified as the report was being prepared and future configurations were determined based on information included in the Facilities Finance Plan for the community. Additional changes that occur from private development requirements are not able to be identified until the developments apply for approvals and project-level traffic evaluations are performed. In response to the specific intersection of La Jolla Village Drive and Towne Centre Drive, the three turn lanes being added as a project-level requirement were evaluated for each of the four future year alternatives included in the Transportation Impact Study (Appendix C) and it was concluded that those additional lanes would not change the conclusions of the EIR. Each alternative would continue to operate at LOS E or F during both AM and PM peak hours and each alternative would continue to have a significant, unmitigated impact at that location.

HMA-1-12 Please see response to comment HMA-1-11.

HMA-1-13 The commenter asserts that the future Synchro worksheets included in the Transportation Impact Study (Appendix C) should be revised to be within the allowable range. For the future analysis, peak hour factors (PHFs) that were documented less than 0.80 in existing conditions were adjusted to be equal to 0.80. PHFs documented greater than 0.95 in existing conditions were maintained in future analyses as it was assumed that if traffic is spread that equally already, it would not change in the future. For movements with no volumes, the PHFs may show less than 0.80 but do not affect the analysis.

HMA-1-14 The commenter asserts that the future Synchro worksheets should be adjusted to reflect available green time versus showing maximum splits. The signal timing used in the Synchro outputs accurately reflects the signal timings. In the timing graphics included in the Synchro worksheets, areas that show green time not fully extended to their potential reflect the green time allocated to that movement, but it would be extended and remain green if the complementing phase is green.

LETTER

Harry L Mathis
San Diego City Councilmember, District 1, 1993-2000
5640 Sandburg Avenue
San Diego, CA 92122-4132
858-457-2508, Cell 858-945-1233

July 29, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200
MS 413
San Diego, CA 92101

Re: DEIR for University Community Plan Amendment, Project #480286/SCH #2015121011

Via E-mail (PlanningCEQA@sandiego.gov)

Dear Ms. Morrison:

As a concerned 46-year resident and homeowner in a neighborhood above Regents Road in Southwest University City, I am submitting the following comments on the Draft PEIR for the above named proposed amendment to the University Community Plan (UCP). **Please acknowledge receipt by return e-mail.** I will parallel this e-mail with a signed letter via U.S. Mail or by hand on Monday, August 1. Thank you.

Comments on University City Community Plan Amendment Draft PEIR:

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RESPONSE

Harry Mathis (July 29, 2016)

HMA-1-15 Please see responses to comments HMA-1-1 through HMA-1-14.

HM-1-15

Harry Mathis (July 29, 2016)

Table 4.2.9 Future Roadway Segment Analysis: The roadway segment analysis for Genesee Avenue ends at Lehrer Drive, just south of SR 52. However, it would be logical to conclude that the project would create significant traffic impacts on Genesee Avenue south of Lehrer Drive that have not been documented in the project's Draft EIR. Based on the results of Table 4.2.9, the V/C ratio for the segment of Genesee Avenue between the SR 52 EB Ramp and Lehrer Drive without the project is 0.928. With the project, the V/C ratio on this same roadway segment is 0.96. Therefore, the project adds 0.032 to the V/C ratio for this roadway segment. Based on the thresholds shown in Table 4.2.8, the allowable increase in V/C ratio due to a project is 0.02. Since Lehrer Drive carries a relatively small amount of traffic, the conditions along Genesee Avenue north and south of Lehrer Drive would be similar. Therefore, it would be logical to conclude that significant traffic impacts would occur on the segment of Genesee Avenue between Lehrer Drive and Clairemont Mesa Boulevard. This roadway segment should be analyzed and the resulting significant impact should be documented for public review in a re-circulated version of the Draft EIR.

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The analysis does not provide any comparison to the existing community plan. This comparison should be evaluated to fairly determine the impact of removing certain community plan elements and mitigation for impacts caused by the removal of planned road network improvements should be disclosed. Instead, the EIR only compares the road network alternatives to the existing baseline and discloses impacts that result largely from increased traffic from cumulative projects unrelated to the proposed project.

HM-1-15
cont.

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LETTER

The EIR traffic study states that cumulative other projects were included in the traffic model. However, no list of other projects seems to have been included precluding any verification or definitive listing of other projects. Additionally, traffic model plots have not been provided as is customary for traffic studies in the region (e.g. Serra Mesa community plan amendment EIR). Without both of these sources of information, no verification of the list of other projects or information about traffic conditions on streets surrounding the study area could be conducted. It is industry standard to provide this information in the environmental document. Not providing this information prohibits an adequate understanding of traffic conditions and effects or impacts, which may be caused by the project.

Several other projects appear to be missing from the analysis. For example, three turn lanes are currently being constructed at the intersection of La Jolla Village Drive and Towne Centre Drive. These projects do not appear in either the existing or future lane configuration graphics in the EIR traffic study. This intersection analysis should be revised. It is likely that these changed lane configurations will change the level of service and therefore the impact conclusions in the EIR. The list of other projects as well as the lane configuration should be checked at all locations.

Reviewing future synchro sheets shows peak hour factors both above and below the allowable range listed in the City of San Diego, Traffic Impact Study Manual. These peak hour factors should be revised to be within the allowable range.

Reviewing the future synchro sheets shows maximum splits shorter than the available green time. These results should be double checked and adjusted.

Thank you for your attention to the above comments.

Sincerely,

Harry Mathis

RESPONSE

Harry Mathis (July 29, 2016)

HM-1-15
cont.

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LETTER

RESPONSE

Carolyn Nash (July 29, 2016)

From: Carolyn Nash
To: PLN Planning/CEQA
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Friday, July 29, 2016 4:38:03 PM
Attachments: Comments on University Community Plan Amendment.docx

(Thank you for your hard work on the PEIR. Comments are below and attached as a Word file)

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

I live in the University Community area in University City (called *South University* in the draft PEIR), south of Rose Canyon. This is to register my strong opposition to the proposed University Community Plan Amendment Project, Project No. 480286, Sch. 2015121011, University Community Area, Council District 1 (Lightner). I also ask some of misleading statements in the draft PEIR – on existing public transit, the housing in the University South area, and Rose Canyon’s historic and current uses – be edited for accuracy. (Text in italics is extracted verbatim from the draft PEIR.)

The proposed University Community Plan Amendment Project would remove the Regents Road bridge and Genesee Avenue expansion from the University Community Plan. The Regents Road bridge and Genesee Avenue expansion have been part of the approved plan for 30 years (approved July 1987, republished in 2014), and should have been built years ago. The approved plan would improve the traffic deadlock on Genesee during rush hours (and the deadlock on the I-5 and I-805), improve public safety (particularly police access) to the South University area (the area south of Rose Canyon), improve access from South University to Scripps and UCSD emergency medical facilities, enhance public access to the Rose Canyon area, and reduce greenhouse gas emissions in the long run. The Genesee Avenue expansion would also improve pedestrian safety at the Genesee-Governor intersection, which, right now, is very hazardous to cross during the day (because of turning vehicles) and terrifying at night. All of this is recognized in the draft PEIR.

Finally, the Regents Road bridge current project would greatly increase access – both pedestrian and bicycle – between South University and North University. It would provide pedestrians from South University with safe, easy access to Rose Canyon Open Space Park and to the shopping and city park on Regents road north of Rose Canyon. And it would provide one more vehicular escape route in case of another fire-related evacuation of the South University area.

South University area description

The PEIR description of South University on p. 2-13 is generally good. However, it implies that the region is single family residential, which was historically true, but the new residential construction has been apartments or condos. The description should mention the (Town View) apartments complex and golf course on the east end of Governor Drive and the apartment complexes off Genesee, in addition to the commercial developments already mentioned in the PEIR.

CN-1-1 Comment acknowledged. Commenter opposes the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CN-1-1

CN-1-2 Comment acknowledged. Additional existing condition details related to east South University are included in the Final PEIR. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

CN-1-2

LETTER

RESPONSE

Carolyn Nash (July 29, 2016)

Transportation Congestion and Public Safety issues

For the South University area, the Regents Road Bridge construction and Genesee Avenue expansion, which this project would eliminate, are particularly important. In South University, rush hour traffic blocks Genesee Avenue going north in the morning and south in the afternoon, and there are no reasonable alternatives. In the afternoon rush hour, southbound I-5 and I-805 are deadlocked, and the 52 is congested going east (and lately, going west as well, backed up from I-5). In the mornings, the 52 westbound backs up from I-5 to almost the 805, so I-5 is not an alternative, nor is I-805, which also backs up northbound.

This is a problem not only for general traffic, but also for access to emergency rooms, which are on the other side of Rose Canyon from University South. The Regents Road bridge would provide a direct access to medical emergency facilities at UCSD and Scripps from South University, both for individuals and emergency services.

The PEIR shows that the proposed project make this worse, and the proposed mitigation measures – which are neither approved for funded -- would not correct it: *Implementation of the Project would remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge from the UCP. With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of the Mitigation Measures TRA-1 and TRA-2 provided in Section 4.2.4.3, significant traffic impacts would result and present increased difficulty in accessing areas due to poor traffic conditions including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays. Further, Mitigation Measures TRA-1 and TRA-2 are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.*

The PEIR makes it clear that this is a public safety issue for police, fire, and emergency services, and that the proposed project (not building the Regents Road bridge or improving Genesee Avenue) would make it worse, with or without the possible mitigation measures discussed in the report.

Police:

As described in Section 4.13.1.1, the Northern Division of the SDPD provides police services for Beat 115 along the Genesee Avenue Corridor. The Northern Division headquarters is located off of Eastgate Mall, to the southeast of the intersection of Genesee Avenue and Eastgate Mall. Genesee Avenue serves as a main access to Eastgate Mall and multiple entry points to the police facility are located directly off of Genesee Avenue. Genesee Avenue serves as a main north south access route for police dispatch. Genesee Avenue serves as a main north-south access route for fire and emergency services dispatch.

As discussed in Section 4.2, Transportation/Circulation, there would be significant traffic impacts to roadway segments and intersections in the future year with implementation of the Project. Future Year is the scenario used for transportation modeling purposes. While some transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Project proposes transportation

CN-1-3 Comment noted.

CN-1-3

CN-1-4 Commenter reiterates text from the Draft PEIR related to police and fire/emergency services. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CN-1-4

LETTER

RESPONSE

Carolyn Nash (July 29, 2016)

improvements as Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3. These would make alterations to the existing roadway network in an effort to improve areas of poor operation. Even with implementation of these transportation mitigation measures, significant traffic impacts would still result and would present increased difficulty in police accessing areas within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.

Fire and emergency services:

Genesee Avenue serves as a main north-south access route for fire and emergency services dispatch. ...

CN-1-4
cont.

There would be significant traffic impacts to roadway segments and intersections in the future year with implementation of the Project. As discussed in Section 4.2, Transportation/Circulation, -Future Year with Adopted UCP, a total of 21 roadway segments would operate at an unacceptable LOS (Table 4.2-9) and 29 intersections (Table 4.2-10) operating at an unacceptable LOS. Twenty-eight of these 29 intersections exceed significance thresholds. ...

Even with implementation of Mitigation Measures TRA-1 and TRA-2, significant impacts on fire and emergency services would still result and would present increased difficulty in accessing areas within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.

Rose Canyon

Rose Canyon is Rose Canyon Open Space Park. Access to Rose Canyon Park from South University is currently very limited – either a trail entrance on Genesee, with no parking, or a small parking lot on Regents Road at south end of Rose Canyon, with a trail that is narrow and extremely steep. Further, it is not safe to cross the canyon, because active railroad tracks rundown the middle of the canyon. The PEIR notes the elimination of the planned Regents Road Bridge would continue to exclude the ability of travelers to access the opposite side of Rose Canyon via Regents Road, thus reducing access provided to and from the community.

CN-1-5

Comment acknowledged. Details related to the AT&SF railroad tracks are included in Section 4.7, Noise, and Section 4.8, Historical Resources, of the Draft PEIR. Commenter requests details be added to the Final PEIR regarding the day and night use of the tracks and recent construction in Rose Canyon. However, the requested details have not been added as they would not contribute to the environmental analysis.

Rose Canyon Open Space Park is a resource, but it is hardly an untouched area. The draft PEIR states: by the mid-1800s Rose Canyon was settled by ranchers and dairymen. In 1852, Louis Rose, one of San Diego's original pioneers, acquired 740 acres that included the mouth of San Clemente Canyon. By 1856, Rose's ranch grew to 1,920 acres, and included a tannery and a brickyard. The importance of Rose Canyon includes the centuries of Native American occupation of the area, the continuation of historic ranching activities into the 1940s, and the development of the railroad system through the canyon in 1883. It also mentions sewer lines.

CN-1-5

In numerous places, the draft PEIR description of Rose Canyon mentions that the AT&SF railroad tracks ... are considered a historic structure. It should also state clearly that the tracks are used day and night, and that there has recently been significant track construction in Rose Canyon, with construction access from the north, including construction of a temporary access road (see http://www.keepsandiegomoving.com/Lossan/Elvira_to_morena.aspx).

Existing Public Transit

Section 2.1.3.5, p. 8, Existing Transit, states: Generally, the MTS bus routes within the Project

CN-1-6

CN-1-6

Comment acknowledged. Section 2.1.3.5, Existing Transit, on page 2-8 of the Final PEIR has been revised to clarify the existing transit conditions for the South University area. The existing transit conditions are further discussed in the Existing Conditions Report prepared by the City of San Diego on December 2015. Refer to the Clarifications and Modifications section of the Final PEIR for revised text.

LETTER

vicinity operate approximately every 10 to 15 minutes on both weekdays and weekends. This is not true for South University (the area south of Rose Canyon), and needs to be corrected in the draft PEIR.

- From South University, only the MTS 50 bus goes to downtown San Diego, and it stops only on Genesee. It runs only on weekdays (NOT weekends), only until about 6 pm, and at 1-hour intervals mid-day.
- The MTS 105 bus runs through part of South University (south on Genesee to Governor, then on Governor between Genesee and Regents) to Old Town (but no further). It runs at roughly 30-minute intervals weekdays, but stops before 7 pm; it does NOT run from South University on weekends.
- Finally, in South University, the MTS 41 bus stops *only* on Genesee and goes to Fashion Valley tram station (not downtown). It runs at about 20-minute intervals during the week, and 30-minute intervals on the weekend. To get between South University and downtown San Diego on this bus requires a transfer, and often a long wait, at the bus depot at Fashion Valley, which is isolated and not a comfortable place to be after dark.

In short, public transit from the South University area (south of Rose Canyon) is inadequate, despite the impression given in the PEIR. The statements on existing transit should be changed to reflect the actual public transportation availability in South University, as compared to the region north of Rose Canyon.

Carolyn Nash

6634 Dennison St

San Diego, CA 92122

cjntravel@gmail.com

RESPONSE

Carolyn Nash (July 29, 2016)

CN-1-6
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LETTER

RESPONSE

Carolyn Nash (July 29, 2016)

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

I live in the University Community area in University City (called *South University* in the draft PEIR), south of Rose Canyon. This is to register my strong opposition to the proposed University Community Plan Amendment Project, Project No. 480286, Sch. 2015121011, University Community Area, Council District 1 (Lightner). I also ask some of misleading statements in the draft PEIR – on existing public transit, the housing in the University South area, and Rose Canyon’s historic and current uses – be edited for accuracy. (Text in italics is extracted verbatim from the draft PEIR.)

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For the South University area, the Regents Road Bridge construction and Genesee Avenue expansion, which this project would eliminate, are particularly important. In South University, rush hour traffic blocks Genesee Avenue going north in the morning and south in the afternoon, and there are no reasonable alternatives. In the afternoon rush hour, southbound I-5 and I-805 are deadlocked, and the 52 is congested going east (and lately, going west as well, backed up from I-5). In the mornings, the 52 westbound backs up from I-5 to almost the 805, so I-5 is not an alternative, nor is I-805, which also backs up northbound.

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The PEIR shows that the proposed project make this worse, and the proposed mitigation measures – which are neither approved for funded – would not correct it: *Implementation of the Project would remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge from the UCP. With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of the Mitigation Measures TRA-1 and TRA-2 provided in*

CN-1-7

Comments noted.

CN-1-7

LETTER

Section 4.2.4.3, significant traffic impacts would result and present increased difficulty in accessing areas due to poor traffic conditions including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays. Further, Mitigation Measures TRA-1 and TRA-2 are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.

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Fire and emergency services:

Genesee Avenue serves as a main north-south access route for fire and emergency services dispatch. ...

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Rose Canyon Open Space Park is a resource, but it is hardly an untouched area. The draft PEIR states: by the mid-1800s Rose Canyon was settled by ranchers and dairymen. In 1852, Louis Rose, one of San Diego's original pioneers, acquired

RESPONSE

Carolyn Nash (July 29, 2016)

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CN-1-7
cont.

LETTER

RESPONSE

Carolyn Nash (July 29, 2016)

740 acres that included the mouth of San Clemente Canyon. By 1856, Rose's ranch grew to 1,920 acres, and included a tannery and a brickyard. The importance of Rose Canyon includes the centuries of Native American occupation of the area, the continuation of historic ranching activities into the 1940s, and the development of the railroad system through the canyon in 1883. It also mentions sewer lines.

In numerous places, the draft PEIR description of Rose Canyon mentions that the AT&SF railroad tracks *...are considered a historic structure*. It should also state clearly that the tracks are used day and night, and that there has recently been significant track construction in Rose Canyon, with construction access from the north, including construction of a temporary access road (see http://www.keepsandiegomoving.com/Lossan/elvira_to_morena.aspx).

Existing Public Transit

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- From South University, only the MTS 50 bus goes to downtown San Diego, and it stops only on Genesee. It runs only on weekdays (NOT weekends), only until about 6 pm, and at 1-hour intervals mid-day.
- The MTS 105 bus runs through part of South University (south on Genesee to Governor, then on Governor between Genesee and Regents) to Old Town (but no further). It runs at roughly 30-minute intervals weekdays, but stops before 7 pm; it does NOT run from South University on weekends.
- Finally, in South University, the MTS 41 bus stops *only* on Genesee and goes to Fashion Valley tram station (not downtown). It runs at about 20-minute intervals during the week, and 30-minute intervals on the weekend. To get between South University and downtown San Diego on this bus requires a transfer, and often a long wait, at the bus depot at Fashion Valley, which is isolated and not a comfortable place to be after dark.

In short, public transit from the South University area (south of Rose Canyon) is inadequate, despite the impression given in the PEIR. The statements on existing transit should be changed to reflect the actual public transportation availability in South University, as compared to the region north of Rose Canyon.

Carolyn Nash
6634 Dennison St
San Diego, CA 92122
cjntravel@gmail.com

CN-1-7
cont.

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LETTER

RESPONSE

Elizabeth Pelling (July 29, 2016)

From: Elizabeth Pelling
To: PLN_Bianca@ucsd.edu
Subject: RE: University Community Plan Amendment, NO. 2015121011
Date: Friday, July 29, 2016 9:00:49 PM

Dear Planners,

I strongly support the deletion of the Regents Road Bridge project and widening of Genesee Avenue from the University Community Plan. My thanks go to the City for moving to delete the two out of date road projects. They are unnecessary, costly and environmentally damaging. Not only does the removal of the two projects reduce the incursion of freeway traffic through our neighborhoods, but it eliminates a great threat to a precious natural area, Rose Canyon, one of the few remaining undisturbed canyons in San Diego.

Rose Canyon is an important natural area which provides wetland, habitat for wildlife and space for movement of wildlife through the canyon. Rose Canyon is a jewel, a remnant of old California. We who live in University City treasure this wonderful canyon.

Thank you,
Elizabeth Pelling

2828 Passy Ave.
San Diego, CA 92122
858-453-1569

EPE-1-1

EPE-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Diane Speed (July 29, 2016)

From: [Diane Speed](#)
To: [PLN Planning/CEQA](#)
Subject: Draft Program Environmental Impact Report
Date: Friday, July 29, 2016 1:13:59 PM

July 29, 2016

Susan Morrison
Environmental Planner,
City of San Diego Planning Department

Regarding:
Project Name : University Community Plan Amendment
Project No. 480286/ SCH No. 2015121011
Community Area: University
Council District: 1 (Lightner)

I have lived in University City for over thirty years, in which time I have seen tremendous growth in the community and surrounding areas. With this growth has come overwhelming traffic conditions which I believe can be relieved by building the Regents Road Bridge. For many reasons, this bridge will be a vital link that the City's infrastructure needs by providing a parallel route (north-south) to Genesee Avenue. It will relieve the unacceptable traffic conditions on Genesee, provide an extra route for emergency vehicles, provide a needed emergency evacuation route for all residents, and provide a safe road for bikes and pedestrians.
> The Draft Program Environmental Impact Report (Draft PEIR) for the University Community Plan amendment cites a large number of intersections and roadway segments in UC that are unacceptable in terms of their capability to process the current traffic volume. The Draft PEIR also says this problem will continue to get worse. How can you possibly recommend against the Regents Road Completion project which would obviously improve the unacceptable present and future traffic circulation in this community.

Respectfully submitted,
Diane Speed
7110 Cather Ct.
San Diego, Ca 92122

DS-1-1

DS-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Nancy M. Sturm (July 29, 2016)

From: [Jerry and Nancy Sturm](#)
To: [P.N. Planning/CEQA](#)
Subject: Response to Draft PEIR University Community Plan Amendment
Date: Friday, July 29, 2016 2:22:14 PM

July 29, 2016

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department

Re: Project Name: University Community Plan Amendment
Project No: 480286/SCH No. 2015121011
Community Area: University
Council District: 1 (Lightner)

The finding that construction of the Regents Road Bridge would reduce traffic on Genesee Avenue is consistent with previous Environmental Impact Reports that validated the need for completion of the Regents Road corridor.

The City Council has permitted the overdevelopment of the Golden Triangle area while setting aside the completion of the planned infrastructure for that development. Our current gridlock is testament to the results of those poor decisions.

I believe the finding of significant and unmitigated impacts on the areas of transportation/circulation, air quality, greenhouse gas emissions, noise, and public services and facilities should be the major factor in selecting the building of the Regents Road Bridge as the Superior Alternative.

Sincerely,

Nancy M. Sturm

5977 Cozzens Street
San Diego, CA 92122
(858) 453-6599

[i-nsturm@sbrcglobal.net](mailto:nsturm@sbrcglobal.net)

NMS-1-1

NMS-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment will be considered by the City during the decision-making process.

LETTER

RESPONSE

Alice M. Tana (July 29, 2016)

TANA & ASSOCIATES

Public Relations, Marketing and Communications

July 29, 2016

Mr. Dan Monroe, Senior Planner
City of San Diego, Planning Department
1010 Second Avenue, Suite 1200 East Tower, MS 413
San Diego, California 92101

Dear Mr. Monroe:

Subj: Regents Road Bridge and Draft Program Environment Impact Report (PEIR)

This is one response to the City of San Diego's Draft Program Environmental Impact Report (PEIR) for the University Community Plan (UCP) Amendment.

I do not concur with the actions by the University Community Planning Group (UCPG) on July 15 with its vote of approval of the Draft PEIR, which refers to the removal of the Regents Road Bridge and the Genesee Widening projects from the community plan.

The Regents Road Bridge and the Genesee Widening projects are important to University City community.

I have been a business owner commuting to my offices in University City since 1985 and have served as a business member on the board of UCPG for twenty-five years including six years as its chairman.

My comments are submitted from the standpoint of the businesses and the entire UC community, consisting of not only residents, but for all others who are involved: Commuting owners, employers, and employees at the various firms, companies, and corporations; faculty, staff, and students at UCSD; doctors, nurses, patients, and staff at the medical centers and facilities; shoppers at the now expanding University Towne Center and other shopping centers; seniors residing in the Costa Verde and Garden Community expansion; children living in North UC being reassigned to schools in South UC; and most importantly, drivers of emergency fire, police, and ambulance vehicles.

Without the Regents Road Bridge, there is only one north-south access to University City, which is confined to Genesee Avenue.

4370 La Jolla Village Drive, Suite 400 – San Diego, California 92122
Telephone: 858-395-8262 – E-mail: tanamktpr@aol.com

AMT-1-1

Comment acknowledged. Commenter opposes the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

AMT-1-1

LETTER

Current traffic problems on Genesee Avenue without the Regents Road Bridge are now impacting not only for those living in UC, but affects those all in the city as well as county-wide. On Genesee Avenue commuter traffic is jammed northbound in the mornings and southbound in the evenings between La Jolla Village Drive and Clairemont Mesa Drive.

Regents Road currently exists, already built as a divided, four lane street with approaches to Rose Canyon: Southbound from Arriba Street and La Jolla Village Drive, and northbound from Governor Drive and State Route 52. Both approaches end at the edge of Rose Canyon, unconnected.

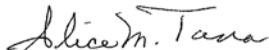
The bridge would provide a second north-south access to University City, bounded by State Route 52 and Interstates 5 and 805. The bridge is part of the original UC Plan which had taken into consideration, the growth and traffic problems currently experienced in University City.

The bridge will provide ample clearance above the floor of Rose Canyon, where concerns are many for free access of wildlife and for bike paths in natural settings, but allows for transit corridor of existing railroad tracks. The bridge also provides a better footprint for more open canyon space when compared with the existing build up at the overpass for Genesee Avenue over the same tracks in the canyon.

One major environmental impact that is indicated in the report is the statement regarding 9 out of 20 signalized intersections on Genesee Avenue which operate at unacceptable levels during peak hours. Not only is it a traffic and safety issue, it is an environmental issue due to idling vehicle emissions - especially in the vicinity of several schools. The traffic problems on Genesee make up a pattern that the report indicates are worsening. This whole issue was asked and answered in 2006 when threw City Council voted to proceed with building the bridge.

During my tenure with the UCPG, there was support and approval at the City of the Regents Road Bridge project and is currently fully funded through the Financial Benefits Assessment (FBA).

Respectfully submitted,



Alice M. Tana
President and Owner

RESPONSE

Alice M. Tana (July 29, 2016)

AMT-1-1
cont.

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LETTER

RESPONSE

Stephanie Webber (July 29, 2016)

From: [swebber](#)
To: [E.N. Benjamin/CFJA](#)
Subject: University City Community Plan Amendment, No 480286/SCH No.2015121011
Date: Friday, July 29, 2016 2:36:01 PM

As a resident of University City living at 5556 Stresemann Street, I wish to register my very strong support for the deletion of both the Regents Road Bridge and the Widening of Genesee Ave from the Community Plan.

I believe that the Regents Road Bridge would be particularly damaging to Rose Canyon which I, and many, many others, enjoy regularly and feel it is essential to preserve. The canyon is home to a wide variety of wildlife as well as wetland areas which would all be harmed by building a bridge which would encroach significantly into the canyon and bring pollution, noise and disruption to the native habitats that thrive there today. We have so few peaceful, unspoiled natural places in the city, it would be tragic to destroy this one.

In addition, as a local resident, I am very concerned about the amount of additional traffic that would be drawn off the freeway and brought, instead, through our residential neighborhood by the apparent "short cut" the bridge would provide. Regents Road would become a speedway as a result and be congested by traffic attempting to merge onto 52 which is already inadequate for the task. The increased traffic on our residential streets would be dangerous for pedestrians, particularly schoolchildren attending our many local schools as well as bicyclists, and generally reduce the quality of life for residents by bringing noise and pollution to our doorsteps.

I believe that the huge amount of money the combined projects would cost would be totally wasted because they would not improve traffic significantly and would have a negative impact on our quality of life. Expenditure of a similar amount of funds on public transportation solutions that would reduce traffic in our community would be far more beneficial to all.

I appreciate the City for it's leadership in moving to delete these two out-dated projects from the Community Plan.

Sincerely

Stephanie Webber

5556 Stresemann St
San Diego CA 92122

SW-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

SW-1-1

LETTER

RESPONSE

Victoria Barham (July 30, 2016)

From: [Philo](#)
To: [C.N. Barntrey, CFIA](#)
Cc: [Friends of Rose Canyon](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Saturday, July 30, 2016 1:48:18 PM

To Whom It May Concern,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

The Draft EIR indicates that both of these road projects would draw traffic off of the freeways and through our neighborhoods. I am concerned that additional traffic on Regents Road and Genesee Avenue would result in dangerous crossings for pedestrians, especially students at our local schools. I am a teacher at Doyle Elementary. A significant number of Doyle students walk to school each day and many cross Regents Road at Berino Court. My daughter recently graduated from University City High school. Many University City High School students cross Genesee Avenue at Governor Drive or Decoro Street when they walk to school.

I also strongly support protecting Rose Canyon. The Regents Road Bridge project would be especially damaging to Rose Canyon. Many families, Boy Scout and Girl Scout troops and students come to Rose Canyon to enjoy its beauty and learn about its wildlife and plants. As a Boy Scout, my son has enjoyed community service activities in Rose Canyon such as catching invasive crawdads and watering oak saplings. Many classes from our local schools take guided nature walks for up-close, hands-on learning experiences. Building the Regents Road Bridge would interfere with recreational, educational, and visual enjoyment of Rose Canyon as well as harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon.

I would like to thank the City for moving to delete these two outdated road projects from the plan, especially the Regents Road Bridge project.

Respectfully,

Victoria Barham
3657 Millikin Ave.
San Diego, CA 92122

VB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

VB-1-1

LETTER

RESPONSE

Mike Colburn (July 30, 2016)

From: Michael Colburn <mcolbur1@san.rr.com>
Sent: Saturday, July 30, 2016 7:55 PM
To: PLN_PlanningCEQA
Subject: University Community Project Plan Amendment PROJECT No. 480286/SCH No. 2015121011

Re: Support for Regents Road Bridge

This part of our transportation infrastructure has been needed for decades. Not building this bridge will continue to divert significant traffic of all types on to Genesee Ave., which is already heavily congested on a daily basis. There seems to be an attitude growing in the state that if roads are NOT built, that traffic will magically disappear. This might have some validity in a city where commuters have real options that don't consume hours of their time, compared to driving. Such is not the case here, and it won't be the case for a long time. Forcing commuters to drive their vehicles longer distances guarantees higher GHG and other emissions. Even after the mid-coast trolley project is done, the places accessible within a reasonable distance to the line, will be limited. I'm sure we have all been "paying forward" for this bridge in our taxes over the decades; now is the time to cash in on that "investment".

Mike Colburn
Mission Bay

MC-1-1

MC-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. Commenter mentions the higher GHGs emissions that would occur if Regents Road Bridge is not constructed, which is discussed in Chapter 9.0, Alternatives Analysis, of the Draft PEIR. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Aibhilin Cronin (July 30, 2016)

From: [Aibhilin Cronin](#)
To: [E.N. Blomquist, PEIR](#)
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 4:29:50 PM

Dear City Planners,

I live above Rose Canyon. As a kid I enjoyed all of the species of animals, the nature, and the atmosphere. I still enjoy walking, running and biking in Rose Canyon. Building a bridge would not only destroy many animals' habitats, but would also ruin all the possible fun kids kids can have in the natural world. These days, kids do not get enough outdoor activities due to technology. But all the possibilities of the canyon beckon to the children making them want to do more outdoor activities. I have had so many great memories in Rose Canyon, I would hate for future generations to miss out on that amazing opportunity. A bridge across Rose Canyon at Regents Rd would be disruptive to the local neighbors and would destroy many homes of animals. Rose Canyon is not a place to be destroyed, it is a place of enjoyment, laughter, and memories.

AC-1-1

I strongly support removal from the city plan of the Regents Rd bridge project.

Thank you,
Aibhilin Cronin

3176 Bunche Avenue
San Diego, CA 92122

AC-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: PJM_PlanningCFDA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 10:22:10 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

Page 4,13-19.
c. Schools, Libraries, and Parks and Recreational Facilities
4.13.4.4

"... the traffic conditions **would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge** from the UCP. Further, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, **impacts to emergency service providers associated with the Project would remain significant and unmitigated** at the program level."

Construction of the Regents Road Bridge will help, so says the report. Build the bridge.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-1-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-1-1

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: PLN_PlanningCEQA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 10:09:50 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

4.13.4.
a. Police Protection
paragraph 2

“While some transportation impacts would occur regardless of implementation of the Project, some operational deterioration **would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge** from the UCP. . . . Even with implementation of these transportation mitigation measures, significant traffic impacts would still result and **would present increased difficulty in police accessing areas** within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.”

Construction of the Regents Road Bridge is a solution, so says the report. Build the bridge.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-2-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-2-1

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: P/N_PlanningCEQA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 4:59:24 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

In this regard may I refer you to page 4.5-17, City of San Diego Climate Action Plan:

Action 3.6 of the CAP (Implement transit-oriented development within Transit Priority Areas) is intended to meet that goal and has a target to "reduce average vehicle commute distance by 2 miles through implementation of the General Plan City of Villages Strategy by 2035."

A Regents Road Bridge would reduce commute times for those living in west areas of University City, Clairemont, perhaps even Pacific Beach and La Jolla.

See also 4.5.5.2, Significance of Impacts:

Given the increase in VMT and GHG emissions from mobile sources, the Project **would not be consistent** with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-3-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. The Draft PEIR discusses consistency with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP in Section 4.5, Greenhouse Gas Emissions. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-3-1

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: PLN_PlanningCFOA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 4:09:13 PM

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the Construction of the Regents Road Bridge and No Widening of Genesee Avenue.

In this regard I quote from the last sentence of paragraph section 9.2.2.1, Land Use:

"In this regard, the Construction of the Regents Road Bridge and No Widening of Genesee Avenue would provide a greater community benefit by improving access within the UPC Area when compared to the Project."

Sincerely,

Jerry Fitzsimmons
5437 Villanova Avenue
San Diego, California, 92122

JF-4-1

JF-4-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: P.N. PlanningCEQA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 10:15:33 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

Page 4.13-17.

b. Fire and Emergency Services
paragraph 2

“some operational deterioration would be worsened by the removal of the planned **Genesee Avenue Widening and Regents Road Bridge** from the UCP. The Future Year with Adopted UCP scenario and the Future Year with Project scenario, as provided in Table 4.13-4, show a substantial exceedance from the City’s target average response time of 7.5 minutes”

Construction of the Regents Road Bridge will help, so says the report. Build the bridge.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-5-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-5-1

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: [Jerry Fitzsimmons](#)
To: [PJ Planning/CEQA](#)
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 6:20:51 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

As a general observation I find the arguments that a Regents Road Bridge would irrevocably damage the flora, fauna and stream bed in Rose Canyon without merit. I reject any conclusions to that effect in the PEIR.

A concerned observer has only to look to the south, to San Clemente Canyon. San Clemente Canyon canyon is crossed by bridges at Genesee Avenue and Regents Road, adjacent to each bridge is a parking lot for public access and recreation. A four-lane free runs **in and parallel** to the canyon. Yet the **plants grow, the critters thrive**, just ask residents whose lots abut the canyon, ask the kids who traipse about the canyon floor (with no concern about railroad tracks).

The idea that Rose Canyon is somehow 'pristine' is belied by the fact that 50 or more trains pass thru daily with more planned for the future. Domestic and feral cats take a toll on the native critters, non-native plants infiltrate.

I want Rose Canyon to continue to be a resource for all of us, and it can be, with a well planned bridge which includes bike lanes and sidewalks, along with a nature/mountain bike trail and a wildlife corridor on the floor of Rose Canyon under the bridge.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-6-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

JF-6-1

As noted in Section 9.2.2.9, the analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. As discussed in Section 9.2.1.9 on page 9-17 of the Draft PEIR, impacts under the No Project Alternative would be greater than those identified for the Project because less land would be preserved in open space. Construction of Regents Road Bridge would result in greater impacts related to Tier I, II, IIIA, and IIIB habitats and greater impacts to aquatic resources including vernal pools and wetlands compared to the Project.

LETTER

RESPONSE

Jerry Fitzsimmons (July 30, 2016)

From: Jerry Fitzsimmons
To: PLN Planning/CEQA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Saturday, July 30, 2016 4:33:38 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

I am in favor for the alternative of the **Construction of the Regents Road Bridge** and No Widening of Genesee Avenue.

In this regard I quote from the last sentence of paragraph 2 section 4.2.8.1, Bicycle Facilities:

"Thus, removal of the planned Regents Road Bridge from the UCP would be in conflict with planned bicycle network improvements as envisioned in local alternative transportation planning documents."

Since the late 1970s I have bicycled along Genesee Avenue from my home to/from UC San Diego, the Regents Road Bridge would provide an alternative. A Regents Road Bridge would share the traffic with Genesee Avenue hopefully making each road a bit safer.

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California, 92122

JF-7-1

Comment acknowledged. Commenter expresses support for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-7-1

LETTER

RESPONSE

Michael Leavenworth (July 30, 2016)

From: Michael Leavenworth <mkleavenworth@me.com>
Sent: Saturday, July 30, 2016 5:30 PM
To: PLN_PlanningCEQA
Subject: University community plan amendment 480286/ SCH No. 2015121011

My name is Michael Leavenworth and my wife Kathy and I live at 7942 Playmor Terrace. We are long time residents who have seen the development of what was once a wild environment.

We support the elimination of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. The Regents Road bridge project would be especially damaging to Rose Canyon where we regularly hike and where I bring my class of 3rd graders each year to observe animals and plants in their natural state.

Sent from my iPhone

ML-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ML-1-1

LETTER

RESPONSE

Christine Mailloux (July 30, 2016)

From: Christine Mailloux <cmailloux@san.rr.com>
Sent: Saturday, July 30, 2016 10:46 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I am writing in support of the proposed Community Plan Amendment that would delete both the widening of Genesee Avenue between Nobel and Route 52 and the Regents Road bridge project. These are outdated projects that do not serve the needs of San Diego residents. As a resident of University City for over 14 years, living east of Genesee Avenue, I agree with the recommendation of the Project EIR that finds NOT building the bridge or widening Genesee Avenue to be the "environmentally superior alternative" (The damage that would be done to our precious urban canyon and open space from both of these projects far outweighs the minimal benefits that these projects might have brought to the community when last analyzed many years ago. Paving over San Diego is an outdated and harmful way to solve any perceived transportation and traffic shortcomings. And, as the EIR notes, outdated traffic studies do not "reflect the most recent development and traffic patterns." (Section 3.1.1.) Indeed, updated studies should incorporate planned improvements as the statistics show that traffic demand has not grown as anticipated over the years and projections for future traffic growth do not justify the extreme measures called for in the current community plan.

If the project objectives are to minimize impacts to biological resources at Rose Canyon (Section 3.1.2), then the "no project" alternative is a "no brainer." Sometimes less is more for these urban open spaces that already have many demands placed on their resources and they should be protected from further harm. Other project objectives such as Identifying transportation improvements and looking at emergency access and multi-modal transportation is already happening on an ongoing basis by the City, County and SANDAG. This is a work in process, but a bridge designed decades ago cannot be the right solution to today's modern transportation thinking. Even as a resident of the East side of University City I am worried about what the bridge will do the culture, feel and community of the area. Moreover, both of my children attend local schools that would be directed impacted by the widening of Genesee- making it even more dangerous than it is today to walk to and from school. I will also note that the EIR appears to find that the availability of emergency services would only be slightly impacted by removal of these projects from the Community Plan (Section 9.2.1.13). I believe the resources saved from NOT building the bridge or the widening should be earmarked for improvement of emergency services in the area.

Thank you for the time, attention and effort to address this issue that is important for all of San Diego. I support the finding that removing the Regents Road Bridge and Genesee widening efforts from the Community Plan is the Environmentally Superior alternative.

Christine Mailloux
 5868 Dirac Street, 92122
 (858) 558-7966

CM-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CM-1-1

LETTER

RESPONSE

Bob Riffenburgh (July 30, 2016)

From: Robert Riffenburgh <riffenbu@mail.sdsu.edu>
Sent: Saturday, July 30, 2016 9:14 AM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I want to thank Mayor Falconer and the City Council for their leadership in moving to delete the Regents Road Bridge project and the widening of Genesee Avenue from the University Community Plan. I strongly support this deletion. Over several decades, I have watched the bridge issue rise and fall (I was a member of the UC Planning Group in the 1970s), dividing the community, and costing extensive time and grief to no purpose—there have never been the funds available for the bridge. The deletion of these projects will at last remove the threat to the wildlife and public enjoyment of Rose Canyon and allow the UC community to come together again and focus on more relevant issues.

Sincerely,
 Bob Riffenburgh
 3069 Award Row
 San Diego CA 92122

BR-1-1

BR-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Don Steele (July 30, 2016)

From: Don Steele <dstele@isocalifornia.com>
Sent: Saturday, July 30, 2016 2:43 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

Sirs:

I strongly support protecting Rose Canyon and the Regents Road bridge project would be especially damaging to the open natural park of Rose Canyon.

My family enjoys this open space every single day – as do thousands of people that drive past and through its existing roadways. Any more roads, bridges or other encroachments would greatly degrade this beautiful scenery that is part of what makes San Diego unique.

A bridge would also detract and interfere with recreational, educational and the mental serenity afforded by the enjoyment of Rose Canyon. It would also further harm wildlife habitats and the protections to downstream bays and wetlands.

Don Steele
3436 Millikin Ave.
San Diego, CA 92122

DST-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DST-1-1

LETTER

RESPONSE

Nancy Steele (July 30, 2016)

From: nsteele2@ucsd.edu
To: [J.N. Blainey/PEIR](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Saturday, July 30, 2016 2:59:35 PM

I strongly support the deletion of the Regents Road bridge project from the University Community Plan. The bridge would be extremely costly and damaging to the environment and the recreational enjoyment of the open space. It would do nothing to alleviate traffic through our community, only pulling more cars off the freeway and increasing traffic.
 I oppose the widening of Genesee for the same reason. We don't need MORE traffic at higher speeds near our schools and endangering our small community.
 Thank you to the leadership of the City for addressing these two outdated projects

Nancy Steele
 3436 Millikin Avenue
 San Diego CA 92122

NS-1-1

NS-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Christine Wan (July 30, 2016)

From: Kitty Wan <kittyw49@gmail.com>
Sent: Saturday, July 30, 2016 10:37 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment" number 480286

Build the bridge. I personally have been waiting 37 years for it. Now the population of UC has increased to the point that the additional access is necessary for all of us, north, south, east, and west. And as for the spurious argument of "saving Rose Canyon", apparently the wildlife never got the memo that bridges and roads are detrimental to them. Here on the east end we have foxes, coyotes, and an occasional cougar. Obviously the wildlife hasn't suffered---except the rabbit population.

Christine Wan
 Dirac St.

CW-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CW-1-1

LETTER

RESPONSE

Patricia A. Wilson (July 30, 2016)

From: pwilson003@san.rr.com
Sent: Saturday, July 30, 2016 7:13 AM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment# 480286/SCH No. 2015121011
Attachments: 480286-Sch No. 2015121011 Wilson Response.docx

Response from Patricia A. Wilson attached.

Thank you.

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LETTER

RESPONSE

Patricia A. Wilson (July 30, 2016)

Patricia A. Wilson
4185 Porte de Palmas, #165
San Diego, CA 92122

Phone: (858) 202-1879
New Email: pwilson003@san.rr.com



EMAIL: PlanningCEQA@sandiego.gov

July 29, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
East Tower, Ste. 1200
San Diego, CA 92101

RE: University Community Plan Amendment# 480286/SCH No. 2015121011

As a resident of Las Palmas Condominium Association ("Association") I strongly support the amendment to the Transportation Element of the University Community Plan which deletes the construction of the Regents Road Bridge and the widening of Genesee Avenue.

I believe now, as I did in 2006 when the Regents Road Bridge was last considered, that the construction and completion of the Bridge will negatively impact the health, safety, comfort and/or general welfare of the nearby communities and, in particular, our residents here in Las Palmas, as our community directly borders Regents Road south from Arriba almost to Rose Canyon. And, my unit is directly along Regents Road.

Further, I believe that the construction and completion of the Regents Road Bridge will likely cause noise, air pollution, traffic circulation and other negative impacts within the Association's 218-unit community, and, even further negatively affect those units facing, and closest, to Regents Road, such as my unit, as well as the units and recreational area on the Porte de Merano cul de sac.

In 2006 it was uncertain as to the extent the City of San Diego could mitigate issues under the California Environmental Quality Act ("CEQA"); these matters remain unresolved ten years later in 2016.

In addition, I believe that the removal of the Regents Road Bridge and Genesee Avenue widening maximizes the long-term health, safety, and quality of life in North and South University City and creates the greatest community benefit by:

- Minimizing the re-routing of highway traffic through residential neighborhoods, including the Las Palmas community, Doyle Elementary School (over 900 enrolled students), and Doyle Recreation Park.
- Providing for a safer neighborhood for walking and biking in all our communities.
- Maintaining a level of acceptable noise in residential interiors and exteriors.
- Allowing for current residential parking on Regents Road and safer ingress/egress to the Las Palmas community along Regents Road and Porte de Merano.

PAW-1-1

PAW-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

- Preventing the deterioration of our neighborhood aesthetics and the environment of our nearest natural resource, Rose Canyon.
- Maintaining the habitat of Rose Canyon for wildlife, wetlands, and the water quality in Rose Creek, which flows into Mission Bay.
- Improving transit and transportation based on the traffic engineering studies in the Project Findings.

I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road Bridge.

Sincerely,

Patricia A. Wilson

PAW-1-1
cont.

RESPONSE

Patricia A. Wilson (July 30, 2016)

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LETTER

RESPONSE

Dan Amelang (July 31, 2016)

From: Dan Amelang
To: Z.N. Blanning/CF16
Subject: University Community Plan Amendment, No. 460286/ SCH No. 2015121011
Date: Saturday, July 30, 2016 11:13:34 PM

To whom it may concern,

My name is Dan Amelang. I've lived near Rose Canyon with my wife and two young children for the past 11 years. (We currently live at 3932 Via Tranquilo.) During this time, Rose Canyon has been an invaluable resource for us as a place of family recreation (hiking and biking), education (nature walks) and relaxation (solitary walks to "get away"). Our experiences in Rose Canyon have only been possible because the natural land features and wildlife have been protected from excessive development.

This is why I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I applaud the City leaders for moving in this direction. In particular, the Regents Road project is an expensive, destructive, and wholly unjustified effort.

I have heard from some that we Doyle Elementary parents (my daughter is a student there) wish for the bridge in order to facilitate taking our children to another school, as if Doyle were undesirable, or Genesee weren't close enough for us to cross the canyon. I know of absolutely no parents who feel this way. Besides, the older children on this side attend Standley Middle across the canyon, via Genesee, and we get along just fine. There is no need for an additional bridge. If there were such a problem, why not do the right thing and build more schools on our side instead?

We understand how bad the traffic on Genesee can be. My son goes to Standley Middle School and he goes there and back every school day via Genesee Avenue. My daughter's violin teacher lives on the other side, and we have to take Genesee. We get to the 52 via Genesee and the Clairemont neighborhood via Genesee.

But we are opposed to widening Genesee. It already serves it's purpose well enough, and widening it will only bring more traffic (see the analysis in the Draft EIR). It is already dangerous enough for children to navigate to/from school, and it is already a loud eyesore in the beautiful canyon. Please let it be.

Thank you for reading, and thank you for your service to our city.

Dan Amelang
3932 Via Tranquilo
San Diego, CA 92122
858-205-9927

DAM-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DAM-1-1

LETTER

RESPONSE

Gregory J. Barnes (July 31, 2016)

From: [Gregory J. Barnes, Esq.](#)
To: [PLN_PlanningCEQA](#)
Subject: Comment letter regarding the DPEIR for PROJECT NAME: University Community Plan Amendment, PROJECT No. 480286 / SCH No. 2015121011
Date: Sunday, July 31, 2016 3:12:51 PM
Attachments: [Comment letter of 7-31-16 re DPEIR to Susan Morrison.pdf](#)

Ms. Morrison, attached please find my comment letter to the Draft Program Environmental Impact Report (DPEIR) for the above-referenced project.

Please confirm, by return email, that you have received the comment letter.

Thank you, Gregory Barnes

Gregory J. Barnes
7165 Calabria Court, Unit D
San Diego, CA 92122
619.787.0302
gjbarnes@earthlink.net

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LETTER

RESPONSE

Gregory J. Barnes (July 31, 2016)

7165 Calabria Court, Unit D
San Diego, CA 92122
July 31, 2016

Via Email: PlanningCEQA@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue
East Tower, Suite 1200, MS 614C
San Diego, CA 92101

PROJECT NAME: University Community Plan Amendment
PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Ms. Morrison,

I am writing to you with my written comments regarding the Draft Program EIR (“DPEIR”) issued on June 17, 2016. I wrote to you previously on December 12, 2015 concerning my objections to the timing of the NOP and the Scoping Meeting. In that letter I requested that the NOP, the comment period thereunder, and the DPEIR Scoping Meeting be postponed as originally dated, and moved out of the Holiday season to sometime in January or February, 2016 so that a more reasonable time frame may be available for all of the communities and organizations affected by the process to fully participate. That was not done in an attempt to “fast track” this whole process for political purposes.

I also wrote to you on January 1, 2016 concerning the scope and alternatives of the proposed PEIR, with four (4) specific comments for items and information to be included in the upcoming DPEIR. These comments were not incorporated into the DPEIR because of the irresponsible time constraints put on the city staff and consultants to drive this DPEIR through for action in the fall before the District 1 Councilwoman leaves office. The rushed nature of this process has caused an extreme number of mistakes and inadequacies to appear in the DPEIR.

I submit the following comments concerning the PEIR issued on June 17, 2016, the first two of which comments are a portion of those originally prepared and submitted by Evelyn Heidelberg, Esq., Counsel to Citizens for the Regents Road Bridge, Inc., which I adopt and support:

- 1. THE ENVIRONMENTAL IMPACTS OF THE TWO SETS OF TRANSPORTATION MITIGATION MEASURES SHOULD HAVE BEEN EVALUATED AS PART OF THE PROGRAM EIR

The DPEIR concludes that the Project would have significant unmitigated environmental effects as to five environmental issue areas: transportation/circulation; air quality;

GJB-1-1	Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
GJB-1-2	Comment noted.
GJB-1-3	The commenter recommends evaluating the environmental impact of TRA-1 and TRA-2 in the PEIR. The Mitigation Framework is explained at the beginning of Section 4.2.4.3. As it states in the section, project-level analysis of the potential impacts of the proposed mitigation would be completed at such a time the improvements are implemented. Projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review.

LETTER

RESPONSE

Gregory J. Barnes (July 31, 2016)

greenhouse gas emissions; noise; and public services and facilities. The DPEIR concluded that there are no feasible mitigation measures for greenhouse gas emissions and for public services and public services and facilities. The sole mitigation measure identified to address noise impacts places the burden on future residential development in the Genesee Avenue Corridor to implement noise control measures. (See DPEIR, at page 10-11 to 10-12.) The remaining mitigation measures are directed primarily at the Project's significant transportation/circulation impacts, which as a byproduct would also ameliorate the air quality impacts of the Project. (See id. at pages 10-10 and 10-11.)

The Project is an unusual one, as it involves removal of long-planned transportation facilities from a community plan and the general plan. Unlike most projects evaluated under CEQA, if the Project were approved, there would be no subsequent approvals necessary for its implementation. Under the usual case, the mitigation measures are assured of implementation because the project approved cannot move forward unless and until the mitigation measures are fully funded and approved for implementation, if not already fully implemented. Here, although the CEQA Guidelines require adoption of a mitigation monitoring and reporting program be adopted upon certification of an EIR to ensure that the mitigation measures are implemented, there is no project implementation to "drive" implementation of the mitigation measures. If the Project were adopted, the Regents Road Bridge and the Genesee Avenue Widening projects would each be removed from the UCP and the General Plan. Any follow up to implement any of the 23 transportation/circulation mitigation measures encompassed by the two sets of Transportation/Circulation Mitigation Measures, TRA-1 and TRA-2, would require inclusion in the University City Public Facilities Financing Plan, with identified funding sources.

Nevertheless, as noted the CEQA Guidelines require the City to commit to implement the identified mitigation measures. The DPEIR acknowledges that implementation of the 23 measures comprising TRA-1 and TRA-2 would themselves have potentially significant environmental effects. For example, at pages 4.4-20 and 4.4-21, the discussion of potential mitigation of the air quality impacts caused by the Project suggests that the operational changes to the transportation system that comprise TRA-1 and TRA-2 could actually increase air quality impacts. ("these improvements to the transportation network would also affect criteria air pollutant emissions. Project-level analysis of the potential impacts of the proposed mitigation measures will be completed at such time a[s] the improvements are implemented." (DPEIR, at page 4.4-21.)

Yet, despite this implicit acknowledgment that the implementation of TRA-1 and TRA-2 will worsen air quality (although improving traffic operations to some extent), the DPEIR proposes to defer consideration of the air quality, greenhouse gas emission and other environmental effects of those 23 measures, most of which involve roadway widening, construction of new traffic lanes, and/or removal of on-street parking, until "such time the improvements are implemented." (DPEIR, at page 4.2-52; see also pages 10-4 to 10-6.) I believe that the environmental impacts of TRA-1 and TRA-2 should be evaluated as part and parcel of the Project, rather than deferred and evaluated individually under CEQA if and

GJB-1-3
cont.

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RESPONSE

Gregory J. Barnes (July 31, 2016)

when they are programmed for implementation, because the mitigation measures may have significant adverse environmental impacts, worse than the environmental impacts that are attributed (without support, as discussed in Section III.B.2.) to the No Project Alternative, or to the Project (including its significant unmitigated effects on five environmental issue areas). In short, the cure (in the form of TRA-1 and TRA-2) could be as bad as or worse than the disease (i.e., the admitted significant and unmitigated impacts of the Project on transportation/circulation, greenhouse gas emissions, air quality, noise and public services and facilities. If subsequent environmental review of the 23 mitigation measures comprising TRA-1 and TRA-2 were to bear this out, the City would have to prepare and approve an Amended PEIR to find alternative mitigation measures, or to consider undoing the currently proposed amendment and restoring what is now the No Project Alternative. That would be an expensive and time-consuming process. It makes far more sense to explore those environmental impacts of the mitigation measures as part of the process of considering the Project, rather than to defer that analysis. Indeed, if TRA-1 and TRA-2 were evaluated as to their environmental impacts, it might change the evaluation of the project alternatives, such that the Project – or the “No Construction of Regents Road Bridge and Widening of Genesee Avenue, depending on which part of the DPEIR one reviews – may not be deemed the environmentally superior alternative (even using the flawed methodology adopted by the DPEIR).

GJB-1-3
cont.

Evaluating TRA-1 and TRA-2 now, rather than deferring that evaluation, is supported by the CEQA guidelines, which discusses the limitations of “tiering.” “Tiering” refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects” (14 Cal. Code Regs. §15152(b).) But, the CEQA guidelines admonish that “[t]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” (Id.) Deferral of detailed, site-specific information is allowed “as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.” (Id. §15152(c)). The public, in reviewing the proposed Project and its DPEIR, and City Council, when deciding whether to approve the Project, need to understand whether the environmental impacts of the 23 transportation mitigation measures, individually or collectively, may be of such consequence that there will be little likelihood of their being approved. Here, CEQA’s informational disclosure objectives are not satisfied by deferring the analysis of the 23 transportation mitigation measures.

GJB-1-4

The grade-separated intersection at Governor Drive and Genesee Avenue was included in this Draft PEIR as mitigation to intersection deficiencies at this location and acknowledgement that it would also benefit the arterial flow along Genesee Avenue between SR 52 and Nobel Drive. At the intersection with Governor Drive, additional through lanes cannot be added without changing curbs, so the grade separation provides increased input within the existing intersection footprint. It is included in the following proposed alternatives: the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative (the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative has been revised for the Final PEIR); the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative; and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative. Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

- 2. Prior Environmental Analysis of Genesee Avenue Widening to Include Grade Separation at Governor Drive Showed that It Would Offer No Substantial Traffic Congestion Reduction and that Grade Separation Would Have Significant Unmitigated Impacts on Neighborhood Character/Aesthetics, on Landform Alteration and on Construction Traffic

GJB-1-4

The EIR for the University City North/South Transportation Corridor Study, which was finalized on June 13, 2006, considered seven alternatives: a Genesee Avenue Widening Alternative; a Regents Road Bridge Alternative; a Genesee Avenue/Governor Drive Grade

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Gregory J. Barnes (July 31, 2016)

Separation Alternative; a Genesee Avenue Widening and Regents Road Bridge Alternative; a Grade Separation and Regents Road Bridge Alternative; a Limited Roadway Changes Alternative; and a No Project Alternative. (See Final EIR for Project No. 27445 (hereinafter, "2006 FEIR") at pages 2-3.)

The 2006 FEIR included a chapter identifying "Alternatives Considered But Rejected." (See 2006 FEIR, Chapter 9.0.) It discusses alternatives that were determined to be infeasible for various reasons during the CEQA scoping process. (Id. at 9-1.) The first such alternative that was rejected was labeled "Grade Separation/Genesee Avenue Widening." As noted in the preceding paragraph, the 2006 FEIR considered as a separate alternative a project consisting only of constructing a grade-separated intersection at Genesee Avenue and Governor Drive, and as another separate alternative the widening of Genesee Avenue. The 2006 FEIR noted that the alternative of "Grade Separation/Genesee Avenue Widening" was rejected for further consideration during the scoping process "because it would offer no substantial traffic congestion reduction when compared with the alternatives evaluated in Section 4.0. Genesee Widening by itself accomplishes the same benefits as a combination with grade separation. Grade separation alone only provides for a better level of service at the intersection of Governor and Genesee...." (2006 FEIR, at 9-1 (emphasis supplied).)

The 2006 FEIR found that both the Genesee Avenue Widening Alternative and the Grade Separation Alternative would involve significant impacts to neighborhood character/aesthetics, by requiring 5,800 feet and 1,800 feet respectively of retaining walls and crib walls that would be constructed along both sides of the widened roadway, and by narrowing the median from 18 feet to 8 feet. That would require removal of large, mature trees within the median and along sidewalks that could not be replaced. The 2006 FEIR concluded that "the impact of the loss of landscaping along Genesee Avenue on the neighborhood character is considered significant and unmitigable." (2006 FEIR, at page 3.)

The 2006 FEIR found that the Grade Separation Alternative would involve significant impacts in the form of landform alteration, in that it would require roughly 60,000 cubic yards of earthwork along a 2,400-foot-long segment of Genesee Avenue, and because it would include approximately 1,350 feet of retaining walls, create vertical slopes greater than 10 feet in height, and would impact natural slopes greater than 25 percent. (Id.) The 2006 FEIR concluded that there were no mitigation measures available to reduce significant landform alteration impacts of these alternatives. (Id.)

Several observations are warranted in light of the above-referenced findings of the 2006 FEIR. First, given that the 2006 FEIR concluded that "Genesee Widening by itself accomplishes the same [traffic congestion reduction] benefits as a combination with grade separation[]" and that the Genesee Avenue/Governor Drive Grade Separation Alternative would have significant and unmitigated impacts on neighborhood character/aesthetics, landform alteration, and construction traffic generation and associated impacts (e.g., congestion, air emissions), it is surprising that the DPEIR included, as a feature of the "No Regents Road Bridge and Genesee Avenue Widening Alternative, grade separation at the

GJB-1-4
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RESPONSE

Gregory J. Barnes (July 31, 2016)

Genesee Avenue/Governor Drive intersection. Stated differently, why would the City incorporate a feature into an alternative that had been relatively recently evaluated and as to which the City had concluded, in a Final EIR, that the grade separation feature had no traffic congestion reduction benefits and had numerous, significant, unmitigated environmental impacts? It appears as if the City, in scoping the DPEIR, completely ignored the extensive and expensive process and product (including the input of the Public Working Group) involved in the University City North/South Transportation Corridor Study. Had the DPEIR complied with CEQA's requirement to explain the City's rationale in selecting the alternatives evaluated, and in rejecting the alternatives determined to be infeasible during the scoping process, perhaps this question would have been answered.

GJB-1-4
cont.

Second, is noteworthy that the DPEIR does not address the impacts of the "No Regents Road Bridge and Genesee Avenue Widening Alternative" on (a) neighborhood character/aesthetics due to the extensive use of retaining walls and crib walls and the removal of large, mature trees that would be required under that alternative, or (b) landform alteration due to required earthwork, creation of extreme vertical slopes, and extensive changes to natural slopes, or (c) temporary traffic congestion and air quality impacts caused by the need to close a substantial section of Genesee Avenue to traffic during construction of the grade separation feature.

GJB-1-5

GJB-1-5 Please see response to comment Citizens-2-56.

Third, given these findings of the 2006 FEIR, it is astonishing that the "No Regents Road Bridge and Genesee Avenue Widening Alternative" was selected as the "environmentally superior alternative" (or alternately, as the "environmentally superior build alternative" if one considers that the DPEIR identified the Project as the "environmentally superior alternative" at pages 9-6 and 9-48 of the DPEIR).

GJB-1-6

GJB-1-6 Please see response to comment Citizens-2-57.

3. The DPEIR Fails to Adequately Discuss the Current Environmental Conditions Which Exist in Rose Canyon Over Which the Regents Road Bridge would Span

GJB-1-7 Comment noted.

The proposed Regents Road Bridge would span Rose Canyon ("Canyon") with minimal direct contact with the floor of the Canyon. The planned bridge, which will be approximately 79 feet wide in an approximately 3 mile long canyon (15,840 feet) is, and has been, intended to SPAN the narrow section of the canyon where the 4-lane Regents Road sections come to abrupt ends on both the south and north sides of the canyon." The width of the footprint of the bridge constitutes less than 0.5 % (0.00498) of the total length of the Canyon. None of the current environmental features of the Canyon would be eliminated by the construction of the bridge, save for the rearrangement of the location of some of the fill located in the Canyon near the North terminus of South Regents Road at the Canyon.

GJB-1-7

However, despite continual statements that the Canyon is a "pristine" environmental location, the opposite is true. For instance, all trains between Oceanside and San Diego go through Rose Canyon - 52 or more trains a day (and many more when the double tracking is completed). The North County Transit District (NCTD) Coaster trains between Oceanside and San Diego go through Rose Canyon. The floor of the Canyon, in the same area where the bridge would span the Canyon, was recently dug up extensively by the railroad to put in a

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RESPONSE

Gregory J. Barnes (July 31, 2016)

switching track from one of the double tracks to the other. This extensive construction work on the floor of the Canyon was, in all likelihood, as great, or greater, than the construction footprint for the Regents Road Bridge as it would be built.

One of the City of San Diego's main large sewer lines also goes through the length of Rose Canyon (see all of the manholes in the Canyon), as well as power lines go through the Canyon. There is no parking for use of the Canyon. The Rose Creek waterway is but a trickle most of the year and is strewn with trash and assorted market baskets. Other than the one main walking path, the majority of the Canyon is off limits to leaving the trail.

A proper description of the current environmental condition of the Canyon must be part of any environmental discussion surrounding the Regents Road Bridge option.

Respectfully submitted,


Gregory J. Barnes

GJB-1-7
cont.

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LETTER

RESPONSE

Karen Basbaum (July 31, 2016)

From: Karen Basbaum
To: P.N. Benjamin, PEIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 9:38:41 PM

I am writing this note to support deleting the Regents Road Bridge project and the widening of Genesee Avenue. I am a resident of University City and like many of my neighbors, I have chosen to live in this neighborhood because of its quiet tranquility.

Hiking through Rose Canyon has become a weekend ritual to our family. We cherish the time there with our two children (ages 7 & 8) where we can get fresh air and exercise, be present, and hear and see nature in its true form. In a busy, distracting world, having someplace beautiful to explore in our neighborhood is a gift and I hope it is one my children can continue to grow-up enjoying.

Sincerely,
Karen Basbaum
2585 San Clemente Terrace
San Diego, CA 92122

KB-1-1

KB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Jacob Birnbaum and Janina Zukotynski (July 31, 2016)

From: [Jack Birnbaum](#)
To: [P.N. Hanonofsky](#)
Cc: [rosecanyon@ucsd.edu](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 8:09:34 PM

We applaud the City's commitment to removing the proposed Regents Road Bridge, an unnecessary huge expense with irreversible adverse effects on Rose Canyon and the quality of life in University City. It is past time for this albatross to be taken off the table as we go forward in planning for the local community.

Jacob Birnbaum
 Janina Zukotynski
 4296 Caminito Terviso
 San Diego, CA 92122

BZ-1-1

BZ-1-1

Comment acknowledged. Commenters express support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Iris Clauss (July 31, 2016)

From: iris_c
To: P.A. Bagnino/CFIA
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 4:04:11 PM

To Whom It May Concern:

As a long-time resident and homeowner of University City, I strongly support the **deletion** of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

University City is well-known for being a family-friendly and senior-friendly neighborhood. This is not a neighborhood that needs additional traffic through the community.

Adding the bridge to Regents Road would only increase through traffic that needs to stay on the freeway. It would also add significant air pollution to our community. As a parent of young children, this is a major concern to me and my family.

As for expanding Genesee, Genesee is already being used as a "shortcut" to people that work in the UTC north area. Commuters that live outside of University City should be encouraged to use the freeway, not build additional shortcuts through our small residential neighborhood.

Thank you to City of San Diego leadership for moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

Thank you,
Iris Clauss
3152 Bunche Ave.
San Diego, Ca 92122

IC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

IC-1-1

LETTER

RESPONSE

Jeanne Beach Eigner (July 31, 2016)

From: Jeanne Eigner
To: P.U. Planning/CPA
Cc: rosecanyon@ucsd.edu, rt.com
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 7:34:35 PM

Thank you for letting me voice my very strong objections to the Rose Canyon bridge/extension and widening of Regents Road, and my strong support for removing the project from the Community Plan. The three main objections to the plan are 1. safety concerns, 2. preservation of the irreplaceable natural resource that is Rose Canyon, and 3. financial concerns.

First, safety: As a resident of the Barcelona neighborhood on the north side of Rose Canyon, I can attest that this area is much more densely traveled and populated than the south side of Regents Road. I travel on Regents at different hours of the day, and not only does the road see heavy automobile traffic, but there are many, many more pedestrians than seen on the south side. Perhaps bridge proponents from the south side don't realize that at any time of day, hundreds of college students are walking to and from bus stops, and residents are walking to the Regents Center north of La Jolla Village Drive and the Von's Center on Arriba Street. In the morning, there is already severe congestion at Doyle Elementary School, as parents walk or drive their children to school; pedestrian traffic remains heavy as residents and children go to Doyle Recreation Center all during the day. Students from La Jolla Country Day School, residents of the UCSD Housing north of La Jolla Village, and the thousands of residents of the condo and apartment complexes that line Regents between Arriba Street and Eastgate Mall would be endangered by increased traffic. Can we risk the lives of children?

Second: This afternoon, I watched hawks circling overhead and heard their calls. They doubtless nest in the canyon, as do owls and other native bird species and animals. Not only is the canyon a wonderful resource for school classes, Scout groups, birders, bicyclists, walkers and runners, it is a crucial habitat for butterflies, plants, reptiles, and other threatened species of wildlife. It is vital to preserve the canyon as a resource for human education and enjoyment, a habitat for our non-human neighbors, and a wetland and watershed.

Third: Building a bridge will be an expensive misuse of time, effort, and money. The resources required to create this folly would be better spent on repairing and improving extant infrastructure greatly in need of maintenance, creating better bicycle paths and street markings for cyclists, and bolstering public transportation. With the extension of much-needed light rail/trolley, enhanced bus lines and connections would be a much better use of public funds. Simply creating more roads for more cars means more pollution, more noise, and more hazards; it's outdated thinking and anachronistic planning.

Thank you for protecting and preserving Rose Canyon as an important natural resource and lovely last remnant of the wild. Thank you for keeping our roads and walkways safe for pedestrians. Thank you for your financial responsibility. And many, many thanks for your

JBE-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JBE-1-1

LETTER

continued efforts to create and preserve a San Diego we are so proud to call America's Finest City!

Jeanne Beach Eigner
4052 Caminito Meliado
San Diego, CA 92122
619.743.1900
jbeigner@hotmail.com

JBE-1-1
cont.

RESPONSE

Jeanne Beach Eigner (July 31, 2016)

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LETTER

RESPONSE

John Lee Evans (July 31, 2016)

From: [Evans, John](#)
To: [PLN_Planning/CPA](#)
Cc: [Evans, John](#)
Subject: University City Planning Amendment No. 480286/SCH No. 2015121011
Date: Sunday, July 31, 2016 8:30:32 PM

I am a Trustee of the San Diego School District Board of Education representing University City. I strongly support the removal of the Regents Road extension through Rose Canyon, as well as the removal of widening Genesee.

Either of those projects, if implemented, would have a detrimental affect on the five public schools of University City. The Regents Road extension would divide the attendance areas of Spreckels and Doyle elementary schools and would create a safety problem for young students. The Genesee widening would have the same negative effect on UC High School, Curie Elementary and Standley Middle School. Every school in University City would be negatively impacted.

Furthermore, Rose Canyon serves as a living laboratory for our schools. It allows students in an urban environment to get up close to nature and it is within walking distance of our schools. We cannot lose this precious resource for our students.

Thank you for your consideration.

John Lee Evans
Trustee, San Diego Unified School District, District A

Sent from my iPad

JLE-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JLE-1-1

LETTER

RESPONSE

Barbara Fitzsimmons (July 31, 2016)

From: Barbara Fitzsimmons
To: PLN Planning/CEQA
Subject: PEIR - University City Plan Amendment
Date: Sunday, July 31, 2016 11:14:13 AM

PROJECT NAME: University Community Plan
Amendment PROJECT No. 480286 / SCH No.
2015121011 COMMUNITY AREA: University COUNCIL
DISTRICT: 1 (Lightner)

Susan Morrison, Environmental Planner

Dear Ms. Morrison,

After perusing the Draft PEIR for the University Community Plan, and after much thought concerning the proposed Regents Road Bridge, I am writing to you to stress the importance of NOT allowing the changes in the PEIR for our community. I am a long time resident (48 years), and I find that many of the pro comments for this change in the PEIR are utter nonsense. The need for a second connection between North UC and South UC is so obvious to a thinking person.

1. The Golden Triangle area is becoming the major business center in San Diego. Construction of new and modification of present businesses and homes is obvious to all. Transport to and through this center of activity is limited to one north-south road, Genesee Avenue. With all of this activity, the traffic is becoming a nightmare, and it promises to become much, much worse in the future.

BFI-1-1 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BFI-1-1

LETTER

RESPONSE

Barbara Fitzsimmons (July 31, 2016)

2. The one road allows for too long a time for emergency vehicles to reach South U C. Also, it is much too small to handle many people in an emergency such as a canyon fire.

3. There has been a concerted effort by a small percentage of homeowners to stop the Regents Road project. They are afraid that the bridge over Rose Canyon would ruin their view and damage their property values.

4. This "pristine" canyon would NOT be ruined by this bridge.

Rose Canyon is not pristine; only in some people's imagination. The flora and fauna would NOT forever be damaged, but would return. Educational field trips certainly would not be ruined by this bridge; canyon activities could continue to be an asset to the community.

BFI-1-1
cont.

5. The plan for this bridge has for many, many years been a part of the overall plan for University City. Developers have paid into the city coffers, so money for this much-needed project should not be an issue.

Therefore, why on earth would the city be swayed by a few to put the remainder of the area citizens at risk?

I urge you to see that the PEIR is NOT updated to remove the Regent Road Bridge!!

Thank you,

Barbara Fitzsimmons

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LETTER

3437 Villanova Ave.

San Diego 92122-2310

bfitzsimmons@ucsd.edu

858-453-5787

RESPONSE

Barbara Fitzsimmons (July 31, 2016)

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LETTER

RESPONSE

Jerry Fitzsimmons (July 31, 2016)

From: Jerry Fitzsimmons
To: P.N. Planning/CEQA
Cc: contactus@citizensfortheregentsroadbridge.org
Subject: PROJECT NAME: University Community Plan Amendment PROJECT No. 480286 / SCH No. 2015121011
Date: Sunday, July 31, 2016 10:25:04 PM

PROJECT NAME: University Community Plan Amendment

PROJECT No. 480286 / SCH No. 2015121011

COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

July 30, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department

If the "I" in "EIR" is for impact, I find the idea of an EIR addressing the removal of a project rather curious, a non-impact.

In section after section of the PEIR the conclusion that something will not happen if something is not done is mind boggling.

For instance:

No new water facilities would need to be constructed as a result of this Project. There would be no increase in demand above that of existing conditions due to the removal of the planned Regents Road Bridge from the UCP. Therefore, no significant impact would occur.

No excessive use of fuel or natural gas would result from the removal of the planned Regents Road Bridge from the UCP. Therefore, no significant impact would occur.

Wow, what a leap of intuition! How much did that verbiage cost us?

Sincerely,

Jerry Fitzsimmons
3437 Villanova Avenue
San Diego, California 92122

JF-8-1

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JF-8-1

LETTER

RESPONSE

Gary and Nancy Frederich (July 31, 2016)

From: Nancy Frederich
To: City Planning/CPA
Subject: University Community Plan Amendment, PROJECT No. 400286 / SCH No. 2015121011
Date: Sunday, July 31, 2016 8:38:31 PM

Dear Planning Department,

Reading through the Draft EIR, we see that in addition to changing the look of Rose Canyon, both road projects (Regents Road Bridge and The Widening of Genesee) would reroute normal freeway users through residential areas. This would produce major traffic through our local neighborhoods and school zones, affecting our children, pedestrians and bicyclists. To spend tens of millions of dollars on a bridge to decrease some small incremental amount of rush hour traffic is unnecessary.

GNF-1-1

GNF-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Thank you

Gary and Nancy Frederich
3041 Mercer Lane
San Diego, CA 92122

LETTER

RESPONSE

Harry Griswold (July 31, 2016)

From: [Harry Griswold](#)
To: [Eli Blumstein, PEIR](#)
Subject: University City Community Plan Amendment, No. 160286/SCH No. 2015121011;
Date: Sunday, July 31, 2016 10:15:41 PM

I want to say as simply as I can, I think it would be immoral as well as unfruitful to waste tens of millions of dollars for the purpose of destroying a peaceful canyon while merely satisfying the narrow financial interests of a very few business people. And yet somehow consideration of the Regents Road bridge and widening of Genesee goes on like a bad disease we can't shake. I live very near Rose canyon, have attended numerous meetings, and have generally tried to keep up with the various arguments and analyses presented over the years. The bottom line in my mind is that no appreciable traffic or safety concern will be met by going forward. But a lot of wildlife will be displaced and a refuge for walkers, birders, eagerly learning children, and bicyclists will be decimated forever. This cannot be allowed to happen.

The real needs we the people have are for better public transit, better maintained streets and updated water and sewage systems, to name a few possibilities. Why not improve the canyon with better bike paths and safe rail crossings? Tens of millions of dollars can go a very long way for a large number of quality of life projects. It should be unthinkable that the city would squander huge resources to destroy a canyon while gaining nothing for the general population, for my neighbors and myself. Just because the plan was set down decades ago doesn't add any weight to an argument for it. If people feel a sense of incompleteness because we have two dead-end pieces of street both named Regents Rd. that aren't connected, then rename one of those pieces to something else and the inevitability of the connection will instantly and cheaply lose a LOT of its rationale.

I say get real, get rid of the outdated plan, save a nice place of green, a rare refuge in our busy city, and start to think more creatively about how tens of millions of dollars might be spent for the true benefit of the many residents of this area.

Thank you for considering my comments. Please have the courage to do what is right.

(I'm resending this because I forgot to put my name of the first copy.)

Harry Griswold
5556 Stresemann St.
griswold@san.rr.com

HG-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

HG-1-1

LETTER

RESPONSE

Heidi Hansen (July 31, 2016)

From: [Heidi Hansen](#)
 To: [PLN Planning/CF14](#)
 Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
 Date: Sunday, July 31, 2016 2:34:04 PM

Hello:

As a 25 year resident of the University City neighborhood and consistent user of Rose Canyon, I urge the City to expunge both the Regents Road Bridge project and the widening of Genesee Ave. from the University Community Plan.

Both projects would permanently damage the fabric of our community by drawing traffic through residential streets, and irreparably harm the unique and fragile environment of Rose Canyon, while providing no meaningful benefits to the University City or San Diego as a whole. The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. There is no cost/benefit analysis to be done when the material and environmental costs are clearly documented to be extremely high and any beneficial outcome is entirely in question.

Thank you for your thoughtful consideration.

Sincerely,
 Heidi Hansen

Heidi Hansen
 3463 Wellesly Ave.
 San Diego, CA 92122
 858-775-2157

HH-1-1

HH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Lisa Heikoff (July 31, 2016)

From: [Lisa Heikoff](#)
 To: [PLR_Berning@CI.A](#)
 Subject: University Community Plan Amendment, No. 400206/5CH No 2015121011
 Date: Sunday, July 31, 2016 5:55:55 PM

I am writing in support of the University Community Plan Amendment to remove the Regents Road Bridge and the widening of Genesee Ave. from the University Community Plan. The Regents Road bridge would be particularly destructive to the canyon and its recreational benefits to residents and support of wildlife. My husband and I have lived in University City for 26 years and raised our three daughters here. We were an active Girl Scout family and all of my daughters relied on the canyon trails to practice their backpacking skills. I continued to walk in Rose Canyon with friends on a weekly basis. The UC High cross country team relies on the canyon trails for practice runs. The educational programs developed for school children in University City and Clairemont have been highly successful in restoring interest in the outdoors to children who spend too much time in front of electronic screens. The bridge project would also degrade wildlife corridors and the Rose canyon watershed. The Draft EIR indicates that both of these road projects would draw traffic off of the freeways and through our neighborhoods. This will result in less safe roadways for residents and schoolchildren, more noise, and increased pollutants in the air right near schools and athletic fields where children will be exposed. I commend the Mayor and the City for their leadership in moving to delete these two outdated road projects and supporting progressive public transportation and a focus on preserving the environment of the City. The presence of greenbelts within our communities is a significant part of quality of life in San Diego.

Sincerely
 Lisa Heikoff MD
 3246 Willard St.
 San Diego, CA 92122

LH-1-1

LH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Charley Herzfeld (July 31, 2016)

From: Charley Herzfeld
To: Bill Blanning, et al
Subject: University Community Plan Amendment, No. 400266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 1:36:31 PM

To Whom It May Concern:

I strongly support deleting both the Regents Road Bridge and the Genesee Avenue widening projects from the University Community Plan. Thank you to community and City leaders for their hard work in taking these real steps towards a 21st century view of the world in which modern transportation elements, not just more roads, are provided in combination with the realization of the importance of our canyons, parks and green spaces.

Our open spaces must be preserved, augmented and enhanced to accommodate all kinds of needs of a growing population. These two projects, particularly the Regents Road Bridge, would be environmentally damaging and degrade Rose Canyon significantly. I have been a birdwatcher for over 50 years and for the last 10 years have led public bird walks in Rose Canyon. The area where the bridge would be built, and the finger canyon which would be filled, is one of the best natural habitats in the city. Its many native trees and plants such as willows, oaks, and sycamores, provide incredibly good habitat for many important birds including California Gnatcatcher, Blue Grosbeak, Yellow-breasted Chat, Peregrine Falcon, White-tailed Kite, and Olive-sided Flycatcher, just to mention a few. These are the birds that come to mind when I think of the excitement and happiness that birders of all ages and skills experience when they actually get to see them in the beautiful natural setting of Rose Canyon.

This is just one of the reasons why we need to delete these harmful projects from the University Community Plan.

Charley Herzfeld
5832 Stresemann Street
San Diego CA 92122

CHE-1-1

CHE-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Elinor M. Jacobs (July 31, 2016)

From: Elinor Jacobs
To: P.N. Planning/CEQA
Subject: FW: University Community Plan Amendment, Project No 480286
Date: Sunday, July 31, 2016 6:35:59 PM

From: Elinor Jacobs [mailto:eljacobs@san.rr.com]
Sent: Sunday, July 31, 2016 5:48 PM
To: 'Planning' <CEQA@sandiego.gov>
Subject: University Community Plan Amendment, Project No 480286

July 31, 2016

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department

Re: Project Name: University Community Plan Amendment
Project No: 480286/SCH No. 2015121011
Community Area: University
Council District: 1 (Lightner)

The construction of the Regents Road Bridge would reduce the traffic on Genesee Avenue and the findings of the Environmental Impact Reports validate the need for the completion of connecting the Regents Road corridor.

I believe the finding of significant and unmitigated impacts on the areas of transportation/circulation, greenhouse gas emissions, air quality, noise and public services should be a major factor in selecting to build the Regents Road Bridge as an obvious Required Priority.

Our City Council has permitted the overdevelopment of the Golden Triangle area and repeatedly set aside the completion of the planned (40+ years) Regents Road Bridge. Our current gridlock and the predicted increased traffic are the results of poor decisions. Our city deserves better action from the city council.

Sincerely,

Elinor M. Jacobs

4624 Murphy Avenue
San Diego, CA 92122
858-453-1528

eljacobs@san.rr.com

EMJ-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

EMJ-1-1

LETTER

RESPONSE

Keith Jenne (July 31, 2016)

From: [Jenne, Keith](#)
To: [E.N. Banning/CFJA](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 9:42:08 PM

Good Afternoon,

Please allow this email to serve as a submission of public comment to the Environmental Impact Report with respect to removing the Genessee Avenue Widening and Regents Road Bridge project from the University Community Plan Transportation Element.

As a resident of the community, **I strongly support removing the Genessee Avenue Widening and Regents Road Bridge project from the University Community Plan Transportation Element.**

I thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

I am grateful that we are near a final resolution to permanently remove these projects from the community plan. These projects would double or triple the number of traffic lanes THROUGH the University City Community. With respect to Genessee Avenue Widening, this will further divide a cohesive community into an East and West sections. Genessee Avenue is already difficult and dangerous to cross. As residents of the West side, we travel to the East side daily, and we worry that a larger roadway will make it that much more difficult and dangerous. It will also negatively affect our quality of life and vitality in addition to the increased noise and air pollution.

Adding Regents Road Bridge will cause an even greater division of the community between the East and West side of Regents Road in South University City. Currently this is a cohesive community, and adding the connection of North and South Regents Road with a bridge, adding increased traffic that accompanies this connection will fractionate University City even more. Nearly all of us in South University City will be negatively impacted by a new thoroughfare that will divide our cohesive community. The Regents road bridge project would interfere with our recreational, educational, and visual enjoyment of Rose Canyon and it would harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon.

Additionally, Induced demand is a research finding now accepted by California Department of Transportation. Additional lanes of thoroughfare will add more vehicles traveling through our community. This will add more noise and air pollution, and decrease the quality of life in our community, in addition to the obvious impact and disruption to the the Rose Canyon open space. The EIR illustrates clearly that the true congestion evident on Genessee Avenue is mainly Southbound commuter traffic in the afternoon. Please make sensible changes to current traffic flow to redirect these vehicles onto the freeway in the afternoon instead of short-cutting through our community. Adding additional traffic capacity through our community will invite other commuter vehicles through our community, and will negatively impact our community in an irreversible way.

Please take these factors into consideration and remove the Genessee Avenue Widening and Regents Road Bridge project from the University Community Plan Transportation Element.

Thank you, Mayor Falconer, and Council President Lightner for your thoughtful consideration of this.

KJ-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genessee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KJ-1-1

LETTER

important move toward a sustainable future for the University City community.

Respectfully,

Keith Jenne
6346 Bunche Terrace
San Diego, CA 92122

KJ-1-1
cont.

1. Multistage Environmental and Social Impact Assessment of Road Projects; Guidelines for a comprehensive process. UN ESCAP

http://docs.sandiego.gov/citybulletin_publicnotices/CEQA/PN1300%20NOP%20PN%20Date%2012-2-15.pdf

2. <http://smartergrowth.org/californias-dot-admits-that-more-roads-mean-more-traffic/>

http://www.dot.ca.gov/research/docs/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf

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LETTER

RESPONSE

Erik and Kristin Kistler (July 31, 2016)

From: [Kistler, Erik](#)
 To: [City Planning/PEIR](#)
 Subject: University Community Plan Amendment, No. 460286/ SC# No. 2015121011
 Date: Sunday, July 31, 2016 9:55:02 PM

To the Planning Commission, City of San Diego,

I very much support the deletion of the Regents Road Bridge plan and the Widening of Genesee Avenue from the University City Community Plan. I would like to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the environmentally damaging, costly, and unnecessary Regents Road bridge project. I have been running in Rose Canyon for over 20 years on an almost daily basis and I enjoy very much the pristine open space we have here. Now I bring my children to Rose Canyon as well, so they can experience nature in the City of San Diego. Growing up in Los Angeles, I saw open spaces paved over with considerable regularity; the same pattern threatens to repeat itself here in San Diego, with predictable consequences. Rose Canyon represents one of the few remaining open space jewels left in San Diego. Predictably, where there is open space, people want to build, for short term gain. I congratulate the City on being far-sighted and realizing that Rose Canyon is a treasure that this City cannot afford to lose or pave over.

From a pragmatic point of view, the draft EIR indicates that a bridge through Rose Canyon and widening of Genesee Avenue would serve to divert traffic from the 5 without changing commute times to East County (via 52) or south appreciably, while destroying not only the Rose Canyon open space but also decimating affected neighborhoods for little appreciable gain. At a certain point it must become clear that building more and wider roads and bridges through communities is destructive and is a short-term solution at best.

Again, thank you to the City for deleting these destructive, expensive, and outmoded proposals.

Sincerely,

Erik and Kristin Kistler
 3250 Millikin Ave
 San Diego, CA 92122

EKK-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

EKK-1-1

LETTER

RESPONSE

Henry F. Krous (July 31, 2016)

From: [Krous, Henry](#)
To: [C. R. Blanning, PEIR](#)
Subject: University Community Plan Amendment, No. 460286/ SCI) No. 2015121011
Date: Sunday, July 31, 2016 8:50:00 PM

To Whom It May Concern,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. With this in mind, I want to express my sincere appreciation to the City leadership in its efforts to delete these two out-of-date road projects. In my opinion, Regents Road bridge project is particularly unnecessary given its excessive cost and potential for environmental destruction. The likely harm that would accrue to Rose Canyon as an environmental habitat as well as a its role as an important recreational, educational, and visual enjoyment for so many of San Diego's citizens far outweighs any perceived advantages at this late date. It seems obvious that the additional traffic that the Draft EIR indicates would be funneled through our neighborhood would certainly reduce the quality of life for the residents of University City as a result of increased risks imposed to pedestrians, bicyclers, and school buses.

HFK-1-1

Thank you for your consideration.

Respectfully,

Henry F Krous MD

HFK-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Adam Lakritz (July 31, 2016)

From: Adam Lakritz
To: P.U. Planning/CEQA
Subject: PROJECT NAME: University Community Plan Amendment;PROJECT No. 480286 / SCH No. 2015121011
Date: Sunday, July 31, 2016 4:41:49 PM

Thank you for the opportunity to provide commentary on the UCPA. I certainly don't have expertise in city planning, however I do have expertise in living in University City since 1992. I have been both an owner and renter during this time, the majority of time has been as an owner. I have resided in both the west part of University City "North" and the central part of University City "North".

I feel the Community planning process is dominated by University City 'South' residents. There should be a requirement to balance the planning groups as the two areas (assuming Rose Canyon as the divider) have different characteristics and demographics makeup. If you look at the data University City 'North' has the majority of the population, the highest population density, highest traffic volumes and the largest property tax base (residential and commercial). Yet the planning process has revolved around the needs of University City 'South' for as long as I have lived here. I wish our elected City Council member was more aware of where the University City electorate lives.

This mix of commercial and residential produces a vibrant, urban community that I enjoy living in. Did I like it when Nobel ended at Towne Center Drive, absolutely. However as San Diego and University City grow it is unreasonable to expect neighborhood character to remain static. I certainly support the widening of Nobel to three lanes as we have a rapidly growing East-West traffic issue in University City (partially due to the UTC expansion). I only support the widening of Nobel with a corresponding improvement in pedestrian crossing. UTC claims to be building a community center, there has to be a way for the community to safely get there.

We have had a North-South traffic issue for much longer than an East-West traffic issue. This North-South issue impacts both freeway and residential access. We have seen the City build more freeway entrances and widen freeway entrances. This has done little good as the freeway itself can not handle the additional traffic. I do not support the expansion of freeway on ramps as mentioned in the Plan amendment. I can only imagine freeway access in the area with the additional traffic in the Torrey plan. On the residential North-South access again the afternoon is the worst time although mornings are becoming heavier, especially with the new transit lanes. Afternoon traffic routinely delays emergency vehicles. The combination of residential and freeway traffic in the afternoon and early evening adds 30 minutes drive time to southbound trips between University City 'North' and 'South'. UCSD is the area's largest employer. Regents Road directly services the UCSD campus, particularly the health campus which generates a good deal of the daily employee traffic. The funding has been in place to build the Regent's Road Bridge and it is time it be built for the majority of the residents in University City.

Rose Canyon is a beautiful resource and a great addition to our community. However, we have to face the current use reality. There is already one bridge over the canyon, how much additional environmental damage will be added with a second bridge? If the environmental impact is that great the Genesee bridge should be closed and removed. The Canyon itself is home to rail lines and major sewer lines. I also understand that train traffic is going to dramatically increase with the double tracking project. I am sure little thought was given to the property value or environmental impact when UC High expanded their athletic fields to the

AL-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

AL-1-1

LETTER

edge of the canyon and erected a very ugly blue structure and more lighting. With solid traffic for 3-4 hours daily (except the weekend) I can't imagine the pollution of idling engines on the Genesee bridge is helping the canyon either.

A second bridge (Regent's Road) is needed, is in the plan for a reason, is funded and should be built. Widening of Genesee should be considered after the Regents Road bridge is built and traffic analysis completed.

Last, pedestrian access in our neighborhood needs to be improved drastically, particularly in areas where residential use and commercial use intersect. I have seen too many near misses at some of our busier intersections. The stoplight at the UTC South entrance has certainly helped. As we widen streets in anticipation of increased access we need to safely remove pedestrians from harm's way. I agree with the plan that more pedestrian overpasses are needed. However, the UTC expansion was allowed to remove a pedestrian overpass with no equivalent alternative in place. UTC is probably the worst place for pedestrian access in the neighborhood and a disgrace. All pedestrian entrances (with the exception of the Towne Center path up the hill) wind up in a parking lot which is no safer than the street. Sidewalks come and go inconsistently.

Again thank you for the opportunity to provide feedback on our neighborhood.

AL-1-1
cont.

RESPONSE

Adam Lakritz (July 31, 2016)

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LETTER

RESPONSE

Keith Lazerson (July 31, 2016)

From: Keith Lazerson
To: PLN Planning/PEIR
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 1:33:11 PM

To whom it may concern,

As a long time resident of University City living in close proximity to Regents Road, I strongly support the deletion of both the Regents Road Bridge project and the Widening of Genesee Avenue project from the University City Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project, which would negatively impact the quality of life of my family and of all my neighbors who live near Regents Road.

As an avid local naturalist, I strongly support protecting Rose Canyon and all its natural beauty and wildlife. Not only is the canyon a peaceful place to relax and enjoy untouched open space but it is a great place to take kids and teach them the importance of preserving nature and the value of having open space in the community. The Regents Road bridge project would seriously damage the delicate ecosystem and wildlife viewing opportunities in Rose Canyon.

As mentioned in the EIR, both of these projects would draw traffic off nearby freeways and direct it right into the local neighborhoods where several schools are located creating dangerous conditions for children who walk to and from these schools.

I look forward to the day when these two aforementioned projects are permanently eliminated from the University City Community Plan.

Sincerely,

Keith Lazerson
5908 Eton Ct
San Diego, CA 92122

KLW.construction@gmail.com

KLZ-1-1

KLZ-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Dinesh Martien (July 31, 2016)

From: Dinesh Martien
To: E.N. Benjamin, EIR
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 5:14:38 PM

To whom it may concern:

I strongly support deleting the Regents Road Bridge and Widening of Genesee Avenue from the UC Plan. Although both of these projects have been in our community plan for decades, they do not reflect the current needs or priorities of our community. The damage caused by these projects would far outweigh any possible benefits achieved.

Rose Canyon is an excellent location to experience nature and recreate. I have mountain biked, hiked, and run through it countless times, often with my two daughters. In fact, we often use a trail into the canyon from Regents Road that would be destroyed by the bridge.

The Draft EIR has predicted that both of these projects would take traffic from freeways and run it through our neighborhood. This is not good for the people or wildlife in our community. Consider that fact that drunk drivers frequently attempt to drive north across the canyon on Regents Road to avoid DUI checkpoints. If the road went through, this would become much more common.

I find it interesting that supporters of the bridge project never show renderings of the bridge. I suspect this is because the project would involve extensive infill of the canyon with a small bridge across the remaining span. If we fast forward 30 years, I am sure we (and our descendents) will be happy to have saved our beautiful canyon from such a fate.

Best Regards,
Dinesh Martien
4328 Rous St
San Diego, CA 92122

DM-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DM-1-1

LETTER

RESPONSE

Fabrice Pierre (July 31, 2016)

From: Fabrice pierre
To: B.N. Banning/CFJA
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 11:38:19 PM

To whom it may concern,

My name is Fabrice Pierre and I am a scientist acknowledged for the co-discovery of several drug candidates for serious diseases such as cancer and cystic fibrosis. I emigrated from France with my spouse 15 years ago and we have been naturalized U.S. citizens just last week. Our kids were born in San Diego and they are currently attending local public schools. One of the many reasons we enjoy living in San Diego is the unique configuration of the City, made of a rare mix of urban areas surrounded by untouched wild canyon areas. This creates a perfect balance of modern life comforts combined with the beauty of a natural environment. My family lives close to the Rose canyon and we appreciate this area for biking, running and bird watching.

This is why I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I feel that the Regents Road bridge project would be especially damaging to Rose Canyon. In spring we are able to watch many migratory birds that rest there on their way to northern places. The bridge project would harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon. It would also add noise perturbation in the canyon which would interfere with recreational, educational, and visual enjoyment of Rose Canyon. This project would provide no practical solution to the traffic congestion problems of the city and the price to pay for the future generations of San Diegans would be horrendous.

I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

Sincerely,

Fabrice Pierre

Fabrice Pierre, Ph.D.

3244 Camino Eastbluff, apt. 40
La Jolla, CA 92037, USA

FP-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

FP-1-1

LETTER

RESPONSE

Joseph Steinbach (July 31, 2016)

From: jsteinbach@ucsd.edu
To: [B.N. Blomquist, EIR](#)
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 11:25:47 AM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to commend the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

The Regents Road bridge project would be especially damaging to Rose Canyon. It would negatively impact habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon

Joseph Steinbach
3547 Luma Ave.
San Diego, CA

JS-1-1

JS-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Devon A. Thompson (July 31, 2016)

From: Devon Thompson
To: P.A. Blanning, EIR
Subject: University Community Plan Amendment, No. 460286/SCH No. 2015121011
Date: Sunday, July 31, 2016 11:19:29 AM

To whom it may concern,

I am writing to convey that I strongly support **deletion** from the University City Community Plan of: **the Regents Road Bridge project and the Widening of Genesee Avenue.**

I have lived and worked in University City for 15 years. Rose canyon is an important natural area in our community where we can enjoy nature. It is a place where the children in our community experience and learn about wildlife in their natural habitat. Walking and cycling through the canyon is a refreshing experience that we have shared with our children and friends and we wish to protect Rose canyon for future generations. A bridge through Rose canyon would harm the wildlife habitat and have negative implications on the water quality in Rose Canyon creek. The Regents Road bridge project would be especially damaging to Rose Canyon as indicated by the Draft Environmental Impact Report. Deleting the Regents Road bridge project would protect Rose Canyon, one of the few natural areas we have in our community.

The Draft Environmental Impact Report indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. Commuters would exit the freeways to use the Regents Road as a byway through our neighborhood. The impact of this additional traffic would be detrimental to our neighborhood. Pedestrians and cyclists would be forced to contend with the increase in vehicular traffic. The noise of the traffic would be especially disruptive to our quiet and peaceful community. Additionally, there are 4 public schools in this area and safety would be negatively impacted with additional traffic during drop off and pick up from school. Studies show that building more roads does not alleviate traffic congestion. See the following articles on this subject.

1. [A study: Building roads to cure congestion is an exercise in futility and quote within](http://www.berc.org/articles/study-building-roads-cure-congestion-exercise-futility)
<http://www.berc.org/articles/study-building-roads-cure-congestion-exercise-futility>
"Duranton and Turner say building more roads results in more driving for a number of reasons: People drive more when there are more roads to drive on, commercial driving and trucking increases with the number of roads, and to a lesser extent, people migrate to areas with lots of roads. Given that new capacity just increases driving, they find that "a new lane kilometer of roadway diverts little traffic from other roads."

2. [California's DOT Admits That More Roads Mean More Traffic Take it from Caltrans: If you build highways, drivers will come.](http://www.citylab.com/commute/2015/11/californias-dot-admits-that-more-take-it-from-caltrans-if-you-build-highways-drivers-will-come)
<http://www.citylab.com/commute/2015/11/californias-dot-admits-that-more-take-it-from-caltrans-if-you-build-highways-drivers-will-come>

DAT-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DAT-1-1

LETTER

RESPONSE

Devon A. Thompson (July 31, 2016)

[roads-mean-more-traffic/415245/](#)

3. What's Up With That: Building Bigger Roads Actually Makes Traffic Worse
<http://www.wired.com/2014/06/wuw-t-traffic-induced-demand/>

I specifically I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

DAT-1-1
cont.

Sincerely,
Devon A. Thompson, B.Sc., Ph.D.
3176 Bunche Avenue
San Diego, CA 92122
858-558-3685
Devonanni@gmail.com

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LETTER

RESPONSE

Luke Zabrocki (July 31, 2016)

From: Luke Zabrocki
To: P.N. Blanning/CFJA
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 3:18:42 PM

City leaders:

I would to thank the city for its leadership in ending one source of intense division within our community by removing the Regents Rd bridge project and the Genessee Rd widening project from the city plan.

Like many members of our San Diego community, I am a military brat and an active duty service member. I grew up in University City along Rose Canyon and after being stationed for over a decade on the east coast I have finally been able to move back to San Diego with fortune enough to live in the same UC neighborhood. I have very fond memories of spending time exploring Rose Canyon as a child and I am ECSTATIC that the city has had the foresight to protect this natural treasure so that my children can grow up with the same opportunities.

The draft EIR recently published shows that the Regents Road Bridge project and widening of Genessee will have minimal traffic impact for the cost and simply draw traffic from the freeways through our quiet community. Thank you for supporting the protection of Rose Canyon and supporting fiscal responsibility by putting an end to these special interest projects.

V/R,

Luke Zabrocki
CDR, MC, USN
3262 Lahitte Ct
San Diego, CA 92122

LZ-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genessee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LZ-1-1

LETTER

RESPONSE

Mariette Kobrak (July 31, 2016)

From: Mariette Kobrak
To: E.N. Bagnino/UCIA
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 2:42:15 PM

I am a 47-year resident of University City and have lived on the edge of Rose Canyon these many years. My children have grown up in this community and had a wonderful natural park just yards from our home to explore the great outdoors. When we settled here there was an elementary school with portable classrooms, no Standley Park, no Junior high school, nor a high school. But we had faith in this community as a good place to bring up children.

There has always been a threat to despoil the canyon. The Rose Canyon area was zoned for manufacturing which fortunately we got changed. Then there was the threat of an additional bridge connecting North UC and South UC. I am thankful to the present city council for eliminating this possibility and I urge you to adopt the amendment to the general plan which would not only eliminate this harmful bridge but also the widening of Genesee. We don't need additional commuters taking shortcuts through our community and in the process ruin our natural environment.

It is not just important for residents like me who have enjoyed this canyon, but also for the school children on their nature walks, the cyclists and any other recreational users I meet here frequently. Please remove this threat from future plans.

Mariette Kobrak
3427 Tony Dr
San Diego, CA 92122

MK-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

MK-1-1

LETTER

RESPONSE

Marlene Petrie (July 31, 2016)

From: [jag.oft](#)
To: [24.0_Berning_City](#)
Subject: University Community Plan Amendment No. 480266 / SCH No. 2015121011
Date: Sunday, July 31, 2016 1:29:44 PM

We strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. We thank the City for its leadership in moving to delete these two out-of-date road projects, very expensive and unnecessary projects, especially the costly and environmentally damaging Regents Road bridge project

We strongly support protecting Rose Canyon, which is a jewel in the University City Community, and should be protected now and for the future. The Regents Road bridge project would be especially damaging to Rose Canyon.

Both of these road projects would primarily draw traffic off the freeways and through our local neighborhoods. There is no need for this with all the new public transport options being developed and built in our community. We strongly oppose increasing automobile traffic through our community, which would lead to highly significant impacts to schools, pedestrians, biking, walking and noise all of which would have to be mitigated assuming they even could be.

Thanks again,
Marlene Petrie
7934 Cam. Dia
San Diego 92122

MP-1-1

MP-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

MaryAnn and Rob Klima (July 31, 2016)

From: Avalon Dreaming
To: UC Planning PEIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 7:00:36 PM

Dear Planning Committee,
My husband and I are long time residents of University City and we love our community just the way it is so I am writing to state that we strongly support the removal of the Regents Road Bridge and the Widening of Genesee Avenue projects from the University City Community Plan.

We are thankful that the leadership for the city are moving to delete these projects and are in favor of protecting Rose Canyon. We frequent the canyon on birding expeditions and walks and we appreciate and need this little piece of serenity in the neighborhood. The draft EIR indicates that both projects would draw traffic off the freeways and through our neighborhoods. This would create an unsafe environment for our children, our pets, our schools, for biking and walking, not to mention the noise and air pollution it would create. We urge you to please move forward with the amendment and delete the projects once and for all.

We appreciate your consideration.

Kindly,
MaryAnn and Rob Klima
5672 Carnegie St. 92122

MRK-1-1

MRK-1-1 Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Patricia Brounstein (July 31, 2016)

From: Patricia Brounstein
 To: E.N. Blainson/EI18
 Cc: "BCC"; "Richard Larsen"
 Subject: University Community Plan Amendment, No.480286/SCH No. 2015121011
 Date: Sunday, July 31, 2016 3:58:01 PM
 Importance: High

Dear Planning Committee,

I want to take the time to thank you for recognizing that it is important to vote to delete both the Regents Road bridge project and the Widening of Genesee to 6 lanes between Nobel and the 52.

I strongly support the protection of Rose Canyon. The Regents Road bridge project would be very damaging to Rose Canyon.

I thank the leadership of the City for its movement to delete these two out-of-date projects. These projects are unnecessary, costly and environmentally damaging.

Thank you for your consideration.

Sincerely,
 Patricia Brounstein
 3938 Camino Calma
 San Diego, CA 92122
 858-457-5959

PB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

PB-1-1

LETTER

RESPONSE

Robert A. Jacobs (July 31, 2016)

From: [Robert Jacobs](#)
To: [E.N. Planning/CEQA](#)
Subject: University Community Plan Amendment, Project No. 480286
Date: Sunday, July 31, 2016 6:40:01 PM

July 31, 2016

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department

Re: Project Name: University Community Plan Amendment
Project No: 480286/SCH No. 2015121011
Community Area: University
Council District: 1 (Lightner)

The construction of the Regents Road Bridge would reduce the traffic on Genesee Avenue and the finding of the Environmental Impact Reports validate the need for completion of connecting North and South Regents Road.

I strongly believe the findings of significant and unmitigated impacts on the areas of transportation/circulation, air quality, greenhouse gas emissions, noise and public services should be a major factor in selecting the building of the Regents Road Bridge as the Ultimate Alternative.

The failure to plan for increased traffic and the current gridlock in the Golden Triangle affecting users from various city areas, travelling to and from work, are the results of poor decisions by our City Council.

Our City Council has permitted the overdevelopment of the Golden Triangle and repeatedly set aside the completion of the planned bridge (40+years) which was approved and paid for by developers.

It would be unconscionable to deny approval of this much needed bridge which will serve to alleviate traffic for many city users.

Sincerely,

Robert A. Jacobs

4624 Murphy Avenue
San Diego, CA 92122
858-453-1528

Rjacobs4@sanrr.com

RAJ-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RAJ-1-1

LETTER

RESPONSE

Russell Craig (July 31, 2016)

From: russellcraig@pacbell.net
To: [UCUC_Diagram/UC16](#)
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 6:58:29 PM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

Very simple-the Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods and solve nothing at the expense of Rose Canyon.

Just as a better solution was found for running the trolley to the UTC area there are better solutions to meet the needs of the area than these costly projects.

Thank you

RUSSELL CRAIG
4235 CAMINITO CASSIS, 92122

RC-1-1

RC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Roger Cavnaugh (July 31, 2016)

From: Roger Cavnaugh
To: E.N. Bannister, EIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 12:36:56 PM

RE: DRAFT EIR RECOMMENDATIONS ON REGENTS RD BRIDGE AND GENESEE WIDENING.

Dear City of San Diego Planning Department,

As residents of University Woods in University City since 1983 my wife and I strong support removing the Regents Rd bridge over Rose Canyon and the widening of Genesee from the Community Plan for these reasons:

1. As noted in the Draft EIR these projects would draw freeway traffic to local streets.

a. Funneling relatively high speed commuter traffic to Regents Rd north of Rose Canyon would destroy the safety and walkability of the neighborhood where Doyle Elementary, Doyle Park and Doyle Community Center draw high volumes of pedestrian preschool and school age children and their parents. Before school and after school traffic already creates traffic bottlenecks and amplifying those bottlenecks would be counterproductive as well as unsafe.

b. In addition the relatively low cost housing flanking Regents brings a high concentration of UC students and the young families of biotech workers and grad students. Large numbers of these folks walk, take buses, hike and skate to school and/or work, creating additional safety concerns that would only be significantly exacerbated by a bridge drawing increased commuters.

c. Recent long term international studies indicate that not only does the volume of proximate auto emissions negatively impact children's health but also significantly contributes to cognitive impairments.

2. Our children's safety and well being and the quality of community life are more of a priority than commuter convenience given that 21st century transit solutions provide better options than the obsolete strategy of encouraging more single occupaney vehicles.

3. Rose Canyon is an irreplaceable asset and its ecological integrity, wildlife habitat, water quality and recreational use would be significantly damaged by the massive displacement of land required for the bridge and its approaches. San Diego's own Richard Louv's work has crystallized the research on our children's need for exposure to Nature for healthy development. Let's not turn Nature deficit into Nature bankruptcy disorder.

The City's initiative on updating our Community Plan and deleting obsolete projects is very much appreciated and bodes well for continuing the quality of life that makes San Diego's claim of "finest city" more than just the weather.

Sincerely,

Roger Cavnaugh, PhD

RCA-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RCA-1-1

LETTER

RESPONSE

Roxieann Danner (July 31, 2016)

From: Roxieann Danner
To: City of San Diego
Subject: Fw: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 8:04:34 PM

Correction: Address is included at the bottom of the attached email.

----- Forwarded Message -----
From: Roxieann Danner <rdanner42@sbcglobal.net>
To: "PlanningCEQA@sanidiego.gov" <PlanningCEQA@sanidiego.gov>
Sent: Sunday, July 31, 2016 5:59 PM
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I have lived in the same house in University City since 1967 and my family and I have hiked the beautiful and serene trails of Rose Canyon for years. The peace and beauty of this green belt is a unique feature of the City of San Diego and provides a wonderful opportunity for wild life education and the study of wetlands and native plants.

There is nothing as peaceful as walking through the canyon in the mornings or evenings to the sound of the wide variety of birds singing, rabbits running around, and the general well-being and safety the area provides, away from the noise and congestion of roads, traffic, and the sounds of horns honking.

Because many of us in University City are walkers and bikers, there is great concern about the hazards that additional traffic being routed through our community will cause. As a walker, I already have problems safely crossing the streets in our Community because they are already highly impacted by the cars that use our community as a short-cut to the existing freeways - and they have no interest in slowing their speed to let a pedestrian cross the street - even at marked crosswalks, never mind crosswalks that are not marked, but are a legal pedestrian right-of-way. Adding a Regents Road bridge and widening Genesee Avenue will further impact our ability to use our area as a safe walking community and will further endanger our children and adult bike riders.

As a result, I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I have greatly appreciated the support of the City over the years in providing this wonderful area for our citizens to enjoy the beautiful outdoors, a unique feature in a busy urban area. Thank you for deleting these two out-of-date road projects from the Plan - especially the environmentally damaging Regents Road bridge project.

Respectfully,
Roxieann Danner

RD-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

RD-1-1

LETTER

RESPONSE

Roxieann Danner (July 31, 2016)

5433 Dalen Avenue
San Diego, CA 92122

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LETTER

RESPONSE

Susan Hathaway (July 31, 2016)

From: [Susan Hathaway](#)
To: [E.N. Blomquist PEIR](#)
Subject: University Community Plan Amendment, No. 460266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 2:10:53 PM

Sirs,

I absolutely support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

I'd like to thank the City for its leadership in working to remove these two out-of-date road projects, especially the unnecessary, costly, and environmentally damaging Regents Road bridge project.

Thank you very much.

Susan Hathaway
6119 Charae Street
San Diego, CA 92122

SH-1-1

SH-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Sid and Rita Schipper (July 31, 2016)

From: Sid and Rita Schipper
To: EIR, Planning/EIR
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Sunday, July 31, 2016 7:27:37 PM

We strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. We want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

We live right along Rose Canyon and we strongly support protecting Rose Canyon.

The Regents Road bridge project would be especially damaging to Rose Canyon. We frequently walk together in the canyon and it is a good way for us to get exercise and enjoy the outdoors. Losing that ability would make our lives much more difficult.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. Regents Road goes directly past Doyle Elementary school and increasing traffic there would be a danger to the schoolchildren there. I was hit by a car when I was 5 years old in elementary school and it was because of the fact that I was crossing the street near my school which was in a very high traffic area in New York City. Let's not exacerbate an already bad problem by increasing traffic from freeways that can support it to smaller community roads that cannot.

Thank you again for your leadership in these matters.

Sincerely

Sid and Rita Schipper
3974 Camino Lindo
San Diego, CA 92122

858-554-0748

SRS-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

SRS-1-1

LETTER

RESPONSE

Susan Traganza (July 31, 2016)

From: staganza@comcast.net
To: [E.N. Blomquist, EIR](#)
Subject: University community plan amendment, No. 480286/SCH No. 201-512-1011
Date: Sunday, July 31, 2016 9:07:42 AM

Dear Council,

My name is Susan Traganza and I live at 3032 Renault Street in University City. I have owned my home for 30 years and feel very devoted to protecting the canyon space surrounding my neighborhood. I strongly support the deletion of the Regents Road bridge project and the widening of Genesee Avenue from the university community plan. I want to thank the city for its leadership in moving to delete these two projects, especially the unnecessary, costly and environmentally damaging Regents Road Bridge project. The draft EIR indicates that both of these road projects would primarily draw traffic off the freeway and through out local neighborhood. I am particularly sensitive to this issue since my work is close to Rose Canyon. I am a teacher at Doyle Elementary and I am very concerned about the big increase in traffic that would happen on Regents Road if the Regents Road bridge were built. I see small children walking across Regents Road to get to school each day and I can't imagine what would happen if there was a huge increase in cars and traffic. In the morning, the intersection of Regent's Road and Berino Ct. is also congested with UCSD students riding their bikes to class. More cars would mean more accidents!! In addition to the safety issues, building the Regents Road bridge would also damage Rose Canyon. I have work tirelessly to protect this valuable natural open space. My three sons all built their Eagle Projects in this canyon and have used it repeatedly for nature studies with their Boy Scout troop. Each year, I take my kindergarten students on a field trip to the Canyon. The Rose Canyon docents do an amazing job of teaching the children about wildlife and habitat protection during our walk on the trail leading into the canyon. This experience would not be possible if the Regents Road bridge was built.

Thank you so much for listening to our concerns.

Susan Traganza

Sent from my iPad

ST-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

ST-1-1

LETTER

RESPONSE

Valerie and Garey Ramey (July 31, 2016)

From: Valerie Ramey
To: E.N. Dunnington, PEIR
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 10:17:45 AM

To Whom It May Concern:

We are writing to express our support for the deletion of the Regents Road bridge/cut-and-fill project and the Genesee Avenue Widening project from the University Community Plan. We want to thank the City for carefully reviewing the issue and moving to delete these two out-of-date road projects. The Regents Road bridge project would be particularly unnecessary, costly, and environmentally damaging.

We moved to University City in 1998 and our children grew up hiking in Rose Canyon. Our daughter honed her animal photography skills in the very part of Rose Canyon that would be destroyed by the bridge. Our children are now grown, but our hearts are warmed every time we hear the happy noise of a Spreckels Elementary class being led into the canyon on a school field trip. For many of those children, the Rose Canyon field trip is the first exposure they have had to nature. Even in this era of school budget cuts, the school is able to provide this field trip because Rose Canyon is in walking distance and Friends of Rose Canyon provides the guides.

The Regents Road bridge project was added to the plan years ago based on traffic projections that have not been realized and during an era when nature was abundant and roads were more scarce. The situation is now reversed, so the value of preserving a gem such as Rose Canyon now exceeds the value of an extra road.

Sincerely,

Valerie and Garey Ramey
3225 Millikin Avenue
San Diego, CA 92122

VGR-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

VGR-1-1

LETTER

RESPONSE

Vicki Lindblade (July 31, 2016)

From: Vicki Lindblade
To: P.N. PlanningCEQA
Subject: University Community Plan Amendment
Date: Sunday, July 31, 2016 8:16:17 PM

Re: PROJECT No. 480286 / SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Dear Susan Morrison,

I would like to highlight a few items on the draft PEIR for the UC community Plan Amendment. In several ways it indicates that the proposed "mitigations", in particular the construction of the Regents Street Bridge would be beneficial:

1. Without the option of the Regents Street Bridge to alleviate the traffic stagnation on Genesee especially during rush hours, the result would be that the ever-increasing traffic load would result in a VIOLATION OF AIR QUALITY STANDARDS, and and INCREASE IN GREENHOUSE GASES. (SEE 4.4.5.2 and 5.2.2.3 in the PEIR)

2. Doing nothing to alleviate the congestion here would also result in a SIGNIFICANT INCREASE IN CONGESTION ON I-5 and I-805 AND 8 OF THE ASSOCIATED ON-RAMPS. (SEE 10.2.1 of PEIR)

3. Also, it is significant that Genesee is the only roadway providing a North-south artery within University City. This is not good in case of emergencies either to provide a way to leave or a way for emergency vehicles--either police or firemen--to reach many residents of University City in case of emergency or for many of us south of Rose canyon to reach some of the nearest medical facilities. (The plane crash on Huggins street a few years ago is an example. If it had occurred during rush hour instead of late morning, the fire trucks would have been significantly delayed and the damage would have been much more wide-spread.)

4. Traffic on Genesee will only get worse if the issue is not addressed constructively as more developments keep growing in north UC and as UCSD expands its many facilities. We do have many fine facilities and, during many hours of the day, no hopeful way to access them. I'm sure the businesses in the area would welcome a little relief from the high levels of traffic congestion.

The PEIR clearly concludes that, at the very least, the Regents Street Bridge construction would help to diminish many of these problems.

Thanks you for your attention to this matter.

Vicki Lindblade
4630 Huggins Street
San Diego,CA

- VL-1-1 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
VL-1-2 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
VL-1-3 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.
VL-1-4 Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Avi Butbul (August 1, 2016)

From: [Avi Butbul](#)
 To: [E.N. Blanning/CFIA](#)
 Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
 Date: Monday, August 01, 2016 9:34:29 AM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

I strongly support protecting Rose Canyon. The Regents Road bridge project would be especially damaging to Rose Canyon.

The Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. I oppose increasing the amount and speed of traffic through the community THAT WILL EFFECT Schools, pedestrians, biking, walking, noise.

thanks,
 --
 Avi Butbul
 3223 lahitte court S
 San Diego ca 92122

AB-1-1

AB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Becky McKeand (August 1, 2016)

From: Becky McKeand <Becky.McKeand@MCMCG.COM>
Sent: Monday, August 01, 2016 1:25 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

I do not believe the bridge would benefit our community. I believe the result would be through traffic diverting from 15. The bridge would be detrimental to our community. Open spaces are an essential element for wildlife and recreation. I would like to preserve and protect Rose Canyon.

I think widening Genesee Ave is an overkill and costly solution to a traffic problem that can be mitigated by other methods less intrusive and short-sighted methods.

I strongly support removing both of these projects from the University Community Plan.

Thank you.

Becky McKeand
6026 Scripps Street
San Diego, CA 92122

BM-1-1

BM-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.



Becky McKeand | Sr. AIS Systems Engineer – Global DevOps
 3111 Camino Del Rio North, Suite 1100
 San Diego, CA 92108
 DIRECT: 858.580.8514 | CELL: 619.885.7704
becky.mckeand@mcmcg.com

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LETTER

RESPONSE

Ben Stevenson (August 1, 2016)

From: Matthew Stevenson
To: Ben Stevenson
Subject: University Community Plan Amendment, No. 480266/SCH No. 2015121011
Date: Monday, August 01, 2016 12:39:42 PM

Dear Sirs,

I support the Draft EIR studies that would REMOVE the Regents Road Bridge and the Widening of Genesee Avenue to 6 lanes from the University Community Plan. I believe the importance of preserving the Rose Canyon Open Space Park, as well as preserving the character of the University City neighborhoods effected by these projects is far more important than the questionable benefits the projects would provide.

Rose Canyon is a treasured part of the community and a special landmark for citizens of the neighborhood. I have donated many volunteer hours in Rose Canyon Open Space park and have been by joined by many others donating well over 1,000 hours to improve the park. It is a treasured community asset and should be further preserved. Building these projects is exactly opposite of University City community goals. The open space park is included in the Multiple Species Conservation Program as a regionally important habitat preserve. Disturbances such as the land bridge and widened road are detrimental to these community goals.

As the facts have shown, much of the traffic utilizing these improvements will be introduced and come from surrounding freeways. It will not improve traffic flow in the effected neighborhood. This is profoundly unjust and defies the basic logic of traffic improvements.

I support the Draft EIR studies that would REMOVE the Regents Road Bridge and the Widening of Genesee Avenue to 6 lanes from the University Community Plan. Thank you.

Ben Stevenson
Former longtime University City resident, Former Chair, Rose Canyon Recreation Council
1901 Titus Street
San Diego, 92110

BS-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

BS-1-1

LETTER

RESPONSE

Ciaran N. Cronin (August 1, 2016)

From: Ciaran Cronin
To: P.N. Bannigan, PhD
Cc: Leahy, Angela
Subject: Re: University Community Plan Amendment, No. -180286/ SCH No. 2015121011
Date: Sunday, July 31, 2016 9:26:53 AM

To whom it may concern

I wholeheartedly support the removal of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

As a resident of University City for 15 years, I have spent countless hours cycling and walking in Rose Canyon with my wife and two children. Our children were just one year-olds (twins) when we moved here and they have enjoyed using the canyon as a wildlife resource to explore nature and to augment their school projects. Rose Canyon provides a wonderful natural park for local residents to get some exercise and enjoy some quiet time within the boundaries of the city. We have been very fortunate to have such a wonderful resource near our home and I would hope that this continues into the future for other families who make UC their home.

The Draft EJR supports the finding that building a Bridge across Rose Canyon and widening Genesee Road would serve primarily to provide rat-runs for non-local motorists trying to shave a few minutes off their commute times, a notion not surprising considering the advent of modern smartphone apps like Waze. Building a bridge just to serve capillary commuter traffic with the concomitant damage to the wonderful resource that Rose Canyon provides for the local UC community would be a very sad development.

Therefore, I am very grateful to the City, the Mayor and councilwoman Sherri Lightner for supporting the removal of both the Regents Road bridge project, and the widening of Genesee Avenue, from the University Community Plan.

Sincerely
Ciaran N. Cronin BSc PhD
3176 Bunche Avenue
San Diego, CA 92122

CNC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

CNC-1-1

LETTER

RESPONSE

Carole Pietras (August 1, 2016)

From: Carole Pietras <rcpietas@sbcglobal.net>
Sent: Monday, August 01, 2016 3:26 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, Project No. 480286,Schedule No. 2015121011
Attachments: Pietras Letter to Susan Morrison re the draft PEIR. 7312016.pdf
Importance: High

July 31, 2016

Via email to: PlanningCEQA@sandiego.gov

Ms. Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200
MS 413
San Diego, CA 92101

Re: Draft PEIR for University Community Plan Amendment, Project No. 480286
SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lighner)

Dear Ms. Morrison,

The proposed amendment to the Transportation Element of the University Community Plan (UCP) is too important to be rushed to conclusion before the election in November. It is not fair to those who live and work in the UCP area to have the council make a decision to remove the Regents Road bridge from the community plan without providing reasonable time for public input. It's not uncommon for comment periods to last 45 or 60 days for other projects. My criticism is not directed to City staff; they are doing what they are instructed to do. My criticism is directed toward the process and the political expediency behind it. The public deserves better and everyone affected by the traffic on Genesee deserves better.

CP-1-1

Consistent with the requirements of CEQA, a good faith effort was made during the preparation of the Draft PEIR. The legal requirements of the CEQA Guidelines, Section 15082, NOP and Determination of Scope of PEIR, were met. Pursuant to CEQA Guidelines 15082, an NOP was prepared and circulated on December 2, 2015, which began a 30-day comment period that ended on January 4, 2016. Approximately 100 comment letters were received on the NOP during this time and were considered in preparation of the PEIR. A scoping meeting was held on December 16, 2015, starting at 6:00 p.m. at the Nobel Recreation Center Meeting Room #2, located at 8810 Judicial Drive, San Diego, California 92122, to inform the public about the Project and receive comments. Appendix A of the Draft PEIR includes all the comment letters received during the NOP review period. In addition, the public was advised during the scoping meeting and in responses to email/phone inquiries about an extension that the NOP and scoping meeting were just the beginning of the public input process for the environmental review document, and that there would be other opportunities to become involved throughout the Project. In addition, the public was advised that, while the NOP states a 30-day deadline for the receipt of comments, public comments would be accepted throughout the EIR process, and that there would be additional

Many people objected to the timing of the NOP, Scoping Meeting on Dec. 16th and the Comment Period ending on January 1st. Verbal and written requests to extend the comment period beyond the busy holiday season were ignored. The Planning Group (UCPG) didn't meet in December. The City Council was in recess most of the month; however, the public was given a limited time to respond during a major holiday period, and the comments were limited because of that. Why were public requests to extend the comment period denied?

CP-1-1

CP-1-2

The Comment period for the DPEIR is limited to 30 days and is taking place during the summer vacation time. Once again, the public's request for additional time was ignored.

CP-1-3

When the traffic study was released, there were many questions. Written and verbal comments expressed concerns about the time periods when the traffic was "counted" and the methodology used. One of the peak travel times in the afternoon from 3:00 p.m. - 4:00 p.m. was not included. School dismissal times, change of shifts at the hospitals and medical clinics in North UC start the afternoon rush

CP-1-4

Carole Pietras (August 1, 2016)

opportunities to provide comment on the Project, such as during public review of the draft environmental document and any public hearings. The public was also encouraged to provide their contact information so they could receive future notices. All applicable requirements established by the CEQA Guidelines related to the preparation, notice, and public review and comment to the NOP prepared for the Project have been adequately followed and complied with.

CP-1-2

Commenter incorrectly asserts that the public review period for the Draft PEIR was limited to 30 days. Public review for the Project consisted of a 45-day comment period occurring from June 17, 2016 to August 1, 2016. Pursuant to CEQA Guidelines Section 15105, CEQA requires that the public review period for a Draft EIR be no less than 30 days and no longer than 60 days except under unusual circumstances. When a project is submitted to the State Clearinghouse for review by State Agencies, the public review period should be no less than 45 days unless a shorter period, not less than 30 days, is approved by the State Clearinghouse. As the Draft PEIR was sent to the State Clearinghouse for review, a 45-day review period was required. The Draft PEIR was available for public review from June 17, 2016 through August 1, 2016, a 45-day time frame consistent with the public review period requirements under CEQA. As such, the requisite public review period was fulfilled pursuant to the CEQA Guidelines.

In accordance with San Diego Municipal Code §128.0307, Requests for Additional Public Review Time on the Draft Environmental Document, “The Planning Director may approve a request from the affected officially recognized community planning group or interested party if there is no officially recognized community planning group for an additional review period not to exceed 14 calendar days. The additional time for review shall not extend the time for action beyond that required under law.” The University Community Planning Group, as “the affected officially recognized community planning group” did not request an additional review period beyond the 45-day comment period.

LETTER

RESPONSE

Carole Pietras (August 1, 2016)

<p>hours. <u>School dismissal times at Curie Elementary on Governor just east of the Governor/ Genesee intersection and UC High located on Genesee are close to 2:00p.m. and should be included as well. The Genesee/Governor intersection was identified by the traffic experts as the most congested!</u> The intersection of La Jolla Village Drive and Genesee is equally congested but has more lanes. Was the traffic study limited by the money available?</p>	<p>CP-1-5</p>	<p>CP-1-3</p>	<p>Please see response to comment CP-1-1.</p>
<p>• The language in the PEIR is very confusing. The “project” is removing two projects – Regents Road Bridge and Genesee Widening--from the community plan, while “no project” is keeping both projects in the plan. This convoluted definition makes it much more difficult to read and understand the document.</p>	<p>CP-1-6</p>	<p>CP-1-4</p>	<p>Please see response to comment Citizens-1-4.</p>
<p>○ We now have “widening” without widening Genesee – just narrow the lanes to fit six where there are now four and add more traffic to Genesee! Genesee Widening is NOT defined that way in the community plan or FBA.</p>	<p>CP-1-5</p>	<p>CP-1-5</p>	<p>Please see response to comment Citizens-1-4.</p>
<p>○ Genesee widening also is suddenly described as including a grade separation at Governor and Genesee. When/how did this become part of Genesee widening? Genesee Widening is NOT defined that way in the community plan or FBA. <u>That alternative was presented and also rejected in 2006 after an exhaustive study</u></p>	<p>CP-1-7</p>	<p>CP-1-6</p>	<p>Comment noted.</p>
<p>• Why is Grade Separation suddenly appearing again as an alternative or mitigation? (TRA 2.3) The Grade Separation alternative was rejected in 2006 for a number of good reasons:</p>	<p>CP-1-7</p>	<p>CP-1-7</p>	<p>Please see responses to comments Citizens-1-10 and GJB-1-4.</p>
<p>○ Safety issues-- How could Genesee be shut down for construction without an alternate north-south route? --The community is already <u>at risk</u> now with only <u>one north/south road, and no parallel streets to Governor Dr.</u> that run the length of the community (east/west).</p>	<p>CP-1-8</p>	<p>CP-1-8</p>	<p>Please see responses to comments Citizens-1-10 and GJB-1-4.</p>
<p>--Minor and major incidents have closed Northbound and/ or Southbound lanes on Genesee. Genesee was closed for hours when a tree fell across traffic lanes. It was closed again the next day when a tree fell across the opposite lanes. A major accident closed all lanes in both directions for several hours. Cars had NOWHERE to go.</p>	<p>CP-1-8</p>	<p>CP-1-8</p>	<p></p>
<p>--It is <u>well known that emergency vehicles often travel in opposite traffic lanes</u> to get to south University City. The new mini-station in south UC is welcomed and helps in some situations, but the modified pick-up truck cannot transport injured or those in crisis to hospitals.</p>	<p>CP-1-8</p>	<p>CP-1-8</p>	<p></p>
<p>--Approximately 4,000 students attend the 4 schools in south UC near that intersection. Access to Standley Middle School from Genesee is at Radcliffe Lane.</p>	<p>CP-1-8</p>	<p>CP-1-8</p>	<p></p>
<p>○ Effect on residential units on Genesee-- the <u>277 condominium units</u> on the west side of Genesee (<i>between the Mobil gas station on the corner of Genesee and Governor Dr., and the WB ramp to 52 from SB Genesee</i>) would be greatly impacted.</p>	<p>CP-1-9</p>	<p>CP-1-9</p>	<p>Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.</p>
<p>--Ingress and egress for the Regency Villas 132 unit senior (62+) condominium complex is from Genesee Ave. They would also lose the parking lane on Genesee.</p>	<p>CP-1-9</p>	<p>CP-1-9</p>	<p></p>
<p>○ Land issues: As noted in the PEIR, there are gas stations on all four corners of the intersection of Genesee and Governor Dr. Possible need to acquire private land. High retaining walls would completely change the character of the community. Trees would be lost.</p>	<p>CP-1-10</p>	<p>CP-1-10</p>	<p>Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.</p>
<p>○ Construction noise and dirt: Many more truckloads of dirt would have to be removed, generating more dust and construction noise than building the Regents road bridge.</p>	<p>CP-1-11</p>	<p>CP-1-11</p>	<p>Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.</p>

LETTER

RESPONSE

Carole Pietras (August 1, 2016)

- **Widening Genesee would have the same adverse effect as the Grade Separation. (TRA-1.6)** It's already very risky to cross 4 lanes of traffic. **Crossing six lanes would be worse—especially for students going to/from Standley Middle School and senior citizens who have to cross Genesee to go at the shopping center.**

CP-1-12

CP-1-12

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

-- When the additional left turn lane from WB Governor to SB Genesee was added, the lanes on Governor east of Genesee were narrowed; and the bike lane on Governor was removed from the Middle School to the eastern most driveway at the Vons shopping center. The large fire engine has a difficult time turning left on Governor from SB Genesee because of the new configuration of the intersection.

CP-1-13

CP-1-13

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

- **How were the mitigations determined? Some of the mitigations are worse than the problem.**
TRA-2.13: Governor Drive and I-805 Northbound Ramps (Intersection 79): Install roundabout control at this roadway intersection.
 This may look good on paper, but the reality makes this ludicrous!
Imagine competing with vehicles entering and exiting the freeway, vehicles going to /from the Business Park on the south side of Governor, the church, residences that can only enter and exit their community on Lakewood dr. at Governor, the office complex on the North side, McElroy Field where many tournaments are held, the playground, the park and ride, the office complex and the Town Park Villas/La Jolla del Rey senior apartment complex in the process of doubling in size to over 1100 units!

CP-1-14

CP-1-14

Please see response to comment Citizens-1-5.

THE REGENTS ROAD BRIDGE WAS SELECTED IN 2006 AS THE BEST

ALTERNATIVE. Transportation/circulation, air quality, greenhouse gas emissions, noise, and public services and facilities should be the major factor in selecting the building of the Regents Road Bridge as the Superior Alternative.

CP-1-15

CP-1-15

Comment acknowledged. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

- **IT IS STILL THE BEST ANSWER TO OUR TRAFFIC AND TRANSPORTATION PROBLEMS.**
 -- It is the only alternative that provides an additional north/south route offering two vehicle lanes in each direction, a dedicated bicycle lane and a sidewalk for pedestrians *and* safe crossing over the railroad tracks.
 -- It saves vehicle miles, time and emissions.
 -- Students from North UC could easily cross the canyon via the bridge to Spreckels Elementary and Standley Middle School.
 -- It also provides community balance. Why are residents living along the Genesee corridor being forced to accept additional traffic and traffic lanes? Please look at an aerial view of the community that includes both Regents Rd, and Genesee Avenue from SR 52 to Rose Canyon. You will see there are **no curb cuts on Regents Rd.** vs. a number of condominiums and apartments fronting Genesee both north and south of Governor Dr.
 --A pedestrian/bike/emergency lane bridge does not provide relief from congestion for the Genesee corridor. It only protects one area of the community from having to deal with traffic. It does NOT provide community balance.

CP-1-15

The Regents Road Bridge is a vital link in the city's infrastructure and provides a shorter route to UCSD, Torrey Pines Mesa, hospitals, medical centers and businesses and a needed emergency evacuation route. Construction would be much less intrusive than widening Genesee with or without a grade separation. It will also provide an alternate north south route in the event of the need to evacuate the community.

Respectfully submitted,

Carole Pietras
 6917 Lipmann St
 San Diego CA 92122
 858 452-8378

LETTER

RESPONSE

Carole Pietras (August 1, 2016)

July 31, 2016

Via email to: PlanningCEQA@sandiego.gov

Ms. Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, East Tower, Suite 1200
MS 413
San Diego, CA 92101

via email to

Re: **Draft PEIR for University Community Plan Amendment, Project No. 480286**

SCH No. 2015121011
COMMUNITY AREA: University
COUNCIL DISTRICT: 1 (Lightner)

Dear Ms. Morrison,

The proposed amendment to the Transportation Element of the University Community Plan (UCP) is too important to be rushed to conclusion before the election in November. *It is not fair to those who live and work in the UCP area to have the council make a decision to remove the Regents Road bridge from the community plan without providing reasonable time for public input.* It's not uncommon for comment periods to last 45 or 60 days for other projects. My criticism is not directed to City staff; they are doing what they are instructed to do. My criticism is directed toward the process and the political expediency behind it. The public deserves better and everyone affected by the traffic on Genesee deserves better.

CP-1-16 Please see responses to comments CP-1-1 through CP-1-15.

- **Many people objected to the timing of the NOP, Scoping Meeting on Dec. 16th and the Comment Period ending on January 1st.** Verbal and written requests to extend the comment period beyond the busy holiday season were ignored. The Planning Group (UCPG) didn't meet in December. The City Council was in recess most of the month; however, the public was given a limited time to respond during a major holiday period, and the comments were limited because of that. **Why were public requests to extend the comment period denied?**
- **The Comment period for the DPEIR is limited to 30 days and is taking place during the summer vacation time.** Once again, the public's request for additional time was ignored.
- **When the traffic study was released, there were many questions.** Written and verbal comments expressed concerns about the time periods when the traffic was "counted" and the methodology used. One of the peak travel times in the afternoon from 3:00 p.m. – 4:00 p.m. was not included. School dismissal times, change of shifts at the hospitals and medical clinics in North UC start the afternoon rush hours. School dismissal times at Curie Elementary on Governor just east of the Governor/ Genesee intersection and UC High located on Genesee are close to 2:00p.m. and should be included as well. **The Genesee/Governor intersection was identified by the traffic experts as the most congested!** The intersection of La Jolla Village Drive and Genesee is equally congested but has more lanes. Was the traffic study limited by the money available?
- **The language in the PEIR is very confusing.** The "project" is removing two projects – Regents Road Bridge and Genesee Widening--from the community plan, while "no project" is keeping both projects in the plan. This convoluted definition makes it much more difficult to read and understand the document.

CP-1-16
cont.

LETTER

- We now have “widening” without widening Genesee – just narrow the lanes to fit six where there are now four and add more traffic to Genesee! Genesee Widening is NOT defined that way in the community plan or FBA.
- Genesee widening also is suddenly described as including a grade separation at Governor and Genesee. When/how did this become part of Genesee widening? Genesee Widening is NOT defined that way in the community plan or FBA. That alternative was presented and also rejected in 2006 after an exhaustive study
- **Why is Grade Separation suddenly appearing again as an alternative or mitigation? (TRA 2.3)**
The **Grade Separation alternative was rejected in 2006 for a number of good reasons:**
 - **Safety issues--** How could Genesee be shut down for construction **without an alternate north- south route?**
--The community is already at risk now with only one north/south road, and no parallel streets to Governor Dr. that run the length of the community (east/west).

--Minor and major incidents have closed Northbound and/ or Southbound lanes on Genesee. **Genesee was closed for hours when a tree fell across traffic lanes. It was closed again the next day when a tree fell across the opposite lanes. A major accident closed all lanes in both directions for several hours. Cars had NOWHERE to go.**
 - It is well known that emergency vehicles often travel in opposite traffic lanes to get to south University City. The new mini-station in south UC is welcomed and helps in some situations, but the modified pick-up truck **cannot transport injured or those in crisis to hospitals.**
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--Ingress and egress for the **Regency Villas 132 unit senior (62+) condominium complex is from Genesee Ave.** They would also lose the parking lane on Genesee.
 - **Land issues:** As noted in the PEIR, there are gas stations on all four corners of the intersection of Genesee and Governor Dr. Possible need to acquire private land. High retaining walls would completely change the character of the community. Trees would be lost.
 - **Construction noise and dirt:** Many more truckloads of dirt would have to be removed, generating more dust and construction noise than building the Regents road bridge.
- **Widening Genesee would have the same adverse effect as the Grade Separation. (TRA-1.6)** It's already very risky to cross 4 lanes of traffic. **Crossing six lanes would be worse—especially for students going to/from Standley Middle School and senior citizens who have to cross Genesee to go at the shopping center.**

-- When the additional left turn lane from WB Governor to SB Genesee was added, the lanes on Governor east of Genesee were narrowed; and the bike lane on Governor was removed from the Middle School to the eastern most driveway at the Vons shopping center. The large fire engine has a difficult time turning left on Governor from SB Genesee because of the new configuration of the intersection.

RESPONSE

Carole Pietras (August 1, 2016)

CP-1-16
cont.

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LETTER

- **How were the mitigations determined? Some of the mitigations are worse than the problem.**
TRA-2.13: Governor Drive and I-805 Northbound Ramps (Intersection 79): Install roundabout control at this roadway intersection.
This may look good on paper, but the reality makes this ludicrous!
Imagine competing with vehicles entering and exiting the freeway, vehicles going to /from the Business Park on the south side of Governor, the church, residences that can only enter and exit their community on Lakewood dr. at Governor, the office complex on the North side, McElroy Field where many tournaments are held, the playground, the park and ride, the office complex and the Town Park Villas/La Jolla del Rey senior apartment complex in the process of doubling in size to over 1100 units!

THE REGENTS ROAD BRIDGE WAS SELECTED IN 2006 AS THE BEST ALTERNATIVE.

Transportation/circulation, air quality, greenhouse gas emissions, noise, and public services and facilities should be the major factor in selecting the building of the Regents Road Bridge as the Superior Alternative.

- **IT IS STILL THE BEST ANSWER TO OUR TRAFFIC AND TRANSPORTATION PROBLEMS.**
-- It is the only alternative that provides an additional north/south route offering two vehicle lanes in each direction, a dedicated bicycle lane and a sidewalk for pedestrians *and* safe crossing over the railroad tracks.
-- It saves vehicle miles, time and emissions.
-- Students from North UC could easily cross the canyon via the bridge to Spreckels Elementary and Standley Middle School.
-- It also provides community balance. Why are residents living along the Genesee corridor being forced to accept additional traffic and traffic lanes? Please look at an aerial view of the community that includes both Regents Rd, and Genesee Avenue from SR 52 to Rose Canyon. You will see there are **no curb cuts on Regents Rd.** vs. a number of condominiums and apartments fronting Genesee both north and south of Governor Dr.
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The Regents Road Bridge is a vital link in the city's infrastructure and provides a shorter route to UCSD, Torrey Pines Mesa, hospitals, medical centers and businesses and a needed emergency evacuation route. Construction would be much less intrusive than widening Genesee with or without a grade separation. It will also provide an alternate north south route in the event of the need to evacuate the community.

Respectfully submitted,

Carole Pietras
6917 Lipmann St
San Diego CA 92122
858 452-8378

RESPONSE

Carole Pietras (August 1, 2016)

CP-1-16
cont.

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LETTER

RESPONSE

Donna Andonian (August 1, 2016)

From: djandonian@yahoo.com
Sent: Monday, August 01, 2016 4:38 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan for the following reasons:

- The Regents Road Bridge and the widening of Genesee would draw traffic off of I-5 and I-15 by people trying to avoid freeway traffic, particularly now that traffic detection applications can be downloaded for free onto anyone's cell phone, causing more congestion than is currently being experienced. This technology was not available at the time that the Regents Road Bridge was originally added to the University Community Plan.
- I would prefer to see transportation funds going to public transportation rather than encouraging more single passenger cars on the road.
- Rose Canyon needs to be protected for recreational use and the wildlife living in the canyon. I hike in the canyon as a way to relax and enjoy nature, and from a young age took my grandchildren hiking there to teach them about nature and encourage them to get outside rather than sitting in the house playing video games.

Thank you for your attention to this matter!

Donna Andonian
3967 Camino Lindo
San Diego, CA 92122

DAN-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

DAN-1-1

LETTER

RESPONSE

Elliot Cavanaugh (August 1, 2016)

From: Elliot Cavanaugh <ecavanaugh@gmail.com>
Sent: Monday, August 01, 2016 4:48 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I am strongly in favor of removing the Regents Road Bridge and widening of Genesee Avenue from the Community Plan. Growing up in University City, Rose Canyon served as unique place to gain firsthand experience of the natural world right in my backyard. Spending time in Rose Canyon not only gave me many happy memories, but also developed a sense of appreciation, curiosity, and wonder for the environment that has stayed with me through my life. These changes to the community plan are vital for preserving Rose Canyon, and ensuring that future generations in University City will have the same opportunities.

Elliot Cavanaugh
 7835 Camino Noguera, San Diego, CA 92122

EC-1-1

EC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Greg and Jan Shaughnessy (August 1, 2016)

From: greg shaughnessy <gregshag@msn.com>
Sent: Monday, August 01, 2016 3:38 PM
To: PLN_PlanningCEQA
Cc: Deborah Knight; rosecanyon@san.rr.com
Subject: University Community Plan Amendment No. 480286/SCH No. 20151211011

I am a resident of University City and wish to express my strong support for the elimination of both the Rose Canyon bridge and the widening of Genesee Avenue from the city plan. The lovely Rose Canyon is an open space treasure for our residents and should not be tampered with. As for the widening of Genesee, the improvements presently under construction on I-5 at Genesee and the extension of the San Diego trolley to the UTC and UCSD area, will greatly reduce the need for additional lanes on that North/South corridor. The removal of these two projects from the city plan will also assist greatly in maintaining the quality of life that our residents enjoy.
 Thank you for your consideration in this important matter.

Greg and Jan Shaughnessy
 3263 Lahitte Ct.
 San Diego, Ca. 92122
 858-455-1020

GJS-1-1
 GJS-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Isabelle Kay (August 1, 2016)

From: [Isabelle Kay](#)
To: [P.N. Harono@CFJA](#)
Cc: [pncanynon@psu.edu](#)
Subject: University Community Plan Amendment, PROJECT No. 480286 / SCH No. 2015121011
Date: Monday, August 01, 2016 10:56:34 AM
Attachments: [Bridge_removal_amendment_PEN_comment_#_1Awa16.docx](#)

Dear Ms. Morrison,

please find attached a letter with my short comments on the University Community Plan Amendment regarding the deletion of the Regents Road Bridge and of the widening of Genesee Avenue.

Please let me know if you have any questions.

Isabelle Kay

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LETTER

RESPONSE

Isabelle Kay (August 1, 2016)

31 July 2016

Susan Morrison,
Environmental Planner,
City of San Diego Planning Department,
1010 Second Avenue, East Tower, Suite 1200, MS 413,
San Diego, CA 92101
Via e-mail to PlanningCEQA@sandiego.gov

Cc: rosecanyon@san.rr.com

Re: Draft Programmatic Environmental Impact Report addressing the **University Community Plan Amendment, PROJECT No. 480286 / SCH No. 2015121011** in the **University Community Planning Area**

Dear Ms. Morrison,

Thank you for the thorough analysis presented in this Environmental Impact Report (EIR). I appreciate that the city leadership, and especially Councilwoman Sherri Lightner and Mayor Kevin Faulconer, have proposed this forward-looking Project, the Community Plan Amendment to remove the Regents Road Bridge and the Genesee Avenue widening.

The findings of the report make an irrefutable case that the existing projects in the Community Plan -- to build the Regents Road Bridge and to widen Genesee Avenue -- will do more harm than good for the University Community, and that deleting them from the plan is in the best interests of our neighborhoods, our schools, and our overall quality of life.

The report confirms what those of us who live here know from personal experience: that drivers seek relief from clogged freeways by taking surface roads. Clearly, were these structures ever to be built, the level of service would shortly be just as compromised as prior to their construction. The SR 56 is a good example. Furthermore, there would be more traffic emitting fumes, and noise during rush hours; and when the traffic was flowing (non-peak hours), the dangers to pedestrians, pets, bicyclists, and even local drivers would be significantly increased by the faster, larger, and additional traffic flows.

The removal of the Regents Road Bridge from the Community Plan through the adoption of this amendment will:

- preserve Rose Canyon as an incredibly valuable social benefit, for its recreational, educational, and aesthetic values;
- minimize impacts to wildlife habitat and wildlife passages through Rose Canyon. This will improve the chances that Rose Canyon fulfills its legal mandate as a major component of the MHPA to protect endangered and listed species;
- avoid further degradation of wetlands and the water quality in Rose Creek, the major freshwater source for Mission Bay. Large scale wetland restoration planning is underway

IK-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

IK-1-1

LETTER

RESPONSE

Isabelle Kay (August 1, 2016)

at the mouth of Rose Creek in Mission Bay, and will require improved water quality from the upstream sources.

IK-1-1
cont.

Thank you for the opportunity to comment.

Sincerely,



Isabelle Kay
3163-A Evening Way
La Jolla, CA 92037
UCPG residential member, area 2

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LETTER

RESPONSE

Joe Bride (August 1, 2016)

From: [Joe Bride](#)
To: [P.N. Blanton/CFJA](#)
Cc: rosamys@sonit.com; [Christine](#)
Subject: University Community Plan Amendment 480286 SCH No.2015121011
Date: Monday, August 01, 2016 11:07:11 AM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the UC Community Plan.

The DRAFT EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. Traffic finds the path of least resistance. Increasing the "cut through" capacity of UC will only increase the "cut through" volume that clogs up our lifestyle.

--
 Joe Bride
 5147 Via Cinta
 SDCA 92122

JB-1-1

JB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Joseph H. Brooks (August 1, 2016)

From: [Joe Brooks & Dora Walker](#)
To: [T.M. Blomquist, EIR](#)
Subject: University Community Plan Amendment, No. 400260/ SCI) No. 2015121011
Date: Monday, August 01, 2016 5:08:27 PM

To whom it may concern,

I completely support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University City Community Plan.

I also want to thank the City for their leadership to remove and delete these two road projects that were placed in the University City Community plan all the way back in 1960! Times have changed dramatically and also the University Cities surface transportation needs.

The Regents Road bridge project makes *no* sense as well as the widening of Genesee. The bridge would denigrate the habitats and do enormous environmental damage in our treasured Rose Canyon. The widening of Genesee would also *not* seriously reduce the traffic of those who choose to travel on this street. The freeways surrounding University City provide the best access to all parts of this community.

For example, traffic in San Diego has increased by exponential portions in the recent years. Reducing the traffic in *front* of Doyle School should be a top consideration, not increasing the traffic in front of this highly attended school.

JHB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

JHB-1-1

LETTER

I have resided in University City for more than 25 years. If the oppositions biggest argument is that access to a fire station, you can build several fire stations for the \$50 million that the Community Plans 1960 bridge would cost.

Thank you for considering my input and support of removing the Regents Bridge/Widening of Genesee road from the University City Community Plan.

Joseph H. Brooks
4286 Caminito Terviso
San Diego, CA 92122
858-450-9771

JHB-1-1
cont.

RESPONSE

Joseph H. Brooks (August 1, 2016)

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LETTER

RESPONSE

John P. Bott (August 1, 2016)

From: John Bott <johnb75@san.rr.com>
Sent: Monday, August 01, 2016 4:36 PM
To: PLN_PlanningCEQA
Cc: rosecanyon@san.rr.com; johnb75@san.rr.com
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

I have been a resident of South University since 1975. My family has always enjoyed the recreational opportunities available in Rose including biking, hiking and enjoying the open space. In the past few years my son and I have enjoyed bird watching in the canyon together in the Canyon. I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project. Putting the bridge through would devastate one of the prime environmentally sensitive areas in the City of San Diego and would interfere with recreational, educational, and visual enjoyment of Rose Canyon. the bridge project would harm habitat for wildlife, wetlands and the movement of wildlife through Rose Canyon. The Regents Road bridge project and widening Genesee would draw traffic from the surrounding freeways leading to serious traffic congestion and noise.

JPB-1-1

JPB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

Sincerely,

John P. Bott
5942 Carnegie St.
San Diego, CA 92122

LETTER

RESPONSE

Karen C. Arden (August 1, 2016)

From: Karen Arden <arden.karen@gmail.com>
Sent: Monday, August 01, 2016 4:59 PM
To: PLN_PlanningCEQA
Subject: University City Community Plan

To Whom It May Concern:

I am a University City resident who is concerned about removing the Regents Road Bridge from the community plan. I lived in University City during the 203 fires and Genesee heading north was the only way out of the neighborhood if we had to evacuate. All other possible exit avenues were closed. The community was supposed to have another northern exit.

I am also concerned about people crossing the train tracks to get from one side of the west end of University City to the other. With double tracks, there will be more trains and the real possibility of people being killed as they cross the tracks. A bridge with bike and pedestrian lanes will make the neighborhood much safer.

With the possibility of Vision 2020 creating a center of University City along Governor Drive between Genesee and Regents Road, it would seem to make sense to build the Regents Road Bridge to enable better access to the proposed pool and walking track.

The bridge may not need to be built right now but I am concerned about entirely removing it as a possibility for the community. We may need it in the future.

Best wishes,
Karen C. Arden

KCA-1-1

Comment acknowledged. Commenter opposes the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KCA-1-1

LETTER

RESPONSE

Karen Hughes (August 1, 2016)

From: [Karen Hughes](#)
To: [P.N. Benjamin, CEQA](#)
Subject: University Community Plan Amendment, No. 480286/SCH No. 2015121011
Date: Monday, August 01, 2016 9:55:33 AM

I strongly support the protection of Rose Canyon as part of important environmental concerns, and support the deletion of the Regents Road bridge project. Thank you for deleting this environmentally damaging project.
Karen Hughes
4083 Porte de Palmas #104
San Diego, CA 92122

KH-1-1

KH-1-1

Comment acknowledged. Commenters express support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Kristen Jensen-Pergakes (August 1, 2016)

From: Kristen Jensen-Pergakes <kjensenpergakes@gmail.com>
Sent: Monday, August 01, 2016 5:15 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

Dear San Diego City,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. Protecting Rose Canyon is important for my family and many others in the University City community. My family and I walk the canyons on a regular basis and my young daughter really enjoys the native plants and animals in our area. I greatly appreciate this and all of the other protected green space in central San Diego because I grew up in Orange County where I witnessed the trails I grew up exploring with my family disappear in favor of housing developments. Please protect this natural treasure in our community.

I understand that the Draft EIR indicates that both these road projects would primarily draw traffic off the freeways and through our local neighborhoods. I have been commuting on these freeways and Genesee Ave for almost 15 years, and I understand how busy it is at afternoon rush hour (morning rush hour time is not congested). However, I would not trade the "potential" for less traffic on my evening drive home for more commuter traffic in my neighborhood. There are many people out walking and children riding bikes at that time that their safety would be compromised.

I thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project. I hope you will act on what the voters of University City voiced to the UCPG and remove these road projects from the city plan.

Kind Regards,

Kristen Jensen-Pergakes

2954 Renault Pl.
San Diego, CA 92122

KJP-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KJP-1-1

LETTER

RESPONSE

Karen Straus (August 1, 2016)

From: Karen Straus <kstraus1@gmail.com>
Sent: Monday, August 01, 2016 4:37 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

Planning Committee,

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project.

I strongly support protecting Rose Canyon. The Regents Road bridge project would be especially damaging to Rose Canyon.

I live on Rose Canyon and frequently hike the canyon, from the 805 bridge to the 5/52 merge. I access the canyon from my home, without using a car to get there. It is especially gratifying to me that I don't have to get in a car, use fuel and clog the freeways to go find nature somewhere else.

I hike the canyon to enjoy wildlife and native plants. it is one of the few places in San Diego where I can lose myself in the peace and quiet and sights and scents of nature.

I especially enjoy the canyon for its rich bird life. Three of the "Big Five" California birds can regularly be seen in the canyon: California Towhee, California Gnatcatcher and California Thrasher, along with another sought-after Western species, the Wrenit. The California Gnatcatcher is listed as endangered as a result of habitat loss for human use.

Perhaps the most important aspect of the canyon for me is the regeneration of life with the spring nesting season. This past spring I had the joy of witnessing the courtship behavior of a pair of White-tailed Kites, another Western species highly sought by birders. I watched the Rose Canyon pair build a nest, hunt for gophers, and hatch and successfully fledge three youngsters. I have been thrilled to see other raptors in the canyon: Red-tailed Hawks, Cooper's Hawks, Kestrels and Red-shouldered Hawks. I've seen coyotes, foxes and owls, and never tire of watching the rabbits, gophers, lizards, insects, butterflies and yes, the occasional snake.

We don't need more houses, more people, bigger roads and bridges; we need more nature. We need to protect the quality of life for humans in University City and for wildlife in Rose Canyon. Please don't promote or encourage more human development and further loss of habitat for wildlife. Habitat preservation is not just for wildlife; it is for people to enjoy as well. University City is so lucky to have Rose Canyon. Please leave what little remains as it is. Life that is all people and their homes and buildings, their cars and roads, with little or no wildlife and wildflowers, is a life far less rich and less satisfying. We all need the opportunity to refresh ourselves in nature.

Karen Straus
7151 Rock Valley Court
San Diego, CA 92122

KS-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

KS-1-1

LETTER

RESPONSE

Karen Straus (August 1, 2016)

ATTACHMENT TO
COMMENT LETTER KS-1

Writer/Editor/Photographer
birdbrained.biz
kstraus1@gmail.com



Rose Canyon nesting pair of White-tailed Kites



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LETTER

RESPONSE

Kevin Wirsing (August 1, 2016)

From: [Kevin Wirsing](#)
To: [PLB_Beggs@ucsd.edu](#)
Subject: University Community Plan Amendment: PROJECT No. 480286 / SCH No. 2015121011
Date: Monday, August 01, 2016 11:44:00 AM

University Community Plan Amendment:
 PROJECT No. 480286 / SCH No. 2015121011
 COMMUNITY AREA: University
 COUNCIL DISTRICT: 1 (Lightner)

<!--[if !supportEmptyParas]--> <!--[endif]-->
 The only problem I have with the PEIR: what took so long? The PEIR fully describes all the likely/potential impacts of removing the Regents Road Extension/Bridge and Genesee Widening from the community plan. Given the substantial and enduring benefits and opportunities the entire city will enjoy when these projects are removed from the community plan. PLEASE move forward with the plan amendment as expeditiously a possible.

<!--[if !supportEmptyParas]--> <!--[endif]-->
 Kevin Wirsing
 3310 First Avenue, Unit 4B
 San Diego CA 92103
 858-382-5641

KW-1-1

KW-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Megan Bryden (August 1, 2016)

From: bylermegan@gmail.com on behalf of Megan Bryden
To: [PLN Planning/UCP](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Monday, August 01, 2016 11:42:05 AM

I am in favor of removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP). Thank you to the city leadership for moving to do this.

I feel Rose Canyon will be negatively impacted by the addition of a Regents Road Bridge and/or by the widening of Genesee Avenue. More importantly I do not believe either change will have a noticeable impact on peak traffic congestion, though it will increase traffic, noise, and pollution near our homes, schools, parks, and open spaces. These projects would be costly and more harmful than helpful- thank you for working to have them removed from the UCP.



Megan Bryden
308.9 (555) 0000

MB-1-1

MB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Michele McKeand (August 1, 2016)

From: [wabincont@ucsd.edu](#)
To: [B.N. Banning, Esq.](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Monday, August 01, 2016 9:16:26 AM

I strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

I do not believe the bridge would benefit our community. I believe the result would be through traffic diverting from I5. The bridge would be detrimental to our community. Open spaces are an essential element for wildlife and recreation. I would like to preserve and protect Rose Canyon.

I commute on Genesee between Governor Drive and Campus Pointe to and from work. "Rush hour" lasts a very short part of the day and increases my commute by ten minutes if I travel during that period. The majority of the time traffic is light or non-existent. This project is unnecessary.

I strongly support removing both of these projects from the University Community Plan.

Thank you.

Michele McKeand
6026 Scripps Street
San Diego, CA 92122

MMK-1-1

MMK-1-1 Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Michael R. Pelling (August 1, 2016)

From: [Michael Pelling](#)
To: [PLN_Blanney_CPA](#)
Cc: [Michael Pelling](#)
Subject: University Community Plan Amendment, No. 480286/SCH No. 2015121011
Date: Monday, August 01, 2016 12:17:55 AM

I urge the City of San Diego to amend the University Community Plan by deleting construction of the Regents Road Bridge and Widening of Genesee Avenue. The Regents Road Bridge, in particular, would be profoundly harmful to the precious open space environment of Rose Canyon, a resource that is unique in the University City Community.

The Draft EIR for the deletion of those two projects notes that the primary impact they would have, if implemented, would be to shift some traffic from nearby freeways to community surface streets. That presumable advantage of reducing regional freeway congestion, however, would be short lived as freeway traffic loads continue to increase. The noise and safety impacts on local University City streets, though, would be permanent and constitute an unacceptable cost to the community for these projects.

For these reasons, I support the above referenced amendment to the community plan, and again urge the City of San Diego to complete the process of deleting the Regents Road Bridge and Genesee Ave Widening from that plan.

Michael R. Pelling
 2828 Passy Ave
 San Diego, CA 92122

MRP-1-1

MRP-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Margie Watkins (August 1, 2016)

From: [The Watkins](#)
To: [P.U.N. Planning/CEDA](#)
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011
Date: Monday, August 01, 2016 7:24:24 AM

Dear San Diego Planning Committee,

The Regents Road bridge project would be a great connection for recreation, accessibility, commuting, traffic relief and nature. I strongly OPPOSE the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan.

I live in SouthWest UC and spend at least 3 days a week biking, hiking or running in the canyon. I love to make an adventure of going to a store or restaurant, and work. The bridge would create a valued link over the creek, and most importantly the train tracks, for recreators. With the trolley and speed train, the access points for crossing the tracks will be minimal. This bridge is an important access link. It will also make the new trolley stops more accessible for people in our area.

It is my understanding that the bridge will include a road to a parking lot in the canyon. That will make it so much more accessible. In this Marian Bear park video found on The Friends of Rose Canyon website, the spokesman (Marian Bear's grandson) encourages visitors to the park, which in turn makes it more people friendly. The area is more valuable, the more people visit it. <https://vimeo.com/104365059> I too, will feel 'safer' if there are more recreational users and less seclusion for riff-raff.

There will be a huge impact to the wildlife during the construction of the bridge. But once completed, wildlife will be able to rebuild their habitats around it. A similar disruption occurred when the habitat was destroyed in order to be 'restored' in the canyons about 8 years ago. Tons of trucks, dust, sprinkler lines, orange fencing...but a few years later it is recovered. As for the view, the bridge will not dominate it, as there is a curve to the canyon and groves of large trees on either side of Regents.

While I am a great admirer of Debbie Knight and her effort to preserve and encourage people to get out in the canyon, I think the fear mongering created by "the Friends" over the bridge is exaggerated. Based on how many people I see in the canyon, probably few of the people behind her ever set foot in it. They use "the Friends" as a cover for protecting their quick access to the freeway and fear of lower property values.

Regents Road has lots of width to it to accommodate extra lanes, if needed. Houses on the southern end are not built right up against it, so there are minimal driveways needing access. I will probably actually have to wait for a traffic light when getting on to it, but the relief it will provide to Genesee and the schools near it is enormous. I currently fear for all the commuters who ride bikes on Genesee when school is starting, as well as the students.

I am sure you have heard the safety and traffic arguments a hundred times over, so I will not dwell on those.

MW-1-1

Comment acknowledged. Commenter opposes the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

MW-1-1

LETTER

Please, please, please, continue forward with the building of the bridge, which I was first made aware of when I bought my house here in 1994.

Margie Watkins
5310 Bragg Street
San Diego, CA 92122
858 558 3045

MW-1-1
cont.

RESPONSE

Margie Watkins (August 1, 2016)

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LETTER

I

RESPONSE

Naomi McLean (August 1, 2016)

From: Naomi <mcleans1@hotmail.com>
Sent: Monday, August 01, 2016 2:36 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/SCH No. 2015121011

I would like to voice my support for the removal of the Regents Road Bridge from the University Community Plan. I strongly support protecting Rose Canyon, which is an asset to our community. It is very important for both the people and wildlife that use it. North University City is very dense and will only get denser when new projects in the neighborhood are completed. Rose Canyon is a much needed area of open space that would be damaged if the bridge were built.

I am also concerned about pedestrian safety because of increased traffic on Regents Road if the bridge were built. Many parents and children walk to Doyle School and Doyle Park from the surrounding apartments. Both early in the morning when visibility is poor and in the afternoon, kids swarm across the street. The bridge would make crossing Regents Road that much more dangerous.

I appreciate this opportunity to express my support for the deletion of the Regents Road Bridge from the University Community Plan.

Naomi McLean
4089 Caminito Terviso
San Diego, CA 92122

NM-1-1

NM-1-1

Comment acknowledged. Commenters express support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Robert Brucker (August 1, 2016)

From: Robert Brucker
To: PLN Planning/EIR
Cc: Friends of Rose Canyon
Subject: University Community Plan Amendment #480286/Sch no. 2015121011
Date: Monday, August 01, 2016 9:15:57 AM

I want to support the deletion of both the Regents Rd bridge and the Genesee widening project and thank your committee for all your hard work on this issue.

I very concerned with preservation of the beauty and wildlife of Rose Canyon. Additionally, life in our community would be negatively impacted by drawing traffic through the heart of it. This is the best solution for people and wildlife. Thank you!

Robert Brucker MD
3253 Labitte Ct. SD 57122
858-453-2137

Sent from my iPhone

RB-1-1

RB-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Robert E. and Amy E. Murad (August 1, 2016)

From: anymurad@gmail.com
To: R.E.Blanning@CI3d
Subject: University Community Plan Amendment, No. 480266/ SCH No. 2015121011
Date: Monday, August 01, 2016 12:42:38 PM

To whom it may concern:

We would like to personally thank the city of San Diego in moving forward to eliminate two projects which would take heavy tolls on our community of University City. Both the Regents Road bridge project and the widening of Genesee Avenue would have unnecessary, costly damaging consequences to this neighborhood and the environment and Rose Canyon. We have lived in the same house in University City for nearly 30 years. Our children have grown up here going to the neighborhood schools and we have taken great pride and interest in this wonderful area. The trails through Rose Canyon are frequently used and enjoyed by our family. Our property on Fisk Avenue backs up to Genesee Avenue and the widening of that street would have a tremendous, detrimental effect on our home. We along with many people in this neighborhood make use of the parks and neighborhood shops and do quite a bit of walking through the area. Increased traffic would definitely put a damper on this type of activity and make it unsafe for our children to walk to school. Thank you again for your support in eliminating these two projects.

Sincerely,
Robert E. Murad, M.D.
Amy E. Murad
6651 Fisk Ave.
San Diego, California 92122

Sent from my iPhone

REM-1-1

REM-1-1 Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Roisin Heather Cronin (August 1, 2016)

From: Roisin Cronin
To: RHC_Beamings@CFJA
Subject: University Community Plan Amendment, No. 480366/ SCH No. 2015121011
Date: Sunday, July 31, 2016 10:35:23 AM

Dear Planning Committee,

I completely support the removal of the plan to build the bridge over Rose Canyon. Ever since I was little, I have found Rose Canyon to be a special place to create memories in. I would go on bike rides, hikes, and runs with my family all the time, and I subconsciously formed the belief that it would always be a natural reserve for me to go to all throughout my life. Now that I am growing older, I can understand the severity of how detrimental a bridge would be to this special canyon. My backyard canyon and childhood home would no longer be special. I'm sure this is the case for many other children in University City, and many more to come. Thank you very much for stopping the plan to build this bridge.

RHC-1-1

Sincerely,
Rosie Cronin

Roisin Heather Cronin
3176 Bunche Avenue
San Diego, California
92122
United States

RHC-1-1

Comment acknowledged. Commenter expresses support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Susan J. Sifton (August 1, 2016)

From: Susan J. Sifton <horses@carltonranch.com>
Sent: Monday, August 01, 2016 4:46 PM
To: PLN_PlanningCEQA
Cc: 'Friends of Rose Canyon'
Subject: : University Community Plan Amendment, No. 480286/ SCH No. 2015121011

Our City Council has the best interest of our children, with the decision to preserve our outdoor science and history lab that is Rose Canyon. Our children love to leave the class room to see, feel and smell flowers and trees, and discover roly pollies, pollywogs, lady bugs and birds. As someone who leads walks for Friends of Rose Canyon, I am privileged to see the children's eyes brighten and widen as they discover nature, with wonder and delight on a school day! I would like to let the voices of the children speak to this. The two most heard comments are, "Best field trip ever!", and that the canyon walks look like their favorite video game. "I thought that this was only in (favorite video game). It is really real! I did not know that this was a real place I could go, and it is right here!" I have heard this last comment in some form from every grade in every school, more times than I can count. Preserving Rose Canyon is absolutely necessary. Our City Council has preserved for our children some of the most fun we had growing up as kids in San Diego.

Susan Sifton
 10341 Orozco Rd.
 San Diego, Ca. 92124
 (Tierra Santa)

SJS-1-1

Comment acknowledged. Commenter expresses support for preserving Rose Canyon. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

SJS-1-1

LETTER

RESPONSE

Sandra Lippe (August 1, 2016)

From: Sandra Lippe
To: U.C. Planning/CRP
Subject: U.C. Community Plan Amendment, # 480286/SC1, # 2015171011
Date: Monday, August 01, 2016 9:25:00 AM

As a forty-year volunteer and resident of University City, I support the removal of Regents Road Bridge from the U.C. Community Plan. This uncivil war back and forth in our community needs to end. The bridge plan needs to go. First of all, you cannot unbuild a mistake. The bridge is a mistake. I have spent years running and hiking in the canyon, going on nature walks with children who have had no real nature experience, seeing wildlife up close. I have entered the canyon and welcome the relief from the noise of Genesee and Regents and UTC.

How many pro-bridge supporters have ever been in the canyon? I would be very few. Recently I saw how much of the hillside would be cut away to build the bridge. I brought a pro-bridge friend with me. He had supported the bridge for decades. He had a true conversion after this experience and understood the importance of NOT building the bridge, not ruining the canyon.

This isn't the east side against the west side, as portrayed by some pro-bridge folks. If I lived in City Heights or Point Loma, I wouldn't want the bridge. It will not help relieve traffic, but encourage traffic to bleed through our other arteries like Governor and side streets. It will not make it faster to get fire engines here. We need a fire station in U.C.

Do not damage beautiful Rose Canyon by slicing and dicing the canyon. Keep it intact for generations to come of wildlife and human life. I salute Mayor Faulconer and Council President Sherri Lightner for coming together for the good of the people of San Diego, not just University City.

Sincerely,
Sandra Lippe
2549 Angell
San Diego, CA.92122

SL-1-1

Comment acknowledged. Commenter expresses support for the removal of the Regents Road Bridge project from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

SL-1-1

LETTER

RESPONSE

Joan Selleck and Paul Maschel (August 1, 2016)

From: Selleck, Joann <JSelleck@cozen.com>
Sent: Monday, August 01, 2016 4:39 PM
To: PLN_PlanningCEQA
Cc: rosecanyon@san.rr.com
Subject: University Community Plan Amendment NO 480286 sch no 2015121011

We strongly support protecting Rose Canyon and believe the deletion of the proposed Regents Rd bridge and widening of Genesee from the plan will greatly benefit RC and San Diego, and particularly the surrounding community. We thank and appreciate all of the persons who spent many hours working on the evaluation of the project and arriving at this correct, wise and forward-thinking conclusion.

Now that the issue of the bridge/road has been resolved we should all move forward to make sure that RC is widely known as the jewel it is for all of San Diego to enjoy, and do whatever is necessary to sustain it currently and in the future.

Thank you.

Joann Selleck
 Paul Maschel
 4246 Caminito Terviso
 SD CA 92122

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SM-1-1
 SM-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

Jerry Wanetick and Ann Kennedy (August 1, 2016)

From: Ann Kennedy <akennedy@redants.com>
Sent: Monday, August 01, 2016 4:53 PM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment, No. 480286/ SCH No. 2015121011

We strongly support the deletion of the Regents Road Bridge project and the Widening of Genesee Avenue from the University Community Plan. I want to thank the City for its leadership in moving to delete these two out-of-date road projects, especially the unnecessary, costly and environmentally damaging Regents Road bridge project. Let's protect our open spaces and keep the expansion of our roadways to a minimum, we are on the precipice of new transportation solutions with self driving technologies which make these projects in UC all the more out of sync with the times and the needs of our community.

Jerry Wanetick and Ann Kennedy
2906 Renault Pl
San Diego CA 92122

WK-1-1

WK-1-1

Comment acknowledged. Commenters express support for the removal of both the Regents Road Bridge and Genesee Avenue Widening projects from the UCP. This comment does not address the adequacy of the Draft PEIR, but is part of the administrative record.

LETTER

RESPONSE

RINCON BAND OF LUISEÑO INDIANS

Environmental Department

1 W. Tribal Road • Valley Center, California 92082
(760) 297-2330 Fax:(760) 297-2339



June 23, 2016

Susan Morrison
City of San Diego
Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment Project No. 480286

Dear Ms. Morrison:

This letter is written on behalf of the Rincon Band of Luiseno Indians. Thank you for inviting us to submit comments on the University Community Plan Amendment Project No. 480286. Rincon is submitting these comments concerning your projects potential impact on Luiseno cultural resources.

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseno people. This is to inform you, your identified location is not within the Luiseno Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

RINCON-1-1 Comment noted. As new development is proposed, the City will comply with AB 52 requirements for contact and consultation with the Native American Heritage Commission and interested tribes.

RINCON-1-1

Bo Mazzetti
Tribal Chairman

Stephanie Spencer
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

LETTER

RESPONSE

Pala Band of Missions Indians (July 5, 2016)

PALA TRIBAL HISTORIC PRESERVATION OFFICE

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



July 5, 2016

Susan Morrison
City of San Diego Planning Dept.
1010 Second Ave. East Tower, Suite 1200, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment

Dear Mrs. Morrison:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

Consultation letter 1

PALA-1-1 Comment noted. As new development is proposed, the City will comply with AB 52 requirements for contact and consultation with the Native American Heritage Commission and interested tribes.

PALA-1-1

CLARIFICATIONS AND MODIFICATIONS

In response to the comments received during public review and to City staff input subsequent to distribution of the Draft PEIR, minor revisions, clarifications and/or additions have been made to the document which do not change the conclusions of the Final PEIR regarding the project’s potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, these revisions, clarifications, or additions to the document – which are shown in ~~strikeout~~/underline format – do not represent “significant new information” and therefore recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur. Table CM-1 summarizes the clarifications and modifications to the Final PEIR. However, minor text changes, such as fixes for typographical errors, that were made to the Final EIR are not included in Table CM-1.

**Table CM-1
Clarifications and Modifications**

Section/Page # of the Final PEIR	Clarification and Modification
Universal Clarifications and Modifications	
	All references to “UCSD” have been replaced with “UC San Diego” in the Final PEIR.
	All references to “discretionary projects” have been replaced with “projects” in the Final PEIR.
	All references to “ministerial projects” have been replaced with “projects” in the Final PEIR.
	All references to “No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative” have been replaced with “No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative”
	Figure 2-2, Figure 4.1-1, Figure 4.1-2, Figure 4.1-3, Figure 4.1-4, Figure 4.7-1, Figure 4.13-1, and Figure 4.15-1 All suggested revisions to the figures regarding UC San Diego lands have been revised accordingly. The universal revisions to the figures include the following: <ul style="list-style-type: none"> • Added Scripps Institution of Oceanography to “outside city jurisdiction” • Removed Scripps Hospital (east side of I-5) from “outside city jurisdiction” • Removed VA Hospital (west side of I-5) from “outside city jurisdiction”
Executive Summary	
Section ES.6.2, Environmentally Superior Alternative, Pages ES-11 through ES-12	The Final PEIR has been revised to state the following: State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative <u>among other</u>

Section/Page # of the Final PEIR	Clarification and Modification
	<p><u>alternatives considered.</u> If the No Project Alternative is the environmentally superior alternative, the PEIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 9.0 of the PEIR, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would be considered environmentally superior because it would reduce impacts compared to the other proposed alternatives that preserve more open space as it would <u>not construct a bridge structure.</u> <u>This alternative would not involve widening of Genesee Avenue. Instead, the alternative would restripe the existing four-lane roadway to a six-lane roadway.</u> <u>The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way. As such, therefore, resulting this alternative would result in fewer impacts to transportation/circulation (roadway segments, freeway segments, and ramps), air quality (operation criteria pollutants), and GHGs, and noise (operation).</u> <u>Implementation of the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would eliminate one of the significant impacts associated with the Project. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would not result in a significant impact related to noise (Issue 3).</u></p> <p><u>Further, in contrast to other alternatives the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in reduced impacts to land use, historical resources, biological resources, and geological conditions.</u></p> <p>However, as with the other alternatives, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in greater impacts to land use, visual effects and neighborhood character, air quality (construction), energy, noise (construction), historical resources, biological resources, geological conditions, paleontological resources, hydrology and water quality, public utilities, and health and safety, when compared to the Project.</p> <p>The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would have similar impacts to the Project in terms of impacts to public services and facilities and population and housing.</p> <p>Additionally, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon, <u>would not widen Genesee Avenue, and would perform all proposed roadway improvements within the existing right-of-way.</u> Lastly, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative <u>seeks to provide transportation improvements that would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due</u></p>

Section/Page # of the Final PEIR	Clarification and Modification
	<p>to greater capacity when compared to the Project. <u>Further, the other proposed alternatives, which would result in the construction of either Regents Road Bridge or a Pedestrian Bike Bridge with Emergency Access, would preserve less open space and result in greater impacts to biological resources. Based on the discussion provided above, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative.</u></p>
<p>Chapter 1.0 Introduction</p>	
<p>Section 1.2, Scope and Structure of the PEIR, Page 1-6</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Chapter 9.0: Alternatives to the Project. Per CEQA Guidelines Section 15126.6, this chapter considers alternatives to the Project that could reduce one or more of the significant environmental impacts identified in Chapter 4.0. In addition, alternatives that were considered but rejected from more detailed analysis are also identified.</p>
<p>Chapter 2.0 Environmental Setting</p>	
<p>Section 2.1.2, University Community Area, under “University Community Area Contexts” Page 2-4 (third paragraph)</p>	<p>“Scripps Institute” has been replaced with “Scripps Institution of Oceanography.”</p>
<p>Section 2.1.2 University Community Area, under “Existing Transit,” Page 2-4 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Several types of transit currently serve the UCP Area. There are 14 Metropolitan Transit Service (MTS) routes that serve the University community including the SuperLoop (201/202 and 204), Rapid Route 237, and Coaster Connection Routes 978 and 979. There is also one North County Transit District (NCTD) Breeze Route (Route 101). <u>Three of the 14 MTS routes serve the southern University community (south of Rose Canyon); MTS Route 41 runs from UC San Diego to Fashion Valley, MTS Route 50 runs from UTC to downtown, and MTS Route 105 Runs from UTC to Old Town.</u> UCSD UC San Diego Transportation Services provides eight shuttle routes that serve the UCP Area. The shuttle routes specifically serve the campus, medical centers, and other key points off campus. Students, faculty, and staff can ride the shuttles for free. All shuttles operate during academic quarters with some shuttles operating year-round.</p>
<p>Section 2.1.3.5, Existing Transit, Page 2-8 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Other bus routes serving the Genesee Avenue Corridor include MTS 105 (Old Town – University City). Bus stops are located along Governor Drive (MTS 41, 50, and 105), Decoro Street (MTS 41 and 50), Centurion Square (MTS 41 and 50), Luigi Terrace (MTS 41 and 50), Calgary Drive (MTS 41 and 50), Governor Drive, Radcliffe Lane, April Court, and SR 52 (Ramp). Generally, the MTS bus routes within the Project vicinity operate approximately every 10 to 15 minutes on both weekdays and/or weekends. <u>This route does not run</u></p>

Section/Page # of the Final PEIR	Clarification and Modification
	<u>from the southern University area (south of Rose Canyon) on weekends.</u>
Section 2.1.3.7, Emergency Services, Pages 2-9 through 2-10 (sixth paragraph)	<p>The Final PEIR has been revised to state the following:</p> <p>Police protection to the Genesee Avenue Corridor areas is provided by the SDPD Northern Division, located at 4275 Eastgate Mall. The Northern Division serves a population of 225,234 people and encompasses 41.3 square miles. The Project site is located specifically in Beat 115 of the Northern Division (SDPD 2016a). The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County. As of February <u>June</u> 2016, a total of 109 <u>118</u> sworn police officers <u>and one civilian employee</u> were assigned to Northern Patrol Operations. Of those, <u>approximately 90</u> full-duty officers are performing field operations. On average, approximately 45 <u>43</u> officers are divided among three shifts per day, who patrol the Northern Division (approximately 15 <u>14</u> patrolling officers at any given time). The Northern Division’s average response time for 2015 was 7.3 minutes for Priority E – Imminent Threat to life calls. Beat 115’s average response time for the same category of calls was 8.3 minutes. The Northern Division and Beat 115 average response times exceed the City’s target average response time of 7.0 minutes for these priority-type calls (SDPD 2016b, Citygate 2011).</p>
Section 2.1.4.5, Existing Transit, Page 2-12 (second paragraph)	<p>The Final PEIR has been revised to state the following:</p> <p>Other bus routes serving the Regents Road Corridor include MTS 41 (Fashion Valley - UCSD UC San Diego), 50 (UTC Express), and 105 (Old Town – University City). Bus stops are located along Nobel Drive (MTS 41, 50, and 105), Decoro Street (MTS 41 and 50), Centurion Square (MTS 41 and 50), Luigi Terrace (MTS 41 and 50), Calgary Drive (MTS 41 and 50), Governor Drive, Radcliffe Lane, April Court, and SR 52 (Ramp). Generally, the MTS bus routes within the Project vicinity operate approximately every 10 to 15 minutes on weekdays and/or weekends. <u>MTS Route 50 does not run on weekends. MTS Route 105 does not run from the southern University area (south of Rose Canyon) on weekends.</u></p>
Section 2.2.1, General Plans and Zoning, under “University Community Plan,” Page 2-13 (third paragraph)	<p>The Final PEIR has been revised to state the following to clarify the description of the land uses within the South University area:</p> <p>South University is bordered by three freeways: I-5 on the west, I-805 on the east, and SR 52 on the south. These freeways and two major canyons, Rose Canyon on the north and San Clemente Canyon (Marian Bear Memorial Park) on the south, isolate as well as define the South University Subarea. Access to the subarea is available from Regents Road and Genesee Avenue from the south, Genesee Avenue from the north, and the Governor Drive exit off of I-805 from the east. The South University Subarea is planned to be a homogeneous, single-family residential neighborhood, drawing its distinct identity from Rose Canyon to the north and San Clemente Canyon (Marian Bear Memorial Park) to the south. Land uses consist primarily of single-family residential development. Commercial centers are clustered along Governor Drive at Regents Road and Genesee Avenue, which primarily serve the daily needs of area residents. An office park has been developed on the south side of Governor Drive at I-805, which serves as an employment center. <u>South University also includes new areas of higher density residential neighborhoods</u></p>

Section/Page # of the Final PEIR	Clarification and Modification
	<p><u>on the south side of Governor Drive near I-805. A 9-hole golf course also exists south of Governor Drive.</u></p>
<p>Section 2.2.1, General Plans and Zoning, under “Clairmont Mesa Community Plan,” Page 2-16 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Clairmont Mesa Community Plan</u></p> <p>The Clairmont Mesa Community Plan (CMCP) was adopted by the City Council on September 26, 1989 (City of San Diego 2011c). The Clairmont Mesa community is located to the south of this subarea on the other side of SR 52. The CMCP is intended to provide guidance for the orderly growth of the Clairmont Mesa community. Major goals of this plan include preserving and enhancing Marian Bear Memorial Park, and improving the street system to accommodate growth. The analyzed changes along the Regents Road Corridor would be consistent with the CMCP. A more detailed analysis of the project alternatives in the context of the CMCP is provided in Section 4.1 of this PEIR.</p>
<p>Chapter 3.0 Project Description</p>	
<p>Chapter 3.2.2 Removal of Regents Road Bridge</p>	
<p>Section 3.2.2, Removal of Regents Road Bridge, Page 3-3 (eighth bullet)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The proposed 12-space parking lot that would have been built north adjacent to <u>to</u> of the present terminus of Regents Road on the south side of Rose Canyon would not be constructed. This would have provided parking for persons accessing Rose Canyon from an existing trail.</p>
<p>Chapter 4.0 Environmental Analysis</p>	
<p>Chapter 4.2 Transportation/Circulation</p>	
<p>Section 4.2.1.2, Existing Mobility Network, under “Bus Routes,” Pages 4.2-10 through 4.2-12 (first and second paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Bus Routes</u></p> <p>Fourteen MTS routes serve the UCP Area, including the SuperLoop (201/202 and 204), Rapid Route 237, and Coaster Connection Routes 978 and 979. There is also one NCTD Breeze Route (Route 101). <u>Three of the 14 MTS routes serve the southern University community (south of Rose Canyon).</u></p> <p>The combination of the MTS, NCTD, and UCSD-UC San Diego <u>UC San Diego</u> bus/shuttle routes covers the majority of the UCP Area and provides connections to transfer stations and COASTER/AMTRAK stations that allow users to access other bus routes, trolley lines, and regional services. <u>The southern University community (south of Rose Canyon) is served by three MTS bus routes with bus stops along Genesee Avenue and Governor Drive.</u></p>

Section/Page # of the Final PEIR	Clarification and Modification
Table 4.2-6, Intersections Operating at Unacceptable Level of Service, Page 4.2-20	See clarifications and modifications to Table 4.2-6, Intersections Operating at Unacceptable Level of Service on Page 4.2-20 of the Final PEIR.
Section 4.2.1.3, Existing Operating Conditions, under “Intersections,” Page 4.2-21 (first and second paragraphs)	<p>The Final PEIR has been revised to state the following:</p> <p>As shown in Table 4.2-6, the following seven<u>four</u> study area intersections are currently operating at LOS E or F during both the AM and PM peak hour within the UCP Area:</p> <ul style="list-style-type: none"> • Genesee Avenue/I-5 SB Ramps – AM: LOS E / PM: LOS E • Genesee Avenue/Governor Drive – AM: LOS E / PM: LOS E • Genesee Avenue/SR 52 eastbound (EB) Ramps – AM: LOS E / PM: LOS F • La Jolla Village Drive/Villa La Jolla Drive – AM: LOS E / PM: LOS F • La Jolla Village Drive/Towne Center Drive – AM: LOS F / PM: LOS F • Regents Road/SR 52 EB Ramps – AM: LOS F / PM: LOS E • Governor Drive/I-805 NB Ramps – AM: LOS F / PM: LOS F <p>The following intersections operate at LOS E or F during one peak hour period as shown in Table 4.2-6:</p> <ul style="list-style-type: none"> • <u>Genesee Avenue/I-5 SB Ramps – PM: LOS E</u> • Genesee Avenue/I-5 NB Ramps – PM: LOS F • Genesee Avenue/La Jolla Village Drive – AM: LOS E • Genesee Avenue/Decoro Street – PM: LOS F • Genesee Avenue/Centurion Square – AM: LOS E • Genesee Avenue/ SR 52 westbound (WB) Ramps – PM: LOS F • <u>Genesee Avenue/SR 52 eastbound (EB) Ramps – PM: LOS F</u> • Genesee Avenue/Appleton Street/Lehrer Drive – AM: LOS F • La Jolla Village Drive/Torrey Pines Road – PM: LOS F • La Jolla Village Drive/Regents Road – PM: LOS F • La Jolla Village Drive/Executive Way – PM: LOS E • La Jolla Village Drive/I-805 SB Ramps – AM: LOS F • Miramar Road/Eastgate Mall – PM: LOS F • Miramar Road/Camino Santa Fe – PM: LOS F • Regents Road/Luna Avenue – PM: LOS E • <u>Regents Road/SR 52 EB Ramps – AM: LOS E</u> • North Torrey Pines Road/La Jolla Shores Drive – PM: LOS E • Gilman Drive/I-5 SB Ramps – PM: LOS F
Section 4.2.3, Significance Determination, under “Methodologies and Assumptions, Future Condition Improvements,” Page 4.2-28 (second paragraph)	The reference to the “new Eastgate Mall” has been replaced with “new Gilman Bridge.”

Section/Page # of the Final PEIR	Clarification and Modification
Table 4.2-9, Future Year Roadway Segments with Unacceptable Level of Service, Page 4.2-30	See clarifications and modifications to Table 4.2-9, Future Year Roadway Segments with Unacceptable Level of Service on Page 4.2-30 of the Final PEIR.
Section 4.2.4.1 Impact Analysis, under “Roadway Segments, Future Year with Project,” Page 4.2-32 (first, second, and third paragraphs)	<p>The Final PEIR has been revised to state the following:</p> <p><i>Future Year with Project</i></p> <p>Table 4.2-9 outlines the significant impacts anticipated along roadway segments with implementation of the Future Year with Project. With implementation of the Project, a total of 2420 roadway segments within the traffic study area would degrade to unacceptable operating conditions which exceed the significance thresholds.</p> <p>Under the Future Year with Project, the four <u>three</u> following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur under Future Year with Adopted UCP. Thus, the impact at these segments can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E) • Genesee Avenue: Nobel Drive to Centurion Square (LOS F) • Genesee Avenue: Centurion Square to Governor Drive (LOS F) • La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E) <p>As shown in Table 4.2-9, 1413 of the segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP. These 1413 segments are considered to have a significant decrease in operation due to an exceedance of the V/C ratio thresholds (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.</p>
Table 4.2-10, Future Year Intersections with Unacceptable Level of Service, Pages 4.2-33 through 4.2-34	See clarification and modifications to Table 4.2-10, Future Year Intersections with Unacceptable Level of Service on Pages 4.2-33 through 4.2-34 of the Final PEIR
Section 4.2.4.1 Impact Analysis, under “Intersections, Future Year with Project,” Page 4.2-35 (second, third, and fourth paragraphs)	<p>The Final PEIR has been revised to state the following:</p> <p>With implementation of the Project, 3028 intersections would operate at unacceptable LOS operating conditions which exceed the significance thresholds by future year. Some of the intersections would have significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods.</p> <p>Under the Future Year with Project, the following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, under Future Year with Adopted UCP, these intersections would operate at acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.</p>

Section/Page # of the Final PEIR	Clarification and Modification
	<ul style="list-style-type: none"> • Genesee Avenue/La Jolla Village Drive (PM) • Genesee Avenue/Nobel Drive (AM) • Genesee Avenue/Decoro Street (AM) • Genesee Avenue/Centurion Square (AM and PM) • Genesee Avenue /Governor Drive (PM) • Genesee Avenue/SR 52 WB Ramps (AM) • Genesee Avenue/SR 52 EB Ramps (AM and PM) • La Jolla Village Drive/I-5 SB Off Ramp (PM) • Gilman Drive/I-5 SB Ramps (PM) <p>As shown in Table 4.2-10, 24<u>19</u> of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These 24<u>19</u> intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.</p>
<p>Section 4.2.4.2 Significance of Impacts, under “Roadway Segments,” Page 4.2-36 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Roadway Segments</p> <p>Deteriorated traffic conditions would result in significant impacts at 24<u>20</u> roadway segments with implementation of the Project in the future year (Table 4.2-11 is provided for informational purposes). For informational purposes, Table 4.2-13<u>11</u> is presented and summarizes the level of significance for roadway segments after implementation of mitigation measures discussed in Section 4.2.4.3. <u>As shown in Table 4.2-11, of the 24</u>20 roadway segments within the traffic study area that would degrade to unacceptable operating conditions which exceed the significance thresholds, nine segments have feasible measures available to reduce impacts. Eight<u>Six</u> of the nine segments would be improved to operate at LOS D or better and the impact would be mitigated to less than significant. The remaining segment would be improved by the improvement measures; however, while the measures would improve the segment operations, the LOS would not be improved to an acceptable LOS. Two segments operating at unacceptable conditions would not trigger an impact. Thus, impacts along 13 roadway segments would remain significant and unmitigated (Issues 1, 3, and 4) even after incorporation of Mitigation Measures TRA-1 and TRA-2 specified in Section 4.2.4.3 (<u>Table 4.2-13, which is provided for informational purposes</u>).</p>
<p>Section 4.2.4.2 Significance of Impacts, under “Intersections,” Page 4.2-36 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Intersections</p> <p>With implementation of the Project, 31<u>30</u> intersections would operate at unacceptable LOS operating conditions by future year during one or both of the peak periods. Thirty<u>Twenty-eight</u> of the 31<u>30</u> intersections exceed the significance thresholds. Nine<u>One</u> of these significantly impacted intersections under the Project would operate at acceptable LOS with implementation of</p>

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	<p>Future Year with Adopted UCP. Also, 24¹⁹ of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. For informational purposes, Table 4.2-12 is presented and summarizes the level of significance for intersections after implementation of mitigation measures. As shown in Table 4.2-12, 48¹⁹ of the 34³⁰ intersections that would operate at LOS E or F in the future year do not have feasible measures available to <u>bring operations to an acceptable LOS</u>reduce impacts. <u>Of the 28 intersections that exceed the significance thresholds, 18 of the intersections do not have feasible measures available to reduce impacts.</u> However, while the measures would improve the intersection operations, the delay time would not be reduced to below a level of significance. The impacts at the 20¹⁸ study area intersections would remain significant and unmitigated (Issues 1, 3, and 4) even after incorporation of Mitigation Measures TRA-1 and TRA-3 (Table 4.2-14 which is provided for informational purposes). Thus, the Project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.</p>
<p>Table 4.2-11, Future Year Roadway Segment Operation with Implementation of Mitigation, Pages 4.2-37 through 4.2-39</p>	<p>See clarification and modifications to Table 4.2-11 on Pages 4.2-37 through 4.2-39 of the Final PEIR.</p>
<p>Table 4.2-12, Future Year Intersection Operation with Implementation of Mitigation, Page 4.2-40 through 4.2-42</p>	<p>See clarification and modifications to Table 4.2-12, Future Year Intersection Operation with Implementation of Mitigation on Pages 4.2-40 through 4.2-42 of the Final PEIR.</p>
<p>Table 4.2-13, Summary of Impacted Roadway Segments after Mitigation, Page 4.2-43</p>	<p>See clarification and modifications to Table 4.2-13, Summary of Impacted Roadway Segments after Mitigation on Page 4.2-43.</p>
<p>Table 4.2-14, Summary of Impacted Intersections after Mitigation, Page 4.2-44</p>	<p>See clarification and modifications to Table 4.2-14, Summary of Impacted Intersections after Mitigation, Page 4.2-44.</p>
<p>Section 4.2.4.3, Mitigation Framework, Pages 4.2-46 through 4.2-47</p>	<p>The Final PEIR has been revised to state the following:</p> <ul style="list-style-type: none"> ● TRA-2.4: Genesee Avenue and SR 52 Westbound Ramps (Intersection 18): <u>An Intersection Control Evaluation (ICE) will be conducted to determine the best measure for mitigation. One option is to</u> sSignalize the intersection and square up ramps, adding a protected phase for northbound left-turns from Genesee Avenue to the SR 52 ramp, and add a second right-turn lane on the exit ramp. ● TRA-2.13: Governor Drive and I-805 Northbound Ramps (Intersection 79): <u>An ICE will be conducted to determine the best measure for mitigation. One option is to</u> install roundabout control at this roadway intersection.

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Section 4.2.4.4, Significance after Mitigation, Page 4.2-47	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary pProjects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
Section 4.2.6.4, Significance after Mitigation, Page 2-54	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary pProjects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
Section 4.2.7.4, Significance after Mitigation, Pages 2-55 through 4.2-56	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary pProjects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San</u></p>

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	<p><u>Diego 2014b</u>). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 4.2.8.4, Significance after Mitigation, Page 2-58</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary pProjects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Chapter 4.4 Air Quality</p>	
<p>Section 4.4.4.1 Impact Analysis, Page 4.4-16 (eighth paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The Project requires an amendment to the General Plan and as determined in this analysis (see Issue 2 and in Section 4.2, Transportation/Circulation), would increase the total regional VMT compared to the Adopted UCP. SANDAGSDAPCD is currently developing an update to the RAQS and an ozone attainment plan for the 8-hour ozone NAAQS. Any changes to the transportation network and the General Plan as a result of the Project would be incorporated in the updates to future air quality attainment plans. However, the increase in VMT as a result of the Project has not been accounted for in the current RAQS.</p>
<p>Section 4.4.5.1 Impact Analysis, under “Operational,” Page 4.4-19 (seventh paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>As shown in Table 4.4-5, the net change in emissions of ROG, NO_x, CO, PM₁₀, and PM_{2.5} associated with the Project would not exceed applicable daily or annual thresholds established by the City of San Diego. However, the emission estimates were based on available detailed traffic data <u>for freeways and arterials</u> (e.g., peak hour speeds) that only account for 75 percent of the total VMT in the Project area. Therefore, to fully account for the impacts of the Project, <u>including VMT on additional roadways such as collectors,</u> the net changes in emissions were adjusted by 25 percent to account for the total</p>

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	<p>VMT in the Project area. This is considered conservative because it assumes the change in VMT and speeds on those additional roadways would be similar in magnitude with arterial and freeways. However, it is possible that the smaller roadways would not experience the same magnitude of VMT and speed change and could potentially be beneficial for Project-related emissions. Nevertheless, because specific information (e.g., peak hour speeds) is not available to support this assumption, it was conservatively assumed that the emissions would increase based on the percentage of VMT. Table 4.4-6 shows the adjusted total operational emissions from the Project.</p>
<p>Section 4.4.5.3, Mitigation Framework, Page 4.2-41 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>In general, implementation of these policies would preclude or reduce air quality impacts. Compliance with all applicable local, state, and federal standards is required of all projects and is not considered mitigation. However, it is possible that, for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation. Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. If implemented, Mitigation Framework (Mitigation Measures TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, these improvements to the transportation network would also affect criteria air pollutant emissions. Project-level analysis of the potential impacts of the proposed mitigation measures will be completed at such a time the improvements are implemented. Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2.</u> No additional feasible mitigation is available to reduce impacts associated with the Project.</p>
<p>Section 4.4.6.1, Impact Analysis, Pages 4.4-22 through 4.4-23 (sixth and seventh paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>However, according to the traffic analysis and as discussed in Section 4.2, Transportation/Circulation, several roadway segments would operate at LOS E or F in the future year in the future year with implementation of the Project. Under the Project in the future year, the three <u>two</u> following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur with implementation of the Adopted UCP. Thus, the impact at these roadway segments can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue: Nobel Drive to Centurion Square (LOS F) 46,500 ADT

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	<ul style="list-style-type: none"> • Genesee Avenue: Centurion Square to Governor Drive (LOS F) 54,600 ADT • La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E) 55,000 ADT <p>Under the Project in the future year, the nine <u>seven</u> following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, in the future year with implementation of the Adopted UCP, these intersections would continue to operate at acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue/La Jolla Village Drive (PM) • Genesee Avenue/Nobel Drive (AM) • Genesee Avenue/Decoro Street (AM) • Genesee Avenue/Centurion Square (AM and PM) • Genesee Avenue/Governor Drive (PM) • Genesee Avenue/SR 52 WB Ramps (AM) • Genesee Avenue/SR 52 EB Ramps (AM and PM) • La Jolla Village Drive/I-5 SB Off Ramp (PM) • Gilman Drive/I-5 SB Ramps (PM)

Chapter 4.5 Greenhouse Gas Emissions

<p>Section 4.5.5.1 Impact Analysis, City of San Diego Climate Action Plan, Pages 4.5-17 through 4.5-18</p>	<p><u>City of San Diego Climate Action Plan</u></p> <p>The CAP does not include any goals or measures that directly relate to the Project or transportation infrastructure projects. Strategy 3 of the CAP includes actions to increase mass transit, implement the Bicycle Master Plan, and promote transit oriented development. These, and other measures in the CAP, do not directly relate to the removal of a planned improvement from the UCP. Actions 3.4 and 3.5 of the CAP, which relate to the implementation of Traffic Signal and Roundabouts Master Plans, aim to reduce vehicle miles traveled and promote effective land use by implementing transit-oriented development within Transit Priority Areas. These actions do not directly pertain to roadway projects. However, the CAP does include a goal to promote effective land use so as to reduce VMT. Action 3.6 of the CAP (Implement transit-oriented development within Transit Priority Areas) is intended to meet that goal and has a target to “reduce average vehicle commute distance by 2 miles through implementation of the General Plan City of Villages Strategy by 2035.”</p> <p>As discussed earlier, the overall VMT is projected to increase as a result of the Project. Although changes in trip distance were not directly evaluated for the Project, the Project could affect commute routes for local residents by increasing future trip distances as a result of rerouting trips to other existing local arterials. Therefore, it is conservatively assumed that the overall increase in VMT is not consistent with the goals of the CAP.</p> <p>In addition, t <u>The removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side</u></p>
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	<p><u>of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon. Thus, removal of the planned Regents Road Bridge from the UCP would be in conflict with planned bicycle network improvements as envisioned in local alternative transportation planning documents.</u></p>
<p>Section 4.5.5.2 Singificance of Impacts, Page 4.5-18</p>	<p>Given the increase in VMT and GHG emissions from mobile sources, the Project would not be consistent with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP. Because the overall VMT is projected to increase as a result of the Project, the Project could affect commute routes for local residents by increasing future trip distances as a result of rerouting trips to other existing local arterials. Further, the removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon.</p> <p>Therefore, the Project could conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The impact would be significant and unmitigated at the program level.</p>
<p>Chapter 4.7 Noise</p>	
<p>Section 4.7.6.3, Mitigation Framework, Pages 4.7-30 through 4.7-31 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The City of San Diego’s General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level noise mitigation measures for discretionary projects. Discretionary pProjects with the potential to result in significant noise impacts are subject to site-specific review in accordance with the City’s General Plan, Noise Element, including the City’s 2015 General Plan Amendments; the UCP, Noise Element; the City’s Municipal Code, Noise Ordinance; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. The following Mitigation Framework (Mitigation Measure NOI-1) shall be required of all discretionary projects on a case by case basis with the potential to result in significant noise impacts. Noise impacts would be significant with the removal of the widening of Genesee Avenue from the UCP. Mitigation Measure NOI-1 would address the significant impacts related to operational noise along the Genesee Avenue Corridor.</p>
<p>Chapter 4.11 Paleontological Resources</p>	
<p>Section 4.11.4.1, Impact Analysis, Pages 4.11-5 through 4.11-6 (first, second, and third paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, activities that excavate or grade geologic formations which could contain fossil resources would be significant. The Project impact area is underlain by geological formations which are considered to have a high and/or moderate potential for containing fossil resources.</p> <p>Excavation and/or grading activities implemented in accordance with the Project that involve excavation into the underlying geologic formation could expose the formations and associated fossil remains. These projects, both</p>

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	<p>ministerial and discretionary could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, discretionary projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a potentially significant impact. Thus, impacts resulting from discretionary development would be potentially significant.</p> <p>Ministerial Projects implemented in accordance with the Project would likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to ministerial activities associated with the Project would be potentially significant.</p>
<p>Chapter 4.12 Hydrology and Water Quality</p>	
<p>Section 4.12.2.3, Local, Page 4.12-19</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>City of San Diego Drainage Design Requirements Council Policies</u></p>
<p>Chapter 4.13 Public Services and Facilities</p>	
<p>Section 4.13.1.1(a), Police Protection Services, Page 4.13-1 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>As of February <u>June</u> 2016, a total of 109 <u>118</u> sworn police officers <u>and one civilian employee</u> were assigned to Northern Patrol Operations. Of those, <u>approximately</u> 90 full-duty officers are performing field operations. On average, approximately 45 <u>43</u> officers are divided among three shifts per day, who patrol the Northern Division (approximately 45 <u>14</u> patrolling officers at any given time). The Northern Division is currently staffed at 83 percent of its recommended staffing level (recommended staffing is derived from a formula based on call for service, response times, etc.) and frequently operates at one to two officers below its recommended staffing level for each work shift (SDPD 2016).</p>
<p>Section 4.13.4.1(a), Police Protection Services, Pages 4.13-15 through 4.13-16 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>As discussed in Section 4.2, Transportation/Circulation, there would be significant traffic impacts to roadway segments and intersections in the future year with implementation of the Project. Future Year is the scenario used for transportation modeling purposes. While some transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Project proposes transportation improvements as Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures</u></p>

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	<p><u>TRA-1 and TRA-2.</u> These would make alterations to the existing roadway network in an effort to improve areas of poor operation. Even with implementation of these transportation mitigation measures, significant traffic impacts would still result and would present increased difficulty in police accessing areas within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.</p>
<p>Section 4.13.4.1(b), Fire and Emergency Services, Page 4.13-17 (fourth paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Future Year with Project conditions would result in a total of 2420 roadway segments within the traffic study area to degrade to unacceptable operating conditions in exceedance of the significance thresholds. With implementation of the Project, 3028 intersections would operate at unacceptable LOS operating conditions which exceed the significance thresholds by future year. Under the Project in the future year, the following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. Some of those intersections currently operate at LOS E or F, but would continue to experience significantly worsened conditions with implementation of the Project. Some of these intersections would have significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods.</p> <ul style="list-style-type: none"> • Genesee Avenue/La Jolla Village Drive (PM) • Genesee Avenue/Nobel Drive (AM) • Genesee Avenue/Decoro Street (AM) • Genesee Avenue/Centurion Square (AM and PM) • Genesee Avenue /Governor Drive (PM) • Genesee Avenue/SR 52 WB Ramps (AM) • Genesee Avenue/SR 52 EB Ramps (AM and PM) • La Jolla Village Drive/I-5 SB Off Ramp (PM) • Gilman Drive/I-5 SB Ramps (PM)
<p>Section 4.13.4.4, Significance After Mitigation, Page 4.13-20(first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police and fire and emergency service response times would be significant. While Mitigation Measures TRA-1 and TRA-2 would result in improvements to intersection and road segment operations, the traffic conditions would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. Further, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, impacts to emergency service providers associated with</p>

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	the Project would remain significant and unmitigated at the program level.
Chapter 5.0 Cumulative Impacts	
<p>Section 5.2.2.1.1 Impact Analysis, under “Roadway Segments,” Page 5-7 (first and second paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Roadway Segments</p> <p>With implementation of the Project, a total of 24<u>20</u> roadway segments within the traffic study area would degrade to unacceptable operating conditions which exceed the significance thresholds. Under Future Year with Project, the four<u>three</u> roadway segments listed below would be characterized by LOS E or F. These unacceptable operating conditions would not occur with implementation of the Adopted UCP transportation improvements. Thus, the impacts at these segments can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E) • Genesee Avenue: Nobel Drive to Centurion Square (LOS F) • Genesee Avenue: Centurion Square to Governor Drive (LOS F) • La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E) <p>As shown in Table 4.2-9, 44<u>13</u> of the segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the Adopted UCP. These 44<u>13</u> segments are considered to have a significant decrease in operation due to an exceedance of the V/C ratio thresholds (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Implementation of the Project would eliminate two significant impacts associated with the Adopted UCP that would occur in the future year along two segments of Regents Road:</p> <ul style="list-style-type: none"> • SR 52 WB Ramps to SR 52 EB Ramps • SR 52 EB Ramps to Luna Avenue
<p>Section 5.2.2.1.1 Impact Analysis, under “Intersections,” Page 5-8 (first and second paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Intersections</p> <p>With implementation of the Project, 34<u>30</u> intersections would degrade to unacceptable LOS operating conditions by future year. Thirty<u>Twenty-eight</u> of the 34<u>30</u> intersections exceed the significance thresholds. Some of those intersections currently operate at LOS E or F, but would continue to experience significantly worsened conditions. Some of the intersections would be characterized by significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods. Under Future Year with Project, the nine<u>seven</u> following intersections would be characterized by unacceptable operating conditions of LOS E or F during the peak period indicated. However, in Future Year with Adopted UCP, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.</p>

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	<ul style="list-style-type: none"> • Genesee Avenue/La Jolla Village Drive (PM) • Genesee Avenue/Nobel Drive (AM) • Genesee Avenue/Decoro Street (AM) • Genesee Avenue/Centurion Square (AM and PM) • Genesee Avenue/Governor Drive (PM) • Genesee Avenue/SR 52 WB Ramps (AM) • Genesee Avenue/SR 52 EB Ramps (AM and PM) • La Jolla Village Drive/I-5 SB Off Ramp (PM) • Gilman Drive/I-5 SB Ramps (PM) <p>As shown in Table 4.2-10, 24<u>19</u> of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These 24<u>19</u> intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Implementation of the Project would eliminate significant impacts associated with Future Year with Adopted UCP that would occur in the future year at three intersections along Regents Road:</p> <ul style="list-style-type: none"> • Regents Road/Arriba Street (AM and PM) • Regents Road/Governor Drive (AM and PM) • Regents Road/Luna Avenue (AM)
<p>Section 5.2.2.1.2, Significance of Impacts, under “Roadway Segments,” Page 5-10</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Roadway Segments</p> <p>Deteriorated traffic conditions would result in significant impacts at 24<u>20</u> roadway segments with implementation of the Project in the future year. Of the 24<u>20</u> roadway segments within the traffic study area that would degrade to unacceptable operating conditions, nine segments have feasible measures available to reduce impacts (Table 4.12-11). Eight<u>Six</u> of the nine segments would be improved to operate better than existing conditions and the impact would be mitigated to less than significant (Table 4.12-13). The remaining segment would be improved by the improvement measures; however, while the measures would improve the segment operations, the LOS would not be improved to operations better than existing. Two segments operating at unacceptable conditions would not trigger an impact. Thus, impacts along 13<u>14</u> roadway segments would remain significant.</p>
<p>Section 5.2.2.1.2, Significance of Impacts, under “Intersections,” Page 5-10 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Intersections</p> <p>With implementation of the Project, 34<u>30</u> intersections would degrade to unacceptable LOS operating conditions by future year during one or both of the peak periods. Thirty<u>Twenty-eight</u> of these 34<u>30</u> intersections exceed the significance thresholds. Twenty one<u>Nineteen</u> of the intersections operating at unacceptable LOS in the future year would be significantly worse during one</p>

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	<p>or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These 21¹⁹ intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Of these 30²⁸ intersections <u>that exceed the significance thresholds</u>, 18 intersections operating at LOS E or F in the future year do not have feasible measures available to reduce impacts (Table 4.2-14). Two intersections, Genesee Avenue/Decoro Street and La Jolla Village Drive/Villa La Jolla Drive, have mitigation measures proposed. However, while the proposed mitigation measures would improve the intersection operations, the delay time would not be reduced to below a level of significance. The impacts at the remaining 41¹⁰ intersections would be improved to operate at an LOS D or better and the significant impact would be mitigated in both the AM and PM peak hours. Table 4.2-12 summarizes the level of significance for intersections after implementation of mitigation measures. The impacts at the 20¹⁸ study area intersections would remain significant and unmitigated even after incorporation of Mitigation Measures TRA-1 and TRA-2 specified in Section 4.2.4.3. Thus, the Project would result in an increase in projected traffic congestion that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.</p>
<p>Section 5.2.2.1.4, Significance After Mitigation, Page 5-11</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary pProjects, including implementation of the proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. <u>Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level. As such, the Project’s contribution to the aforementioned impacts when considered in conjunction with past, present, and future projects would be cumulatively considerable.</p>
Chapter 8.0 Mandatory Discussion Areas	
<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Transportation/Circulation - Increase in Projected Traffic</p>	<p>The Final PEIR has been revised to state the following:</p> <p>As discussed in Section 4.2, Transportation/Circulation, deteriorated traffic conditions would result in significant impacts at 21²⁰ roadway segments under Future Year with Project. Four of these significantly impacted roadway segments under the Project would continue to operate at acceptable LOS with</p>

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<p>Which Is Substantial in Relation to the Existing Traffic Load and Capacity of the Street System,” Page 8-2</p>	<p>implementation of the Adopted UCP. Also, 13 of the roadway segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the Adopted UCP.</p> <p>As discussed in Section 4.2, Transportation/Circulation, with implementation of the Project, 3028 intersections would degrade to unacceptable LOS operating conditions which exceed the significance thresholds during one or both of the peak periods by future year. Eight of these significantly impacted intersections under the Project would operate at acceptable LOS with implementation of the Adopted UCP. Also, 2419 of the intersections operating at unacceptable LOS in Future Year with Project would be significantly worse during one or both of the peak hours with implementation of the Project as compared to the Adopted UCP. Thus, the Project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system. The impact would be significant.</p> <p>All discretionary projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, Transportation Mobility Element; the UCP; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Transportation/Circulation - Result in the Addition of a Substantial Amount of Traffic to a Congested Freeway Segment, Interchange, or Ramp,” Page 8-3 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, Transportation Mobility Element (City of San Diego 2008); the UCP; and the City’s CEQA Significance Determination Thresholds (City of San Diego 2011), through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with</u></p>

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	<p><u>implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Transportation/Circulation - Result in a Substantial Impact upon Existing or Planned Transportation Systems,” Page 8-4 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, <u>Transportation Mobility</u> Element; the UCP; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Transportation/Circulation - Result in Substantial Alterations to Present Circulation Movements, Including Effects on Existing Public Access Areas,” Pages 8-4 through 8-5 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, <u>Transportation Mobility</u> Element; the UCP; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>

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<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Transportation/Circulation - Conflict with Adopted Policies, Plans, or Programs Supporting Alternative Transportation Modes,” Page 8-5 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Discretionary pProjects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, <u>Transportation Mobility</u> Element; the UCP; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Air Quality - Cause a Violation of Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation,” Page 8-6 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The net increase in emissions of ROG, PM₁₀, and PM_{2.5} would not exceed applicable daily or annual thresholds established by the City of San Diego (Table 4.4-6,). However, the net increase in emissions of (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area) for the total Project area VMT would exceed the applicable annual thresholds established by the City of San Diego. Considering that the Project’s long-term operations would exceed annual thresholds of significance for NO_x and CO, operation of the Project could violate an ambient air quality standard or contribute substantially to an existing violation. Discretionary pProjects with the potential to result in significant impacts related to air quality are subject to site-specific review in accordance with the City’s General Plan; the UCP; the City’s Municipal Code; and the City’s CEQA Significance Determination Thresholds, through the discretionary process. Further, Mitigation Measures TRA-1 through TRA-2 provided in Section 4.2.4.3 would reduce significant traffic impacts to roadway segments and intersections. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.</p>

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<p>Section 8.1, Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented, under “Public Services and Facilities - Result in an Impact to Police Service and Fire and Emergency Service Response Times,” Page 8-8 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>With implementation of the Project, traffic conditions would degrade to unacceptable LOS operating conditions by the future year, which is substantial in relation to the existing traffic load and capacity of the street system. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. <u>However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.</u> Therefore, impacts to emergency service providers associated with the Project would remain significant and unmitigated at the program level.</p>
<p>Section 8.2, Significant Irreversible Environmental Changes, under “Primary and Secondary Impacts,” Page 8-10 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Implementation of the Project would remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge from the UCP. With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of the Mitigation Measures TRA-1 and TRA-2 provided in Section 4.2.4.3, significant traffic impacts would result and present increased difficulty in accessing areas due to poor traffic conditions including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays. Further, Mitigation Measures TRA-1 and TRA-2 are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. The Project would not provide access to areas that were previously inaccessible. Therefore, the Project would not have primary and secondary impacts related to access to previously inaccessible areas.</p>
<p>Chapter 9.0 Alternatives Analysis</p>	
<p>Section 9.1 Rationale for Alternatives Selection, Page 9-1 (fourth paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The alternatives identified in this analysis are intended to further reduce or avoid significant environmental impacts associated with the Project. In accordance with Section 15126.6(c) of the CEQA Guidelines, the following analysis of alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In developing the alternatives to be addressed in this chapter, consideration was given to each alternative’s ability</p>

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	to meet the basic objectives of the Project and to eliminate or reduce potentially significant environmental impacts. In addition, this PEIR also provides a discussion on alternatives that were considered but rejected.
Section 9.2, Alternatives Considered, Page 9-6 (second paragraph)	The Final PEIR has been revised to state the following: Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify an environmentally superior alternative. <u>In instances when a No Project alternative represents the environmentally superior alternative, the above-referenced section of the CEQA Guidelines requires that the PEIR also identify an environmentally superior alternative from among the other alternatives considered.</u> Based on the evaluation presented below, it was determined that the <u>Project No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative</u> is the environmentally superior “build” alternative <u>among the alternatives considered.</u> The No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative was determined to be the environmentally superior “build” alternative.
Section 9.2.1.1, Land Use Page 9-6 (first paragraph)	The Final PEIR has been revised to state the following: Based on the program-level analysis, the No Project Alternative would result in greater impacts related to land use policies when compared to the Project. The proposed Rose Canyon <u>Regents Road</u> Bridge under the No Project Alternative would result in a loss of habitat. In addition, the widening of Genesee Avenue over Rose Canyon would result in impacts to vegetation communities as well as fringes of habitat that occur along the existing Genesee Avenue alignment. As a result, the No Project Alternative would have greater MHPA impacts when compared to the Project. However, the No Project Alternative would connect the present north and south termini on either side of Regents Road with a bridge across Rose Canyon, and, therefore, open up an area previously inaccessible. In this regard, the No Project Alternative would provide a greater community benefit by improving access within the UCP Area when compared to the Project. <u>However, because of the greater MHPA impacts, the No Project Alternative would have significant but mitigable impacts when compared to the Project.</u>
Table 9-1, Comparison of Project Alternatives – Proposed Elements, Pages 9-7 and 9-8	See clarifications and modifications to Table 9-1 Comparison of Project Alternatives – Proposed Elements on Pages 9-7 and 9-8 of the Final PEIR.
Section 9.2.1.2 Transportation/Circulation, Page 9-12 through 9-13 (first and second paragraphs)	The Final PEIR has been revised to state the following: Impacts associated with the No Project Alternative are addressed in the Transportation Impact Study provided as Appendix C. Implementation of the No Project Alternative would have potentially reduced impacts to roadway segments and intersections compared to those of the Project. Under the No Project Alternative in future year, there would be a total of 19 roadway segments operating at an unacceptable LOS in exceedance of the significance thresholds. With implementation of the Project, a total of 24 <u>20</u> roadway segments within the traffic study area would degrade to unacceptable operating conditions in exceedance of the significance thresholds. Under the

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	<p>Project, 14<u>13</u> of the segments that would be operating at unacceptable LOS in future year would be significantly worse as compared to the No Project Alternative. In addition, under the Project in future year, the four<u>three</u> following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur with implementation of the No Project Alternative. Thus, the impact at these segments can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E) • Genesee Avenue: Nobel Drive to Centurion Square (LOS F) • Genesee Avenue: Centurion Square to Governor Drive (LOS F) • La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E) <p>The No Project Alternative would result in reduced traffic impacts related to intersections when compared to the Project. Under the No Project Alternative in future year, there would be 28 significantly impacted intersections operating at an unacceptable LOS E or F during at least one of the peak hours. With implementation of the Project, 30<u>28</u> intersections would degrade to unacceptable LOS operating conditions in exceedance of the significance thresholds. Under the Project, 24<u>19</u> of the intersections operating at unacceptable LOS in future year would be significantly worse during one or both of the peak hours as compared to the No Project Alternative. These 24<u>19</u> intersections are considered to have a significant decrease in operations due to an exceedance of the delay time thresholds for LOS E and F when comparing the Project to the No Project Alternative in future year. In addition, under the Project in future year, the nine<u>seven</u> following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, in future year with implementation of the No Project Alternative, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • Genesee Avenue/La Jolla Village Drive (PM) • Genesee Avenue/Nobel Drive (AM) • Genesee Avenue/Decoro Street (AM) • Genesee Avenue/Centurion Square (AM and PM) • Genesee Avenue /Governor Drive (PM) • Genesee Avenue/SR 52 WB Ramps (AM) • Genesee Avenue/SR 52 EB Ramps (AM and PM) • La Jolla Village Drive/I-5 SB Off Ramp (PM) • Gilman Drive/I-5 SB Ramps (PM)
<p>Section 9.2.1.4 Air Quality, Page 9-14 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Operational impacts for the No Project Alternative would result in reduced air quality impacts related to air quality plans when compared to the Project. The construction of Regents Road Bridge and the widening of Genesee Avenue in the No Project Alternative are in the UCP Transportation Element and are, therefore, included in the 2050 RTP/SCS. <u>The No Project Alternative impacts related to air quality plans and criteria pollutants are less than significant when compared to the Project.</u></p>

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Section 9.2.1.6 Energy, Page 9-15 (second paragraph)	<p>The Final PEIR has been revised to state the following:</p> <p>Operational impacts of the No Project Alternative would result in greater energy demand as the Project as the No Project Alternative would modify or construct new transportation facilities. <u>The No Project Alternative is anticipated to reduce VMT and reliance on fossil fuels.</u> The No Project Alternative would require additional electrical power to accommodate traffic signal modifications and street lighting. <u>The No Project Alternative would have less than significant impacts.</u></p>
Section 9.2.1.7 Noise, Pages 9-15 through 9-17 (first, second, and third paragraphs)	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the No Project Alternative would result in greater noise impacts related to construction when compared to the Project. The No Project Alternative could potentially result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors during construction activities (i.e., earth moving and pile driving). Unlike the Project, the No Project Alternative would also result in construction noise impacts to sensitive biological resources habitat. <u>Therefore, the No Project Alternative impacts related to construction would be significant and mitigable when compared to the Project.</u></p> <p>Based on the program-level analysis, the widening of Genesee Avenue in the No Project Alternative would result in reduced operational noise impacts when compared to the Project. As discussed in Section 4.7.1.6, noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4. As shown in Table 4.7-4, With Project compared to Without Project, the distances of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City’s residential exterior CNEL noise standards with the Project. Under the Project, the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases within the residences. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Unlike the No Project Alternative, this is a potentially significant impact under the Project. Discretionary pProjects implemented in accordance with the Project with the potential to result in significant operational noise impacts shall be required to implement the Mitigation Framework (Mitigation Measure NOI-1). However, impacts to operational noise would remain significant and unmitigated at the program level under the Project. <u>The construction of Genesee Avenue Widening in the No Project Alternative would have less than significant impacts related to established standards/operation when compared to the Project.</u></p>

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	<p>Based on the program-level analysis, the construction of the planned Regents Road Bridge in the No Project Alternative would result in greater operational noise impacts when compared to the Project. As shown in Table 4.7-2 in Section 4.7, Noise, Future Year With Project in comparison to Future Year With Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor would substantially decrease by more than half. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases by 43 to 69 feet to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Impacts under the Project would be less than significant. However, impacts under the No Project Alternative are anticipated to expose people to noise levels that exceed City standards. As such, the No Project Alternative would require mitigation measures to be determined at the project level. <u>The No Project Alternative would have significant but mitigable impacts related to established standards/operation with the construction of Regents Road Bridge when compared to the Project.</u></p>
<p>Section 9.2.1.8 Historical Resources, Page 9-17 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>The No Project Alternative would have significant but mitigable impacts related to historical resources when compared to the Project.</u></p>
<p>Section 9.2.1.9 Biological Resources, Page 9-17 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the extent of impacts to biological resources resulting from implementation of the No Project Alternative would be greater than those identified for the Project because less land would be preserved in open space under this alternative. Genesee Avenue and Regents Road would remain as they are today under the Project. The No Project Alternative would result in greater MHPA compatibility impacts when compared to the Project. The proposed changes at Rose Canyon under the No Project Alternative would result in a loss of habitat. The planned widening of Genesee Avenue and the construction of Regents Road Bridge in the No Project Alternative would result in greater impacts related to Tier I, II, IIIA, and IIIB habitats when compared to the Project. The No Project Alternative would result in greater impacts related to aquatic resources, including vernal pools and wetlands. Both the planned Genesee Avenue Widening and the Regents Road Bridge construction projects are expected to involve removal of vegetation (clearing, brushing, and trimming) and grading (filling, backfilling, compacting, leveling, etc.). The widening of Genesee Avenue over Rose Canyon would result in significant permanent and temporary impacts to jurisdictional habitats. <u>As such, the No Project Alternative would have significant but mitigable impacts related to biological resources when compared to the Project.</u></p>
<p>Section 9.2.1.10 Geological Conditions, Page 9-18 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The construction of the planned Genesee Avenue Widening and Regents Road Bridge would expose people or structures to additional geologic hazards</p>

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	beyond existing conditions; therefore, significant <u>but mitigable</u> impacts would occur under the No Project Alternative <u>when compared to the Project.</u>
Section 9.2.1.11 Paleontological Resources, Page 9-18 (last sentence)	The Final PEIR has been revised to state the following: <u>The No Project Alternative would have less than significant impacts related to paleontological resources.</u>
Section 9.2.1.12 Hydrology and Water Quality, Page 9-19 (last sentence)	The Final PEIR has been revised to state the following: As such, hydrology and water quality impacts would be greater under the No Project Alternative when compared to the Project; <u>however, overall impacts under the No Project Alternative would be less than significant when compared to the Project.</u>
Section 9.2.1.14 Public Utilities, Pages 9-20 through 9-21 (last sentence)	The Final PEIR has been revised to state the following: <u>Overall impacts to public utilities under the No Project Alternative would be significant but mitigable when compared to the Project.</u>
Section 9.2.1.15 Health and Safety, Page 9-21 through Page 9-22 (first, second, and third paragraphs)	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the extent of impacts related to exposure to wildland fires from implementation of the No Project Alternative would be greater than those identified for the Project. The No Project Alternative would entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition, which could result in a temporary increase in the potential for accidental wildfires. Implementation of the No Project Alternative would be required to adhere to brush management regulations, specifically the City’s Fire Prevention Bureau Policy B-08-1, Clarification of Brush Management Regulations and Landscape Standards and required preparation of a Brush Management Plan and Program in order to obtain discretionary, grading, and/or building permits (City of San Diego 2010b). <u>The No Project Alternative would have less than significant impacts related to wildland fires similar to the Project.</u></p> <p>Based on the program-level analysis, the extent of impacts related to exposure of hazardous materials under the No Project Alternative would be greater than those identified for the Project. Implementation of the No Project Alternative would result in the exposure of hazards that could be encountered during grading and/or construction-related activities. Construction activities under the No Project Alternative are short term and would be subject to federal, state, and local health and safety requirements. <u>The No Project Alternative would have significant but mitigable impacts related to hazardous materials when compared to the Project.</u></p> <p>Based on the program-level analysis, the extent of impacts related to impairment of an adopted emergency response plan under the No Project Alternative would be similar to those identified for the Project. Both the Project and the No Project Alternative would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. <u>The No Project Alternative would have less than significant impacts related to</u></p>

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	<p><u>emergency response plans similar to the Project.</u></p> <p>Based on the program-level analysis, the extent of impacts related to exposure of people to AIAs would be similar to those identified for the Project. MCAS Miramar is approximately 1 mile to the east of the UCP Area. Montgomery Field is approximately 5 miles southeast of Regents Road. Implementation of both the Project and the No Project Alternative would not result in structures that would impair heliport or private airstrip operations. Any helicopter operations would be undertaken in accordance with FAA safety and flight regulations. As with the Project, the No Project Alternative would also require adherence to applicable regulations imposed by federal, state, and local agencies. <u>The No Project Alternative would have less than significant impacts related to AIAs similar to the Project.</u></p>
<p>Section 9.2.2.1 Land Use, Page 9-22 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>However, because of the greater MHPA impacts, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.</u></p>
<p>Section 9.2.2.2 Transportation/Circulation, Pages 9-22 through 9-23 (first and second paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Impacts associated with the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative are addressed in the Transportation Impact Study provided in Appendix C. As provided in Appendix C, traffic/circulation impacts associated with implementation of the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in similar traffic impacts related to roadway segments when compared to the Project. There would be a total of 21 roadway segments operating at an unacceptable LOS with a significant impact under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. With implementation of the Project, a total of 24<u>20</u> roadway segments within the traffic study area would degrade to unacceptable operating conditions in exceedance of the significance thresholds</p> <p>The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in reduced traffic impacts related to intersections when compared to the Project. There would be a total of 29 intersections operating at an unacceptable LOS with significant impact under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. With implementation of the Project, 30<u>28</u> intersections would degrade to unacceptable LOS operating conditions in exceedance of the significance thresholds. Under the Project, 20 of the intersections operating at unacceptable LOS in future year would be significantly worse during one or both of the peak hours as compared to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. These 24<u>20</u> intersections are considered to have a significant decrease in operations due to an exceedance of the delay time thresholds for LOS E and F when comparing the Project to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative in future year. In addition, under the Project in future year, the three following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated.</p>

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	<p>However, in future year with implementation of the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.</p> <ul style="list-style-type: none"> • <u>Genesee Avenue/La Jolla Village Drive (PM)</u> • <u>Genesee Avenue/Decoro Street (AM)</u> • <u>Genesee Avenue/Centurion Square (AM and PM)</u> • Genesee Avenue/SR 52 EB Ramps (AM and PM) • <u>La Jolla Village Drive/I-5 SB Off Ramp (PM)</u>
<p>Section 9.2.2.3 Visual Effects and Neighborhood Character, Pages 9-24 through 9-25 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Overall, the aesthetic impacts related to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.</u></p>
<p>Section 9.2.2.4 Air Quality, Page 9-25 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater construction emissions compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would construct the planned Regents Road Bridge, but not widen Genesee Avenue. As such, a substantial number of trips associated with construction activities would result. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts would not occur under the Project. <u>Therefore, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.</u></p>
<p>Section 9.2.2.7 Noise, Pages 9-27 through 9-28 (first and second paragraphs)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would potentially result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors during construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. <u>Therefore, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative impacts related to construction would be significant and mitigable when compared to the Project.</u></p>

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	<p>Based on the program-level analysis, the construction of the planned Regents Road Bridge would result in greater operational noise impacts when compared to the Project. ADT and peak hour traffic volumes along the Regents Road Corridor are anticipated to increase with construction of the planned Regents Road Bridge. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor is anticipated to decrease by 43 to 69 feet to the residences With Project. Therefore, the construction of the planned Regents Road Bridge would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). In addition, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would remove of the widening of Genesee Avenue from the UCP. As discussed in Section 9.2, Noise, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan because the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases to the residences (see Table 4.7-4). The construction of planned Regents Road Bridge and the removal of the widening of Genesee Avenue from the UCP would combine for greater operational noise impacts under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative when compared to the Project. <u>The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts related to the construction of the Regents Road Bridge. However, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would have significant but unmitigable impacts related to the removal of the widening of Genesee Avenue similar to the Project.</u></p>
<p>Section 9.2.3.1 Land Use, Page 9-31</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in greater <u>similar</u> impacts related to land use policies when compared to the Project. <u>This alternative would result in the reconfiguration of Genesee Avenue which would consist of restriping the existing four-lane roadway to a six-lane roadway. This alternative would not involve widening of Genesee Avenue. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way, therefore impacts to vegetation communities in Rose Canyon and fringe habitat that occur along the existing Genesee Avenue alignment would not result.</u> As a result, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would have greater <u>similar</u> MHPA impacts when compared to the Project. <u>As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts as with the Project.</u></p>
<p>Section 9.2.3.2 Transportation/Circulation, Page 9-31 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Impacts associated with the No Construction of Regents Road Bridge and</p>

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	<p>Widening Reconfiguration of Genesee Avenue Alternative are addressed in the Transportation Impact Study provided in Appendix C. As provided in Appendix C, traffic/circulation impacts associated with implementation of No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would have the potential to reduce impacts to roadway segments and intersections compared to those of the Project. Under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, the number of roadway segments locations that would operate at poor LOS (E or F) is a total of 22 roadway segments, 20 of which are a significant impact. Under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, the number of intersection locations that would operate at poor LOS (E or F) during at least one peak period are 3429 intersections, 2927 of which are a significant impact.</p>
<p>Section 9.2.3.3 Visual Effects and Neighborhood Character, Page 33 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing when compared to the Project. Unlike the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, the Project would remove construction elements from the UCP, which would not result in any visual impacts. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would introduce a new structure that would dominate previously unobstructed views. The primary structural/architectural features created by the planned Genesee Avenue Widening would be the retaining walls and crib walls that would be constructed along both sides of the widened roadway. Due to the height and length of the grade-separated intersection retaining walls and the would be in extreme contrast to the existing neighborhood character; impacts would be considered significant. Therefore, the impacts of the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative impacts-related to alteration of public views and visual character would be greater than the Project. Overall, the aesthetic impacts related to the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.</p>
<p>Section 9.2.3.4 Air Quality, Pages 9-33 through 9-34</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in greater construction emissions compared to the Project. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would widen Genesee Avenue. As such, a substantial number of trips associated with construction activities would result. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts</p>

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	<p>would not occur under the Project. <u>Therefore, impacts related to construction would be significant but mitigable when compared to the Project.</u></p> <p>Operational impacts for the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in similar air quality impacts related to air quality plans when compared to the Project. The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would be partially consistent with the adopted community plan land use designations upon which the RAQS and SIP were based. The widening of <u>Reconfiguring</u> Genesee Avenue <u>from an existing four-lane roadway to a six-lane roadway</u> is included in the 2050 RTP/SCS, and there would be no significant regional air quality impacts associated with its implementation. However, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would not construct Regents Road Bridge, similar to the Project. As such, the Project and the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS. As such, both could conflict with or obstruct implementation of the applicable air quality plan. The Project's and the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative's impact to air quality plans would be significant and unmitigated.</p> <p>The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in reduced criteria pollutant emissions when compared to the Project and is not anticipated to exceed the thresholds. The widening <u>reconfiguring</u> of Genesee Avenue is anticipated to result in VMT and speed change that would result in a reduction in overall operational emissions. Long-term operations associated with the Project would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area). Air quality emission under the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would not exceed criteria pollutant emissions thresholds and would result in less than significant impacts, in contrast to the Project.</p>
<p>Section 9.2.3.7, Noise, Pages 9-35 through 9-36</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. <u>Therefore, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative impacts related to construction would be significant but</u></p>

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	<p><u>mitigable when compared to the Project.</u></p> <p>Based on the program-level analysis, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in reduced operational noise impacts when compared to the Project. The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would not result in noise impacts related to the construction of Regents Road Bridge. In addition, the widening of Genesee Avenue would further reduce noise impacts. As discussed in Section 4.7.1.6, noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4. As shown in Table 4.7-4, With Project compared to Without Project, the distances of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City’s residential exterior CNEL noise standards with the Project. Under the Project, the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases within the residences under the Project. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Unlike the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative, this is a potentially significant impact under the Project. <u>Under the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative, operational noise impacts would be less than significant when compared to the Project.</u></p>
<p>Section 9.2.3.8, Historical Resources, Page 9-36</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative. No impacts to prehistoric sites, historic buildings, religious or sacred sites, or disturbance to human remains would result from the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative because all proposed roadway improvements would be within the existing right-of-way. As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts.</p>
<p>Section 9.2.3.9, Biological Resources, Page 9-36</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The analysis provided in Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in similar impacts related to land use policies when compared to the Project. All proposed roadway improvements would be within</p>

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	<p><u>the existing right-of-way, therefore impacts to vegetation communities in Rose Canyon and fringe habitat that occur along the existing Genesee Avenue alignment would not result. As a result, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have similar MHPA impacts to the Project. As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts.</u></p>
<p>Section 9.2.3.10, Geological Conditions, Page 9-36</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative. <u>The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have no significant impact related to geologic conditions as with the Project.</u></p>
<p>Section 9.2.3.11, Paleontological Resources, Pages 9-36 through 9-37</p>	<p>The Final PEIR has been revised to state the following:</p> <p>The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative. <u>The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant related to paleontological resources.</u></p>
<p>Section 9.2.4.1, Land Use, Page 9-39</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>However, because of the greater MHPA impacts, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.</u></p>
<p>Section 9.2.4.2, Transportation/Circulation, Page 9-40 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Impacts associated with the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative related to roadway segments, intersections, freeway segments, and freeway ramp metering would be significant and unmitigated; however, these impacts would be reduced when compared to the Project.</u></p>
<p>Section 9.2.4.3 Visual Effects and Neighborhood Character, Page 9-40 (second paragraph, last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Overall, the aesthetic impacts related to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.</u></p>
<p>Section 9.2.4.4 Air Quality, Page 9-41 (first paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Therefore, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.</u></p>

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<p>Section 9.2.4.7 Noise, Pages 9-42 through 9-43 (first and second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. <u>Therefore, the impacts under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative related to construction would be significant and mitigable when compared to the Project.</u></p> <p>The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would widen Genesee Avenue. Under the Project, it was determined that the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a), as shown in Table 4.7-4 where the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases to the residences. This is a potentially significant impact under the Project in contrast to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. Therefore, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have reduced operational noise impacts than the Project. <u>The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have less than significant impacts related to established standards/operation with the construction of Genesee Avenue Widening, but would have significant but mitigable impacts related to established standards/operation with the construction of the pedestrian bike bridge.</u></p>
<p>Section 9.2.5.1 Land Use, Page 9-45 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>However, because of the greater MHPA impacts, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.</u></p>
<p>Section 9.2.5.2 Transportation/Circulation, Page 9-46 (last sentence)</p>	<p>The Final PEIR has been revised to state the following:</p> <p><u>Overall, impacts associated with the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative related to roadway segments, freeway segments, and freeway ramp metering would be significant and unmitigated; these impacts would be similar to the Project. Impacts to intersections under this alternative are anticipated to be significant and unmitigated, but slightly reduced impacts when compared to the Project.</u></p>

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Section 9.2.5.3 Visual Effects and Neighborhood Character, Page 9-47 (last sentence)	<p>The Final PEIR has been revised to state the following:</p> <p><u>Overall, the aesthetic impacts related to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.</u></p>
Section 9.2.5.4 Air Quality, Page 9-47 (last sentence)	<p>The Final PEIR has been revised to state the following:</p> <p><u>Therefore, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.</u></p>
Section 9.2.5.7 Noise, Pages 9-48 through 9-49 (first paragraph)	<p>The Final PEIR has been revised to state the following:</p> <p>Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in similar noise impacts related to construction when compared to the Project. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative may result in construction noise impacts to sensitive biological resources habitat. <u>Therefore, the impacts under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative related to construction would be significant and mitigable when compared to the Project.</u></p> <p>Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in greater operational noise impacts when compared to the Project with the construction of the pedestrian bike bridge with emergency access. ADT and peak hour traffic volumes along the Regents Road Corridor are anticipated to increase with the construction of the pedestrian bike bridge with emergency access. Under the Project and as shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases by 43 to 69 feet to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Impacts under the Project would be less than significant. However, impacts under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative are anticipated to expose people to noise levels that exceed City standards. <u>The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would have significant and unmitigated impacts related to established standards/operation with the construction of Genesee Avenue Widening, but would have significant but mitigable impacts related to established standards/operation with the construction of the pedestrian bike bridge.</u></p>

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<p>Section 9.2.5.13 Public Services and Facilities, Page 9-50 (second paragraph)</p>	<p>The Final PEIR has been revised to state the following:</p> <p>Despite the slight improvement in emergency response times when compared to the Project, <u>the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative</u> is anticipated to experience operational deterioration when compared to the City’s target average response times of 7.5 minutes. Response times for all fire stations under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative are anticipated to increase from years 2014 and 2015 average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would remain significant and unmitigated at the program-level under the Project.</p>
<p>Section 9.3, Environmentally Superior Alternative, Pages 9-51 through 9-52</p>	<p>The Final PEIR has been revised to state the following:</p> <p>State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative <u>among other alternatives considered</u>. If the No Project Alternative is the environmentally superior alternative, the PEIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 9.0 of the PEIR, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would be considered environmentally superior because it would reduce impacts compared to the other proposed alternatives that preserve more open space <u>as it would not construct a bridge structure. This alternative would not involve widening of Genesee Avenue. Instead, the alternative would restripe the existing four-lane roadway to a six-lane roadway. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way. As such, therefore, resulting this alternative would result in fewer impacts to transportation/circulation (roadway segments, freeway segments, and ramps), air quality (operation criteria pollutants), and GHGs, and noise (operation). Implementation of the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would eliminate one of the significant impacts associated with the Project. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would not result in a significant impact related to noise (Issue 3).</u></p> <p><u>Further, in contrast to other alternatives the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in reduced impacts to land use, historical resources, biological resources, and geological conditions.</u></p> <p>However, as with the other alternatives, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would result in greater impacts to land use, visual effects and neighborhood character, air quality (construction), energy, noise (construction), historical resources, biological resources, geological conditions, paleontological resources, hydrology and water quality, public utilities, and health and safety,</p>

Section/Page # of the Final PEIR	Clarification and Modification
	<p>when compared to the Project.</p> <p>The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would have similar impacts to the Project in terms of impacts to public services and facilities and population and housing.</p> <p>Additionally, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon, <u>would not widen Genesee Avenue, and would perform all proposed roadway improvements within the existing right-of-way.</u> Lastly, the No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative <u>seeks to provide transportation improvements that</u> would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due to greater capacity when compared to the Project. <u>Further, the other proposed alternatives, which would result in the construction of either Regents Road Bridge or a Pedestrian Bike Bridge with Emergency Access, would preserve less open space and result in greater impacts to biological resources. Based on the discussion provided above, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative.</u></p>
<p>Chapter 10.0 Mitigation Monitoring and Reporting Program</p>	
<p>Chapter 10.0 Mitigation Monitoring and Reporting Program has been removed from the Final PEIR and is now Exhibit C. Please see Exhibit C for all clarifications and modifications.</p>	
<p>Figures</p>	
<p>Figure 4.12-1, Watershed</p>	<p>The following revisions have been made:</p> <ul style="list-style-type: none"> • Title has been changed to “Watershed Areas” • The boundary between Miramar Reservoir Hydrological Area, the Miramar Hydrological Area, and the Scripps Hydrological Area has been defined. • References to “Rose Canyon Creek” have been revised to “Rose Creek. • References to “San Clemente Canyon Creek” have been revised to “San Clemente Creek.”
<p>Appendices</p>	
<p>Appendix E, Transportation Impact Study</p>	<p>See clarification and modifications to Transportation Impact Study in Appendix E.</p>

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EXECUTIVE SUMMARY

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego (hereafter “City”) for the University Community Plan (UCP) Amendment (hereafter “Project”) in compliance with the California Environmental Quality Act (CEQA) of 1970 as amended (Public Resources Code, Section 21000 et seq.), and the CEQA Guidelines (CCR, Title 14, Section 15000 et seq.). In addition, this PEIR has been prepared in accordance with City of San Diego Environmental Impact Report Guidelines (2005). The PEIR relies on the most recent City of San Diego CEQA Significance Determination Thresholds (City of San Diego 2011a). As an informational document, this PEIR is intended for use by the City of San Diego decision makers and members of the general public in evaluating the potential environmental effects of the Project.

ES.1 PROJECT DESCRIPTION

The City of San Diego is proposing to amend the 1987 UCP and, in particular, the UCP Transportation Element in order to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of development without the construction of the planned Genesee Avenue Widening and the Regents Road Bridge. In addition to the amendment to the UCP, an amendment to the North University City Public Facilities Financing Plan (PFFP) (City of San Diego 2014a) would be required. The UCP is guided by the framework and policy direction in the City’s General Plan and reflects citywide policies and programs from the General Plan for the UCP Area (2014b).

This PEIR analyzes the impacts related to removal of the planned Genesee Avenue Widening and the Regents Road Bridge projects from the UCP and, in particular, the UCP Transportation Element. The Project would remove the planned Genesee Avenue Widening project that would expand the roadway from four to six lanes between State Route (SR) 52 and Nobel Drive, add 26 feet of width to the roadway, construct retaining walls, and reduce the arterial median. The Project would also remove the planned Regents Road Bridge project, which would construct two separate, parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road termini on either side of the canyon.

ES.1.1 Removal of Genesee Avenue Widening

The Genesee Avenue Corridor is located in the central portion of the City of San Diego within the UCP Area. The corridor extends along Genesee Avenue from approximately Las Palmas Square, north of Nobel Drive, to south of SR 52. The planned Genesee Avenue Widening would

have involved adding a travel lane in each direction between SR 52 and Nobel Drive in an effort to increase the capacity of this roadway to carry anticipated traffic volumes.

ES.1.2 Removal of Regents Road Bridge

The Regents Road Corridor is also located in the central portion of the City of San Diego within the UCP Area. The corridor extends along Regents Road from approximately Caminito Terviso on the north side of Rose Canyon south to San Clemente Canyon. The planned Regents Road Bridge design consisted of two separate, parallel two-lane bridge structures to be constructed across Rose Canyon, connecting the south and north ends of Regents Road that currently terminate near Lahitte Court on the south and Caminito Cassis on the north. The bridge was originally designed to be 870 feet long.

ES.2 PROJECT LOCATION AND SETTING

The Project is located within the UCP Area in the City of San Diego. The City of San Diego covers approximately 206,989 acres in southwestern San Diego County, in Southern California. The City of San Diego is bordered on the north by the City of Del Mar, the City of Poway, and unincorporated San Diego County land. On the east, the City of San Diego is bordered by the Cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated San Diego County land. To the south, the City of San Diego is bordered by the Cities of Coronado, Chula Vista, and National City, and the United States-Mexico border. The Pacific Ocean is located on the City of San Diego's western border.

The UCP Area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchison, Topeka, and Santa Fe Railway, Marine Corps Air Station Miramar, and Interstate 805 (I-805) on the east; SR 52 on the south; and Interstate 5 (I-5), Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west. The UCP Area also contains two state-controlled properties—the University of California, San Diego (UCSD UC San Diego) and Torrey Pines State Natural Reserve, which lie outside the land use jurisdiction of the City.

The UCP Area encompasses UCSD UC San Diego; the Westfield University Town Centre shopping center; and many high-tech, bio-tech, and clean-tech businesses and research facilities, as well residential and commercial land uses. Sometimes referred to as the “Golden Triangle,” the UCP Area is roughly bordered by La Jolla on the west, SR 52 on the south, Sorrento Valley Road on the north, and I-805 on the east. Rose Canyon separates the higher-density apartments, condominiums, and town homes of North University from the mainly single-family homes of South University.

ES.3 PROJECT OBJECTIVES

Per CEQA, the Project has been developed to meet the following primary objectives:

- Evaluate the environmental impacts of the removal of the planned Genesee Avenue Widening and the Regents Road Bridge projects.
- Minimize impacts to biological resources at Rose Canyon.
- Identify transportation improvements and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle), as part of a balanced transportation network.
- Consider the effects of the Project on the General Plan City of Villages strategies related to emergency access and multi-modal transportation.

ES.4 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION

Chapter 4.0 of this PEIR presents the environmental analysis of the Project. Table ES-1 summarizes the significant impacts identified in the environmental analysis for each issue area. Table ES-1 also outlines the mitigation measures proposed to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance.

Based on the analysis presented in Chapter 4.0, the Project would result in significant and unmitigated impacts to the topic areas of transportation/circulation, air quality, greenhouse gas emissions (GHG), noise, and public services and facilities. Based on the analysis provided in Chapter 5.0, the Project would result in significant and unmitigated cumulative impacts to transportation/circulation, air quality, GHGs, noise, and public services and facilities.

The Project would result in less than significant impacts with no mitigation required for the issue areas of land use, visual effects and neighborhood character, and health and safety.

No significant impacts were identified for the issue areas of energy, historical resources, biological resources, geologic conditions, paleontological resources, hydrology and water quality, public utilities, and population and housing.

Pursuant to Section 15128 of the CEQA Guidelines, agricultural and forestry resources and mineral resources were determined by the City of San Diego, as the lead agency, not to have the potential to cause adverse impacts, and, therefore, have not been addressed in detail in this PEIR.

**Table ES-1
Significant Project Impacts and Proposed Mitigation**

Issue Area	Impact	Mitigation Measure	Level of Significance After Mitigation
Transportation/Circulation			
Would the Project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?	Issue 1: The Project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.	Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation.	Significant and Unmitigated
Would the Project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?	Issue 2: The Project would result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp and the impact would be significant.	No feasible mitigation is available.	Significant and Unmitigated
Would the Project result in a substantial impact upon existing or planned transportation systems?	Issue 3: The Project would result in a substantial impact upon existing or planned transportation systems and the impact would be significant.	Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation.	Significant and Unmitigated
Would the Project result in substantial alterations to present circulation movements, including effects on existing public access to beaches, parks, or other open space areas?	Issue 4: The Project would result in a substantial impact to present circulation movements, including effects on existing public access areas and the impact would be significant.	Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation.	Significant and Unmitigated
Would the Project conflict with adopted policies, plans, or programs supporting alternative transportation modes?	Issue 5: The Project would conflict with adopted policies, plans, or programs supporting alternative transportation modes identified in the Bicycle Master Plan and the impact would be significant.	Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation.	Significant and Unmitigated

Issue Area	Impact	Mitigation Measure	Level of Significance After Mitigation
Air Quality			
Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Issue 1: The Project would conflict with or obstruct implementation of the applicable air quality plan.	No feasible mitigation is available.	Significant and Unmitigated
Would the Project cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	Issue 2: The Project would cause a violation of air quality standards or contribute substantially to an existing or projected air quality violation.	Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation. No additional feasible mitigation is available.	Significant and Unmitigated
Greenhouse Gas Emissions			
Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	Issue 1: The Project would increase greenhouse gas emissions compared to the Adopted UCP.	No feasible mitigation is available.	Significant and Unmitigated
Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG?	Issue 2: The Project would conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions, including the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP.	No feasible mitigation is available.	Significant and Unmitigated
Noise			
Would the project expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan?	Issue 3: The Project would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan as the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases.	Mitigation measure NOI-1 as described in Section 4.7, Noise.	Significant and Unmitigated

Issue Area	Impact	Mitigation Measure	Level of Significance After Mitigation
Public Services and Facilities			
<p>Would the Project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, and maintenance of public facilities, including roads?</p>	<p>Issue 1: The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police service response times and fire and emergency service response times would be significant.</p>	<p>Mitigation measures TRA-1 and TRA-2 as described in Section 4.2, Transportation/Circulation.</p>	<p>Significant and Unmitigated</p>

ES.5 POTENTIAL AREAS OF CONTROVERSY

Consistent with the requirements of CEQA, a good faith effort has been made during the preparation of the PEIR to contact all responsible and trustee agencies; organizations; persons who may have an interest in the Project; and all government agencies, including the State Clearinghouse. This includes the circulation of a Notice of Preparation (NOP) on December 2, 2015, which began a 30-day comment period that ended on January 4, 2016. Approximately 100 comment letters were received on the NOP during this time and were considered in preparation of the PEIR. The comments included the following issues:

- Air quality and greenhouse gases
- Biology
- Mixed-use development
- Traffic and parking
- Multimodal transportation
- Contamination and health risks
- Noise
- Safe access
- Emergency services
- Welfare of children
- Storm water, flooding, and wetlands
- Water quality
- Open space
- Notice of Preparation
- Project description
- Visual impacts
- Cumulative impacts
- Alternatives

A scoping meeting was held on December 16, 2015, starting at 6:00 p.m. at the Nobel Recreation Center Meeting Room #2, located at 8810 Judicial Drive, San Diego, California 92122, to inform the public about the Project and receive comments. Twenty-seven individuals spoke at the scoping meeting. The issues they raised included the timing of the NOP and its review period, impacts to Rose Canyon Open Space Park (Rose Canyon), traffic and circulation, multimodal alternatives, air quality impacts to schools (i.e., Doyle Elementary, Spreckels Elementary, etc.), compliance with the City's Climate Action Plan, downstream water quality impacts (e.g., impacts to Marian Bear Memorial Park, Mission Bay Park), impact on biological resources, emergency access, open space and preservation, and traffic-related incidents.

In reviewing the Project, the City determined that it could result in potentially significant environmental impacts based on the City's current CEQA Significance Determination Thresholds (City of San Diego 2011a). Through this process, the City identified potentially significant environmental impacts associated with the following issues:

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Biological Resources
- Geologic Conditions
- Paleontological Resources

- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Historical Resources
- Hydrology/Water Quality
- Public Services and Facilities
- Public Utilities
- Health and Safety
- Population and Housing

ES.6 SUMMARY OF PROJECT ALTERNATIVES

CEQA mandates that alternatives to the Project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project,” even if the alternatives would impede the attainment of the Project objectives to some degree. Chapter 9.0 of this PEIR provides the Project alternatives and their consideration.

ES.6.1 Alternatives Considered

This PEIR analyzes five alternatives. The alternatives include variations of including and removing the widening of Genesee Avenue, the construction of the Regents Road Bridge, and implementing various multimodal improvements.

No Project Alternative – Construction of Regents Road Bridge and Widening of Genesee Avenue

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as “circumstances under which the project does not proceed.”

The No Project Alternative would result in the planned widening of Genesee Avenue and the construction of the Regents Road Bridge. Genesee Avenue is currently a four-lane road. The No Project Alternative would widen Genesee Avenue from four to six lanes between SR 52 and Nobel Drive. This would involve adding a travel lane in each direction between SR 52 and Nobel Drive in an effort to increase the capacity of this roadway to carry anticipated traffic volumes. The No Project Alternative would involve widening of the bridge crossing Rose Canyon, construction of retaining walls and temporary construction easements, which may result in

property acquisition. This alternative would also include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.

The No Project Alternative would involve construction of two separate parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road termini on either side of the canyon. The bridge/roadway would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned), and through a small ridge adjacent to Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long.

The No Project Alternative would include construction of surface-level improvements at the intersection of Genesee Avenue and Governor Drive. These improvements would be the addition of a northbound and a southbound through lane, maintaining exclusive right-turn lanes in each direction. This requires some modifications to the existing curb to accommodate the right-turn pockets.

Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative

The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would involve construction of two separate parallel two-lane bridge structures across Rose Canyon as described in the No Project Alternative. This alternative would not result in the widening of Genesee Avenue. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would include repurposing the existing footprint of Genesee Avenue to have three through lanes in each direction by reducing median width, adjusting lane utilizations at intersections, and narrowing lanes. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would construct surface-level improvements at the intersection of Genesee Avenue and Governor Drive. These improvements would be the addition of a northbound and a southbound through lane, maintaining exclusive right-turn lanes in each direction. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would require modifications to the existing curb to accommodate the right-turn pockets. This alternative would include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.

No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not involve construction of the bridge structures spanning Regents Road. This

alternative would result in the widening reconfiguration of Genesee Avenue which would consist of restriping the existing four-lane roadway to a six-lane roadway. This alternative would not involve widening of Genesee Avenue. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive, removing northbound and southbound through-movements at the existing intersection and replacing them with two northbound and southbound through-lanes in an undercrossing. The topography of Genesee Avenue approaching this intersection allows for the intersection to remain at its current elevation and an undercrossing to be constructed beneath it. Separating the through traffic on Genesee Avenue would significantly increase flow between the north and south areas of the UCP Area. All proposed roadway improvements would be within the existing right-of-way. Under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, businesses at the intersection would still have access and provide services to the adjacent community, but would experience less traffic on their adjacent roads. This alternative would include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.

Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative

The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would involve construction of a single bridge structure across Rose Canyon to connect the present north and south termini on either side of Regents Road. The pedestrian bike bridge with emergency access would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned), and through a small ridge adjacent to Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long. The bridge structure would provide emergency access that would improve access times for emergency service providers. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in the widening of Genesee Avenue and would include all the features as described in the No Project Alternative. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would also construct a grade-separated intersection at Genesee Avenue and Governor Drive as described in the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative.

Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative

The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would involve construction of the single-lane bridge structure spanning Regents

Road as described in the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. The bridge structure would provide emergency access that would improve access times for emergency service providers. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would include repurposing the existing footprint of Genesee Avenue to have three through lanes in each direction by reducing median width, adjusting lane utilizations at intersections, and narrowing lanes, as described in the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive as described in the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

The environmental analysis of the alternatives presented above is summarized in Chapter 9.0 in Table 9-1, which compares the project elements for each alternative along with the Project. The analysis presented in this discussion is addressed qualitatively in this PEIR as this is a program-level document.

ES.6.2 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative among other alternatives considered. If the No Project Alternative is the environmentally superior alternative, the PEIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 9.0 of the PEIR, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would be considered environmentally superior because it would reduce impacts compared to the other proposed alternatives that preserve more open space as it would not construct a bridge structure. This alternative would not involve widening of Genesee Avenue. Instead, the alternative would restripe the existing four-lane roadway to a six-lane roadway. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way. As such, therefore, resulting this alternative would result in fewer impacts to transportation/circulation (roadway segments, freeway segments, and ramps), air quality (operation criteria pollutants), and GHGs, and noise (operation). Implementation of the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would eliminate one of the significant impacts associated with the Project. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would not result in a significant impact related to noise (Issue 3).

Further, in contrast to other alternatives the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in reduced impacts to land use, historical resources, biological resources, and geological conditions.

However, as with the other alternatives, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in greater impacts to ~~land use~~, visual effects and neighborhood character, air quality (construction), ~~energy~~, noise (construction), ~~historical resources, biological resources, geological conditions~~, paleontological resources, hydrology and water quality, public utilities, and health and safety, when compared to the Project.

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would have similar impacts to the Project in terms of impacts to public services and facilities and population and housing.

Additionally, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon, would not widen Genesee Avenue, and would perform all proposed roadway improvements within the existing right-of-way. Lastly, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative seeks to provide transportation improvements that would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due to greater capacity when compared to the Project. Further, the other proposed alternatives, which would result in the construction of either Regents Road Bridge or a Pedestrian Bike Bridge with Emergency Access, would preserve less open space and result in greater impacts to biological resources. Based on the discussion provided above, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative.

CHAPTER 1.0 INTRODUCTION

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego (hereafter “City”) for the University Community Plan (UCP) Amendment (hereafter “Project”) in compliance with the California Environmental Quality Act (CEQA) of 1970 as amended (Public Resources Code [PRC], Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The PEIR relies on the City’s most recent CEQA Significance Determination Thresholds (City of San Diego 2011a).

The Project is located within the UCP area (hereafter “UCP Area”). The Project would amend the 1987 UCP and, in particular, the UCP Transportation Element in order to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of development without the construction of the planned Genesee Avenue Widening and the Regents Road Bridge. In addition to the amendment to the UCP, an amendment to the North University City Public Facilities Financing Plan (PFFP) (City of San Diego 2014a) would be required (City of San Diego 2014b).

The City’s Community Plan Preparation Manual indicates that the Environmental Impact Report (EIR) for each community plan may tier off the PEIR prepared for the General Plan. Therefore, it was determined that this PEIR would be prepared as a PEIR and incorporate by reference the Final PEIR for the General Plan (State Clearinghouse No. 2006091032), which was approved by City Council on July 2009, in its entirety. The Final General Plan PEIR is available for review at the City’s Development Services Department, located at 1222 First Avenue, San Diego, California 92101.

Per Section 21067 of CEQA and Sections 15367, and 15050 through 15053 of the State CEQA Guidelines, the City is the lead agency under whose authority this document has been prepared. As an informational document, this PEIR is intended for use by the City of San Diego decision makers and members of the general public in evaluating the potential environmental effects of the Project.

1.1 ENVIRONMENTAL REVIEW PROCESS – CEQA COMPLIANCE

1.1.1 Legal Authority

An EIR is an informational document used by a lead agency (in this case, the City of San Diego) when considering approval of a project. The purpose of an EIR is to provide public agencies and members of the general public with detailed information concerning the environmental effects associated with the implementation of a project. An EIR should analyze the environmental consequences of a project, identify ways to reduce or avoid potential environmental effects resulting from the project, and identify alternatives to the project that are capable of avoiding or reducing impacts. CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority. This PEIR provides information to be used in the planning and decision-making process. It is not the purpose of an EIR to recommend approval or denial of a project.

1.1.2 Lead Agency

As lead agency, the City has determined that a PEIR shall be prepared for the Project pursuant to the CEQA Guidelines (Section 15168). This PEIR provides decision makers, public agencies, and the public with detailed information about the potential significant adverse environmental impacts of the Project. By recognizing the environmental impacts of the Project, decision makers will have a better understanding of the physical and environmental changes that would accompany the approval of the Project. The PEIR includes recommended mitigation measures which, should they be implemented, would lessen impacts and provide the lead agency with ways to substantially lessen or avoid significant effects of the Project on the environment, whenever feasible. Alternatives to the Project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the Project.

Prior to approval of the Project, the City, as lead agency and the decision-making entity, is required to certify that the PEIR has been completed in compliance with CEQA, that the information in this PEIR has been considered, and that the PEIR reflects the independent judgment of the City. CEQA requires decision makers to balance the benefits of a project against its unavoidable environmental consequences. If environmental impacts are identified as significant and unmitigated, the City may still approve the project if it finds that social, economic, or other benefits outweigh the unavoidable impacts. The City would then be required to state in writing the specific reasons for approving the Project based on information in the PEIR and other information sources in the administrative record. This reasoning is called a “statement of overriding considerations” (PRC Section 21081 and CEQA Guidelines Section 15093).

In addition, the City, as lead agency, must adopt a mitigation monitoring and reporting program (MMRP) describing those mitigation measures that are determined to be feasible, and were adopted and made a condition of project approval in order to avoid or mitigate significant effects on the environment (PRC Section 21081.6; CEQA Guidelines Section 15097). The MMRP is adopted at the time of project approval and is designed to ensure compliance with the project description and mitigation measures of the PEIR during and after project implementation. If the City decides to approve the Project, it would be responsible for verifying that implementation of the MMRP for this Project occurs.

The PEIR would primarily be used by the City during approval of discretionary actions and permits. These actions and permits are described in further detail in Section 1.4.

1.1.3 Notice of Preparation and Scoping Meeting

Consistent with the requirements of CEQA, a good faith effort has been made during the preparation of the PEIR to contact all responsible and trustee agencies; organizations; persons who may have an interest in the Project; and all government agencies, including the State Clearinghouse. This includes the circulation of a Notice of Preparation (NOP) on December 2, 2015, which began a 30-day comment period that ended on January 4, 2016 (Appendix A). Approximately 100 comment letters were received on the NOP during this time and were considered in preparation of the PEIR. The comments included the following issues:

- Air quality and greenhouse gases
- Biology
- Mixed-use development
- Traffic and parking
- Multimodal transportation
- Contamination and health risks
- Noise
- Safe access
- Emergency services
- Welfare of children
- Storm water, flooding, and wetlands
- Water quality
- Open space
- Notice of Preparation
- Project description
- Visual impacts
- Cumulative impacts
- Alternatives

A scoping meeting was held on December 16, 2015, starting at 6:00 p.m. at the Nobel Recreation Center Meeting Room #2, located at 8810 Judicial Drive, San Diego, California 92122, to inform the public about the Project and receive comments. Twenty-seven individuals spoke at the scoping meeting. The issues they raised included the timing of the NOP and its review period, impacts to Rose Canyon Open Space Park (Rose Canyon), traffic and circulation, multimodal alternatives, air quality impacts to schools (i.e., Doyle Elementary, Spreckels Elementary, etc.),

compliance with the City's Climate Action Plan, downstream water quality impacts (e.g., impacts to Marian Bear Memorial Park, Mission Bay Park), impact on biological resources, emergency access, open space and preservation, and traffic-related incidents. Appendix B provides a transcript of the scoping meeting.

In reviewing the Project, the City determined that it could result in potentially significant environmental impacts based on the City's current CEQA Significance Determination Thresholds (City of San Diego 2011a). Through this process, the City identified potentially significant environmental impacts associated with the following issues:

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Noise
- Historical Resources
- Biological Resources
- Geologic Conditions
- Paleontological Resources
- Hydrology and Water Quality
- Public Services and Facilities
- Public Utilities
- Health and Safety
- Population and Housing

1.2 SCOPE AND STRUCTURE OF THE PEIR

This PEIR analyzes impacts related to removing the widening of Genesee Avenue and removing the construction of the Regents Road Bridge projects from the UCP and, in particular, the UCP Transportation Element. The Project would remove the planned Genesee Avenue Widening project that would expand the roadway from four to six lanes between State Route (SR) 52 and Nobel Drive. The Project would also remove the planned Regents Road Bridge project, which would construct two separate, parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road termini on either side of the canyon.

This PEIR analyzes five alternatives. The alternatives include variations of including and removing the widening of Genesee Avenue, the construction of the Regents Road Bridge, and implementing various multimodal improvements.

The PEIR contains the following chapters:

Executive Summary. Per CEQA Guidelines Section 15123, this section summarizes the environmental consequences that would result from the Project, provides a summary table that lists the Project's anticipated significant environmental impacts, describes recommended

mitigation measures, and indicates the level of significance of impacts after implementation of recommended mitigation measures.

Chapter 1.0: Introduction. Per CEQA Guidelines Section 15124(a) this chapter provides an introduction and overview of the Project and describes the purpose of the PEIR and the CEQA process.

Chapter 2.0: Environmental Setting. Per CEQA Guidelines Section 15125, this chapter describes the existing Project site conditions. It focuses on the circulation network and also covers land uses in the Project site, community plan designations, and existing zoning. The section provides baseline (existing conditions) information for environmental resource issues analyzed in Chapter 4.0.

Chapter 3.0: Project Description. Per CEQA Guidelines Section 15124, this chapter details the Project components, including the Project's purpose and objectives, Project features, anticipated program development, and necessary discretionary permits required for implementation of the Project.

Chapter 4.0: Environmental Analysis. Per CEQA Guidelines Section 15126, this chapter describes the existing conditions for each of the environmental topics, states the environmental issues identified for the Project by the City, and evaluates the potential significant environmental impacts of the Project and recommended mitigation measures to avoid or reduce the significance of potential impacts.

Chapter 5.0: Cumulative Impacts. Per CEQA Guidelines Section 15130, this chapter analyzes the potential significant Project effects that, when considered with other closely related past, present, and reasonably foreseeable future projects, could compound or increase environmental impacts.

Chapter 6.0: Growth Inducement. Per CEQA Guidelines Section 15126(d), this chapter analyzes the ways in which the Project could foster economic or population growth, either directly or indirectly, in the surrounding area.

Chapter 7.0: Effects Found Not to Be Significant. Per CEQA Guidelines Section 15128, this chapter analyzes potential environmental effects identified by the City that, after detailed analysis, were determined not to be significant. This section also provides an analysis on growth-inducing impacts of the Project, such as the ways in which the Project could foster economic or population growth, either directly or indirectly, in the surrounding area.

Chapter 8.0: Mandatory Discussion Areas. Per CEQA Guidelines Section 15126(b)(c), this chapter identifies the changes in the local environment that would result from implementation of the Project, and analyzes potential environmental effects identified by the City that, after detailed analysis, were determined unavoidable if the Project is implemented.

Chapter 9.0: Alternatives to the Project. Per CEQA Guidelines Section 15126.6, this chapter considers alternatives to the Project that could reduce one or more of the significant environmental impacts identified in Chapter 4.0. ~~In addition, alternatives that were considered but rejected from more detailed analysis are also identified.~~

Chapter 10.0: Mitigation Monitoring and Reporting Program (MMRP). CEQA (Section 15126.4) requires that this chapter list all the mitigation measures required to be implemented by the Project, the entity required to monitor the satisfactory completion of the MMRP, and at what point in the process the mitigation measures are to be accomplished.

Chapter 11.0: References. This chapter provides a list of the sources referenced in the PEIR.

Chapter 12.0: Preparers of This Report. Per CEQA Guidelines Section 15129, this chapter identifies the persons and organizations that participated in the preparation of the PEIR.

Appendices: The NOP/scoping comment letters that were prepared for the Project are provided in the Appendices for public review.

1.3 DISCRETIONARY ACTIONS

Amending the UCP Transportation Element is a discretionary act of the City to ensure compliance with the established planning policies and development criteria of the City's General Plan. The required permits or discretionary actions applicable to the Project are described below.

The Project would require City of San Diego approval of the following discretionary actions.

- Amendment to the UCP Transportation Element and General Plan Mobility Element to remove the widening of Genesee Avenue and the construction of the Regents Road Bridge.
- Amendment to the North University City PFFP.
- Approval and certification of a Final EIR.

1.4 INTENDED USES OF THE PEIR

In accordance with CEQA Guidelines, a PEIR may serve as the EIR for subsequent activities or implementing actions, including development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. The PEIR may be used as a basis for future Initial Studies to evaluate potential impacts of future activities. In addition, it may be used as a first-tier PEIR for later environmental documents, thereby focusing later review of projects on specific environmental effects of those projects that were not fully evaluated in the PEIR. It may also serve as a database for the environmental setting; cumulative impacts; project alternatives; and other sections of later, project-specific environmental documents. In this way, the PEIR will streamline and focus future project-specific environmental documents on just those impacts that were not previously analyzed.

Section 15152 of the CEQA Guidelines encourages agencies to tier environmental analyses for separate but related projects. The Guidelines indicate that tiering is appropriate when the sequence of analysis is from a PEIR prepared for a general plan, policy, or program to a PEIR or Negative Declaration for another plan, policy, or program of lesser scope, or to a site-specific PEIR or Negative Declaration. Discretionary actions occurring on this Project site will be examined in light of this PEIR to determine whether an additional environmental analysis must be conducted and documentation prepared. If a subsequent project or later activity would have effects that were not examined in this PEIR, or were not examined at an appropriate level of detail to be used for the later activity, an Initial Study would need to be prepared, leading to a Negative Declaration, Mitigated Negative Declaration (MND), or an EIR. Any lead agency for a later project pursuant to, and consistent with, this Project and this PEIR should limit the EIR, MND, or Negative Declaration on the later projects to effects that:

1. Were not examined as significant effects on the environment in this PEIR; or
2. Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by imposition of conditions, or other means.

Pursuant to State CEQA Guidelines Section 15168(c), the certified PEIR would satisfy CEQA requirements for subsequent activities if the following conditions can be met:

- Pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required (Section 15168(c)(2)); and
- All feasible mitigation measures or alternatives identified in the PEIR will be incorporated (Section 15168(c)(3)).

Preparation of project-level technical studies may be required when certain conditions apply to project-specific activities or implementation of mitigation measures associated with the Project. Any required project-specific technical studies would be used to determine whether such activity is within the scope of the PEIR and whether the PEIR adequately analyzes the activity for CEQA purposes.

1.4.1 Agencies Expected to Use the PEIR

The following agencies are anticipated to consider this PEIR in their approval processes:

- City of San Diego
- California Coastal Commission

1.4.2 Future Actions and Approvals Required

~~Discretionary p~~Projects implemented in accordance with the UCP amendment would require subsequent review in accordance with CEQA and/or ministerial review depending on the specific public improvement. Subsequent projects may include, but are not limited to, public right-of-way and infrastructure improvements, which may require approval of a street vacation, development permits, demolition and/or grading permits, and public improvement plans.

CHAPTER 2.0 ENVIRONMENTAL SETTING

2.1 OVERVIEW

2.1.1 Regional Overview

As discussed in Chapter 1.0, Introduction, the Project is located within the UCP Area in the City of San Diego (see Figure 2-1, Regional Map). The City of San Diego covers approximately 206,989 acres in southwestern San Diego County, in Southern California. The City of San Diego is bordered on the north by the City of Del Mar, the City of Poway, and unincorporated San Diego County land. On the east, the City of San Diego is bordered by the Cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated San Diego County land. To the south, the City of San Diego is bordered by the Cities of Coronado, Chula Vista, and National City, and the United States-Mexico border. The Pacific Ocean is located on the City of San Diego's western border.

2.1.2 University Community Area

University Community Area Context

The UCP Area encompasses approximately 8,500 acres and is bound by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchison, Topeka, and Santa Fe Railway (AT&SF), Marine Corps Air Station (MCAS) Miramar, and Interstate 805 (I-805) on the east; SR 52 on the south; and Interstate 5 (I-5), Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west. The UCP Area also contains two state-controlled properties—the University of California, San Diego (UCSD) UC San Diego and Torrey Pines State Natural Reserve, which lie outside the land use jurisdiction of the City.

The UCP Area encompasses UCSD UC San Diego; the Westfield University Town Centre (Westfield UTC) shopping center; and many high-tech, bio-tech, and clean-tech businesses and research facilities, as well as residential and commercial land uses (see Figure 2-2, Vicinity Map). Sometimes referred to as the “Golden Triangle,” the UCP Area is roughly bordered by La Jolla on the west, SR 52 on the south, Sorrento Valley Road on the north, and I-805 on the east. Rose Canyon separates the higher-density apartments, condominiums, and town homes of North University from the mainly single-family homes of South University.



Source: Esri; SanGIS; SANDAG.

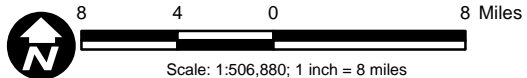
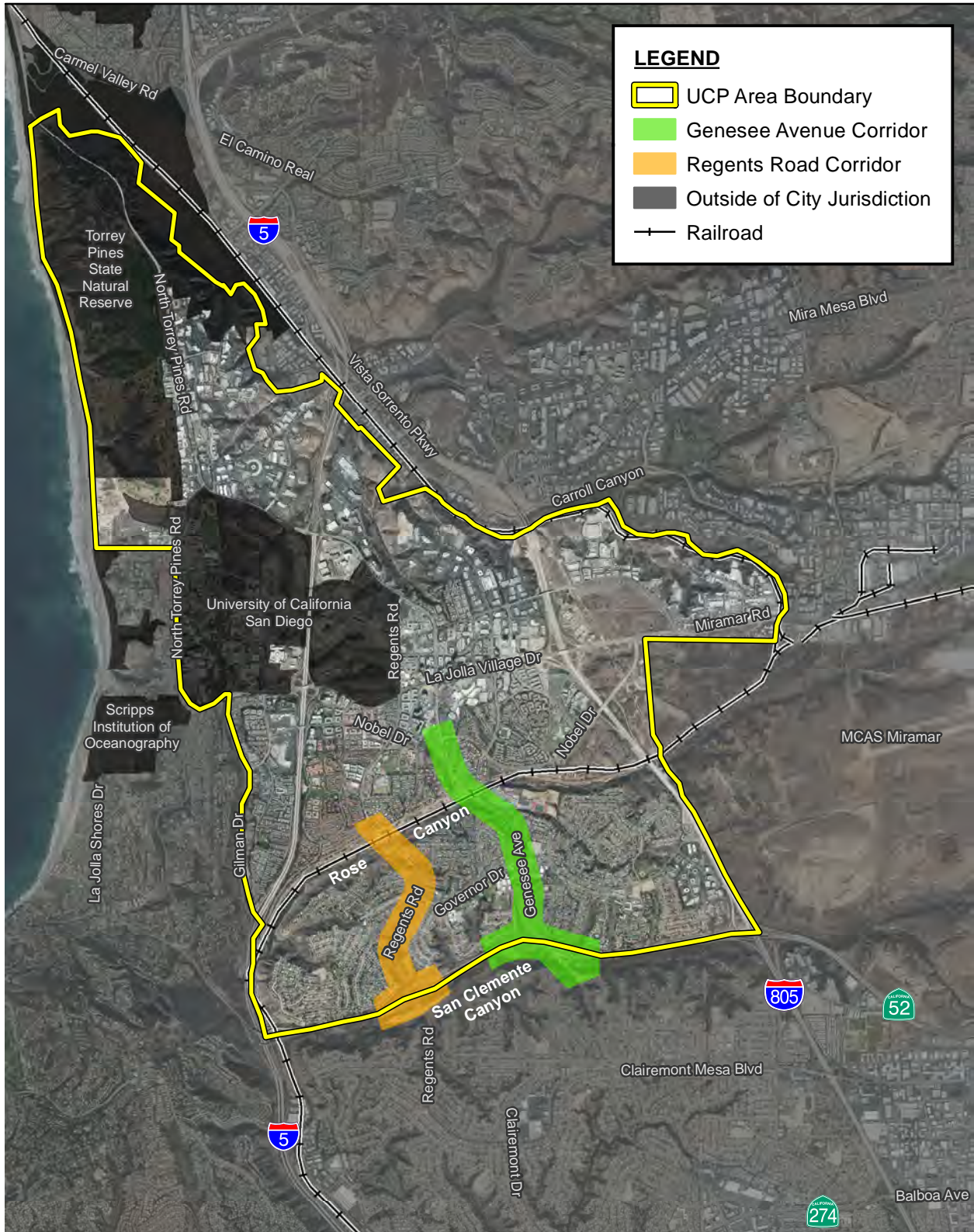
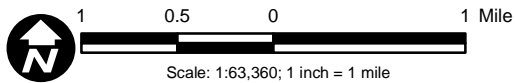


Figure 2-1
Regional Map



Source: SanGIS 2015; SANDAG 2014; Esri.



**Figure 2-2
Vicinity Map**

University Community Plan Amendment Final PEIR

Path: P:_6044\60446078_University_Com_Plan_Amend_EIR\900-CAD-GIS\922_Maps\UCP_EIR_Vicinity.mxd, 9/30/2016, daniel_arellano

Neighboring communities include Torrey Pines, Mira Mesa, Clairemont Mesa, and La Jolla. The Torrey Pines community is located north of the UCP Area. The Mira Mesa community is located east of the UCP Area. Mira Mesa is home to approximately 62,500 people, residing in 20,400 dwelling units. The eastern portion of the Mira Mesa community known as Sorrento Valley is designated for development as an industrial park, which is adjacent to the science research and open space areas in the University community. Approximately 60 percent of the Mira Mesa community has been built, with 12 percent undeveloped (City of San Diego 2011b). The Clairemont Mesa community is located to the south of the UCP Area on the other side of SR 52. Industrial parks border I-5 and higher-density residential development is located along portions of the major roads. The northeastern portion of the La Jolla community borders the UCP Area to both the south and the west. The La Jolla Community Plan generally shows the land south of the Salk Institute designated as low-density residential development. However, the Blackhorse Farm's portion immediately to the west of North Torrey Pines Road and south of the Salk Institute is proposed to include an Executive Conference Center related to ~~UCSD~~ UC San Diego, as well as various types of residential uses. South of this residential area is the Scripps Institution of Oceanography, which is a part of the ~~UCSD~~ UC San Diego campus. Residential development in the La Jolla Shores Planned District lies to the south of ~~Scripps Institute~~ Scripps Institution of Oceanography and La Jolla Village Drive (City of San Diego 2014b).

Existing Transit

Several types of transit currently serve the UCP Area. There are 14 Metropolitan Transit Service (MTS) routes that serve the University community including the SuperLoop (201/202 and 204), Rapid Route 237, and Coaster Connection Routes 978 and 979. There is also one North County Transit District (NCTD) Breeze Route (Route 101). Three of the 14 MTS routes serve the southern University community (south of Rose Canyon); MTS Route 41 runs from UC San Diego to Fashion Valley, MTS Route 50 runs from UTC to downtown, and MTS Route 105 Runs from UTC to Old Town. ~~UCSD~~ UC San Diego Transportation Services provides eight shuttle routes that serve the UCP Area. The shuttle routes specifically serve the campus, medical centers, and other key points off campus. Students, faculty, and staff can ride the shuttles for free. All shuttles operate during academic quarters with some shuttles operating year-round.

Two rail lines travel through the UCP Area: the NCTD COASTER and the AMTRAK Pacific Surfliner. The closest COASTER/AMTRAK station is located in Sorrento Valley, one exit north of the community on I-5. Access to this station is provided by shuttle service to limited portions of the University community. The rail services provide connections north and south of the community and connect to other regional rail services. Both the COASTER and the Pacific Surfliner services are part of the 351-mile-long Los Angeles-San Diego-San Luis Obispo Rail Corridor that travels through a six-county coastal region in Southern California.

Bicycle and Pedestrian Facilities

There are currently about 7.9 miles of bicycle facilities within the UCP Area with over half composed of Class III Bike Routes. Class III Bike Routes provide cyclists with the lowest level of separation from vehicular travel. Two interstate freeways (I-5 and I-805) and one state route (SR 52) form barriers to pedestrian travel between the UCP Area and its surrounding communities.

Emergency Services

The UCP Area is served by the City of San Diego Police Department (SDPD), specifically the Northern Division located at 4275 Eastgate Mall. The Northern Division serves a population of 225,234 people and encompasses 41.3 square miles. As of February 2016, total of 109 sworn police officers are assigned to Northern Patrol Operations. Of those, 90 full-duty officers are performing field operations. The Project site is located specifically in Beat 115 of the Northern Division. The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County (SDPD 2016a).

The City of San Diego Fire-Rescue Department (SDFRD) provides fire protection and emergency services to the Project site through existing facilities. The City's Fire – Rescue Department Station 35 (Station 35), located at 4285 Eastgate Mall, serves the UCP Area and its surrounding areas. The City's Fire Station 27, located at 5064 Clairemont Drive, also serves the UCP Area, West Clairemont, and surrounding areas. Fire Station 9, located at 7870 Ardath Lane, serves La Jolla and its surrounding areas. In addition, Squad 56, located at 3034 Governor Drive, near Regents Road, serves the South University area and is staffed seven days a week from 8:00 a.m. to 8:00 p.m.

2.1.3 Genesee Avenue Corridor

2.1.3.1 Location

The Genesee Avenue Corridor is located in the central portion of the City of San Diego within the UCP Area (Figure 2-2, Vicinity Map). The Genesee Avenue Corridor extends along Genesee Avenue from approximately Las Palmas Square, north of Nobel Drive, to south of SR 52.

2.1.3.2 Existing Land Uses

Within the Genesee Avenue Corridor, Genesee Avenue extends for approximately 2 miles and currently has four lanes of traffic (two in each direction), as shown in Figure 2-2. The median is

currently 18 feet wide, and the parkway¹ is 10 feet wide. The Genesee Avenue Corridor includes actively used AT&SF railroad tracks and a portion of Rose Canyon. The railroad tracks are considered a historic structure and are within Rose Canyon.

The Genesee Avenue Corridor begins just north of Nobel Drive, with the Costa Verde shopping center on the western side of Genesee Avenue and a parking lot for the Westfield UTC shopping center on the eastern side. South of Nobel Drive are several multi-family residential developments on both sides of Genesee Avenue. Continuing south, multi-family residential development is located on the east side of Genesee Avenue, and single-family residential is located on the west side of Genesee Avenue, just north of Rose Canyon. Just south of Rose Canyon on the east side of Genesee Avenue is University City High School. From here, multi-family residential is located west of Genesee Avenue. Multi-family residential development is located to the west of the Genesee Avenue and Calgary Drive intersection and single-family residential development is located to the east. At the intersection of Genesee Avenue and Governor Drive, gas stations are located on each of the four corners. South of the gas stations, the University Square shopping center is located on the east side of Genesee Avenue. All Saints Lutheran Church and multi-family residential are located on the west side of Genesee Avenue, south of Governor Drive. Multi-family residential is located on both sides of Genesee Avenue near Caminito Araya, and on the west side of Genesee Avenue near Caminito Baeza. Just north of San Clemente Canyon in the area of Tamilynne Court and Zenako Street on the east side of Genesee Avenue are single-family residences at the top of a slope above Genesee Avenue. The southernmost portion of the Genesee Avenue Corridor encompasses a portion of SR 52, and a portion of Marian Bear Memorial Park in San Clemente Canyon.

2.1.3.3 Surrounding Land Uses

The Genesee Avenue Corridor is surrounded on all sides by residential and commercial uses, along with schools and parks (Figure 2-2). The Costa Verde Specific Plan area, including commercial and multi-family residential uses, is located northwest of the Genesee Avenue Corridor. The Westfield UTC shopping center is located to the northeast of the Genesee Avenue Corridor. Farther south, the Genesee Avenue Corridor is surrounded to the east and west largely by multi-family residential developments. South of Rose Canyon, the Genesee Avenue Corridor is surrounded by University City High School and a mix of multi-family and single-family residential uses to the east. To the west is a combination of multi-family and single-family residential uses. Several commercial uses surround the Genesee Avenue Corridor to the east and west along Governor Drive; in addition, Curie Elementary School and the University Community Library are located on Governor Drive to the east. South of Governor Drive is a mix

¹ According to the San Diego Municipal Code, Ch. 11: Land Development Procedures, *parkway* means the area within the public right-of-way between the curb of a street and the public right-of-way line.

of multi-family and single-family residential uses to the east and west, along with Standley Middle School and Standley Community Park to the west of the Genesee Avenue Corridor. Farther south and north of San Clemente Canyon are largely single-family homes with some multi-family residential developments. South of the Genesee Avenue Corridor are single-family homes.

2.1.3.4 Topography and Drainage

According to U.S. Geological Survey (USGS) topographic maps for the La Jolla and Del Mar 7.5-minute quadrangles, elevations in the Genesee Avenue Corridor range from approximately 200 feet above mean sea level (AMSL) in Rose Canyon to 300 feet AMSL near Nobel Drive (USGS 2015). On the north side of Rose Canyon, drainage flows generally south from Nobel Drive to Rose Canyon. On the south side of Rose Canyon, Governor Drive is a local topographic high point between Rose Canyon and San Clemente Canyon. Drainage north of Governor Drive flows generally north to Rose Canyon and drainage south of Governor Drive flows generally south to San Clemente Canyon.

Elevations and extent of the 100-year floodplain for Rose Creek around Genesee Avenue are mapped on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panels (06073C1601G and 06073C1602G) (FEMA 2012). Below Genesee Avenue and south of SR 52, the 100-year floodplain is shown as only approximately 70 feet wide, compared to 300 feet wide several hundred feet upstream. This was identified as Zone AE, which is areas of high risk subject to inundation by the 1-percent-annual-chance flood event. At the Genesee Avenue overcrossing, flow in Rose Creek is confined to a box culvert. The creek flows generally east to west, until it reaches I-5, where it turns southward and parallels the east side of the freeway, joining San Clemente Creek and finally entering Mission Bay. This area was also identified as Zone AE and Zone X. Zone X is areas of moderate to low risk with a 0.2-percent-annual-chance flood event.

2.1.3.5 Existing Transit

MTS provides bus service via the SuperLoop. SuperLoop Rapid Routes 201, 202, and 204 provide high-frequency service in the north University City/Golden Triangle area, 7 days a week. Interim service began in June 2009 and expanded in September 2010 to include La Jolla Colony, and again in June 2012 to areas east of Genesee Avenue. To date, 19 SuperLoop Rapid stations have been installed, and improvements to roadways and traffic signals have been completed in several locations on the route. The entire SuperLoop Rapid route is approximately 9 miles. On June 10, 2012, SuperLoop service expanded to areas east of Genesee Avenue, adding additional stops along Executive Drive, Judicial Drive, and Nobel Drive, including the Nobel Athletic Area

and Library. The new Route 204 runs clockwise and connects with other transit services at the Westfield UTC Transit Center, located on Genesee Avenue. SuperLoop Rapid operates 7 days a week from 5:45 a.m. until 10 p.m. Routes 201 and 202 run every 10 minutes during peak commute hours and every 15 minutes at other times. Route 204 runs every 15 minutes (SANDAG 2015a).

Other bus routes serving the Genesee Avenue Corridor include MTS 105 (Old Town – University City). Bus stops are located along Governor Drive (MTS 41, 50, and 105), Decoro Street (MTS 41 and 50), Centurion Square (MTS 41 and 50), Luigi Terrace (MTS 41 and 50), Calgary Drive (MTS 41 and 50), Governor Drive, Radcliffe Lane, April Court, and SR 52 (Ramp). Generally, the MTS bus routes within the Project vicinity operate approximately every 10 to 15 minutes on ~~both~~ weekdays and/or weekends. This route does not run from the southern University area (south of Rose Canyon) on weekends.

2.1.3.6 Bicycle and Pedestrian Facilities

The UCP designates the Genesee Avenue Corridor as an existing Class II bicycle route. Class II bicycle routes are defined as restricted right-of-way located on the paved road surface alongside the traffic lane nearest the curb and identified by special signs, lane striping, and other pavement markings.

Pedestrian facilities include sidewalks, curb ramps, and other amenities such as street trees for shading. Pedestrian bridges are currently built at the following locations to minimize the need for pedestrians to cross the wide, high-volume streets: (1) Genesee Avenue near Executive Square; (2) La Jolla Village Drive east of Genesee Avenue; and (3) Genesee Avenue between La Jolla Village Drive and Esplanade Court.

2.1.3.7 Emergency Services

Fire Station 35 and Fire Station 27 serve the Genesee Avenue Corridor. Fire Station 35 is located at 4285 Eastgate Mall, and its district is 11.32 square miles. Fire Station 35 apparatus includes one fire engine, one aerial truck, one chemical rig, one brush engine (Type III) rig, and one Battalion Chief Vehicle. In fiscal year 2015, the fire engine made 4,017 responses, the aerial truck made 1,785 responses, and the Battalion Chief vehicle made 546 responses (SDFRD 2016a). Four firefighters staff the engine at all times, and four firefighters staff the truck company at all times. Station 35 is also staffed with a Battalion Chief and two medics, for a total of 11 people.

Fire Station 27 is located at 5064 Clairemont Drive and serves West Clairemont, the UCP Area, and surrounding areas. Fire Station 27's district is 5.8 square miles and houses one fire engine. The fire engine made 2,600 responses in fiscal year 2015 (SDFRD 2016b). The station is staffed by four firefighters per 24-hour shift.

Fire Station 9 is located at 7870 Ardath Lane and serves La Jolla and its surrounding areas. Engine 9's district is 4.72 square miles and houses a fire engine and a Paramedic Unit. The fire engine made 1,824 responses in fiscal year 2015 (SDFRD 2016b).

In addition, Squad 56, located at 3034 Governor Drive, near Regents Road, also serves the South University area and is staffed seven days a week from 8:00 a.m. to 8:00 p.m. Operations began in January 2016. In order to provide fire-rescue services to underserved areas, Squad 56 consists of a Fast Response Squad (FRS), which is a two person fire crew, rather than the traditional four person crew. FRS is staged at under-deployed areas where it can respond more quickly than the nearest fire engine and begin patient treatment or fire. One member of the crew is a Fire Captain/EMT and the other is a Firefighter/Paramedic. Squad 56 has a complement of tools, equipment, and medical supplies. It carries a small quantity of water and foam, but does not have the capability to hook up to a hydrant. The FRS crew can treat patients and extinguish small fires (SDFRD 2016c).

At this time, no data is available for Squad 56. As such, only Fire Station 35, Fire Station 27, and Fire Station 9 are analyzed in this PEIR. The General Plan states that the response time for SDFRD to treat medical patients and control small fires, with the first-due unit arriving within the City's target average of 7.5 minutes, is 90 percent of the time from the receipt of the 9-1-1 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas (Citygate 2011). Based on the 90 percent fractile response times for years 2014 and 2015, the average response time for Fire Station 35 was 8.82 minutes and for Fire Station 27 was 8.05 minutes. The response times for both Station 35 and Station 27 did not meet the City's target average of 7.5 minutes. Fire Station 9 did meet the City's target average response times for years 2014 and 2015 with a response time of 7.53 minutes.

Police protection to the Genesee Avenue Corridor areas is provided by the SDPD Northern Division, located at 4275 Eastgate Mall. The Northern Division serves a population of 225,234 people and encompasses 41.3 square miles. The Project site is located specifically in Beat 115 of the Northern Division (SDPD 2016a). The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County. As of ~~February~~ June 2016, a total of ~~409~~ 118 sworn police officers and one civilian employee were assigned to Northern Patrol Operations. Of those, approximately 90 full-duty officers are performing field operations. On average, approximately

45 43 officers are divided among three shifts per day, who patrol the Northern Division (approximately 45 14 patrolling officers at any given time). The Northern Division's average response time for 2015 was 7.3 minutes for Priority E – Imminent Threat to life calls. Beat 115's average response time for the same category of calls was 8.3 minutes. The Northern Division and Beat 115 average response times exceed the City's target average response time of 7.0 minutes for these priority-type calls (SDPD 2016b, Citygate 2011).

2.1.4 Regents Road Corridor

2.1.4.1 Location

The Regents Road Corridor is also located in the central portion of the City of San Diego within the UCP Area (Figure 2-2). The corridor extends along Regents Road from approximately Caminito Terviso on the north side of Rose Canyon south to San Clemente Canyon.

2.1.4.2 Existing Land Uses

The Regents Road Corridor extends for approximately 1.6 miles and currently has four lanes of traffic (two in each direction), except over Rose Canyon where there is no roadway. The Regents Road Corridor contains AT&SF railroad tracks and a portion of Rose Canyon. The railroad tracks are considered a historic structure and are within Rose Canyon. The Regents Road Corridor begins north of Rose Canyon, just south of Porte de Merano Court. At the northernmost end of the corridor are multi-family residential developments on both sides of Regents Road. Regents Road is blocked off from traffic just past the multi-family residential developments, although the pavement continues to the northern edge of Rose Canyon. Single-family homes are located on the east side of Regents Road off of Lahitte Court, east of the Rose Canyon trailhead. Commercial uses are located on the northwest and northeast corners of the intersection of Regents Road and Governor Drive. A church is located at the southwestern corner, and multi-family residential uses are located at the southeastern corner of Regents Road and Governor Drive. Single-family homes on both sides of Regents Road are located south of Governor Drive. Nearing the terminus of the Regents Road Corridor, the slopes on both sides of the roadway become steeper. The southernmost portion of the Regents Road Corridor includes portions of SR 52 and San Clemente Canyon.

2.1.4.3 Surrounding Land Uses

The Regents Road Corridor is surrounded on all sides by residences and commercial uses, along with schools and parks (Figure 2-2). To the northeast of the Regents Road Corridor are Doyle Elementary School and Doyle Community Park, as well as multi-family residential

developments. To the northeast are also multi-family residential developments. South of Rose Canyon, single-family homes are adjacent to the Regents Road Corridor, including homes at the west end of Mercer Lane, at the west edge of Lahitte Court, at the west edge of Millikin Avenue, and along Buisson Street where it parallels Regents Road. The Regents Road Corridor is surrounded by commercial uses to the east and west along Governor Drive. South of Governor Drive are mostly single-family homes to the east and west. Standley Community Park is located to the east. Spreckels Elementary School is located east of Regents Road and south of Governor's Drive along Stadium Street. South of the Regents Road Corridor are single-family homes.

2.1.4.4 Topography and Drainage

According to USGS topographic maps for the La Jolla and Del Mar 7.5-minute quadrangles, elevations in the Regents Road Corridor range from approximately 200 feet AMSL in Rose Canyon to nearly 350 feet AMSL near Governor Drive (USGS 2015). On the north side of Rose Canyon, drainage flows generally south from the residential development to Rose Canyon. On the south side of Rose Canyon, Governor Drive is a local topographic high point between Rose Canyon and San Clemente Canyon. Drainage north of Governor Drive flows generally north to Rose Canyon and drainage south of Governor Drive flows generally south to San Clemente Canyon.

Elevations and extent of the 100-year floodplain for Rose Creek around a projected alignment of Regents Road are mapped on FEMA FIRM Panels 1601 and 1602 (FEMA 2012). Below a projected alignment of Regents Road, the 100-year floodplain is shown as approximately 250 feet wide, with a water surface elevation of approximately 170 feet AMSL. At the previously planned Regents Road overcrossing, flow in Rose Creek is in an open channel. The creek flows generally east to west, until it reaches I-5, where it turns southward and parallels the east side of the freeway, joining San Clemente Creek and finally entering Mission Bay. This area was identified as Zone A, Zone AE, and Zone X. Zone A and Zone AE are high risk areas subject to inundation by the 1-percent-annual-chance flood event. Zone X is areas of moderate to low risk with a 0.2-percent-annual-chance flood event.

2.1.4.5 Existing Transit

MTS provides bus service via the SuperLoop. SuperLoop Rapid Routes 201 and 202 provide high-frequency service in the North University /Golden Triangle area, 7 days a week. Within the Regents Road Corridor, SuperLoop bus stops are located at Nobel Drive (SuperLoop 202) and Ariba Street (SuperLoop 201). SuperLoop Rapid operates 7 days a week from 5:45 a.m. until 10

p.m. Routes 201 and 202 run every 10 minutes during peak commute hours and every 15 minutes at other times (SANDAG 2015a).

Other bus routes serving the Regents Road Corridor include MTS 41 (Fashion Valley - ~~UCSD~~ UC San Diego), 50 (UTC Express), and 105 (Old Town – University City). Bus stops are located along Nobel Drive (MTS 41, 50, and 105), Decoro Street (MTS 41 and 50), Centurion Square (MTS 41 and 50), Luigi Terrace (MTS 41 and 50), Calgary Drive (MTS 41 and 50), Governor Drive, Radcliffe Lane, April Court, and SR 52 (Ramp). Generally, the MTS bus routes within the Project vicinity operate approximately every 10 to 15 minutes on weekdays and/or weekends. MTS Route 50 does not run on weekends. MTS Route 105 does not run from the southern University area (south of Rose Canyon) on weekends.

2.1.4.6 Bicycle and Pedestrian Facilities

The UCP designates the Regents Road Corridor as a proposed Class II bicycle route. Pedestrian facilities include sidewalks, curb ramps, and other amenities such as street trees for shading.

2.1.4.7 Emergency Services

The emergency services for the Regents Road Corridor would be the same as those described for the Genesee Avenue Corridor.

2.2 PLANNING CONTEXT

2.2.1 General Plans and Zoning

City of San Diego General Plan

The City's General Plan (City of San Diego 2008a) sets forth a comprehensive, long-term plan that prescribes overall goals and policies for development within the City of San Diego. According to the General Plan, the UCP Area, which includes the Genesee Avenue and Regents Road Corridors, is located within the Urbanized Lands designation. Urbanized Lands are characterized by older, recently developed, and developing communities at urban and suburban levels of density and intensity.

The Project would build upon the goals and strategies in the General Plan. The UCP is intended to further express General Plan policies by amending the UCP and UCP Transportation Element to reflect planned mobility improvements that have been approved or completed. The two

documents work together to establish the framework for growth and development in the UCP Area.

University Community Plan

The UCP was adopted by the City Council on July 7, 1987, and reprinted October 2014 to incorporate subsequent community plan amendments adopted by the City Council (City of San Diego 2014b). Four subareas are identified in the UCP. The Genesee Avenue and Regents Road Corridors are within the Central Subarea and South University Subarea.

The Central Subarea is bounded by I-805, I-5, Genesee Avenue and Regents Road, La Jolla Village Drive, Gilman Drive, and Rose Canyon. The Central Subarea, north of Rose Canyon, is designed to be the most urban subarea characterized by intense, multi-use urban development. It is planned to be one of the major residential, commercial, and office nodes in the City. It contains two regional commercial centers at the intersections of La Jolla Village Drive and Genesee Avenue, and Nobel Drive and I-5. These centers are connected by a corridor of office and high-density residential development. The Central Subarea is a diverse, mixed-use area of relatively intense development. Generally, higher-intensity development is found in the east-west corridor contained by Eastgate Mall and Nobel Drive, while lower-intensity development is found at the edges of the subarea.

South University is bordered by three freeways: I-5 on the west, I-805 on the east, and SR 52 on the south. These freeways and two major canyons, Rose Canyon on the north and San Clemente Canyon (Marian Bear Memorial Park) on the south, isolate as well as define the South University Subarea. Access to the subarea is available from Regents Road and Genesee Avenue from the south, Genesee Avenue from the north, and the Governor Drive exit off of I-805 from the east. The South University Subarea is planned to be a homogeneous, single-family residential neighborhood, drawing its distinct identity from Rose Canyon to the north and San Clemente Canyon (Marian Bear Memorial Park) to the south. Land uses consist primarily of single-family residential development. Commercial centers are clustered along Governor Drive at Regents Road and Genesee Avenue, which primarily serve the daily needs of area residents. An office park has been developed on the south side of Governor Drive at I-805, which serves as an employment center. South University also includes new areas of higher density residential neighborhoods on the south side of Governor Drive near I-805. A 9-hole golf course also exists south of Governor Drive.

The UCP identifies the Genesee Avenue Corridor as a unifying urban design element in the community. The intersection of Genesee Avenue and Governor Drive is identified as a “special-

treatment” intersection. The plan calls for the design to include a landscaped median in all roads having six lanes and over, directional road signs, and additional landscaping and illumination.

The UCP identifies a portion of the Regents Road Corridor (between Governor Avenue and Nobel Drive) as an “urban path,” which is defined as a primary pedestrian network. The UCP calls for at-grade crossing devices to be installed at various points to ensure pedestrian network continuity.

The Adopted UCP recognizes Genesee Avenue and Regents Road as critical linkages where specific improvements have been identified (City of San Diego 2014b). The following highlights the applicable planned widening concepts for each corridor under the Adopted UCP:

The “III. Linkages” section of the Adopted UCP identifies the proposed modifications to Genesee Avenue and Regents Road.

III. Linkages

Genesee Avenue

Section C: Genesee Avenue: Regents Road to Nobel Drive. This portion of Genesee Avenue includes both four and six-lane sections with some parking and an 18-foot median. Improvements proposed include completion of the widening to a six-lane major arterial and dual left-turn lane.

Section D: Genesee Avenue: Nobel Drive to State Route 52. This portion of Genesee Avenue is currently a four-lane facility with an 18-foot median. The 1987 UCP proposes widening to a six-lane Prime Arterial. The widening of this part of Genesee is proposed to be accomplished within the existing right-of-way by narrowing the median. Components of this widening are to include:

- a. A median of at least eight feet in width.
- b. Retention of existing contiguous sidewalks.
- c. Class II bike lanes in both directions.
- d. No parking.

Regents Road

Section A: Regents Road: Executive Drive to Governor Drive. The plan includes the bridging of Rose Canyon to connect North and South University City. Components of these improvements are to include:

- a. *Landscaping of medians including the median in Regents Road south of Nobel Drive.*
- b. *Median landscaping costs should be included in the North University City Public Facilities Financing Plan and Facilities Benefit Assessment.*
- c. *Contiguous sidewalks except on portion between Executive Drive and Nobel Drive*
- d. *(Urban Node) which should have non-contiguous sidewalks with landscaped parkways.*
- e. *Class II bike lanes in both directions.*
- f. *The bridge spanning Rose Canyon should include landscaping cascading down the sides to continue the vegetated character of the site.*

The “Subarea 4: South University” section of the Adopted UCP identifies the Regents Road Bridge as a planned improvement and lists the following objective:

OBJECTIVE:

Ensure that the Regents Road Bridge across Rose Canyon is compatible with the natural beauty of the canyon.

In addition, the Adopted UCP Transportation Element also identifies these improvements for Genesee Avenue.

IV. PROPOSALS

Streets and Highways

1. Street Network

The existing street system should be maintained and operational improvements made, based on proven need, to increase efficiency and accommodate planned growth. Transportation improvements required above and beyond those shown in the 1983 plan are listed below:

- a. *Widen Genesee Avenue to six lanes from Nobel Drive to SR-52.*

Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan (CMCP) was adopted by the City Council on September 26, 1989 (City of San Diego 2011c). The Clairemont Mesa community is located to the south of this subarea on the other side of SR 52. The CMCP is intended to provide guidance for the orderly growth of the Clairemont Mesa community. Major goals of this plan include preserving and enhancing Marian Bear Memorial Park, and improving the street system to accommodate growth. The analyzed changes along the Regents Road Corridor would be consistent with the CMCP. ~~A more detailed analysis of the project alternatives in the context of the CMCP is provided in Section 4.1 of this PEIR.~~

University of California, San Diego Long Range Development Plan

The ~~UCSD~~ UC San Diego Long Range Development Plan (LRDP) provides data essential to the programming of municipal public services and private development to support ~~UCSD-UC San Diego~~. It is a general land use plan and capacity analysis that guides the physical development of the campus through 2020–2021. Based upon academic and student life goals, the LRDP identifies institutional and development objectives, delineates campus land uses, and estimates the campus building capacity. This plan was last updated in 2004.

Floodplains/Floodway

Portions of the UCP Area are located within the FEMA 100-year floodplain of Rose Creek and San Clemente Creek (see Section 4.12 of the PEIR).

2.2.2 Regional Plans

In accordance with the requirement of Section 15125(d) of the State CEQA Guidelines, this environmental setting discussion includes statements relative to conformance with applicable regional plans. In addition to the City's General Plan, the following regional plans are assessed for consistency.

City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area

The City of San Diego adopted a Multiple Species Conservation Program (MSCP) Subarea plan in 1997. The goal of the City of San Diego's MSCP was to create a habitat preserve system known as the Multi-Habitat Planning Area (MHPA) in order to coordinate conservation efforts on a regional scale while allowing development projects to occur.

The City of San Diego's MSCP Subarea Plan (City of San Diego 1997) was prepared pursuant to the general outline for Natural Community Conservation Plan (NCCP)/ Habitat Conservation Plan (HCP) documents developed by the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to meet the requirements of the Natural Communities Conservation Planning Act of 1992 (NCCP Act) and the Federal Endangered Species Act (FESA). The City's NCCP/HCP fulfilled the requirements for issuance of incidental take authorization under Section 2835 of the state's NCCP Act and an incidental take permit under Section 10 of the FESA. The MSCP identifies certain species as "covered," that are adequately conserved, within the MHPA. The Subarea Plan specifies conditions of coverage for each covered species that must be applied when those species occur in a project area.

In addition, through the Land Development Code (LDC) Biology Guidelines (Biology Guidelines) (City of San Diego 2012a), the City regulates development activities in Environmentally Sensitive Lands (ESLs) according to project location, within or outside of the MHPA. The City of San Diego Municipal Code (City's Municipal Code) established ESL regulations to ensure protection of resources consistent with CEQA and the City of San Diego's MSCP. ESLs include lands within the MHPA, wetlands, sensitive vegetation communities, habitat for listed species, lands supporting narrow endemics, and steep slopes. The regulations encourage avoidance and minimization of impacts to ESLs. The City's Biology Guidelines define the survey and impact assessment methodologies and mitigation requirements for unavoidable impacts (City of San Diego 2012a).

Sensitive biological resources are defined by the City's Municipal Code (City of San Diego 2012a) as:

- Lands that have been included in the MHPA as identified in the City of San Diego's MSCP Subarea Plan;
- Wetlands (as defined by the Municipal Code, Section 113.0103);
- Lands outside of the MHPA that contain Tier I habitats, Tier II habitats, Tier IIIA habitats, or Tier IIIB habitats as identified in the Biology Guidelines;
- Lands supporting species or subspecies listed as rare, endangered, or threatened;
- Lands containing habitats with narrow endemic species as listed in the Biology Guidelines; and
- Lands containing habitats of covered species as listed in the Biology Guidelines.

Upon compliance with the MSCP Subarea Plan and the Biology Guidelines, the City is able to issue “take” authorization for covered species. Prior to the adoption of the MSCP, this “take” authorization would have required project-by-project review with the regulatory agencies. Thus, the MSCP provides for the preservation of a network of habitat and open space, protecting biodiversity, and enhancing the region’s quality of life. The plan is designed to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. By identifying priority areas for conservation and other areas for development, the MSCP streamlined permit procedures for development projects that impact habitat. It also provides an economic benefit by reducing constraints on development and decreasing the costs of compliance with federal and state laws that protect biological resources.

North City Local Coastal Program

The California Coastal Act of 1976 requires all jurisdictions within the Coastal zone to prepare a Local Coastal Program (LCP). The LCP includes issue identification, a land use plan, and implementation ordinances. To respond to individual community concerns, the LCP of the City of San Diego has been divided into 12 segments. The Coastal zone portions of the UCP have been incorporated into the North City LCP segment. The North City LCP also encompasses portions of the community plan areas for Torrey Pines, North City West, Mira Mesa, Sorrento Hills, La Jolla, and the adjacent open space and urban reserve areas identified in the General Plan. These areas are considered as a group because of their unique resource interrelationships created by the Los Peñasquitos and San Dieguito watersheds.

Land Development Code

Chapters 11 through 15 of the City’s Municipal Code are referred to as the LDC, as they contain the City’s land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones and the planned district ordinances that specify permitted land use; development standards, such as density, floor-area ratio (FAR), and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements.

San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan is an update of the Regional Comprehensive Plan for the San Diego Region (RCP) and the 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS), combined into one document. The Regional Plan provides a blueprint for San Diego’s regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. In addition to the 2050 RTP, the

Regional Plan includes an SCS, in compliance with Senate Bill (SB) 375. The SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The purpose of the SCS is to help the region meet the greenhouse gas (GHG) emissions reductions set by ARB. The Regional Plan has a horizon year of 2050 and projects regional growth and the construction of transportation projects over this time period. The Regional Plan was adopted by the San Diego Association of Governments (SANDAG) Board on October 9, 2015.

San Diego Regional Air Quality Strategy

The San Diego Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds (VOC) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. The San Diego County Air Pollution Control District (SDAPCD) is responsible for RAQS development and implementation.

Congestion Management Program

The Federal Highway Administration's (FHWA) Congestion Management Process in Transportation Management Areas (TMA) (23 Code of Federal Regulations [CFR] Section 450.320) requires that each TMA address congestion management through a process involving an analysis of multimodal metropolitan-wide strategies that are cooperatively developed to foster safety and integrated management of new and existing transportation facilities eligible for federal funding. SANDAG has been designated as the TMA for the San Diego region. The 2050 RTP meets FHWA requirements by incorporating the following federal congestion management process: performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-single occupancy vehicle (SOV) analysis, land use impact analysis, the provision of congestion management tools, and integration with the regional transportation improvement program process.

California State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). The requirements within the state CMP were developed to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG provided regular updates for the state CMP from 1991 through 2008. In October 2009, the San Diego region elected to be exempt from the CMP and, since this decision was made, SANDAG has been abiding by the FHWA's

Congestion Management Process in TMA to ensure the region's continued compliance with the federal congestion management process.

Water Quality Control Plan for the San Diego Basin

The San Diego Regional Water Quality Control Board's (RWQCB) Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters (RWQCB 1994). Specifically, the Basin Plan (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan (California Water Code sections 13240 thru 13244, and section 13050(j)). Additionally, the Basin Plan incorporates by reference all applicable state and RWQCB plans and policies.

San Diego County Airport Land Use Commission

The Project site is located within an Airport Land Use Compatibility Plan (ALUCP). The ALUCP safeguards the general welfare of the inhabitants within the vicinity of San Diego International Airport (SDIA) and the public in general. The ALUCP provides policies and criteria for the City of San Diego to implement and for the San Diego County Airport Land Use Commission (ALUC) to use when reviewing development proposals that require rezones and/or plan amendments. The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contained in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code).

In San Diego County, the ALUC function rests with the Board of the San Diego County Regional Airport Authority (SDCRAA), in accordance with section 21670.3 of the California Public Utilities Code. As established by state law (Pub. Util. Code, Section 21670), the ALUC has the responsibility both "to provide for the orderly development of airports" and "to prevent the creation of new noise and safety problems." ALUC policies thus have the dual objective of protecting against constraints on airport expansion and operations that can result from encroachment of incompatible land uses and minimizing the public's exposure to excessive noise and safety hazards. To meet these objectives, the ALUCPs address potential compatibility impacts related to four specific airport-related factors/layers: (1) Noise—Exposure to aircraft noise; (2) Safety—Land use factors that affect safety both for people on the ground and the occupants of aircraft; (3) Airspace Protection—Protection of Airport airspace; and (4) Overflight—Annoyance and other general concerns related to aircraft overflights.

Compatibility policies concerning each of these factors/layers are described in the ALUCP. Each factor/layer is addressed separately. Proposed land use development actions must comply with the compatibility policies and maps for each compatibility factor/layer. The ALUCP has designated Airport Influence Areas (AIAs) for areas that may be significantly influenced by airport-related activities. The AIA serves as the plan boundaries for the ALUCP. To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2, and consists of locations where noise and/or safety concerns may necessitate limitations on the types of land uses. Specifically, Review Area 1 encompasses locations exposed to noise levels of community noise level equivalent (CNEL) 60 decibels (dB) or greater, the safety zones, air space protection, and overflight. Review Area 2 encompasses the portions of the overflight and airspace protection factors/layers not encompassed within Review Area 1. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate.

Montgomery Field ALUCP

Montgomery Field is located approximately 3 miles to the southeast of the UCP Area. The southeastern portion of the Project (just northwest of the I-805 and SR 52 interchange) is within Review Area 2 of the AIA for Montgomery Field. No portion of the UCP Area is located within Review Area 1 of the AIA for Montgomery Field. The Montgomery Field ALUCP is the fundamental tool used by the SDCRAA, acting in its capacity as the San Diego County ALUC, in fulfilling its purpose of promoting airport land use compatibility with Montgomery Field. Specifically, this ALUCP (1) provides for the orderly growth of the airport and the area surrounding the airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general (Pub. Util. Code Section 21675(a)). In essence, this ALUCP serves as a tool for the ALUC to use in fulfilling its duty to review land use plans and development proposals within the AIA at Montgomery Field. The ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

MCAS Miramar ALUCP

MCAS Miramar is located approximately 1 mile to the east of the UCP Area. The Project is within the ALUCP boundaries for MCAS Miramar. The MCAS Miramar AIA is defined as “the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses” (ALUC 2011).

Portions of the UCP Area are within both Review Area 1 and Review Area 2 of the AIA for MCAS Miramar.

The MCAS Miramar ALUCP designates accident potential zones (APZs), which are sets of safety-related zones beyond the ends of military airport runways. Typically, three types of zones are established: a clear zone closest to the runway end, then APZ I and APZ II. The potential for aircraft accidents and the corresponding need for land use restrictions are greatest with the clear zone and diminish with increased distance from the runway. The UCP Area is not located within an APZ.

The MCAS Miramar ALUCP also identifies the Federal Aviation Administration (FAA) Height Notification Boundary and Federal Aviation Regulation Part 77 Airspace Surfaces. The Project is located within the FAA Height Notification Boundary and the Part 77 Surfaces for MCAS Miramar. Title 14 United States Code (USC) Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace (Part 77), establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. The boundary extends 20,000 feet from the runway. Within the boundary, Part 77 requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (slope of 100:1) from the runway. Outside the boundary, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

CHAPTER 3.0 PROJECT DESCRIPTION

This PEIR analyzes the impacts related to removal of the planned Genesee Avenue Widening and the Regents Road Bridge projects from the UCP and, in particular, the UCP Transportation Element. The Project would remove the planned Genesee Avenue Widening project that would expand the roadway from four to six lanes between SR 52 and Nobel Drive. The Project would also remove the planned Regents Road Bridge project, which would construct two separate, parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road termini on either side of the canyon.

3.1 PROJECT PURPOSE AND OBJECTIVES

CEQA requires that an EIR contain a “statement of the objectives sought by the proposed project.” Under CEQA, “[a] clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations. The statement of objectives should include the underlying fundamental purpose of the project” (State CEQA Guidelines Section 15124[b]).

3.1.1 Project Purpose

The UCP and original UCP EIR (No. 86-0278) was adopted and certified on July 7, 1987 (R-268789). The UCP Transportation Element was based on the traffic studies performed in the original EIR. In addition, the North University City PFFP, which incorporated the transportation facilities identified in the UCP, was adopted on April 12, 1988 (FL-270740). The transportation thresholds in the North University City PFFP were last updated on June 26, 2012 (R-307508), based on modeling prepared in 1997. The 1987 UCP and the North University City PFFP do not reflect the most recent development and traffic patterns. The overarching goal of the Project is to amend the UCP Transportation Element in order to reflect planned mobility improvements that have been approved or completed and to analyze the environmental impacts of development without the construction of the planned Genesee Avenue Widening and the Regents Road Bridge. In addition to the amendment to the UCP, the North University City PFFP would be subsequently updated.

3.1.2 Project Objectives

Per CEQA, the Project has been developed to meet the following primary objectives:

- Evaluate the environmental impacts of the removal of the planned Genesee Avenue Widening and the Regents Road Bridge projects.
- Minimize impacts to biological resources at Rose Canyon.
- Identify transportation improvements and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle), as part of a balanced transportation network.
- Consider the effects of the Project on the General Plan City of Villages strategies related to emergency access and multi-modal transportation.

3.2 PROJECT CHARACTERISTICS

3.2.1 Removal of Genesee Avenue Widening

The Genesee Avenue Corridor is located in the central portion of the City of San Diego within the UCP Area. The corridor extends along Genesee Avenue from approximately Las Palmas Square, north of Nobel Drive, to south of SR 52. The planned Genesee Avenue Widening would have involved adding a travel lane in each direction between SR 52 and Nobel Drive in an effort to increase the capacity of this roadway to carry anticipated traffic volumes. Under the Project, Genesee Avenue would not include any of the proposed elements described below:

- Genesee Avenue would not be widened to include an additional 26 feet that would allow a 13-foot-wide travel lane to be added in each direction.
- There would be no reduction in the central median, the landscaped portion of the parkway, or in the existing width of the four travel lanes from 13 feet each to 11 feet each.
- No retaining walls would be constructed.
- Parking along Genesee Avenue southbound from Nobel Drive to Decoro Street and south of Governor Drive would not be eliminated.
- The road cross section at Governor Drive would not be constructed, nor would the parkway width be reduced to accommodate an additional lane of travel in each direction.

- Grading associated with the planned Genesee Avenue Widening would not occur.
- Genesee Avenue over the railroad tracks in Rose Canyon would not be widened to accommodate three travel lanes in north and south directions.

3.2.2 Removal of Regents Road Bridge

The Regents Road Corridor is also located in the central portion of the City of San Diego within the UCP Area. The corridor extends along Regents Road from approximately Caminito Terviso on the north side of Rose Canyon south to San Clemente Canyon. Under the Project, the following elements would not be included:

- The planned Regents Road Bridge would not be constructed. The original design consisted of two separate, parallel two-lane bridge structures to be constructed across Rose Canyon, connecting the south and north ends of Regents Road that currently terminate near Lahitte Court on the south and Caminito Cassis on the north. The bridge was originally designed to be 870 feet long.
- Roadway modifications that would widen sections of Regents Road from approximately 400 feet north of Governor Drive to Lahitte Court, totaling a distance of 950 feet, would not be implemented. This would have accommodated two travel lanes in each direction, a 6-foot-wide striped bike lane and 10-foot-wide parkway along each edge, and a 14-foot-wide center median.
- Widening along the west (southbound) side of the existing road would not occur.
- The proposed retaining wall from Millikin Avenue to the south along the new west edge would not be constructed.
- The proposed retaining wall along the new west edge from Lahitte Court south would not be constructed.
- The four-lane road that would have been built by filling a portion of a tributary canyon and cutting through a ridge for 700 feet north of Lahitte Court would not be constructed.
- There would be no displacement of the existing trailhead.
- The proposed 12-space parking lot that would have been built ~~north~~ adjacent to of the present terminus of Regents Road on the south side of Rose Canyon would not be constructed. This would have provided parking for persons accessing Rose Canyon from an existing trail.

3.0 Project Description

- No roadway resurfacing would occur.
- No grading associated with the planned Regents Road Bridge would occur.

CHAPTER 4.0 ENVIRONMENTAL ANALYSIS

4.1 LAND USE

Land use within the UCP Area is regulated by the City's General Plan (Figure 4.1-1), the UCP (City of San Diego 2014b), the City's LDC, the LCP where applicable, the MCAS Miramar ALUCP, and the Montgomery Field ALUCP. Additionally, the Project site is within the City's MSCP area as described in Section 4.9, Biological Resources.

This PEIR section addresses the consistency of the Project with the development regulations of the LDC and with the goals and policies contained in the City of San Diego General Plan, UCP, LCP, MCAS Miramar ALUCP, Montgomery Field ALUCP, and City of San Diego MSCP Subarea Plan. The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in physical changes to the environment that could result in the creation of secondary environmental impacts considered significant under CEQA.

4.1.1 Existing Conditions

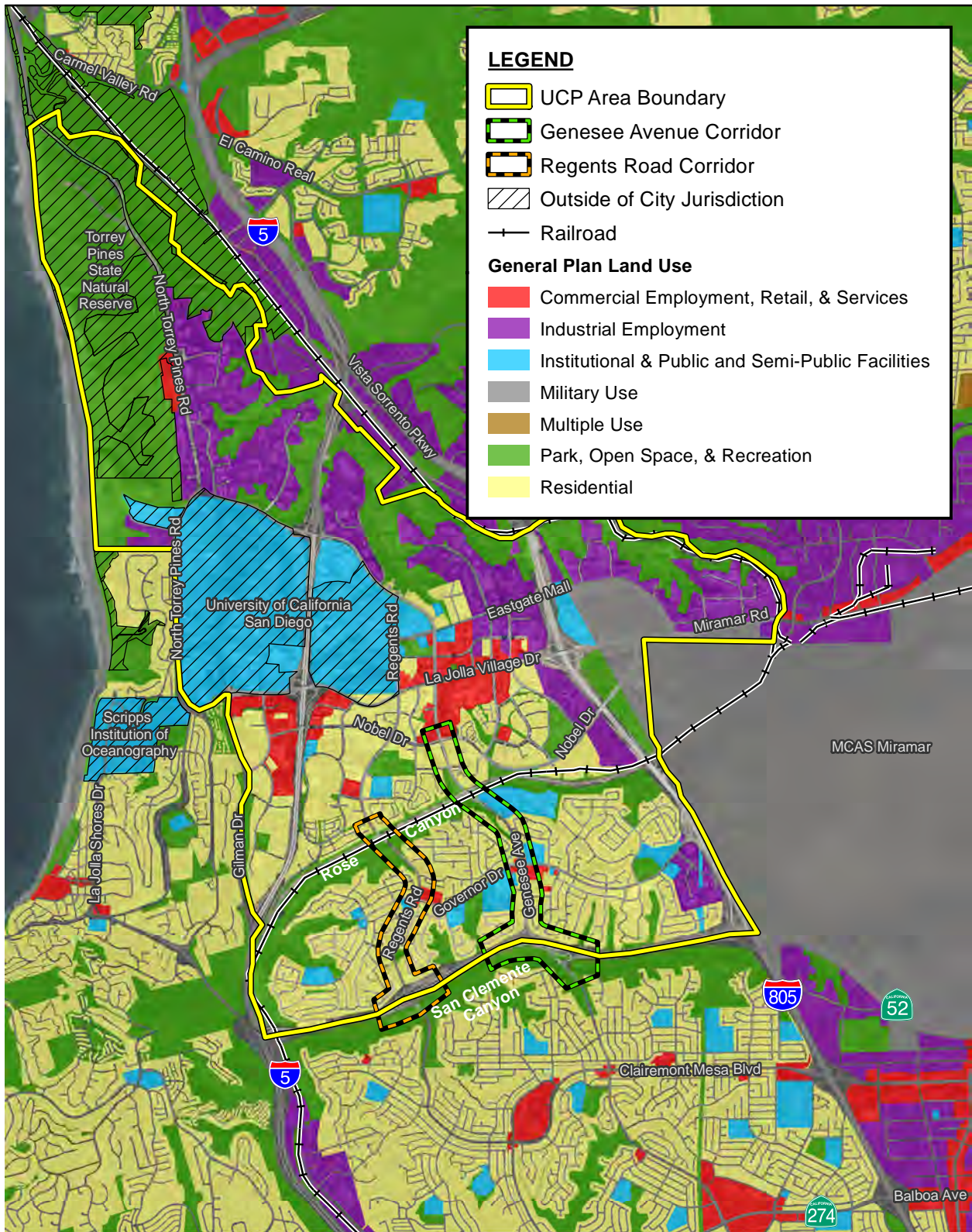
Existing land uses within and adjacent to the affected roadway corridors are characterized in the context of the City of San Diego regulating documents as cited above.

4.1.1.1 UCP Area

The UCP Area is bounded by Los Peñasquitos Lagoon and the east-facing slopes of Sorrento Valley on the north; the tracks of the AT&SF, MCAS Miramar, and I-805 on the east; SR 52 on the south; and I-5, Gilman Drive, North Torrey Pines Road, La Jolla Farms Road, and the Pacific Ocean on the west. The 2014 UCP divides the community into four subareas. The discussion below utilizes these same designations to provide the existing land use conditions for the UCP Area. The four subareas consist of Subarea 1: Torrey Pines; Subarea 2: Central; Subarea 3: Miramar; and Subarea 4: South University (Figure 4.1-2) (City of San Diego 2014b).

Subarea 1: Torrey Pines

The Torrey Pines Subarea includes the Torrey Pines Mesa and surrounding slopes, and the UC San Diego campus. The area is bounded on the west by the Pacific Ocean and by North Torrey Pines Road adjacent to the campus, on the south by La Jolla Village Drive, on the east by



Source: SanGIS 2015; SANDAG 2014; Esri.

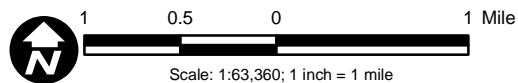
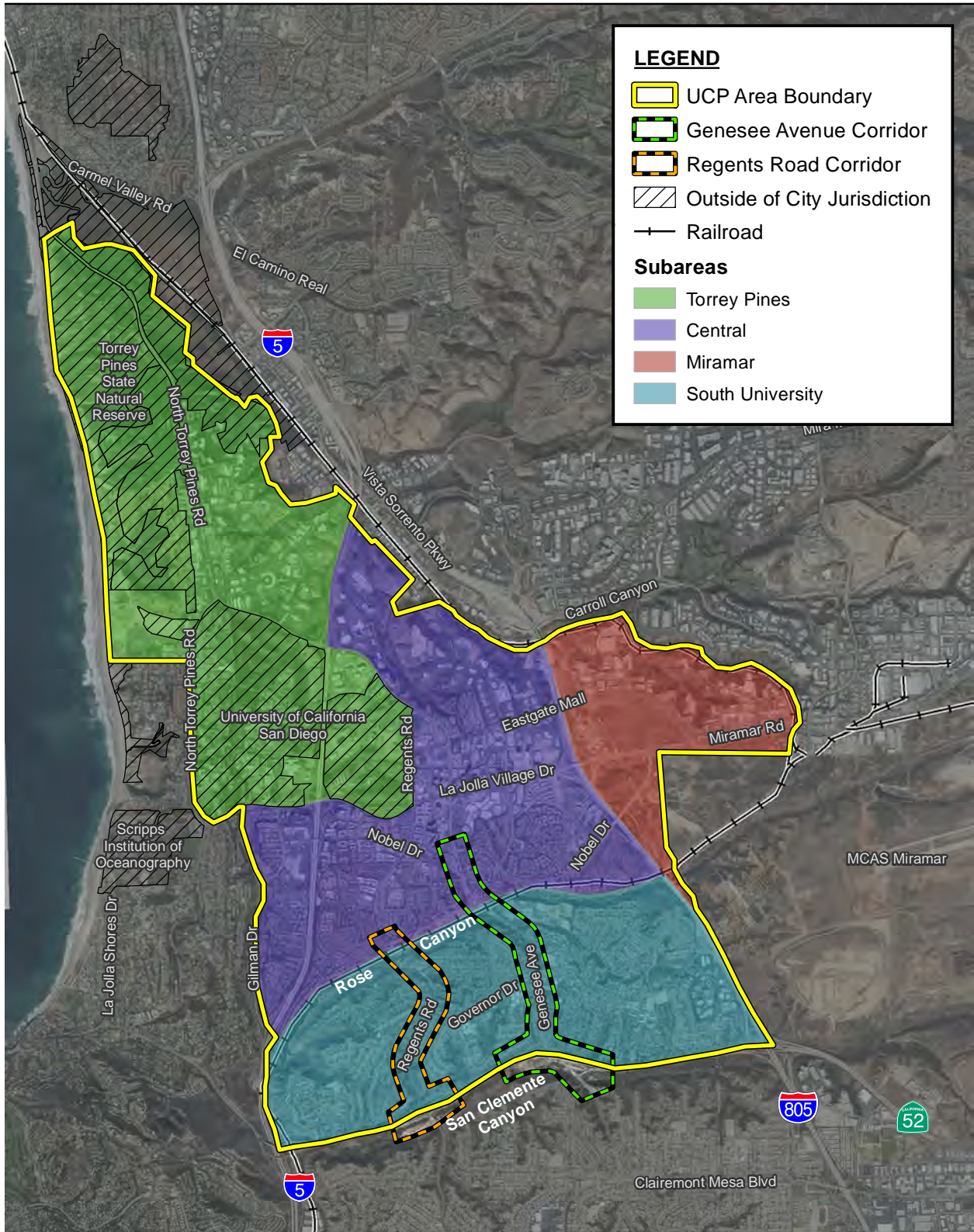


Figure 4.1-1
General Plan Land Use



Source: SanGIS 2015; SANDAG 2014; Esri.

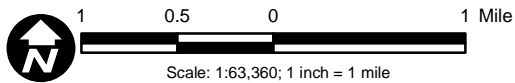


Figure 4.1-2
UCP Subareas

Genesee Avenue and Regents Road, and on the north by Sorrento Valley and Los Peñasquitos Lagoon. Access to the subarea is available from Torrey Pines Road, La Jolla Scenic Drive, and Gilman Drive from the south; La Jolla Village Drive and Genesee Avenue from the east; and Torrey Pines Road from the north. The only major roadways in the area include Genesee Avenue and North Torrey Pines Road.

Most of the Torrey Pines Subarea consists of parks and recreation areas. Torrey Pines State Natural Reserve occupies most of the land north of Genesee Avenue and west of North Torrey Pines Road. Substantial areas east of North Torrey Pines Road are also a part of the state reserve. In addition, UC San Diego owns a large, natural reserve located on the northern portion of the west campus immediately south of Genesee Avenue. The Torrey Pines City Park is located at 11480 N. Torrey Pines Road, and the Villa La Jolla Park is located at the intersection of Via Marin and Via Mallorca.

Other land uses within the Torrey Pines Subarea include UC San Diego educational facilities, the Veteran's Affairs Hospital located near La Jolla Village Drive, Scripps Green Hospital at 10666 N. Torrey Pines Road, and private development east of North Torrey Pines Road consisting of science, research, and development parks.

Subarea 2: Central

The Central Subarea is bounded by I-805, I-5, Genesee and Regents Roads, La Jolla Village Drive, Gilman Drive, and Rose Canyon. It is the most urban of the four subareas of the community. Most of the Central Subarea is developed or has received approval for development. It contains two regional commercial centers at the intersections of La Jolla Village Drive and Genesee Avenue, and Nobel Drive and I-5.

Land uses in this subarea consist of scientific research, business park, office, visitor commercial, and residential development. High-density residential development can be found south of La Jolla Village Drive and north of Eastgate Mall between Genesee Avenue and Towne Center Drive.

Other land uses include park and recreation areas. The Doyle Community Park is located at 8175 Regents Road, Mandel-Weiss Eastgate City Park is located at the intersection of Eastgate Mall and Regents Road, La Jolla Colony Private Park is located at the intersection of Palmilla Drive and Arriba Street, and the Nobel Athletic Field is located at 8810 Judicial Drive.

There are also educational facilities consisting of Doyle Elementary School (3950 Berino Court), Doyle Park Kidz Kamp (8175 Regents Road), La Jolla Country Day School (9490 Genesee

Avenue), Kadim Independent Day School (9001 Towne Center Drive), and Torah High School (9001 Towne Center Drive).

The North University Community Branch Library located at 8820 Judicial Drive is also within the Central Subarea. In addition, this subarea includes a number of hospitals or intermediate care facilities, including:

- ~~UCSD~~ UC San Diego Thornton Hospital at 9300 Campus Point Drive,
- ~~UCSD~~ UC San Diego Health System at 4520 Executive Drive,
- ~~UCSD~~ UC San Diego Medical Group at 4150 Regents Park Row Suite 300,
- Scripps Clinic La Jolla at 4320 La Jolla Village Drive,
- Scripps Memorial Hospital La Jolla at 9888 Genesee Avenue, and
- Integrated Medical Centers at 4445 Eastgate Mall #410.

Subarea 3: Miramar

The Miramar Subarea includes all of the planning area east of I-805. The northern portion of the subarea is part of Carrol Canyon. The predominant land use in this subarea is made up of industrial uses, including warehouses, distribution centers, storage facilities, and automotive-related commercial uses in a typical strip commercial pattern. MCAS Miramar lies east of the UCP Area.

Subarea 4: South University

The South University Subarea is defined as an urbanized area in the General Plan. The subarea is bordered by three freeways: I-5 on the west, I-805 on the east, and SR 52 on the south. These freeways and two major canyons, Rose Canyon on the north and San Clemente Canyon (Marian Bear Memorial Park) on the south, isolate as well as define the South University Subarea. Access to the subarea is available from Regents Road and Genesee Avenue from the south, Genesee Avenue from the north, and the Governor Drive exit off of I-805 from the east. No access is planned from the west. Governor Drive connects most land uses in the subarea, as it is the only major east-west street. Governor Drive terminates at Stresemann Street (City of San Diego 2014b).

The predominant land use in this subarea is single-family residential development. The subarea houses approximately 16,700 persons in 5,700 dwelling units. Commercial centers are clustered along Governor Drive at Regents Road and Genesee Avenue. An office park has been developed on the south side of Governor Drive at I-805, which serves as an employment center.

Other land uses include the University Community Branch Library located at 4155 Governor Drive and educational facilities that include University High School (6949 Genesee Avenue), Marie Curie Elementary School (4080 Governor Drive), Standley Middle School (6298 Radcliffe Drive), and Spreckels Elementary School (6033 Stadium Street). There are also park and recreation facilities that include Rose Canyon, which forms the northern boundary, and San Clemente Canyon (Marian Bear Memorial Park), which forms the southern boundary of the subarea. Standley Community Park (3585 Governor Drive) is located south of Governor Drive between Stadium Street and Radcliffe Drive, University Gardens Park is located on Gullstrand Street north of Governor Drive, University Village Park is located at Florey Street and Gullstrand Street, and Marcy Park is located at Stresemann Street.

4.1.1.2 Genesee Avenue Corridor

As discussed in Section 2.2, Genesee Avenue extends for approximately 2 miles within the UCP Area and currently has four lanes of traffic (two in each direction). The median is currently 18 feet wide with a 10-foot parkway. The Genesee Avenue Corridor begins just north of Nobel Drive and extends south to Marian Bear Memorial Park and SR 52. North of Rose Canyon, the Genesee Avenue Corridor includes the Costa Verde and UTC shopping centers, several multi-family residential developments, and some single-family homes. The Genesee Avenue Corridor includes railroad tracks and a portion of open space within Rose Canyon. South of Rose Canyon is University City High School, multi-family residential, single-family residential, and gas stations. The University Square shopping center is located on the east side of Genesee Avenue, and multi-family residential is located on the east and west sides. The southernmost portion of the Genesee Avenue Corridor encompasses a portion of SR 52 and a portion of Marian Bear Memorial Park, which is within San Clemente Canyon.

Surrounding Land Uses

The Genesee Avenue Corridor is surrounded on all sides by existing residential and commercial uses, along with schools and parks (Figure 4.1-1). Residential and commercial uses are located north of the Genesee Avenue Corridor. Farther south, the Genesee Avenue Corridor is surrounded to the east and west by multi-family residential developments. South of Rose Canyon, the Genesee Avenue Corridor is surrounded by a mix of multi-family and single-family residential uses. Several commercial uses surround the Genesee Avenue Corridor to the east and west along Governor Drive. South of Governor Drive is a mix of multi-family and single-family residential uses, along with Standley Middle School and Standley Community Park to the west of the Genesee Avenue Corridor and Curie Elementary School to the east. Farther south and north of San Clemente Canyon are single-family homes with some multi-family residential developments. South of the Genesee Avenue Corridor are single-family homes.

4.1.1.3 Regents Road Corridor

The Regents Road Corridor extends for approximately 1.6 miles. Within the Regents Road Corridor, Regents Road currently has four lanes of traffic (two in each direction) except over Rose Canyon, where there is currently no roadway. The Regents Road Corridor begins just north of Rose Canyon, where there are multi-family residential developments on both sides of Regents Road. The Regents Road Corridor contains railroad tracks and a portion of open space within Rose Canyon. The southern portion of Rose Canyon within the Regents Road Corridor includes a trailhead for Rose Canyon with signage and an informal dirt parking lot on the west side of Regents Road. Single-family homes are located south of Rose Canyon. Commercial uses are located at the intersection of Regents Road and Governor Drive, along with a church and multi-family residential uses. Farther south along Regents Road are single-family homes. The southernmost portion of the Regents Road Corridor includes portions of SR 52 and San Clemente Canyon.

Surrounding Land Uses

The Regents Road Corridor is surrounded on all sides by residences and commercial uses, along with schools and parks (Figure 4.1-1). To the northeast of the Regents Road Corridor are Doyle Elementary School and Doyle Community Park, as well as multi-family residential developments. To the northwest are also multi-family residential developments. South of Rose Canyon, the Regents Road Corridor is surrounded by single-family homes. The Regents Road Corridor is surrounded by commercial uses to the east and west along Governor Drive. South of Governor Drive, there are largely single-family homes to the east and west, and Standley Community Park is located to the east of the Regents Road Corridor. South of the Regents Road Corridor are single-family homes.

4.1.2 Regulatory Framework

Applicable regulations and the associated agencies with regulatory authority and oversight are described below. The regulations discussed are limited to state and local, as there were no applicable federal land use regulations for the Project.

4.1.2.1 State

North City Local Coastal Program

The California Coastal Act of 1976 requires all jurisdictions within the Coastal zone to prepare an LCP. The LCP includes issue identification, a land use plan, and implementation ordinances.

To respond to individual community concerns, the LCP of the City of San Diego has been divided into 12 segments. The coastal zone portions of the UCP have been incorporated into the North City LCP. The area within the coastal zone and subject to the LCP is the northern portion of the plan area, which does not include the Genesee Avenue Corridor or the Regents Road Corridor. The coastal zone boundary bifurcates ~~UCSD~~ UC San Diego and generally includes the area north of Gilman Drive, east of I-5, and extends to the northern boundary of the UCP. The North City LCP also encompasses portions of the community plan areas for Torrey Pines, North City West, Mira Mesa, Sorrento Hills, La Jolla, and the adjacent open space and urban reserve areas identified in the General Plan.

4.1.2.2 Local

City of San Diego General Plan

As required by State Planning and Zoning Law, the City developed a “comprehensive, long-term plan for the physical development of the City, and of any land outside its boundaries that bears relation to its planning”. For the City of San Diego, this plan is known as the General Plan (City of San Diego 2008a). The General Plan consists of development policies in the form of Findings, Goals, Guidelines, Standards, and Recommendations for a variety of land use elements. The General Plan also references a series of community plans, which are intended to provide more area-specific guidance on development in San Diego. The General Plan’s planned land use designations for the UCP range from Residential; Public and Semi-Public Facilities; Institutional Employment; Commercial Employment, Industrial, Retail, and Services; to Park, Open Space, and Recreation as shown in Figure 4.1-1, General Plan Land Use.

The majority of residential land is within the southern portion of the planning area located south of La Jolla Village Drive, and ~~UCSD~~ UC San Diego is located within the west-central planning area. Park, open space, and recreation land is located at the north (Torrey Pines State Natural Preserve), as well as in other areas interspersed throughout the planning area such as Rose Canyon and San Clemente Canyon in the southern area, and along the eastern boundary adjacent to Industrial Employment land uses and ~~UCSD~~ UC San Diego. Commercial Employment, Retail, and Services are predominantly located along La Jolla Village Drive, along I-5 between La Jolla Village Drive and south of Nobel Drive, and in pockets, including areas along Regents Road and Genesee Avenue.

The Land Use and Community Planning Element (Land Use Element) of the General Plan guides future growth and development into a sustainable citywide development pattern while maintaining or enhancing the quality of life. The relevant goals and policies of the Land Use

Element, as well as other applicable General Plan Elements, for the Project are discussed below in the impact analysis section.

University Community Plan

The UCP was adopted by the San Diego City Council in July 1987 and was most recently amended in August 2014, amending the LCP Land Use Maps to include the North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program Project Overlay Map and Project Overlay Improvements. The UCP is a refinement of citywide goals contained in the General Plan and is intended to serve as a comprehensive guide for residential, recreational, industrial, commercial, office, and multi-use developments; open space preservation and recreation; and development of a transportation network within the plan area. As presented in Chapter 2.0, Environmental Setting, the UCP Generalized Land Use map is presented in Figure 4.1-1. The UCP is comprised of 12 elements: Urban Design, Transportation, Development Intensity, Housing/Residential, Commercial, Industrial, Public Facilities, Open Space and Recreation, Noise, Safety, Resource Management, and General Plan Consistency.

Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones and the planned district ordinances that specify permitted land use; development standards, such as density, FAR, and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements.

The Community Plan Implementation Overlay Zone

The Community Plan Implementation Overlay Zone (CPIOZ) is contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 14. The CPIOZ is implemented to provide supplemental development regulations that are tailored to specific sites within community plan areas of the City. The intent of these regulations is to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted for specific sites as part of the community plan update process. The UCP contains CPIOZ Type A and Type B.

Development on properties identified as CPIOZ Type A that is consistent with the community plan, the base zone regulations, and these supplemental regulations would be processed in accordance with the procedures of the Community Plan Implementation Overlay Zone

(Municipal Code Chapter 13, Article 2, Division 14). Development on parcels designated CPIOZ Type A that is not consistent with the community plan, base zone regulations, and these supplemental regulations is processed as a CPIOZ Type B, as described below.

Development proposals on parcels identified as CPIOZ Type B require discretionary review to determine if the development proposal is consistent with the community plan and these supplemental regulations. Development proposals on any parcel identified as CPIOZ Type B are required to obtain discretionary approval processed as a Site Development Permit, per Municipal Code Chapter 12, Article 6, Division 5.

Transit Area Overlay Zone

One area within the UCP is located within the Transit Area Overlay Zone. The Transit Area Overlay Zone (contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 10) reduces off-street parking requirements in areas that receive a high level of transit service. Section 132.1001, Diagram 132-10A identifies the area near I-5 and Gilman Drive as a transit area. Properties within the Transit Area Overlay Zone are subject to supplemental parking regulations contained in Chapter 14, Article 2, Division 5 of the City's Municipal Code.

Coastal Zone Overlay

Portions of the UCP are located within the Coastal Zone Overlay (contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 4), as depicted in Diagram 132-04. This overlay is intended to protect and enhance the quality of public access and coastal resources.

Coastal Height Limit Overlay Zone

Generally, the area within the UCP west of I-5 is located within the Coastal Height Limit Overlay Zone. The Coastal Height Limit Overlay Zone (contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 5) provides supplemental height limitations and permit requirements for specific coastal areas.

Sensitive Coastal Overlay Zone

The area generally located within Torrey Pines State Natural Reserve is located within the Sensitive Coastal Overlay Zone (contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 6). This overlay is intended to protect and enhance the quality of sensitive coastal bluffs, coastal beaches, and wetlands. Torrey Pines State Natural Reserve is outside the zoning jurisdiction of the City but is within the UCP Area.

Parking Impact Overlay Zone

The area generally located within Torrey Pines State Natural Reserve is located within the Parking Impact Overlay Zone (contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 8), as depicted in Diagram 132-08A. This overlay is intended to provide supplemental parking regulations for specified coastal beach and campus areas that have parking impacts. The intent of this overlay zone is to identify areas of high parking demand and increase the off-street parking requirements accordingly. Torrey Pines State Natural Reserve and UCSD UC San Diego are outside the zoning jurisdiction of the City but are within the UCP Area.

City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area

Refer to description provided in Section 2.2.2

San Diego Forward: The Regional Plan

Refer to description provided in Section 2.2.2

San Diego County Airport Land Use Commission

Refer to the description provided in Section 2.2.2, Regional Plans, and Figures 4.1-3 through 4.1-5.

Montgomery Field ALUCP

Refer to description provided in Section 2.2.2, Regional Plans, and Figures 4.1-3 through 4.1-5.

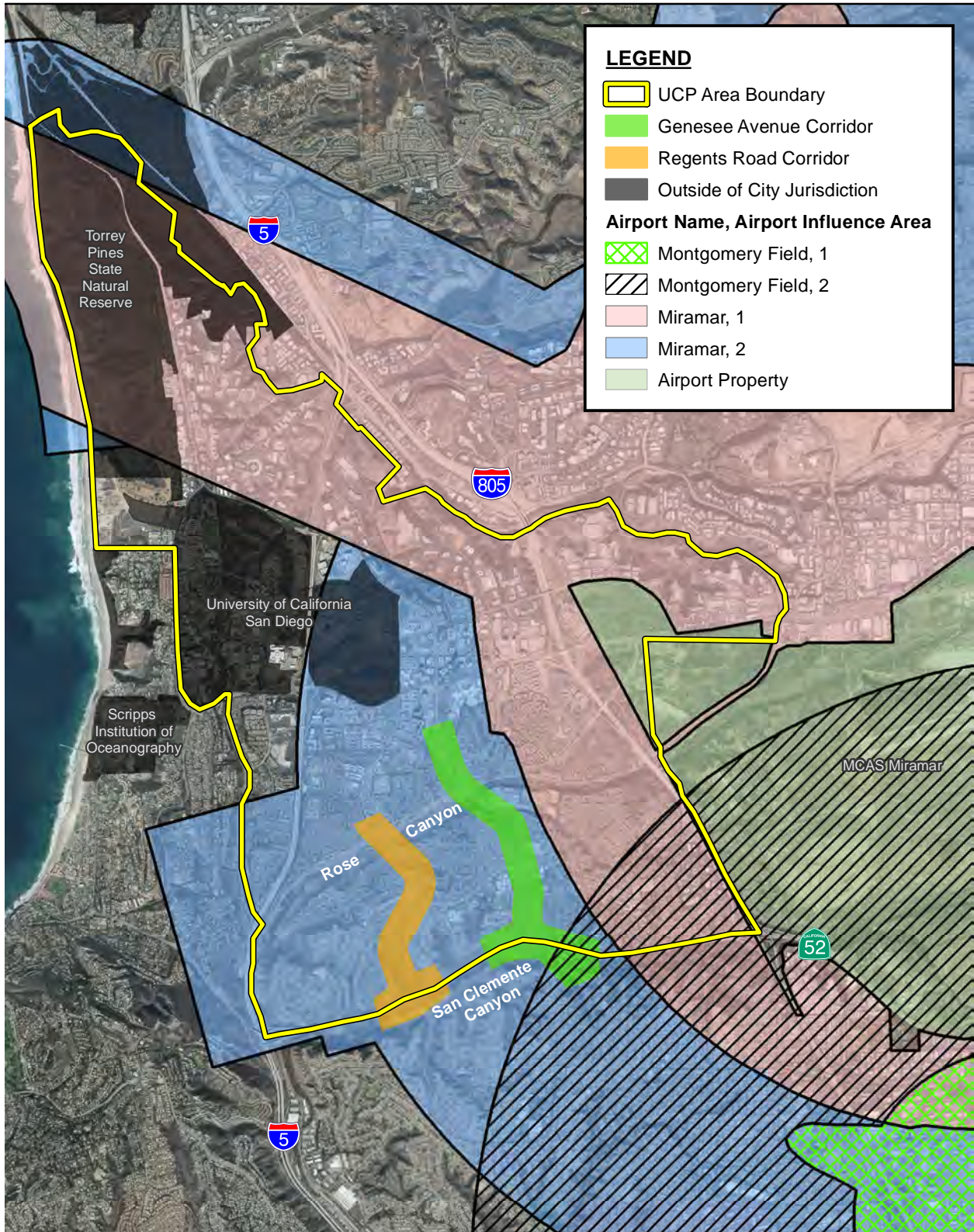
MCAS Miramar ALUCP

Refer to description provided in Section 2.2.2, Regional Plans, and Figures 4.1-3 through 4.1-5.

4.1.3 Significance Determination Thresholds

Based on the City Significance Determination Thresholds (2011a), which have been modified to reflect a programmatic analysis for the Project, impacts related to land use would be significant if the Project would:

1. Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans;



Source: SanGIS 2015; SANDAG 2014; Esri.

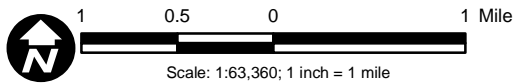
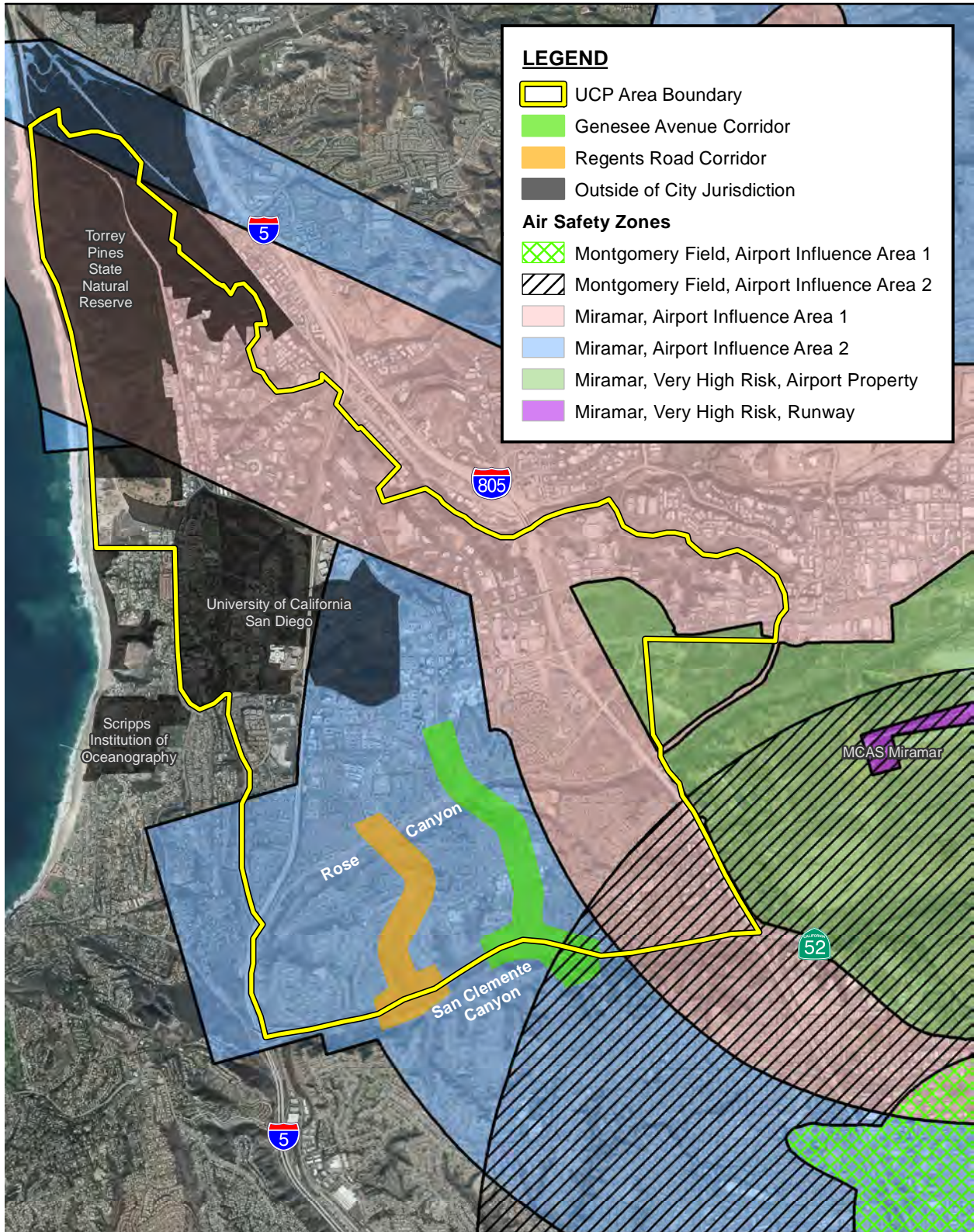


Figure 4.1-3
Airport Influence Areas



Source: SanGIS 2015; SANDAG 2014; Esri.

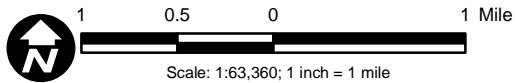


Figure 4.1-4
Air Safety Zones



Source: SANDAG 2014

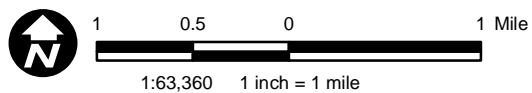


Figure 4.1-5
FAA Height Notification

2. Conflict with the provisions of the City’s Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan;
3. Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP); or
4. Physically divide an established community.

4.1.4 Impact Analysis

Issue 1: Would the Project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans?

4.1.4.1 Impact Analysis

Relevant goals and guidelines from the City of San Diego General Plan and the UCP are discussed below. The two components of the Project—the removal of Genesee Avenue Widening and the removal of Regents Road Bridge—are analyzed below under their respective headings for compatibility with these goals and guidelines.

City of San Diego General Plan

The City of San Diego General Plan guides the long-term development of the City. The policies applicable and relevant to the Project can be found in several General Plan elements, including the Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; and Noise.

University Community Plan

The UCP establishes planning and development controls within the University community, representing a refinement of citywide goals contained in the City’s Progress Guide, General Plan and earlier community plans. The relevant goals and objectives applicable to the Project can be found in the UCP’s Urban Design, Open Space and Recreation, Safety, and Conservation Elements.

Removal of Genesee Avenue Widening

Implementation of the Project would maintain existing conditions. Removal of the planned Genesee Avenue Widening would be consistent with the General Plan Land Use Element. The

removal of the widening of Genesee Avenue would not result in unsafe pedestrian routes, and existing parking. Genesee Avenue would remain as it is currently operating, and landscaping and transit design would remain consistent with the Urban Design Element, including Policy UD-B-5, of the City's General Plan. ~~Public facilities, as discussed in detail in~~ Section 4.13, Public Services and Facilities and Section 4.14, Public Utilities, of this PEIR have been analyzed for potential impacts due to the Project. Section 4.13, Public Services and Facilities and Section 4.14, Public Utilities, of this PEIR is consistent with the Public Facilities, Services, and Safety Element of the General Plan. Genesee Avenue is an existing roadway that was subject to the guidelines from the Noise Element of the General Plan, including incorporating site design and construction techniques to ensure compatibility with surrounding uses and utilizing standard methods for attenuating noise during its original construction.

The UCP contains similar goals to the General Plan in many of its elements, including Urban Design, Open Space and Recreation, Safety, and Conservation. As with the General Plan, the removal of the planned Genesee Avenue Widening from the UCP would not conflict with any of the goals in these elements. Further, this portion of the Project would not conflict with the Safety Element of the UCP, as it would not create or increase geologic hazards, further discussed in Section 4.10, Geologic Conditions, of this PEIR. Therefore, this portion of the Project would not fundamentally conflict with the goals, objectives, and policies of the City's General Plan and the UCP.

This portion of the Project is located outside of the boundaries of the North City LCP. This portion of the Project would not involve the construction or demolition of any new or existing features within the coastal zone; therefore, no conflicts with the LCP or coastal regulations would occur.

Removal of Regents Road Bridge

Implementation of the Project would maintain existing conditions. Removal of the planned Regents Road Bridge construction would not impede the UCP from complying with City of San Diego Land Use guidelines. The removal of the planned Regents Road Bridge would not result in unsafe pedestrian routes, and the existing Rose Canyon trailhead at Regents Road and Lahitte Court would not be displaced, which would be consistent with the City of San Diego General Plan Mobility Element. Because Regents Road would remain as it is under existing conditions, landscaping and transit design would remain consistent with the Urban Design Element of the City's General Plan. ~~Public facilities, as discussed in detail in~~ Section 4.13, Public Services and Facilities and Section 4.14, Public Utilities, of this PEIR, have been analyzed for potential impacts due to the Project. This is consistent with the Public Facilities, Services, and Safety Element of the General Plan. Regents Road is an existing roadway that was subject to the

guidelines from the Noise Element of the General Plan, including incorporating site design and construction techniques to ensure compatibility with surrounding uses and utilizing standards methods for attenuating noise during its original construction.

The UCP contains similar goals to the City of San Diego General Plan in many of its elements, including Urban Design, Open Space and Recreation, Safety, and Conservation. As with the General Plan guidelines, the removal of the planned Regents Road Bridge from the UCP would not conflict with any of the goals in these elements. Further, this portion of the Project would not conflict with the Safety Element of the UCP, as it would not create or increase geologic hazards, further discussed in Section 4.10, Geologic Conditions, of this PEIR.

This portion of the Project is located outside of the boundaries of the North City LCP. This portion of the Project would not involve the construction or demolition of any new or existing features within the coastal zone; therefore, no conflicts with the LCP or coastal regulations would occur.

4.1.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

Because the Project would result in a community plan amendment, the Project would no longer be inconsistent with the UCP and UCP Transportation Element. Further, this portion of the Project would not conflict with any goals, objectives, and recommendations of the City of San Diego General Plan, the North City LCP, or any coastal regulations. Impacts would be less than significant.

Removal of Regents Road Bridge

Because the Project would result in a community plan amendment, the Project would no longer be inconsistent with the UCP and UCP Transportation Element. Further, this portion of the Project would not conflict with any goals, objectives, and recommendations of the City of San Diego General Plan, the North City LCP, or any coastal regulations. Impacts would be less than significant.

4.1.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

4.1.5 Impact Analysis

Issue 2: Would the Project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

4.1.5.1 Impact Analysis

Removal of Genesee Avenue Widening

City of San Diego's MSCP

The Genesee Avenue Corridor contains portions of both Rose and San Clemente Canyons, which are designated MHPA lands. These areas are designated as urban habitat areas and provide habitat for native species, as well as shelter and forage for migrating species. Further discussion on species covered by the MSCP and the MHPA land in this area is provided in Section 4.9, Biological Resources.

Per Section 1.4.2 of the MSCP, roads and utility lines are allowed within the City's MHPA, as long as they adhere to the stated planning policies and design guidelines. Land uses adjacent to MHPA boundaries are managed to ensure minimal impacts to the MHPA. Land uses adjacent to the MHPA within the Genesee Avenue Corridor include Residential, Institutional, and Public and Semi-Public Facilities. The MSCP contains guidelines on managing new and existing development adjacent to the MHPA.

The removal of the planned Genesee Avenue Widening would not impact lands of the MHPA within the Genesee Avenue Corridor, or conflict with the provisions of the City's MSCP. This aspect of the Project would not involve any construction or demolition activities, and would not change the area from its existing conditions. The UCP Area is currently in compliance with the guidelines stated in the MSCP for development within and adjacent to the MHPA within the Genesee Avenue Corridor. See Section 4.9, Biological Resources, and Section 4.12, Hydrology and Water Quality, for best management practices (BMPs) and low impact developments (LIDs) that would be implemented at the Project site to reduce impacts.

Removal of Regents Road Bridge

City of San Diego's MSCP

The Regents Road Corridor contains portions of both Rose and San Clemente Canyons, which are designated MHPA lands. These areas are designated as urban habitat areas and provide habitat for native species, as well as shelter and forage for migrating species. Further discussion on species covered by the MSCP and the MHPA lands in this area is provided in Section 4.9, Biological Resources.

Per Section 1.4.2 of the MSCP, roads and utility lines are allowed within the City's MHPA, as long as they adhere to the stated planning policies and design guidelines. Land uses adjacent to MHPA boundaries are managed to ensure minimal impacts to the MHPA. Land use adjacent to the MHPA within the Regents Road Corridor is residential. The MSCP contains guidelines and implementation instructions on managing new and existing development adjacent to the MHPA.

The removal of the planned Regents Road Bridge construction would not impact lands of the MHPA within the Regents Road Corridor, or conflict with the provisions of the City's MSCP. This aspect of the Project would not involve any construction or demolition activities, and would not change the area from its existing conditions. The UCP Area is currently in compliance with the guidelines stated in the MSCP for development within and adjacent to the MHPA within the Regents Road Corridor.

4.1.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan. Therefore, no significant impact would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan. Therefore, no significant impact would occur.

4.1.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.1.6 Impact Analysis

Issue 3: Would the Project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

4.1.6.1 Impact Analysis

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening aspect of the Project would not change any existing land use designations in the UCP Area. Additionally, no new structures would be constructed. Therefore, no conflicts with the adopted ALUCPs for MCAS Miramar and Montgomery Field would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge construction would not involve the construction of any new or demolition of existing structures. There would be no change in existing conditions, and no change in designated land uses. This aspect of the Project would not conflict with the adopted ALUCPs for MCAS Miramar and Montgomery Field.

4.1.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening would not result in land uses that are not compatible with the adopted ALUCPs for MCAS Miramar and Montgomery Field. Therefore, no significant impacts would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge construction would not result in land uses that are not compatible with the adopted ALUCPs for MCAS Miramar and Montgomery Field. Therefore, no significant impacts would occur.

4.1.6.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.1.7 Impact Analysis

Issue 4: Would the Project physically divide an established community?

4.1.7.1 Impact Analysis

Removal of Genesee Avenue Widening

Genesee Avenue is an existing roadway within the UCP Area. Implementation of this portion of the Project would maintain existing conditions. The removal of the planned Genesee Avenue Widening from the UCP would not involve construction or modification of the existing roadway; therefore, this would not physically divide an established community.

Removal of Regents Road Bridge

Regents Road is an existing roadway within the UCP Area. Implementation of the Project would maintain existing conditions. The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway; therefore, this would not physically divide an established community.

4.1.7.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening would not physically divide an established community; therefore, no significant impacts would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge construction would not physically divide an established community; therefore, no significant impacts would occur.

4.1.7.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.2 TRANSPORTATION/CIRCULATION

This section summarizes the physical and operational conditions of the UCP Area mobility system. This section also identifies the resulting traffic and transportation impacts and related potential environmental impacts that would occur as a result of implementation of the Project. Information presented in the discussion is provided in Appendix C of this PEIR.

4.2.1 Existing Conditions

For the purposes of this analysis, existing conditions represents the traffic conditions of the street network as it exists in 2015. Appendix C of this PEIR contains the existing conditions information used as a baseline for this report.

4.2.1.1 Approach

Traffic Study Area

The approach to defining the traffic study area roadways and intersections is described in this section. Freeways and natural barriers are considered as general study area boundaries. The primary study area encompasses the UCP Area and up to one roadway segment and key intersection beyond the UCP boundary.

Roadway Segments

A total of 68 roadway segments within the traffic study area were selected based on several factors, including:

- Existing Transportation Element roadways functioning or classified as a Collector or higher
- Anticipated Transportation Element roadways functioning or classified as a Collector or higher
- Roadways providing access to/from freeways.

The roadway segments selected for analysis are shown in Figure 4.2-1.



Figure 4.2-1
Traffic Study Area
Roadway and Freeway Segments

Freeway Segments

Three freeways, I-5, I-805, and SR 52, provide regional access to the UCP Area and freeway access is provided by local arterial roadways. Freeway segments adjacent to the community and freeway entrance ramps that are controlled by ramp meters are included in the study area, as shown in Figure 4.2-1.

Intersections

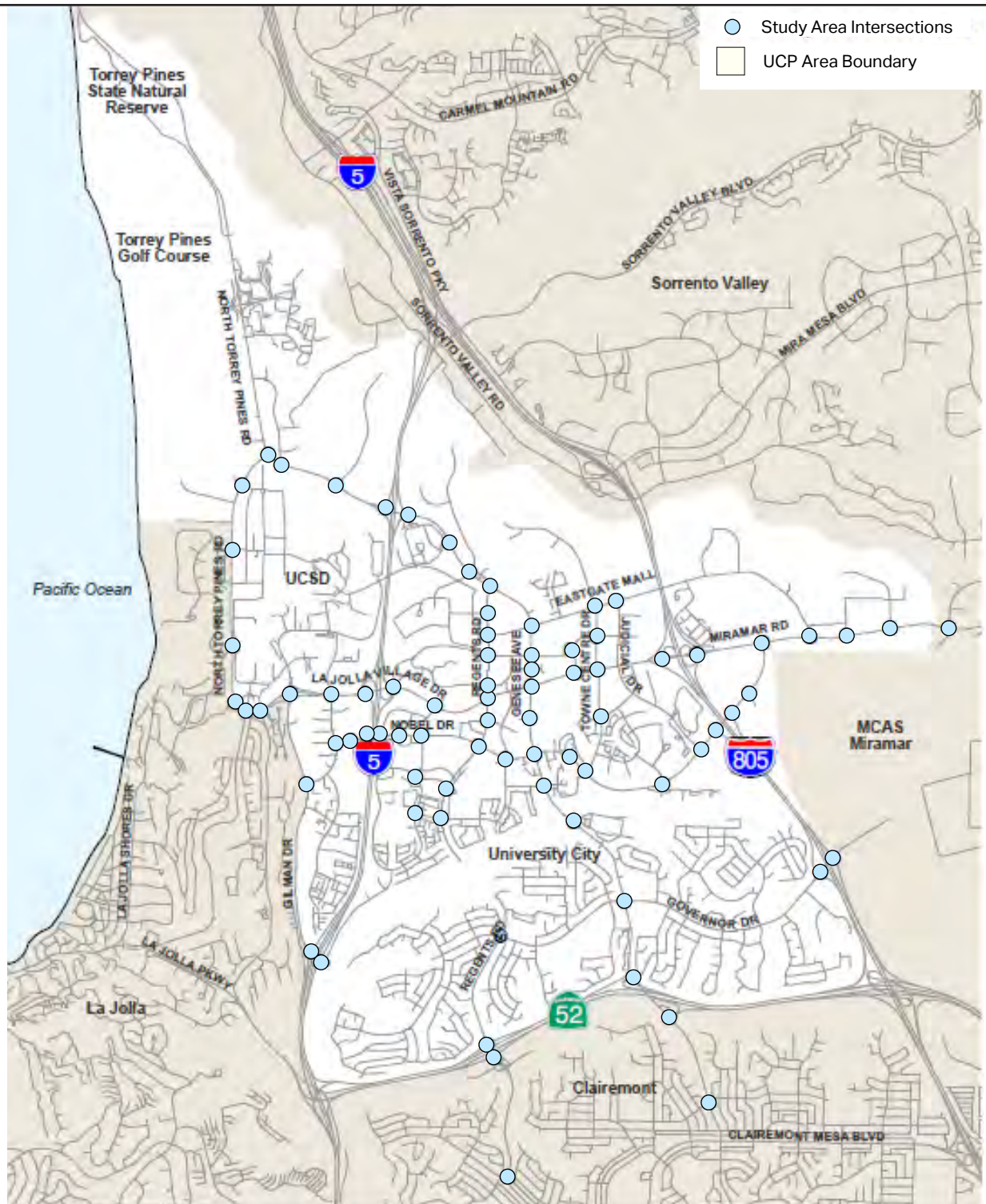
Traffic study area intersections within the UCP Area include those where both intersecting streets meet one of the following criteria:

- Four lanes or wider
- Three lanes and carries over 15,000 average daily traffic (ADT)
- Two lanes and carries over 10,000 ADT
- Intersections that provide access to/from freeways located within the UCP Area
- Signalized intersections along corridors where travel time analysis was performed

Figure 4.2-2 shows the traffic study area intersections selected for analysis. It should be noted that some intersections selected for the traffic study area are located just outside the UCP Area boundary. These intersections were included in the analysis because they may influence or impact the flow of transportation within the UCP Area. Based on these criteria, 80 study intersections were selected for inclusion in the traffic analysis (77 signalized, three unsignalized).

Level of Service Definition

Vehicular level of service (LOS) is a quantitative measure that represents quality of service for the driver. These conditions are generally described in terms of such factors as speed, travel time, freedom to maneuver, comfort, convenience, and safety. LOS A represents the best operating conditions from a driver's perspective (free-flow operations, unimpeded ability to maneuver) while LOS F represents the worst (flow at extremely low speed, high delay, extensive queuing).



**Figure 4.2-2
Traffic Study Area Intersections**

Existing Conditions Methodology

Roadway Segments

Roadway segment LOS standards and thresholds provide the basis for analysis of arterial roadway segment performance. The analysis of roadway segment LOS is based on the functional classification of the roadway, the maximum capacity, roadway geometrics, and existing or forecasted ADT volumes. LOS D is considered acceptable for Mobility Element roadway segments in the City of San Diego (City of San Diego 1998). Table 4.2-1 presents the City's roadway functional classifications, and LOS standards utilized to analyze roadways.

**Table 4.2-1
City of San Diego - Roadway Segment Daily Capacity and
Level of Service Standards**

Roadway Functional Classification	Level of Service				
	A	B	C	D	E
Expressway (6-lane)	<30,000	<42,000	<60,000	<70,000	<80,000
Prime Arterial (6-lane)	<25,000	<35,000	<50,000	<55,000	<60,000
Major Arterial (6-lane, divided)	<20,000	<28,000	<40,000	<45,000	<50,000
Major Arterial (4-lane, divided)	<15,000	<21,000	<30,000	<35,000	<40,000
Collector (3-lane w/ center left-turn lane)	<7,500	<10,500	<15,000	<19,000	<22,500
Collector (4-lane w/o center lane)	<5,000	<7,000	<10,000	<13,000	<15,000
Collector (2-lane w/ center left-turn lane)					
Collector (2-lane no fronting property)	<4,000	<5,500	<7,500	<9,000	<10,000
Collector (2-lane w/ commercial fronting)	<2,500	<3,500	<5,000	<6,500	<8,000
Collector (2-lane multi-family)					
Sub-Collector (2-lane single-family)	-	-	<2,200	-	-

Source: City of San Diego 1998

Intersections

The signalized intersection analysis conforms to the operational analysis methodology outlined in the *2000 Highway Capacity Manual (HCM)*, *Transportation Research Board Special Report 209* (TRB 2000). This method defines LOS in terms of delay, or more specifically, average control delay per vehicle (seconds per vehicle). The LOS criteria used for this technique are described in Table 4.2-2. Synchro 9 (Trafficware) software was used to analyze the operations of both signalized and unsignalized intersections. The City of San Diego considers LOS D or better during the morning (AM) and afternoon (PM) peak hours to be acceptable intersection LOS (City of San Diego 1998). Table 4.2-2 presents the delay and LOS standards utilized to analyze signalized and unsignalized intersections.

**Table 4.2-2
Highway Capacity Manual Operational Analysis Method
Intersection Level of Service**

LOS	Average Control Delay Per Vehicle (seconds)		Level of Service Characteristics
	Signalized	Unsignalized	
A	≤10.0	≤10.0	Volume-to-capacity ratio is low and either progression is exceptionally favorable or the cycle length is very short. If it is due to favorable progression, most vehicles arrive during the green indication and travel through the intersection without stopping.
B	10.1 – 20.0	10.1 – 15.0	Volume-to-capacity ratio is low and progression is highly favorable or the cycle length is short. More vehicles stop than with LOS A.
C	20.1 – 35.0	15.1 – 25.0	Progression is favorable or the cycle length is moderate. The number of vehicles stopping is significant, although many vehicles still pass through the intersection without stopping.
D	35.1 – 55.0	25.1 – 35.0	Volume-to-capacity ratio is high and either progression is ineffective or the cycle length is long. Many vehicles stop and individual cycle failures are noticeable.
E	55.1 – 80.0	35.1 – 50.0	Volume-to-capacity ratio is high, progression is unfavorable, and the cycle length is long. Individual cycle failures are frequent.
F	>80.0	>50.0	Volume-to-capacity ratio is very high, progression is very poor, and the cycle length is long. Most cycles fail to clear the queue.

Source: TRB 2000

Unsignalized intersections, including two-way stop-controlled (TWSC) and all-way stop-controlled (AWSC) intersections, were analyzed using the 2000 HCM unsignalized intersection analysis methodology. The Synchro 9 software supports this methodology and was utilized to produce LOS results. The LOS for a TWSC intersection is determined by the computed or measured control delay and is defined for each minor movement. The LOS for an AWSC intersection is determined by the computed or measured average control delay of all movements.

Freeway Segments and Ramp Meters

Freeway segments were analyzed during the AM and PM peak hours based on the methodologies outlined in the 2000 HCM. The free-flow speed of each freeway segment was calculated based on a base free-flow speed of 65 miles per hour (mph), which is consistent with California Department of Transportation (Caltrans) requirements for analyzing freeway segments. Factors affecting the free-flow speed of each segment include the lane width, lateral clearance, number of lanes, interchange density, and geometric design. Based on each segment's free-flow speed, the density was calculated, which is the primary factor for determining the segment's LOS.

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the safety, traffic operations, and flow on the freeway main lanes. Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The fixed rate approach was used for the analysis and is based solely on the specific time intervals that ramp meters are programmed to release traffic. To the extent possible, the meter rate in the field is set such that the queue length does not exceed the available storage, smooth flows on the freeway mainline are maintained, and there is no interference to arterial traffic. The excess demand at a freeway ramp forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate.

4.2.1.2 Existing Mobility Network

The UCP Area mobility network is composed of diverse elements, including roadway and freeway systems, commuter and intercity passenger rail, public transit (bus service and light rail currently under construction), shuttle services, and bicycle and pedestrian infrastructure.

Regional accessibility to the UCP Area is provided primarily by regional freeways (I-5, I-805, and SR 52) via interchanges with arterial streets. Regional access is provided via the NCTD COASTER and AMTRAK Pacific Surfliner at the Sorrento Valley station located just north of the UCP Area. Within the UCP Area, various mobility elements use the local arterial street system with larger inter-community roadways connecting to adjacent communities and a network of arterial streets connecting residential, commercial, and industrial areas within the community. Key elements of the mobility network are described below. The UCP Area roadway network is shown in Figure 4.2-1.

Freeways

Interstate 5 is a significant north-south interstate highway that traverses the western United States from the Mexican border to the Canadian border. I-5 is located on the western half of the UCP Area and has interchanges at Genesee Avenue, La Jolla Village Drive, Gilman Drive, and Nobel Drive.

Interstate 805 is contained within the San Diego metropolitan area. Termini are both located along I-5, one near the Mexican border and the other near Torrey Pines State Natural Reserve. I-805 is located on the eastern half of the UCP Area and has interchanges at La Jolla Village Drive/Miramar Road, Nobel Drive, and Governor Drive.

State Route 52 is an east-west state highway that connects La Jolla on the west end at the termini with I-5 with the City of Santee and SR 67 on the east end. SR 52 is located on the south side of the UCP Area and has interchanges at Regents Road and Genesee Avenue.

Transportation Element Roadways

Table 4.2-3 provides a brief description of the existing Transportation Element roadways within the UCP Area. Ultimate roadway classifications are taken from the Adopted UCP, last updated October 2014. The portions of the roadways described are intended to reflect the areas within the University Community and may not reflect the entirety of the roadway.

**Table 4.2-3
Transportation Element Roadway Descriptions**

Roadway	Current Build	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification
Eastgate Mall Regents Rd to Genesee Ave	2-lane Collector, continuous two-way left-turn lane, angled parking on both sides	25	4-lane Collector	No
Genesee Ave to Towne Center Dr	4-lane Collector, continuous two-way left-turn lane, no parking, bike lanes on both sides	25	4-lane Major Arterial	No
Towne Center Dr to I-805 Overpass	4-lane Major Arterial, raised median, no parking, bike lanes on both sides	35	4-lane Collector	Yes
I-805 Overpass to Eastgate Dr	2-lane Collector, no parking, bike lanes on both sides	45	4-lane Collector	No
Eastgate Dr to Miramar Rd	2-lane Collector with a continuous left-turn lane, parking on north side	45	4-lane Collector	No
Executive Drive Regents Rd to Regents Park Row	4-lane Collector, continuous two-way left-turn lane	30	4-lane Collector	Portions
Executive Way	4-lane Collector, continuous two-way left-turn lane, parallel parking available on both sides	N/A	4-lane Collector	Yes
Genesee Avenue North Torrey Pines Rd to I-5	6-lane Prime Arterial, no parking, raised medians, bike lanes on both sides	45	6-lane Prime Arterial	Yes
Over I-5	4-lane Major Arterial with no parking	45	4-lane Major Arterial	Yes
I-5 to La Jolla Village Dr	6-lane Prime Arterial, no parking, raised medians, bike lanes on both sides	45	6-lane Prime Arterial, 6-lane Major Arterial	Yes
La Jolla Village Dr to Esplanade Ct	6-lane Major Arterial, no parking, raised medians, bike and bus lanes,	45	6-lane Major Arterial	Yes
Esplanade Ct to Nobel Dr	6-lane Major Arterial, parking on west side, raised medians, bike lanes on both sides	45	6-lane Major Arterial	Yes
Nobel Dr to Lehrer Dr	4-lane Major Arterial, no parking, raised medians, bike lanes on both sides	45	6-lane Major Arterial	Portions
Gilman Drive UCSD UC San Diego Campus to Via Alicante	4-lane Collector, street parking, bike lanes on both sides	45	4-lane Major Arterial	No

Roadway	Current Build	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification
Via Alicante to I-5	4-lane Major Arterial, raised medians, parallel parking on west side, bike lanes	45	4-lane Major Arterial	Yes
Golden Haven Drive	4-lane Major Arterial, no parking, raised medians, bike lanes on both sides	35	4-lane Major Arterial	Yes
Governor Drive	4-lane Major Arterial, raised medians, parallel parking, bike lanes	35	4-lane Major Arterial	Yes
Judicial Drive	4-lane Major Arterial, raised medians, parallel parking, bike lanes (south of Executive Dr.)	N/A	4-lane Major Arterial	Yes
La Jolla Scenic Drive	4-lane Major Arterial, raised medians, parallel parking	N/A	N/A	N/A
La Jolla Village Drive Revelle College Dr to Villa La Jolla Dr	6-lane Prime Arterial, parallel parking, bike lanes (west of La Jolla Scenic Dr)	45	6-lane Prime Arterial	Portions
Villa La Jolla Dr to I-5 SB Ramps	7-lane Prime Arterial, raised medians, no parking	45	8-lane Prime Arterial	No
I-5 SB Ramps to Towne Center Dr	6-lane Major Arterial, raised medians, parallel parking	45	6-lane Prime Arterial	No
Towne Center Dr to I-805 SB Ramps	7-lane Prime Arterial, raised median, no parking	45	8-lane Prime Arterial	No
Lebon Drive Palmilla Dr to Nobel Dr	4-lane Major Arterial, raised medians, parallel parking on both sides	35	4-lane Major Arterial	Yes
Nobel Drive to La Jolla Village Dr	a 5-lane Major Arterial, raised medians, no parking	35	4-lane Major Arterial	Yes
Miramar Road I-805 to Eastgate Mall	8-lane Prime Arterial raised medians, no parking, bike lanes	50	8-lane Prime Arterial	Yes
Eastgate Mall to Camino Santa Fe	6-lane Prime Arterial with raised medians, no parking, bike lanes	50	6-lane Prime Arterial	Yes
North Torrey Pines Road Science Park Rd to Genesee Ave	6-lane Prime Arterial, raised medians, no parking, bike lanes	45	6-lane Prime Arterial	Yes
Genesee Ave to Revelle College Dr	4-lane Major Arterial, raised medians, no parking, bike lanes	45	4-lane Major Arterial	Yes
Nobel Drive Villa La Jolla Dr and I-5	4-lane Major Arterial, raised medians, no parking, bike lanes	40	4-lane Major Arterial	Yes
I-5 to Genesee Ave	6-lane Major Arterial, raised medians, parallel parking, bike lanes	40	6-lane Major Arterial	Yes
Genesee Ave to Towne Centre Dr	4-lane Major Arterial, raised medians, parallel parking on the south side, bike lanes	35	6-lane Major Arterial	Yes
Towne Centre Dr to Judicial Dr	6-lane Prime Arterial, raised medians, no parking, bike lanes	45	6-lane Prime Arterial	Yes
Judicial Dr to Avenue of Flags	5-lane Major Arterial, raised medians, no parking, bike lanes	45	5-lane Major Arterial	Yes
Avenue of Flags to Miramar Rd	4-lane Major Arterial with raised medians, no parking, bike lanes	N/A	4-lane Major Arterial	Yes
Regents Road Genesee Ave to Eastgate Mall	2-lane Collector, continuous left-turn lane, no parking	25	4-lane Major Arterial	No

Roadway	Current Build	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification
Eastgate Mall to La Jolla Village Dr	4-lane Collector, continuous left-turn lane, no parking, bike lanes	25	4-lane Major Arterial	No
La Jolla Village Dr to Nobel Dr	5-lane Major Arterial, raised medians, parallel parking on both sides	25	4-lane Major Arterial	Yes
Nobel Dr to Terminus at Rose Canyon	4-lane Major Arterial, raised medians, parallel parking on both sides	40	4-lane Major Arterial	Yes
South of Rose Canyon to Governor Dr	2-lane Collector, no parking	50	4-lane Major Arterial	No
Governor Dr to Luna Ave	4-lane Major Arterial, raised medians, no parking, bike lanes	50	4-lane Major Arterial	Yes
Torrey Pines Road	4-lane Major Arterial, raised medians, bike lanes	N/A	N/A	N/A
Towne Centre Drive	4-lane Major Arterial, raised medians, parallel parking, bike lanes (between Executive Dr and La Jolla Village Dr)	40	4-lane Major Arterial	Yes
Villa La Jolla Drive South of VA Medical Center	4-lane Major Arterial, raised medians, parallel parking on both sides	40	4-lane Major Arterial	Yes
North of VA Medical Center	2-lane Collector, no parking	25	2-lane Collector	Yes

NA= Not assigned a classification in the UCP.

SB=southbound

Transit

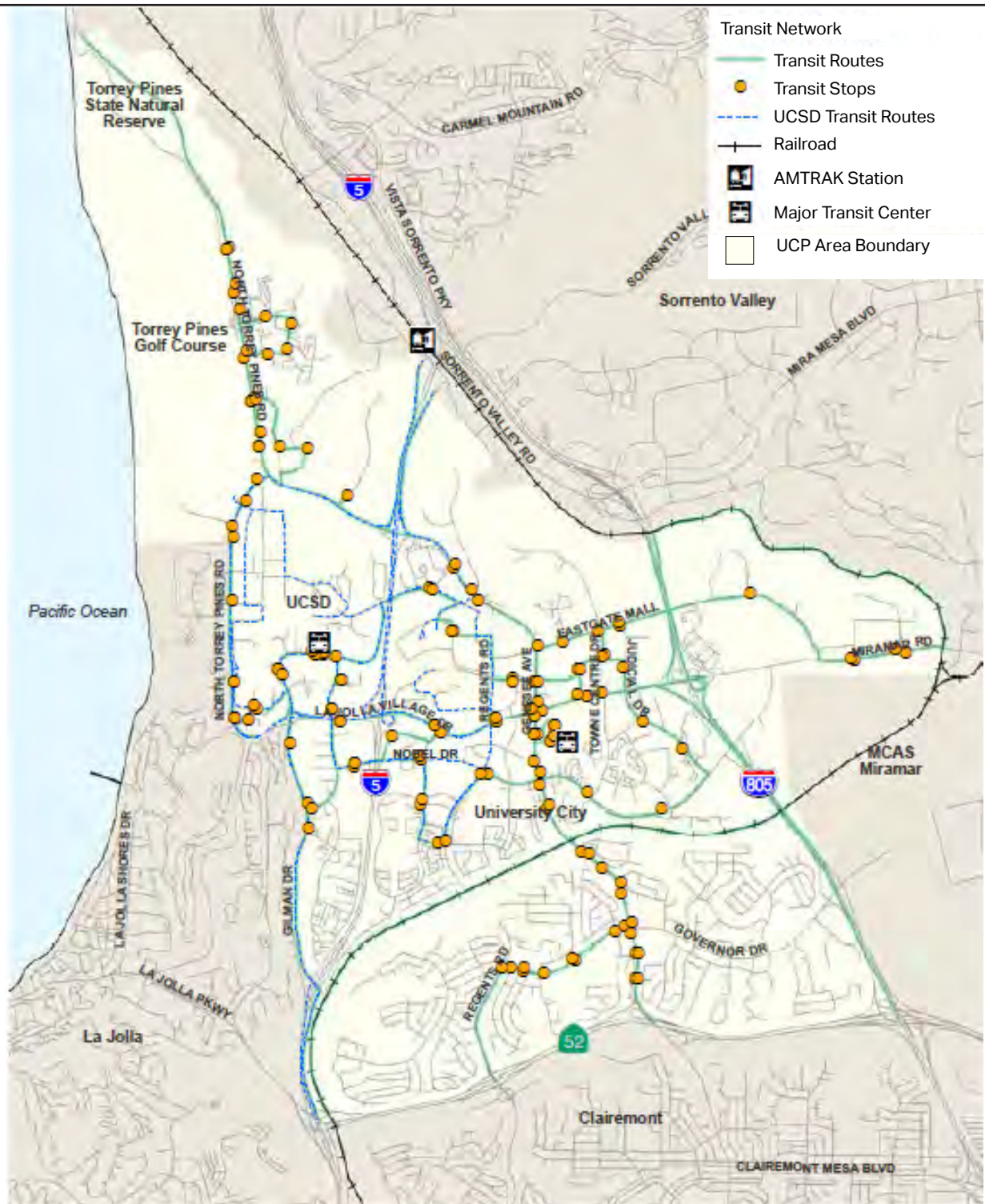
Several modes of transit currently serve the UCP Area as described below. Figure 4.2-3 shows a summary of the existing transit network within the UCP Area.

Shuttle Services

The UCSD UC San Diego Transportation Services provides eight shuttle routes that serve the UCP Area. The shuttle routes specifically serve the campus, medical centers, and other key points off campus. Students, faculty, and staff can ride the shuttles for free. All shuttles operate during academic quarters with some shuttles operating year-round.

Bus Routes

Fourteen MTS routes serve the UCP Area, including the SuperLoop (201/202 and 204), Rapid Route 237, and Coaster Connection Routes 978 and 979. There is also one NCTD Breeze Route (Route 101). Three of the 14 MTS routes serve the southern University community (south of Rose Canyon).



- Transit Network
- Transit Routes
 - Transit Stops
 - - - UCSD Transit Routes
 - +— Railroad
 - A AMTRAK Station
 - M Major Transit Center
 - UCP Area Boundary



Figure 4.2-3
Existing Transit Network

The combination of the MTS, NCTD, and ~~UCSD~~UC San Diego bus/shuttle routes covers the majority of the UCP Area and provides connections to transfer stations and COASTER/AMTRAK stations that allow users to access other bus routes, trolley lines, and regional services. The southern University region (south of Rose Canyon) is served by three MTS bus routes with bus stops along Genesee Avenue and Governor Drive.

Rail Service

Both the NCTD COASTER and AMTRAK Pacific Surfliner travel through the UCP Area as described below. The nearest station is located in Sorrento Valley, one exit north of the UCP Area from I-5.

NCTD COASTER is a commuter rail line operated by NCTD that runs north and south between Oceanside and downtown San Diego through the UCP Area. The COASTER serves eight stations and it takes approximately an hour to travel the entire route. The rail line provides 11 daily round-trip services Monday through Thursday, 13 round-trip services on Fridays, six round-trip services on Saturdays, and four round-trip services on Sundays and holidays. The COASTER provides expanded service for special events as needed (such as Padres games).

AMTRAK Pacific Surfliner is a passenger rail line operated by AMTRAK that runs north and south between San Luis Obispo and downtown San Diego through the UCP Area. The Pacific Surfliner serves 30 stations, including the eight COASTER stations. The rail line offers 12 daily round-trip services between San Diego and Los Angeles, and between Santa Barbara and San Diego.

Bicycle Facilities

Bicycle facilities are an integral component of the UCP Area transportation system, providing local and regional connections. The City has developed a network of designated Class I, II, and III bikeways as part of their Bicycle Master Plan efforts (City of San Diego 2013a). A Class I facility provides for bicycles to travel on a paved right-of-way completely separated from any street or highway. A Class II facility provides bicycles an exclusive or semi-exclusive lane of travel on a roadway separated by a painted line. A Class III facility provides for a shared use with pedestrian or motor vehicle traffic and is only identified by signage and/or pavement markings. A Class IV (Cycle Track) facility provides bicycle travel within the roadway right-of-way, but separated from vehicle lanes by physical barriers or buffers.

There are currently about 69 miles of bicycle facilities within the UCP Area with the majority composed of Class II Bicycle Lanes. Class II Bicycle Lanes provide cyclists with a minor level of separation from vehicular travel. Table 4.2-4 summarizes the mileage of existing bicycle facilities in the UCP Area. Figure 4.2-4 shows the existing bicycle network throughout the UCP Area.

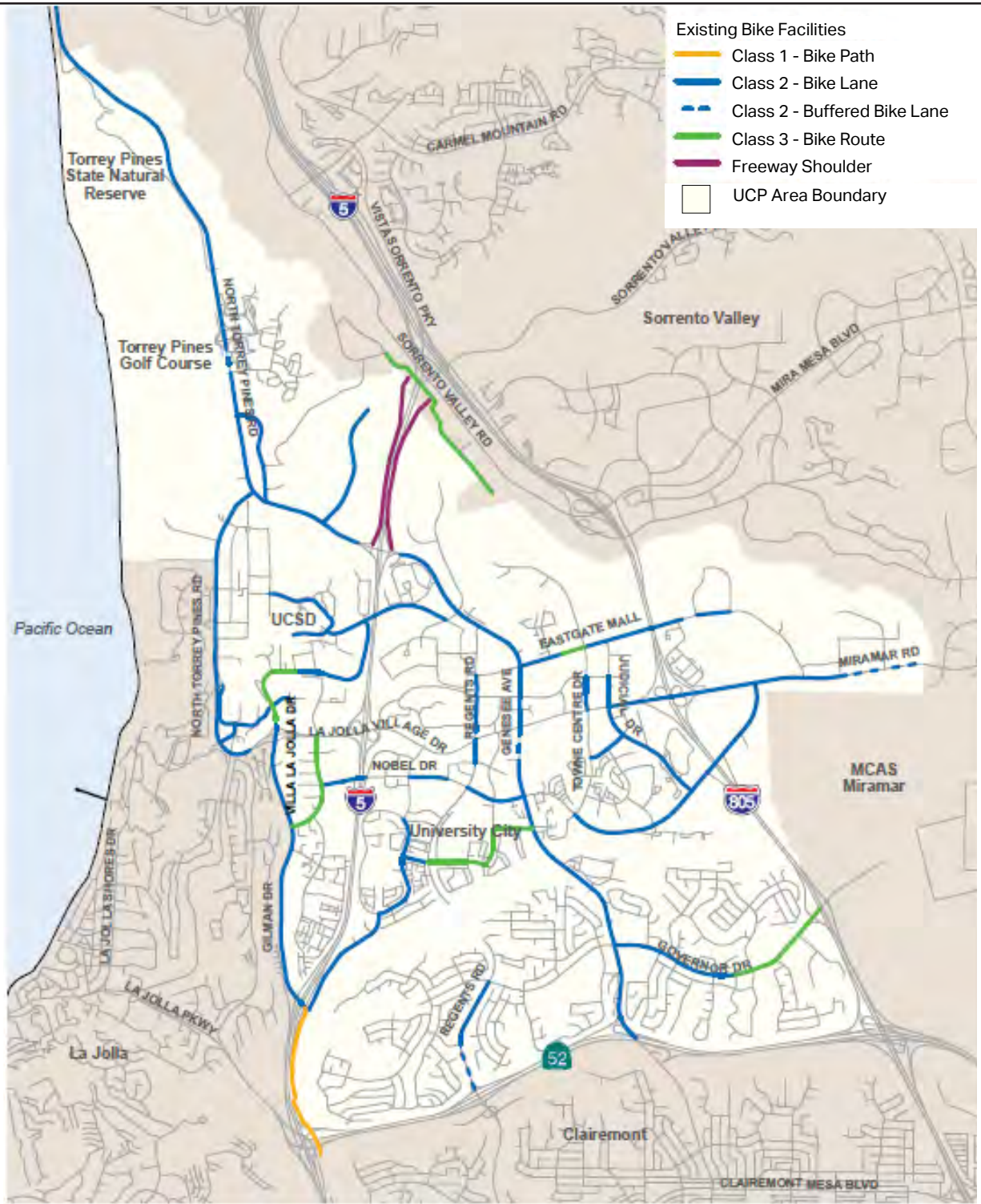


Figure 4.2-4
Existing Bicycle Facilities



**Table 4.2-4
Mileage of Existing Bicycle Facilities within the UCP Area**

Facility Type	Mileage	% of Total Bicycle Facility	% of Total Roadway
Class I Multi-Use Path	1.8	3%	1%
Class II Bicycle Lane	59.7	87%	29%
Class III Bicycle Route	7.4	11%	4%
Class IV Cycle Track	-	0%	0%
Total	68.9	100%	33%

Pedestrian Facilities

Pedestrian facilities include sidewalks, curb ramps, and other amenities such as street trees for shading. Figure 4.2-5 shows existing sidewalks as well as pedestrian barriers. The UCP Area consists of many wide roadways carrying six or more travel lanes, which limit pedestrian crossing locations to signalized locations only. Pedestrian bridges are currently built at the following locations to minimize the need for pedestrians to cross the wide, busy streets: (1) Genesee Avenue near Executive Square; (2) La Jolla Village Drive east of Genesee Avenue; and (3) Genesee Avenue between La Jolla Village Drive and Esplanade Court.

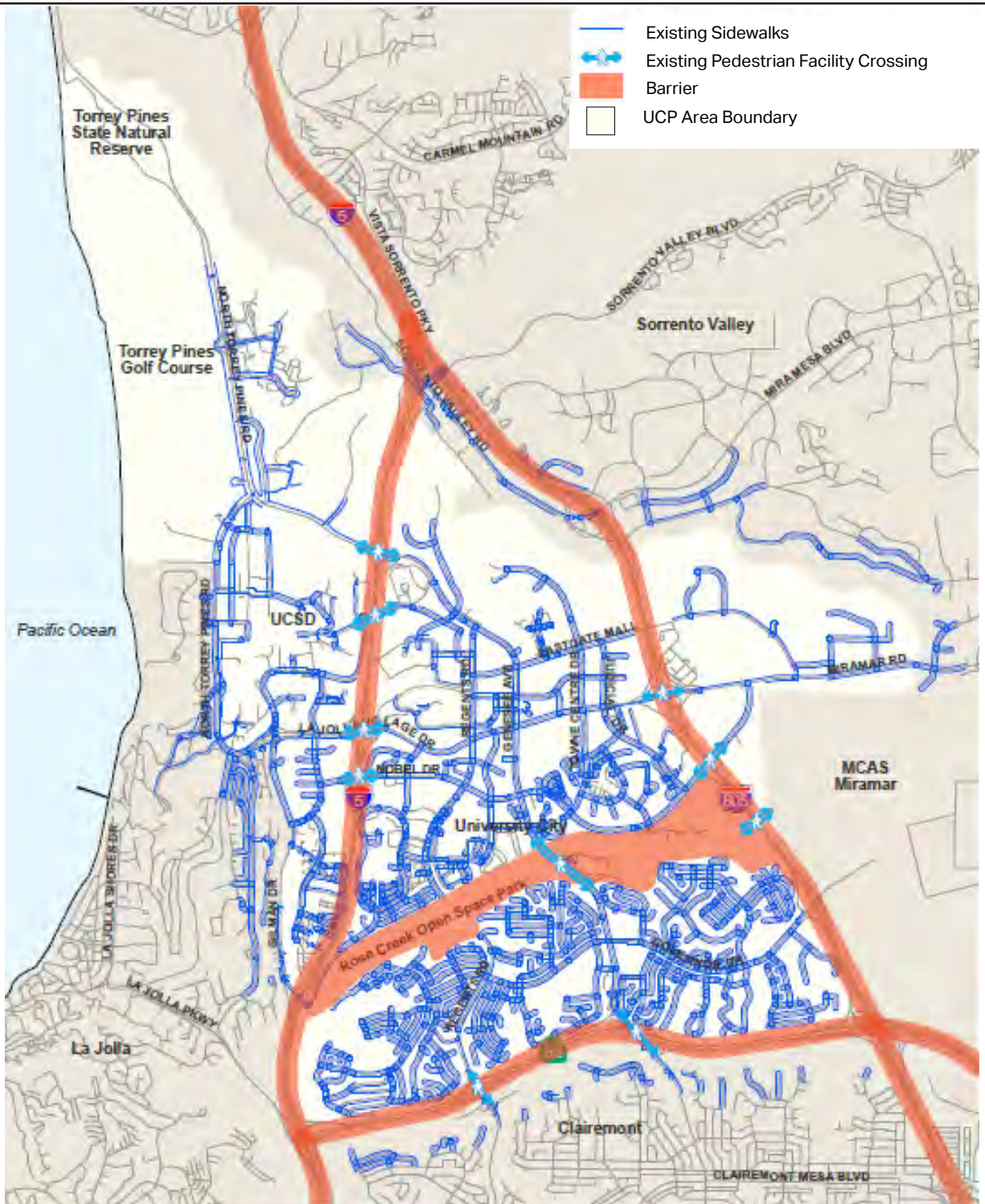
4.2.1.3 Existing Operating Conditions

This section describes key intersections and roadway and freeway segments, as well as existing peak hour intersection traffic volumes, daily roadway and freeway traffic volumes, and existing LOS.

Roadway Segments

A total of 68 roadway segments were included in the existing conditions ADT-based analysis. Each roadway segment in the study area was evaluated by comparing the daily traffic volume with the roadway's theoretical capacity based on its classification. The existing ADT LOS for roadway segments in the UCP Area is illustrated in Figure 4.2-6. All roadway segments function at an acceptable LOS D or better within the UCP Area, except for the nine following segments that are currently operating at LOS E or F:

- Eastgate Mall – between Judicial Drive and Eastgate Drive (LOS F)
- Eastgate Mall – between Eastgate Drive and Miramar Road (LOS E)
- Genesee Avenue – between I-5 southbound (SB) Ramps and I-5 northbound (NB) Ramps (LOS F)
- La Jolla Village Drive – between Villa La Jolla Drive and I-5 SB Ramps (LOS F)



**Figure 4.2-5
Existing Pedestrian Facilities**

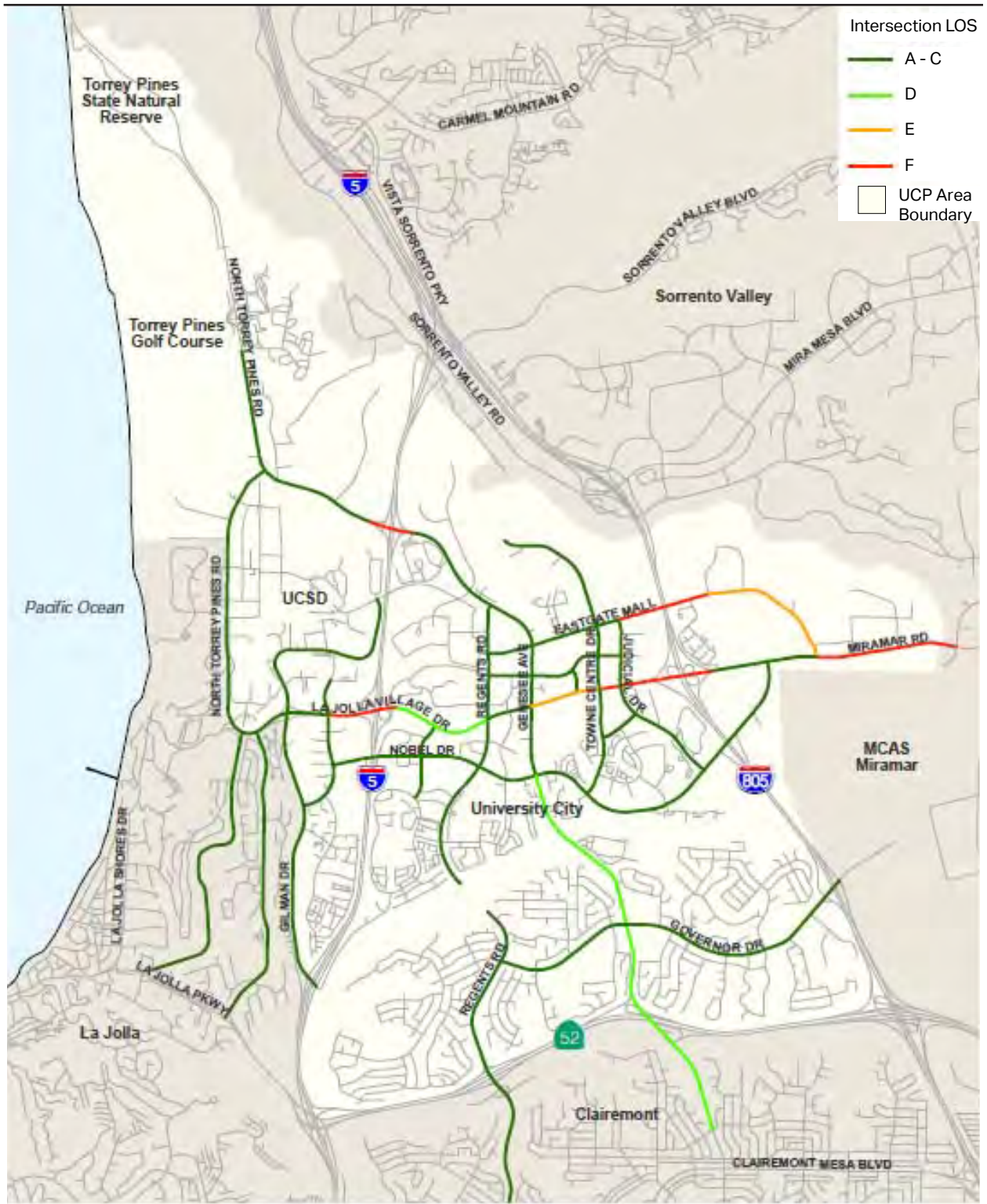


Figure 4.2-6
Existing Roadway Segments Level of Service

- La Jolla Village Drive – between I-5 SB Ramps and I-5 NB Ramps (LOS F)
- La Jolla Village Drive – between Genesee Avenue and Towne Centre Drive (LOS E)
- Miramar Road – between I-805 SB Ramps and I-805 NB Ramps (LOS F)
- Miramar Road – between Eastgate Mall and Camino Santa Fe (LOS F)

Table 4.2-5 presents the results of the roadway segment analysis for the nine segments listed above operating at unacceptable LOS on a typical weekday.

**Table 4.2-5
Existing Level of Service for Unacceptable Roadway Segments**

Roadway	Segment	Existing Functional Classification	LOS E Capacity	ADT	V/C ratio	LOS
Eastgate Mall	Judicial Dr to Eastgate Dr	2-lane Collector (no fronting property)	10,000	10,096	1.010	F
Eastgate Mall	Eastgate Dr to Miramar Rd	2-lane Collector (continuous left turn lane)	15,000	14,668	0.978	E
Genesee Avenue	I-5 SB Ramps to I-5 NB Ramps	4-lane Major Arterial	40,000	49,051	1.226	F
La Jolla Village Drive	Villa La Jolla Dr to I-5 SB Ramps	6-lane Prime Arterial	60,000	62,258	1.038	F
La Jolla Village Drive	I-5 SB Ramps to I-5 NB Ramps	6-lane Major Arterial	50,000	51,391	1.028	F
La Jolla Village Drive	Genesee Ave to Towne Center Dr	6-lane Major Arterial	50,000	45,117	0.902	E
Miramar Road	I-805 SB Ramps to I-805 NB Ramps	6-lane Major Arterial	50,000	66,139	1.102	F
Miramar Road	Eastgate Mall to Camino Santa Fe	6-lane Prime Arterial	60,000	67,748	1.129	F

ADT = average daily traffic; V/C = volume to capacity ratio; LOS = level of service
SB = southbound; NB = northbound

Intersections

A total of 80 study intersections were analyzed as part of the existing conditions assessment, with six of these intersections located in adjacent communities. Peak hour LOS analyses were performed for the AM and PM peak hour at each of the intersections within the study area. Figure 4.2-7 shows the existing AM peak hour LOS at each study area intersection, and Figure 4.2-8 shows the existing PM peak hour LOS.

Table 4.2-6 displays the LOS analysis results for the study area intersections, all signalized, currently operating at unacceptable LOS during the AM and/or PM peak hours, including AM and PM peak hour delay and LOS.

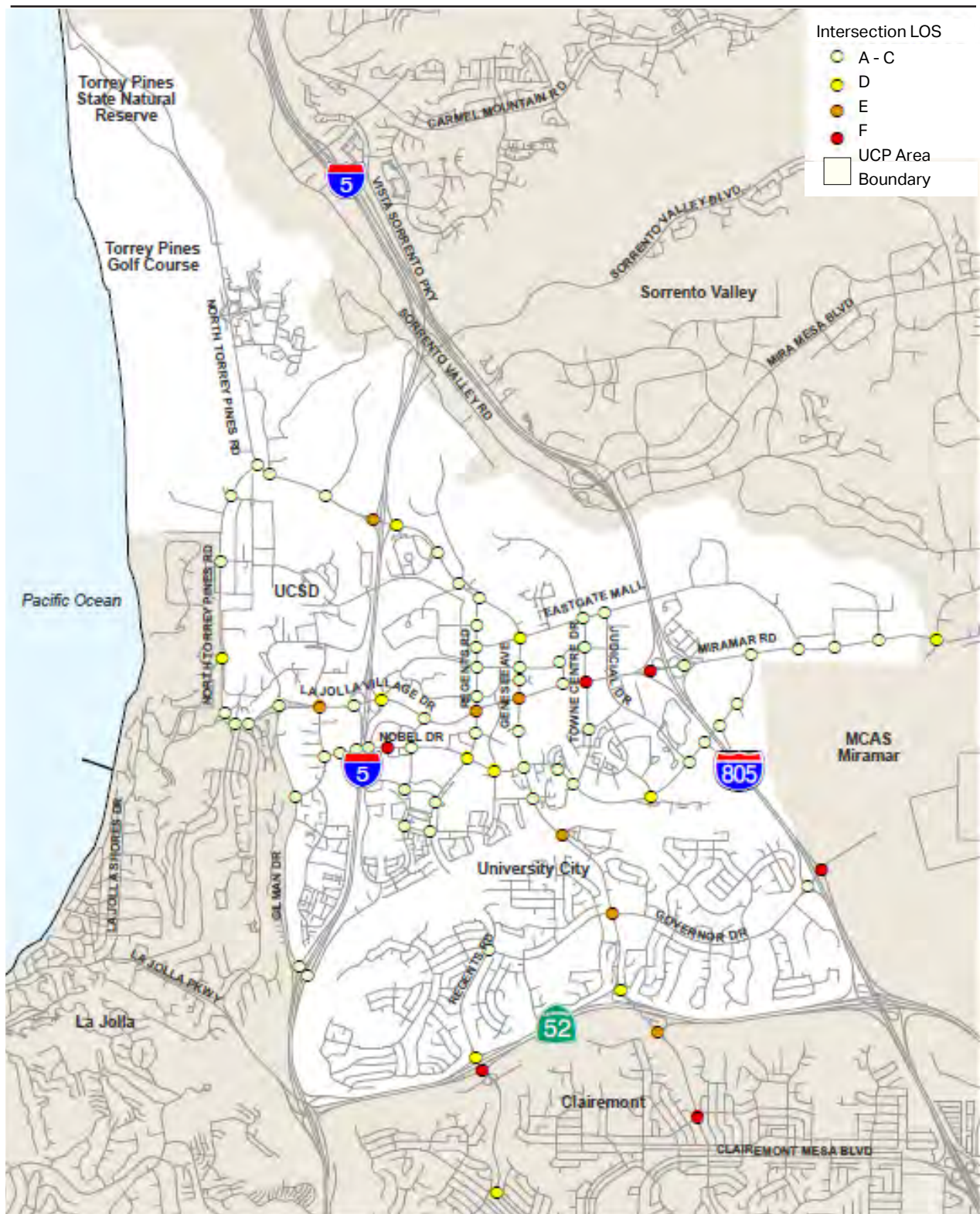


Figure 4.2-7
Existing AM Intersection Level of Service



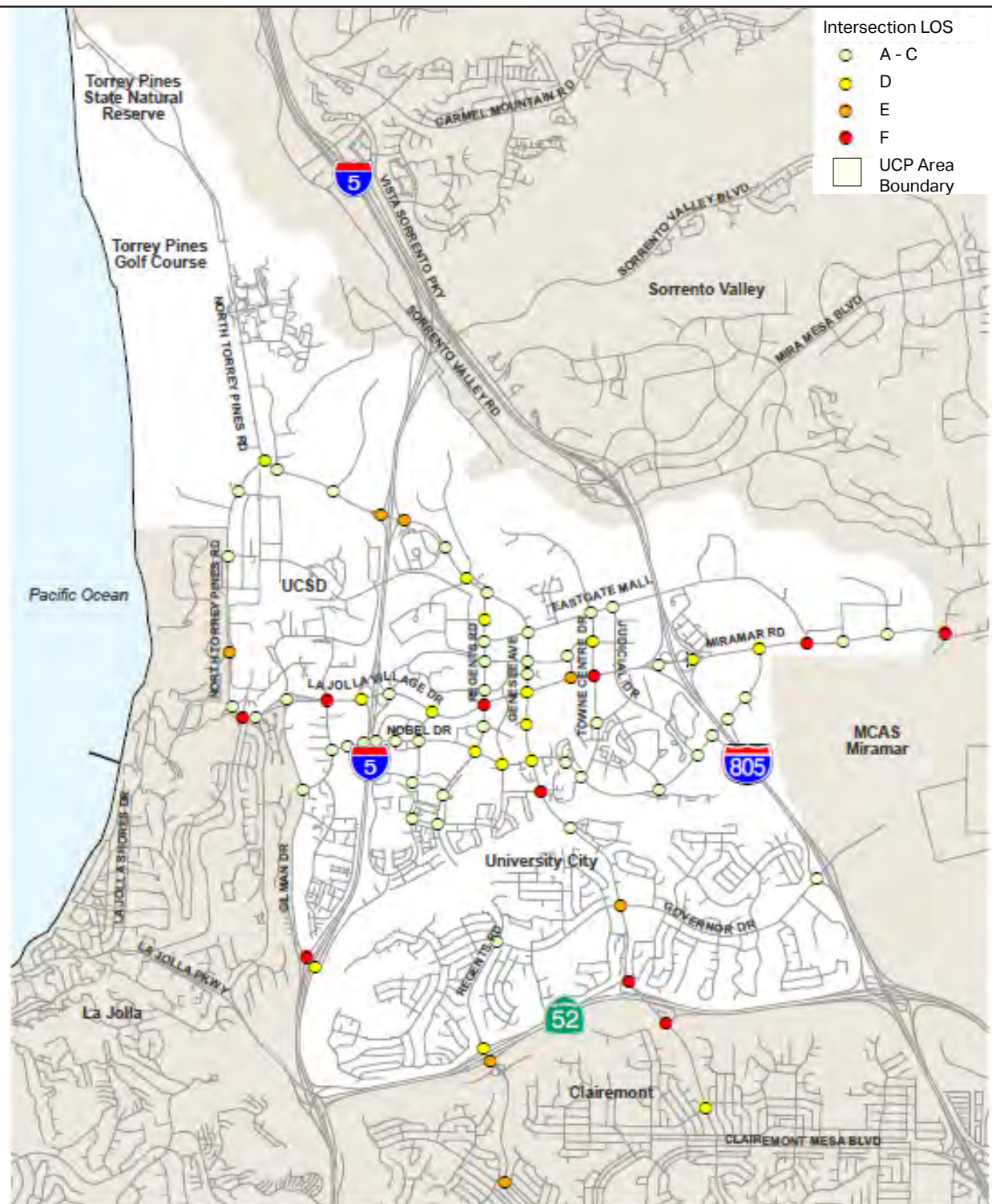


Figure 4.2-8
Existing PM Intersection Level of Service

**Table 4.2-6
Intersections Operating at Unacceptable Level of Service**

Intersection	AM Peak Hour		PM Peak Hour	
	Average Delay (seconds)	LOS	Average Delay (seconds)	LOS
Genesee Avenue/ I-5 SB Ramps	66.3 <u>29.8</u>	E <u>C</u>	69.7 <u>63.0</u>	E
Genesee Avenue/ I-5 NB Ramps	43.7 <u>32.3</u>	D <u>C</u>	Exceeds calculable limit <u>35.9</u>	F <u>D</u>
Genesee Avenue/ La Jolla Village Drive	76.5	E	35.9	D
Genesee Avenue/ Decoro Street	28.6	C	119.8	F
Genesee Avenue/ Centurion Square	66.6	E	14.3	B
Genesee Avenue/ Governor Drive	67.4	E	66.5	E
Genesee Avenue/ SR 52 WB Ramps	27.5 <u>16.0</u>	D <u>C</u>	371.8	F
Genesee Avenue/ SR 52 EB Ramps	55.8 <u>42.7</u>	E <u>D</u>	132.0 <u>126.7</u>	F
Genesee Avenue/ Appleton Street/Lehrer Drive	109.8	F	43.0	D
La Jolla Village Drive/ Torrey Pines Road	27.4	C	106.2	F
La Jolla Village Drive/Villa La Jolla Drive	55.4	E	202.2	F
La Jolla Village Drive/ Regents Road	55.0	D	132.4	F
La Jolla Village Drive/ Executive Way	18.9	B	62.6	E
La Jolla Village Drive/ Towne Center Drive	80.6	F	124.2	F
La Jolla Village Drive/ I-805 SB Ramps	112.8 <u>112.1</u>	F	177.7 <u>16.6</u>	B
Miramar Road/ Eastgate Mall	17.0	B	91.8	F
Miramar Road/ Camino Santa Fe	36.8	D	81.4	F
Regents Road/ SR 52 EB Ramps	99.1 <u>63.6</u>	F <u>E</u>	57.0 <u>16.5</u>	E <u>B</u>
Regents Road/ Luna Avenue	42.6	D	61.6	E
N Torrey Pines Road/ La Jolla Shores Drive	40.4	D	60.6	E
Gilman Drive/ I-5 SB Ramps	9.7	A	169.1	F
Governor Drive/ I-805 NB Ramps	Exceeds calculable limit	F	Exceeds calculable limit	F

EB = eastbound; NB = northbound; SB = southbound; WB = westbound

Bold = Exceeds acceptable LOS D and significance threshold, indicating significant impact

As shown in Table 4.2-6, the following ~~seven~~four study area intersections are currently operating at LOS E or F during both the AM and PM peak hour within the UCP Area:

- ~~Genesee Avenue/I-5 SB Ramps – AM: LOS E / PM: LOS E~~
- Genesee Avenue/Governor Drive – AM: LOS E / PM: LOS E
- ~~Genesee Avenue/SR 52 eastbound (EB) Ramps – AM: LOS E / PM: LOS F~~
- La Jolla Village Drive/Villa La Jolla Drive – AM: LOS E / PM: LOS F
- La Jolla Village Drive/Towne Center Drive – AM: LOS F / PM: LOS F
- ~~Regents Road/SR 52 EB Ramps – AM: LOS F / PM: LOS E~~
- Governor Drive/I-805 NB Ramps – AM: LOS F / PM: LOS F

The following intersections operate at LOS E or F during one peak hour period as shown in Table 4.2-6:

- Genesee Avenue/I-5 SB Ramps – PM: LOS E
- ~~Genesee Avenue/I-5 NB Ramps – PM: LOS F~~
- Genesee Avenue/La Jolla Village Drive – AM: LOS E
- Genesee Avenue/Decoro Street – PM: LOS F
- Genesee Avenue/Centurion Square – AM: LOS E
- Genesee Avenue/ SR 52 westbound (WB) Ramps – PM: LOS F
- Genesee Avenue/SR 52 eastbound (EB) Ramps – PM: LOS F
- Genesee Avenue/Appleton Street/Lehrer Drive – AM: LOS F
- La Jolla Village Drive/Torrey Pines Road – PM: LOS F
- La Jolla Village Drive/Regents Road – PM: LOS F
- La Jolla Village Drive/Executive Way – PM: LOS E
- La Jolla Village Drive/I-805 SB Ramps – AM: LOS F
- Miramar Road/Eastgate Mall – PM: LOS F
- Miramar Road/Camino Santa Fe – PM: LOS F
- Regents Road/Luna Avenue – PM: LOS E
- Regents Road/SR 52 EB Ramps – AM: LOS E
- North Torrey Pines Road/La Jolla Shores Drive – PM: LOS E
- Gilman Drive/I-5 SB Ramps – PM: LOS F

Freeways

Freeway Segments

Three regional corridors (I-5, I-805, and SR 52) run adjacent to or traverse the UCP Area, carrying significant levels of traffic while providing regional access. As shown in Table 4.2-7, seven freeway segments within the traffic study area are currently operating at LOS E or F.

**Table 4.2-7
Existing Freeway Segments with Unacceptable LOS**

Freeway	Segment	Peak Hour	Direction	LOS
I-5	Between SR 52 and Gilman Drive	AM	Northbound	LOS E
		PM	Southbound	LOS F
I-805	Between SR 52 and Governor Drive	AM	Northbound	LOS E
		PM	Southbound	LOS F
I-805	Between Governor Drive and Nobel Drive	AM	Northbound	LOS F
		PM	Southbound	LOS E
I-805	Between Nobel Drive and La Jolla Village Drive	AM	Northbound	LOS E
		PM	Southbound	LOS E
I-805	Between La Jolla Village Drive and Mira Mesa Boulevard	AM	Northbound	LOS E
		PM	Southbound	LOS E
SR 52	Between Regents Road and Genesee Avenue	PM	Eastbound	LOS F
SR 52	Between Genesee Avenue and I-805	AM	Eastbound	LOS E
		PM	Eastbound	LOS F

In general, the failing freeway segments as listed above are those that move traffic toward the UCP Area in the morning and away from the UCP Area in the afternoon.

Ramp Metering

Freeway ramp metering analysis was conducted at the I-5 northbound and southbound on-ramps at Gilman Drive, Nobel Drive, and La Jolla Village Drive, and at the I-805 northbound and southbound on-ramps at La Jolla Village Drive, Nobel Drive, and Governor Drive. The I-5/Genesee Avenue interchange was under construction at the time of this study and ramp meters were removed and not operating.

Five ramps were found to be over capacity in the PM peak hour:

- I-5 SB and Gilman Drive
- I-5 SB and La Jolla Village Drive (WB to SB)
- I-5 SB and La Jolla Village Drive (EB to SB)
- I-805 SB and Nobel Drive
- I-805 SB and Governor Drive

The meter rate adequately controls the expected demand with delays resulting in less than 15 minutes, except at the I-805 southbound and Nobel Drive ramp during the PM peak (21-minute delay).

4.2.2 Regulatory Framework

Applicable regulations that apply to the transportation system and the associated agencies with regulatory authority and oversight are described below.

4.2.2.1 Federal

Department of Transportation Act of 1966

Section 4(f) of the Department of Transportation Act of 1966 specifies that a federally funded transportation project requiring the use of publicly owned parks, recreation areas, historic sites (including those owned privately), wildlife and waterfowl refuges, and many other types of resources can be approved only if there is no feasible and prudent alternate to using that land and if the project is planned to minimize harm to the property. General procedures are as follows:

A specific finding is required. Section 4(f) lands may be used for federal aid highways only if:

- There is no prudent and feasible alternative to using that land; and
- The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

Each federally funded transportation project that would affect Section 4(f) resources must include a Section 4(f) avoidance alternative.

Surface Transportation Assistance Act (STAA)

In 1982, the federal government passed the STAA. This act requires states to allow larger trucks on the “national network,” which is composed of the interstate system plus the non-interstate federal-aid primary system. “Larger trucks” include (1) doubles with 28.5-foot trailers, (2) singles with 48-foot semi-trailers and unlimited kingpin-to-rear axle distance, (3) unlimited length for both vehicle combinations, and (4) widths up to 102 inches. I-5 and SR 78 are defined as STAA routes.

4.2.2.2 State

California Department of Transportation (Caltrans)

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for

street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities, but may influence traffic flow and LOS at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

California Transportation Commission (CTC)

The CTC consists of nine members appointed by the California Governor. CTC is responsible for the programming and allocating of funds for the construction of highway, passenger rail, and transit improvements throughout the state. CTC is responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

Assembly Bill (AB) 32

With AB 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing GHG emissions to 1990 levels by 2020. ARB is coordinating the response to comply with AB 32.

In 2007, ARB adopted a list of early action programs that could be put in place by January 1, 2010. In 2008, ARB defined its 1990 baseline level of emissions, and by 2011 it completed its major rule making for reducing GHG emissions. Rules on emissions, as well as market-based mechanisms like the proposed cap and trade program, took effect in 2012.

On December 11, 2008, ARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included the approval of SB 375, discussed below, as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

AB 1358 – California Complete Streets Act of 2008

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (AB 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multimodal perspective, including public transit, walking, and biking, which have traditionally been marginalized in comparison to autos in contemporary American urban planning.

SB 375

SB 375 has four key components. First, SB 375 requires regional GHG emissions targets. ARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and future years for each Metropolitan Planning Organization (MPO) in the state. For San Diego, the MPO is SANDAG (see below). These targets, which MPOs may propose themselves, will be updated every 8 years in conjunction with the revision schedule for housing and transportation elements.

Second, MPOs will be required to create an SCS that provides a plan for meeting regional targets. The SCS and the RTP must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an alternative planning strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans (also prepared by SANDAG as the MPO for San Diego County) be synchronized on 8-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional transportation planning agencies are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

The SANDAG region was the first region in the state that adopted an SCS and RTP update under SB 375.

4.2.2.3 Local

San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan is an update of the RCP and the 2050 RTP/SCS, combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. The Regional Plan has a horizon year of 2050 and projects regional growth and the construction of transportation projects over this time period. The Regional Plan was adopted by the SANDAG Board on October 9, 2015.

City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is “to improve mobility through development of a balanced, multimodal transportation network.” The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

UCP Transportation Element

The purpose of the Adopted UCP Transportation Element is to establish goals and policies to guide future street network and design, street classification, LOS, transit facilities and service, pedestrian and bicycle accommodations, and facility improvements needed to support future travel needs within the UCP Area.

City of San Diego Bicycle Master Plan (Update December 2013)

The City’s Bicycle Master Plan Update (City of San Diego 2013a) provides a framework for making cycling a more practical and convenient transportation option for a wider variety of San Diegans with varying riding purposes and skill levels. The plan update evaluates and builds on the 2002 Bicycle Master Plan so that it reflects changes in bicycle user needs and changes to the City’s bicycle network and overall infrastructure.

The City Bicycle Master Plan proposes the following traffic study area roadways for bicycle facilities:

- Eastgate Mall – Class II (Bike Lane)
- Executive Drive – Class III (Bike Route)
- Governor Drive, west of Genesee Avenue – Class II (Bike Lane) or III (Bike Route)
- Judicial Drive– Class II (Bike Lane)
- La Jolla Scenic Drive – Class II (Bike Lane)
- La Jolla Village Drive – Class II (Bike Lane)
- Lebon Drive – Class II (Bike Lane)
- Nobel Drive, between I-5 and Lebon Drive – Class II (Bike Lane)
- Nobel Drive, between Lebon Drive and Regents Road – Class II (Bike Lane) or III (Bike Route)

- Nobel Drive, between Regents Road and Miramar Road – Class II (Bike Lane)
- Regents Road, south of Nobel Drive – Class II (Bike Lane) or Class III (Bike Route)
- Regents Road, north of Governor Drive – Class II (Bike Lane) or Class III (Bike Route)
- Towne Centre Drive – Class II (Bike Lane) or Class III (Bike Route)

4.2.3 Significance Determination Thresholds

Based on the City’s Significance Determination Thresholds (City of San Diego 2011a), which have been adapted to guide a programmatic analysis, a significant traffic circulation impact would occur if implementation of the Project would:

1. Result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system;
2. Result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp;
3. Result in a substantial impact upon existing or planned transportation systems;
4. Result in substantial alterations to present circulation movements, including effects on existing public access to beaches, parks, or other open space areas; or
5. Conflict with adopted policies, plans, or programs supporting alternative transportation modes.

Generally, a significant impact is identified when the addition of traffic results in LOS dropping from LOS D or better to substandard LOS E or F. Table 4.2-8 summarizes the significant impact thresholds for facilities operating at a substandard LOS with and without the Project. These thresholds, as applied to roadway segments, are based upon an acceptable increase in the V/C ratio.

**Table 4.2-8
City of San Diego Measures of Significant Project Traffic Impacts**

LOS with Project	Allowable Change Due to Impact		
	Roadway Segments		Intersection Delay (sec)
	V/C	Speed decrease (mph)	
E	0.02	1.0	2.0
F	0.01	0.5	1.0

Source: City of San Diego 2011a

Methodology and Assumptions

Future Condition Improvements

A traffic model was prepared by SANDAG for existing and future community buildout conditions. Traffic counts obtained in 2015 were used to calibrate the existing model results. Using the attributes included in the calibrated existing model, the future land use assumptions and roadway network variations were input to estimate future volumes. The model data provide roadway and freeway volumes, and were not used for intersection volumes. Future peak hour turning movements at the study area intersections were developed using methodologies from National Cooperative Highway Research Program (NCHRP) 255 – Highway Traffic Data for Urbanized Area Project Planning and Design, Chapter 8. NCHRP Report 255 is a compilation of the best techniques that are currently being used in urban areas to forecast future traffic volumes. These techniques were identified through a survey of state and local agencies with follow-up field visits to obtain detailed information on procedural steps and typical applications. The method used to forecast the future turning movement volumes evaluation is the NCHRP’s “Directional Volume Forecast.” Existing daily segment traffic volumes and peak hour intersection turning movements were counted in the field. Future year daily traffic volumes were obtained from the forecast model forecast. For the purposes of this analysis, the term “future year” is defined as the community buildout conditions that were developed based on buildout land use and network assumptions within the UCP Area and superimposed on the SANDAG 2035 regional model. The land use assumptions, model calibration process, and supporting worksheets for calculating future volumes and the resulting peak hour intersection turning movement volumes are included in Appendix C.

Four roadway changes located outside of the traffic study area were included in the future year modeling. These roadway changes were included as they have an influence on traffic conditions within the study area:

- Voigt Drive west of Campus Point reconfiguration as part of Mid-Coast Trolley project, including Campus Point/Voigt Drive intersection modification
- New ~~Eastgate Mall~~ Gilman Bridge connection across I-5
- Charmant Drive changes from one to two lanes
- North Torrey Pines Road modified to have four lanes instead of five lanes north of Callan Drive

The following changes to the freeway network were also included in the future year model and reflected in the freeway analysis:

- I-805 high-occupancy vehicle (HOV) lanes, throughout study area
- New on ramp from Governor Drive to SB I-805
- Direct Access Ramp (DARs) at I-805 and Nobel Drive
- I-5 HOV lanes, north of La Jolla Village Drive
- DARs at I-5 and Voigt Drive
- DARs at I-805 and Carroll Canyon (outside of community influence)
- Carroll Canyon extension to Sorrento Valley Road (outside of community influence)
- Carroll Canyon to I-805 SB Ramp modification (outside of community influence)

4.2.4 Impact Analysis

Issue 1: Would the Project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?

4.2.4.1 Impact Analysis

Roadway Segments

Table 4.2-8 details the thresholds used for determining a significant impact for a roadway segment. A significant impact would result if a roadway segment degrades to LOS E or F. Additionally, if a segment is already operating at an unacceptable LOS, the significance threshold is an increase in V/C ratio of 0.02 for LOS E or 0.01 for LOS F.

Future Year with Adopted UCP

Table 4.2-9 outlines the significant impacts anticipated along roadway segments that would occur in the future year. Future Year with Adopted UCP assumes that the Adopted UCP and all the transportation improvements associated with the current plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). Under these conditions, in the future year a total of 19 roadway segments would operate at an unacceptable LOS in exceedance of the significance thresholds.

**Table 4.2-9
Future Year Roadway Segments with Unacceptable Level of Service**

Roadway Segment	Existing Functional Classification	LOS E Capacity	Existing			Future Year with Adopted UCP			Future Year with Project		
			ADT	V/C ratio	LOS	ADT	V/C ratio	LOS	ADT	V/C ratio	LOS
Eastgate Mall											
Genesee Ave to Easter Way	4-lane Collector	30,000	14,767	0.492	C	25,000	0.833	E	25,400	0.847	E
Judicial Dr to Eastgate Dr	2-lane Collector	10,000	10,096	1.01	F	19,500	1.950	F	19,400	1.940	F
Eastgate Dr to Miramar Rd	2-lane Collector	15,000	14,668	0.978	E	28,800	1.920	F	29,200	1.947	F
Genesee Avenue											
La Jolla Village Dr to Esplanade Ct	4-lane Major Arterial	40,000	28,054	0.701	C						
	6-lane Major Arterial	50,000				41,800	0.836	D	46,400	0.928	E
Nobel Dr to Centurion Sq	4-lane Major Arterial	40,000	30,922	0.773	D				46,500	1.163	F
	6-lane Major Arterial	50,000				39,600	0.792	C			
Centurion Sq to Governor Dr	4-lane Major Arterial	40,000	30,325	0.758	D				54,600	1.365	F
	6-lane Major Arterial	50,000				43,900	0.878	D			
Governor Dr to SR 52 WB Ramp	4-lane Major Arterial	40,000	30,325	0.758	D				43,500	1.088	F
	6-lane Major Arterial	50,000				48,700	0.974	E			
SR52 WB Ramp to SR 52 EB Ramp	4-lane Major Arterial	40,000	31,170	0.779	D	37,300	0.933	E	38,000	0.950	E
SR52 EB Ramp to Lehrer Dr	4-lane Major Arterial	40,000	30,581	0.765	D	37,100	0.928	E	38,400	0.960	E
La Jolla Village Drive											
Revelle College Dr to Villa La Jolla	6-lane Prime Arterial	60,000	44,520	0.742	C	54,300	0.905	D	55,000	0.917	E D
Villa La Jolla Dr to I-5 SB Ramps	6-lane Prime Arterial	60,000	62,258	1.038	F	76,400	1.273	F	76,800	1.280	F
I-5 SB Ramps to I-5 NB Ramps	6-lane Major Arterial	50,000	51,391	1.028	F	59,400	1.188	F	60,900	1.218	F

Roadway Segment	Existing Functional Classification	LOS E Capacity	Existing			Future Year with Adopted UCP			Future Year with Project		
			ADT	V/C ratio	LOS	ADT	V/C ratio	LOS	ADT	V/C ratio	LOS
I-5 NB Ramps to Lebon Dr	6-lane Major Arterial	50,000	44,335	0.887	D	52,000	1.040	F	53,200	1.064	F
Lebon Dr to Regents Rd	6-lane Major Arterial	50,000	42,863	0.857	D	49,900	0.998	E	51,500	1.030	F
Regents Rd to Genesee Ave	6-lane Major Arterial	50,000	38,474	0.769	C	52,400	1.048	F	50,700	1.014	F
Genesee Ave to Executive Way	6-lane Major Arterial	50,000	45,117	0.902	E	49,400	0.988	E	49,200	0.984	E
Executive Way to Towne Center Dr	6-lane Major Arterial	50,000	45,117	0.902	E	67,600	1.352	F	69,500	1.390	F
Miramar Road											
I-805 SB Ramps to I-805 NB Ramps	6-lane Prime Arterial	60,000	66,139	1.102	F	64,600	1.077	F	66,000	1.100	F
Eastgate Mall to Miramar Mall	6-lane Prime Arterial	60,000	67,748	1.129	F						
	7-lane Prime Arterial	70,000				72,200	1.031	F	72,000	1.031	F
Miramar Mall to Camino Santa Fe	6-lane Prime Arterial	60,000	67,749	1.129	F	72,200	1.203	F	72,200	1.203	F
Nobel Drive											
Villa La Jolla Dr to I-5 SB Ramp	4-lane Major Arterial	40,000	26,284	.0657	C	47,500	1.188	F	47,600	1.190	F
I-5 SB Ramp to I-5 NB Ramp	4-lane Major Arterial	40,000	27,642	0.691	C	40,800	1.020	F	41,700	1.043	F
Regents Road											
SR 52 WB Ramps to SR 52 EB Ramps	4-lane Major Arterial	40,000	19,957	0.499	B	35,300	0.883	E	23,500	0.588	C
SR 52 EB Ramps to Luna Ave	4-lane Major Arterial	40,000	21,268	0.532	C	40,600	1.015	F	25,600	0.640	C
Torrey Pines Road											
La Jolla Village Dr to South	4-lane Major Arterial	40,000	26,620	0.666	C	35,600	0.890	E	36,800	0.920	E
Bold = Exceeds acceptable LOS D and significance threshold, indicating significant impact											
Shaded cell = Future Year with Project results in significant operational decrease as compared to Future Year with Adopted UCP condition.											

Future Year with Project

Table 4.2-9 outlines the significant impacts anticipated along roadway segments with implementation of the Future Year with Project. With implementation of the Project, a total of ~~2120~~ roadway segments within the traffic study area would degrade to unacceptable operating conditions which exceed the significance thresholds.

Under the Future Year with Project, the ~~four~~ three following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur under Future Year with Adopted UCP. Thus, the impact at these segments can be specifically attributed to the Project.

- Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E)
- Genesee Avenue: Nobel Drive to Centurion Square (LOS F)
- Genesee Avenue: Centurion Square to Governor Drive (LOS F)
- ~~La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E)~~

As shown in Table 4.2-9, ~~1413~~ of the segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP. These ~~1413~~ segments are considered to have a significant decrease in operation due to an exceedance of the V/C ratio thresholds (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.

Implementation of the Project would eliminate two significant impacts along two segments of Regents Road:

- SR 52 WB Ramps to SR 52 EB Ramps
- SR 52 EB Ramps to Luna Avenue

Intersections

A significant impact to an intersection is considered to occur when conditions degrade to an unacceptable LOS E or F. As shown in Table 4.2-8, when already operating at LOS E or F, the significance threshold is an increase in intersection delay of two seconds for LOS E or one second for LOS F.

Future year with Adopted UCP

Table 4.2-10 outlines the study area intersections with unacceptable LOS in future year. Future Year with Adopted UCP assumes that all the transportation improvements associated with the current plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). Under these conditions, 29 intersections would operate at an unacceptable LOS E or F during at least one of the peak hours. Twenty-eight of these 29 intersections exceed significance thresholds.

**Table 4.2-10
Future Year Intersections with Unacceptable Level of Service**

Intersection	Peak Hour	Existing		Future Year with Adopted UCP		Future Year with Project	
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS
Genesee Avenue/ John Hopkins Drive	AM	17.9	B	132.3	F	98.5	F
	PM	27.6	C	44.2	D	35.4	D
Genesee Avenue/ Scripps Hospital	AM	20.2	C	60.7	E	61.3	E
	PM	21.3	C	74.8	E	71.5	E
Genesee Avenue/ La Jolla Village Drive	AM	77.1	E	121.5	F	121.4	F
	PM	35.8	D	48.8	D	59.5	E
Genesee Avenue/ Esplanade Court	AM	21.4	C	36.8	D	54.5	D
	PM	38.2	D	86.4	F	97.9	F
Genesee Avenue/ Nobel Drive	AM	32.9	C	36.1	D	97.9	F
	PM	42.6	D	60.6	E	91.2	F
Genesee Avenue/ Decoro Street	AM	28.6	C	24.0	D	112.1	F
	PM	119.8	F	69.0	E	314.4	F
Genesee Avenue/ Centurion Square	AM	66.6	E	30.3	C	154.1	F
	PM	14.3	B	9.2	A	95.2	F
Genesee Avenue/ Governor Drive	AM	67.4	E	102.0	F	163.7	F
	PM	66.5	E	51.4	D	110.3	F
Genesee Avenue/ SR 52 WB Ramps	AM	27.5 16.0	D C	27.7 19.8	D C	45.9 18.6	E C
	PM	371.8	F	783.3	F	603.8	F
Genesee Avenue/ SR 52 EB Ramps	AM	55.8 42.7	E D	53.2 43.6	D	69.6 49.9	E D
	PM	132.0 126.7	F	50.0 46.1	D	62.7 58.0	E
Genesee Avenue/ Appleton St/Lehrer Drive	AM	109.8	F	166.2	F	184.1	F
	PM	43.0	D	60.9	E	66.4	E
La Jolla Village Drive/ Torrey Pines Road	AM	27.4	C	49.1	D	53.1	D
	PM	106.2	F	178.2	F	183.9	F
La Jolla Village Drive EB/ Gillman Drive	AM	13.0	B	16.5	C	17.8	C
	PM	24.5	C	141.8	F	170.9	F
La Jolla Village Drive/ Villa La Jolla Drive	AM	55.4	E	123.0	F	127.0	F
	PM	202.2	F	328.4	F	330.0	F
La Jolla Village Drive/ I-5 SB Off-Ramp	AM	31.5 28.7	C	41.6 38.7	D	48.0 45.0	D
	PM	52.8 19.3	D B	52.2 19.1	D B	68.6 26.0	E C
La Jolla Village Drive/ Regents Road	AM	55.0	D	71.8	E	64.9	E
	PM	132.4	F	203.4	F	202.1	F
La Jolla Village Drive/ Executive Way	AM	19.0	B	83.0	F	75.8	E
	PM	61.8	E	233.6	F	266.6	F

Intersection	Peak Hour	Existing		Future Year with Adopted UCP		Future Year with Project	
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS
La Jolla Village Drive/ Towne Center Drive	AM	104.6	F	156.6	F	161.2	F
	PM	129.3	F	167.8	F	171.5	F
La Jolla Village Drive/ I-805 SB Ramps	AM	112.8 112.1	F	173.3 174.3	F	171.7 171.3	F
	PM	17.7 16.6	B	48.5 16.4	B	20.4 16.5	C
Miramar Road/ Eastgate Mall	AM	15.9	B	23.0	C	23.0	C
	PM	74.9	E	104.0	F	104.2	F
Miramar Road/ Camino Santa Fe	AM	36.8	D	43.0	D	44.4	D
	PM	81.4	F	141.9	F	124.8	F
Nobel Drive/ La Jolla Village Square Drive	AM	19.8	B	25.5	C	25.5	C
	PM	45.4	D	167.8	F	150.6	F
Nobel Drive/ I-5 SB On Ramp	AM	3.7	A	3.2	A	3.5	A
	PM	13.4	B	114.2	F	125.1	F
Nobel Drive/ Regents Road	AM	48.4	D	37.9	D	34.7	C
	PM	53.6	D	69.8	E	89.9	F
Regents Road/ Arriba Street	AM	27.6	C	68.6	E	29.0	C
	PM	25.2	C	72.0	E	25.4	C
Regents Road/ Governor Drive	AM	24.0	C	95.5	F	37.1	D
	PM	21.9	C	88.7	F	33.1	C
Regents Road/ Luna Avenue	AM	42.6	D	64.7	E	54.5	D
	PM	61.6	E	95.2	F	66.6	E
N Torrey Pines Road/ La Jolla Shores Drive	AM	40.4	D	60.4	E	61.3	E
	PM	60.6	E	167.1	F	169.9	F
Gilman Drive/ I-5 SB Ramps	AM	9.7	A	9.4	A	10.5	B
	PM	169.1	F	50.9	D	82.9	F ¹
Towne Center Drive/ Eastgate Mall	AM	25.7	C	31.3	C	31.7	C
	PM	39.9	D	65.9	E	69.8	E
Executive Way / Executive Drive	AM	12.3	B	16.7	B	17.1	B
	PM	13.4	B	362.0	F	355.9	F
Judicial Drive/ Eastgate Mall	AM	23.0	C	37.8	D	33.6	C
	PM	25.9	C	75.8	E	67.6	F
Governor Drive/ I-805 NB Ramps	AM	ECL	F	ECL	F	ECL	F
	PM	ECL	F	722.4	F	ECL	F

¹This intersection would continue to operate at LOS F in the future year; however, the intersection delay would be reduced by approximately 87 seconds compared to current conditions and thus is not considered a significant impact when compared to Existing Conditions.

ECL = Exceeds calculable limit

Bold = Exceeds acceptable LOS D and significance threshold, indicating significant impact.

Shaded Cell = Project results in significant operational decrease as compared to Adopted UCP implementation in the future year

Future Year with Project

Table 4.2-10 presents the modeled intersection operations with Project implementation in the future year for both the AM and PM peak hours. Within the table, bold LOS levels indicate a

significant impact which is an unacceptable operating condition that exceeds the significance thresholds per Table 4.2-8.

With implementation of the Project, ~~3028~~ intersections would operate at unacceptable LOS operating conditions which exceed the significance thresholds by future year. Some of the intersections would have significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods.

Under the Future Year with Project, the following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, under Future Year with Adopted UCP, these intersections would operate at acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue /Governor Drive (PM)
- ~~Genesee Avenue/SR 52 WB Ramps (AM)~~
- Genesee Avenue/SR 52 EB Ramps (~~AM and~~ PM)
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~
- Gilman Drive/I-5 SB Ramps (PM)

As shown in Table 4.2-10, ~~2419~~ of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These ~~2419~~ intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.

Implementation of the Project would eliminate significant impacts that would occur under Future Year with Adopted UCP at three intersections along Regents Road:

- Regents Road/Arriba Street (AM and PM)
- Regents Road/Governor Drive (AM and PM)
- Regents Road/Luna Avenue (AM)

4.2.4.2 Significance of Impacts

Roadway Segments

Deteriorated traffic conditions would result in significant impacts at ~~2420~~ roadway segments with implementation of the Project in the future year (~~Table 4.2-11 is provided for informational purposes~~). For informational purposes, Table 4.2-~~13~~11 is presented and summarizes the level of significance for roadway segments after implementation of mitigation measures discussed in Section 4.2.4.3. As shown in Table 4.2-11, of the 2420 roadway segments within the traffic study area that would degrade to unacceptable operating conditions which exceed the significance thresholds, nine segments have feasible measures available to reduce impacts. EightSix of the nine segments would be improved to operate at LOS D or better and the impact would be mitigated to less than significant. The remaining segment would be improved by the improvement measures; however, while the measures would improve the segment operations, the LOS would not be improved to an acceptable LOS. Two segments operating at unacceptable conditions would not trigger an impact. Thus, impacts along 13 roadway segments would remain significant and unmitigated (Issues 1, 3, and 4) even after incorporation of Mitigation Measures TRA-1 and TRA-2 specified in Section 4.2.4.3 (Table 4.2-13, which is provided for informational purposes).

Intersections

With implementation of the Project, ~~3430~~ intersections would operate at unacceptable LOS operating conditions by future year during one or both of the peak periods. ~~Thirty~~Twenty-eight of the ~~3430~~ intersections exceed the significance thresholds. ~~Nine~~One of these significantly impacted intersections under the Project would operate at acceptable LOS with implementation of Future Year with Adopted UCP. Also, ~~2419~~ of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. For informational purposes, Table 4.2-12 is presented and summarizes the level of significance for intersections after implementation of mitigation measures. As shown in Table 4.2-12, 4819 of the 3430 intersections that would operate at LOS E or F in the future year do not have feasible measures available to bring operations to an acceptable LOSreduce impacts. Of the 28 intersections that exceed the significance thresholds, 18 of the intersections do not have feasible measures available to reduce impacts. However, while the measures would improve the intersection operations, the delay time would not be reduced to below a level of significance. The impacts at the ~~2018~~ study area intersections would remain significant and unmitigated (Issues 1, 3, and 4) even after incorporation of Mitigation Measures TRA-1 and TRA-2 (Table 4.2-14 which is provided for informational purposes). Thus, the Project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.

**Table 4.2-11
Future Year Roadway Segment Operation with Implementation of Proposed Mitigation Measures**

Roadway Segment	Current or UCP Buildout Configuration	Classification	LOS E Capacity	Future Year with Project			Future Year with Mitigation			Description of Measure
				ADT	V/C ratio	LOS	ADT	V/C ratio	LOS	
Eastgate Mall										
<u>Genesee Ave to Easter Way</u>	<u>Current Configuration</u>	<u>4 Lane Collector</u>	<u>30,000</u>	<u>25,400</u>	<u>0.847</u>	<u>E</u>	<u>25,400</u>	<u>0.847</u>	<u>E</u>	<u>No improvement proposed.</u>
Judicial Dr to Eastgate Dr	Current Configuration	2 Lane Collector	10,000	19,400	1.940	F	--	--	--	<u>Widen the roadway to a 4-lane Collector with a continuous left-turn lane.</u>
	UCP Buildout	4 Lane Collector	30,000	--	--	--	19,400	0.647	C	
Eastgate Dr to Miramar Rd	Current Configuration	2 Lane Collector	10,000	29,200	1.947	F	--	--	--	<u>Widen the roadway to a 4-lane Collector with a continuous left-turn lane.</u>
	UCP Buildout	4 Lane Collector	30,000	--	--	--	29,200	0.973	E	
Genesee Avenue										
La Jolla Village Dr to Esplanade Ct	Current Configuration	6-lane Major Arterial	50,000	46,400	0.928	E	--	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--	46,400	0.773	C	
<u>Nobel Dr to Centurion Square</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>46,500</u>	<u>1.163</u>	<u>F</u>	<u>46,500</u>	<u>1.163</u>	<u>F</u>	<u>No improvement proposed.</u>
<u>Centurion Square to Governor Dr</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>54,600</u>	<u>1.365</u>	<u>F</u>	<u>54,600</u>	<u>1.365</u>	<u>F</u>	<u>No improvement proposed.</u>
<u>Governor Dr to SR-52 WB Ramps</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>43,500</u>	<u>1.088</u>	<u>F</u>	<u>43,500</u>	<u>1.088</u>	<u>F</u>	<u>No improvement proposed.</u>
<u>SR-52 WB Ramps to SR-52 EB Ramps</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>38,000</u>	<u>0.950</u>	<u>E</u>	<u>38,000</u>	<u>0.950</u>	<u>E</u>	<u>No improvement proposed.</u>
<u>SR-52 EB Ramps to Lehrer Dr</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>38,400</u>	<u>0.960</u>	<u>E</u>	<u>38,400</u>	<u>0.960</u>	<u>E</u>	<u>No improvement proposed.</u>

4.2 Transportation/Circulation

Roadway Segment	Current or UCP Buildout Configuration	Classification	LOS E Capacity	Future Year with Project			Future Year with Mitigation			Description of Measure
				ADT	V/C ratio	LOS	ADT	V/C ratio	LOS	
La Jolla Village Drive										
<u>Villa La Jolla Drive to I-5 SB Ramps</u>	<u>Current Configuration</u>	<u>6 Lane Prime Arterial</u>	<u>60,000</u>	<u>76,800</u>	<u>1.280</u>	<u>F</u>	<u>76,800</u>	<u>1.280</u>	<u>F</u>	<u>No improvement proposed.</u>
I-5 SB Ramps to I-5 NB Ramps	Current Configuration	6-lane Major Arterial	50,000	60,900	1.218	F	60,900	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		1.015	F	
I-5 NB Ramps to Lebon Dr	Current Configuration	6-lane Major Arterial	50,000	53,200	1.064	F	53,200	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		0.887	D	
Lebon Dr to Regents Rd	Current Configuration	6-lane Major Arterial	50,000	51,500	1.030	F	51,500	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		0.858	D	
Regents Rd to Genesee Ave	Current Configuration	6-lane Major Arterial	50,000	50,700	1.014	F	50,700	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		0.845	D	
Genesee Ave to Executive Way	Current Configuration	6-lane Major Arterial	50,000	49,200	0.984	E	49,200	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		0.820	C	
Executive Way to Towne Center Dr	Current Configuration	6-lane Major Arterial	50,000	69,500	1.390	F	--	--	--	<u>Repurpose the right of way to provide for a 6-lane Prime Arterial.</u>
	UCP Buildout	6-lane Prime Arterial	60,000	--	--	--		1.158	F	
Miramar Road										
<u>I-805 SB Ramps to I-805 NB Ramps</u>	<u>Current Configuration</u>	<u>6 Lane Prime Arterial</u>	<u>60,000</u>	<u>66,000</u>	<u>1.100</u>	<u>F¹</u>	<u>66,000</u>	<u>1.100</u>	<u>F¹</u>	<u>No improvement proposed.</u>
<u>Eastgate Mall to Miramar Mall</u>	<u>Current Configuration</u>	<u>7 Lane Prime Arterial</u>	<u>70,000</u>	<u>72,200</u>	<u>1.031</u>	<u>F²</u>	<u>72,200</u>	<u>1.031</u>	<u>F²</u>	<u>No improvement proposed.</u>
<u>Miramar Mall to Camino Santa Fe</u>	<u>Current Configuration</u>	<u>6 Lane Prime Arterial</u>	<u>60,000</u>	<u>72,200</u>	<u>1.203</u>	<u>F</u>	<u>72,200</u>	<u>1.203</u>	<u>F</u>	<u>No improvement proposed.</u>

Roadway Segment	Current or UCP Buildout Configuration	Classification	LOS E Capacity	Future Year with Project			Future Year with Mitigation			Description of Measure
				ADT	V/C ratio	LOS	ADT	V/C ratio	LOS	
<u>Nobel Drive</u>										
<u>Villa La Jolla Dr to I-5 SB On Ramp</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>47,600</u>	<u>1.190</u>	<u>F</u>	<u>47,600</u>	<u>1.190</u>	<u>F</u>	<u>No improvement proposed.</u>
<u>I-5 SB On Ramp to I-5 NB Off Ramp/University Center Lane</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>41,700</u>	<u>1.043</u>	<u>F</u>	<u>41,700</u>	<u>1.043</u>	<u>F</u>	<u>No improvement proposed.</u>
<u>Torrey Pines Road</u>										
<u>La Jolla Village Drive to South</u>	<u>Current Configuration</u>	<u>4 Lane Major Arterial</u>	<u>40,000</u>	<u>36,800</u>	<u>0.920</u>	<u>E</u>	<u>36,800</u>	<u>0.920</u>	<u>E</u>	<u>No improvement proposed.</u>

Bold = Exceeds acceptable LOS D threshold indicating significant impact.

1 - This roadway segment would operate at a LOS F in the future year, however the v/c ratio would decrease compared to current conditions and thus is not considered a significant impact.

2 - This roadway segment would operate at a LOS F in the future year, however the v/c ratio would decrease compared to current conditions and thus is not considered a significant impact.

**Table 4.2-12
Future Year Intersection Operation with Implementation of Proposed Mitigation Measures**

Intersection	Peak Hour	Existing		Future Year With Project		Future Year After Mitigation		Description of Measure
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	
Genesee Avenue/ John Hopkins Drive	AM	17.9	B	98.5	F	19.3	B	Convert one WB through lane on Genesee Ave to a right-turn lane.
	PM	27.6	C	35.4	D	35.5	D	
Genesee Avenue/ Scripps Hospital	AM	20.2	C	61.3	E	<u>61.3</u>	<u>E</u>	No improvement proposed.
	PM	21.3	C	71.5	E	<u>71.5</u>	<u>E</u>	
Genesee Avenue/ La Jolla Village Drive	AM	77.1	E	121.4	F	<u>121.4</u>	<u>F</u>	No improvement proposed.
	PM	35.8	D	59.5	E	<u>59.5</u>	<u>E</u>	
Genesee Avenue/ Esplanade Court	AM	21.4	C	54.5	D	<u>54.5</u>	<u>D</u>	No improvement proposed.
	PM	38.2	D	97.9	F	<u>97.9</u>	<u>F</u>	
Genesee Avenue/ Nobel Drive	AM	32.9	C	97.9	F	<u>97.9</u>	<u>F</u>	No improvement proposed.
	PM	42.6	D	91.2	F	<u>91.2</u>	<u>F</u>	
Genesee Avenue/ Decoro Street	AM	28.6	C	112.1	F	75.7	E	Stripe EB and WB right-turn lanes on Decoro Street.
	PM	119.8	F	314.1	F	265.7	F	
Genesee Avenue/ Centurion Square	AM	66.6	E	154.1	F	<u>154.1</u>	<u>F</u>	No improvement proposed.
	PM	14.3	B	95.2	F	<u>95.2</u>	<u>F</u>	
Genesee Avenue/ Governor Drive	AM	67.4	E	163.7	F	48.7	D	Construct grade-separated intersection, removing NB and SB through movements. Two NB and SB through lanes required in the undercrossing.
	PM	66.5	E	110.3	F	54.6	D	
Genesee Avenue/ SR 52 WB Ramps	AM	27.5 <u>16.0</u>	D <u>C</u>	45.9 <u>18.6</u>	E <u>C</u>	19.3	B	Signalize intersection, square up ramps, add a protected phase for NB left-turns from Genesee Ave to SR 52 ramp. Add second right-turn lane exiting ramp.
	PM	371.8	F	603.8	F	38.4	D	
Genesee Avenue/ SR 52 EB Ramps	AM	55.8 <u>42.7</u>	E <u>D</u>	69.6 <u>49.9</u>	E <u>D</u>	<u>49.9</u>	<u>D</u>	No improvement proposed.
	PM	132.0 <u>126.7</u>	F	62.7 <u>58.0</u>	E ¹	<u>58.0</u>	E ¹	
Genesee Avenue/ Appleton Street/Lehrer Drive	AM	109.8	F	184.1	F	<u>184.1</u>	<u>F</u>	No improvement proposed.
	PM	43.0	D	66.4	E	<u>66.4</u>	<u>E</u>	
La Jolla Village Drive/ Torrey Pines Road	AM	27.4	C	53.1	D	23.4	C	Move pedestrian crossing from east leg to the west leg of the intersection and modify the signal phasing.
	PM	106.2	F	183.9	F	51.9	D	

Intersection	Peak Hour	Existing		Future Year With Project		Future Year After Mitigation		Description of Measure
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	
La Jolla Village Drive EB/ Gillman Drive	AM	13.0	B	17.8	C	19.9	B	Signalize intersection and install a protected SB left-turn phase. Restripe EB ramp approach to have a shared left-right and an exclusive right lane.
	PM	24.5	C	170.9	F	25.8	C	
La Jolla Village Drive/ Villa La Jolla Drive	AM	55.4	E	127.0	F	88.6	F	Add second WB right-turn lane from La Jolla Village Dr to Villa La Jolla Dr.
	PM	202.2	F	330.0	F	312.9	F	
La Jolla Village Drive/ I-5 SB Off Ramp	AM	31.5	C	48.0	D	--	--	No improvement proposed.
	PM	52.8	D	68.6	E	--	--	
La Jolla Village Drive/ Regents Road	AM	55.0	D	64.9	E	<u>64.9</u>	<u>E</u>	No improvement proposed.
	PM	132.4	F	202.1	F	<u>202.1</u>	<u>F</u>	
La Jolla Village Drive/ Executive Way	AM	18.9	B	75.8	E	<u>75.8</u>	<u>E</u>	No improvement proposed.
	PM	62.6	E	266.6	F	<u>266.6</u>	<u>F</u>	
La Jolla Village Drive/ Towne Center Drive	AM	80.6	F	161.2	F	<u>161.2</u>	<u>F</u>	No improvement proposed.
	PM	124.2	F	171.5	F	<u>171.5</u>	<u>F</u>	
La Jolla Village Drive/ I-805 SB Ramps	AM	112.1	F	171.3	F	<u>171.3</u>	<u>F</u>	No improvement proposed.
	PM	16.6	B	16.5	<u>B</u>	<u>16.5</u>	<u>B</u>	
Miramar Road/ Eastgate Mall	AM	17.0	B	23.0	C	21.6	C	Modify the SB Eastgate Mall approach to have two left-turn lanes and one right-turn lane.
	PM	91.8	F	104.2	F	48.0	D	
Miramar Road/ Camino Santa Fe	AM	36.8	D	44.4	D	<u>44.4</u>	<u>D</u>	No improvement proposed.
	PM	81.4	F	124.8	F	<u>124.8</u>	<u>F</u>	
Nobel Drive/ La Jolla Village Square Drive	AM	19.8	B	25.5	C	<u>25.5</u>	<u>C</u>	No improvement proposed.
	PM	45.4	D	150.6	F	<u>150.6</u>	<u>F</u>	
Nobel Drive/ I-5 SB On-Ramp	AM	3.7	A	3.5	A	<u>3.5</u>	<u>A</u>	No improvement proposed.
	PM	13.4	B	125.1	F	<u>125.1</u>	<u>F</u>	
Nobel Drive/ Regents Road	AM	48.4	D	34.7	C	<u>34.7</u>	<u>C</u>	No improvement proposed.
	PM	53.6	D	89.9	F	<u>89.9</u>	<u>F</u>	
Regents Road/ Luna Avenue	AM	42.6	D	54.5	D	<u>54.5</u>	<u>D</u>	No improvement proposed.
	PM	61.6	E	66.6	E	<u>66.6</u>	<u>E</u>	
N Torrey Pines Road/ La Jolla Shores Drive	AM	40.4	D	61.3	E	<u>61.3</u>	<u>E</u>	No improvement proposed.
	PM	60.6	E	169.9	F	<u>169.9</u>	<u>F</u>	
Gilman Drive/ I-5 SB Ramps	AM	9.7	A	10.5	B	11.7	B	Convert one of the WB through lanes to a second left-turn lane.
	PM	169.1	F	82.9	F ²	33.2	C	

Intersection	Peak Hour	Existing		Future Year With Project		Future Year After Mitigation		Description of Measure
		Delay (seconds)	LOS	Delay (seconds)	LOS	Delay (seconds)	LOS	
Towne Center Drive/ Eastgate Mall	AM	25.7	C	31.7	C	31.3	C	Add second WB left-turn lane from Eastgate Mall to Towne Centre Drive.
	PM	39.9	D	69.8	E	52.5	D	
Executive Way / Executive Drive	AM	12.3	B	17.1	B	21.8	C	Modify EB and WB left-turns to protected-permissive instead of permissive.
	PM	13.4	B	355.9	F	50.9	D	
Judicial Drive/ Eastgate Mall	AM	23.0	C	33.6	C	21.8	C	Modify NB and SB approach of Judicial Drive to be split-phased. Restripe NB approach to have a left-turn lane, shared left-through-right lane, right-turn lane.
	PM	25.9	C	67.6	E	46.2	D	
Governor Drive/ I-805 NB Ramps	AM	ECL	F	ECL	F	--	C	Install roundabout.
	PM	ECL	F	ECL	F	--	B	

¹This intersection would operate at LOS E in the future year; however, the intersection delay would be reduced by approximately 74 seconds compared to current conditions and thus is not considered a significant impact.

²This intersection would ~~continue to~~ operate at LOS F in the future year before mitigation; however, the intersection delay would be reduced by approximately 87 seconds compared to current conditions and thus is not considered a significant impact.

ECL = Exceeds calculable limit

Bold = Exceeds acceptable LOS D and significance thresholds, indicating significant impact.

Table 4.2-13
Summary of Impacted Roadway Segments after Proposed Mitigation Measures

Roadway Segment	Impact Directly Attributable to Project	Mitigated to Less than Significant	Partially Mitigated, Not Less than Significant	Significant after Mitigation
Eastgate Mall: Genesee Avenue to Easter Way				X
Eastgate Mall: Judicial Drive to Eastgate Drive		X		
Eastgate Mall: Eastgate Drive to Miramar Road		X		
Genesee Avenue: La Jolla Village Drive to Esplande Court	X	X		
Genesee Avenue: Nobel Drive to Centurion Square	X			X
Genesee Avenue: Centurion Square to Governor Drive	X			X
Genesee Avenue: Governor Drive to SR 52 WB Ramp				X
Genesee Avenue: SR 52 WB Ramp to SR 52 EB Ramp				X
Genesee Avenue: SR 52 EB Ramp to Lehrer Drive				X
La Jolla Village Drive: Revelle College Drive to Villa La Jolla	X			X
La Jolla Village Drive: Villa La Jolla Dr to I-5 SB Ramps				X
La Jolla Village Drive: I-5 SB Ramps to I-5 NB Ramps		X		
La Jolla Village Drive: I-5 NB Ramps to Lebon Drive		X		
La Jolla Village Drive: Lebon Drive to Regents Road		X		
La Jolla Village Drive: Regents Road to Genesee Avenue		X		
La Jolla Village Drive: Genesee Avenue to Executive Way		X		
La Jolla Village Drive: Executive Way to Towne Center Drive			X	X
Miramar Road: Miramar Mall to Camino Santa Fe				X
Nobel Drive: Villa La Jolla Dr to I-5 SB Ramp				X
Nobel Drive: I-5 SB ramp to I-5 NB Ramp				X
Torrey Pines Road: La Jolla Village Drive to South				X

**Table 4.2-14
Summary of Impacted Intersections after Proposed Mitigation Measures**

Intersection	Impact Directly attributable to Project	Mitigated to Less than Significant	Partially Mitigated, Not Less than Significant	Significant after Mitigation
Genesee Avenue/ John Hopkins Drive		X		
Genesee Avenue/Scripps Hospital				X
Genesee Avenue/La Jolla Village Drive				X
Genesee Avenue/Esplanade Court				X
Genesee Avenue/Nobel Drive				X
Genesee Avenue/Decoro Street	X		X	X
Genesee Avenue/Centurion Square	X			X
Genesee Avenue/ Governor Drive		X		
Genesee Avenue/ SR 52 WB Ramps		X		
Genesee Avenue/ SR 52 EB Ramps1	X			X
Genesee Avenue/Appleton Street/Lehrer Drive				X
La Jolla Village Drive/Torrey Pines Road		X		
La Jolla Village Drive EB/Gilman Drive		X		
La Jolla Village Drive/ Villa La Jolla Drive			X	X
La Jolla Village Drive/I-5 SB Off-Ramp	X			X
La Jolla Village Drive/Regents Road				X
La Jolla Village Drive/Executive Way				X
La Jolla Village Drive/ Towne Center Drive				X
La Jolla Village Drive/I-805 SB Ramps				X
Miramar Road/Eastgate Mall		X		
Miramar Road/Camino Santa Fe				X
Nobel Drive/La Jolla Village Square Drive				X
Nobel Drive/I-5 SB On-Ramp				X
Nobel Drive/Regents Road				X
Regents Road/Luna Avenue				X
N Torrey Pines Road/La Jolla Shores Drive				X
Gilman Drive/I-5 SB Ramps2	X	X		
Towne Center Drive/Eastgate Mall		X		
Executive Way /Executive Drive		X		
Judicial Drive/Eastgate Mall		X		
Governor Drive/ I-805 NB Ramps		X		

¹ This intersection would operate at LOS E in the future year; however, the intersection delay would be reduced by approximately 74 seconds compared to current conditions and thus is not considered a significant impact.

² This intersection would operate at LOS F in the future year before mitigation; however, the intersection delay would be reduced by approximately 87 seconds compared to current conditions and thus is not considered a significant impact.

4.2.4.3 Mitigation Framework

The City of San Diego’s General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City’s General Plan, Mobility

Transportation Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element of the UCP. However, significant traffic impacts would still result at the program-level. Project-level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented.

MITIGATION MEASURE TRA-1: Roadway segments shall be enhanced with the following:

- **TRA-1.1: Regents Road from Executive Drive to Genesee Avenue:** Widen the roadway to a four-lane Major Arterial with bicycle lanes, including relocation of the Genesee Avenue and Regents Road intersection to the east.
- **TRA-1.2: Miramar Road from I-805 Ramps to 300 feet east of Eastgate Mall:** Widen the roadway to an eight-lane Prime Arterial.
- **TRA-1.3: Eastgate Mall from Judicial Drive to Eastgate Drive:** Widen roadway to a four-lane Collector with a continuous left-turn lane and additional right-of way to accommodate bicycle facilities, excluding widening the bridge over I-805.
- **TRA-1.4: Eastgate Mall from Eastgate Drive to Miramar Road:** Widen roadway to a four-lane Collector with a continuous left-turn lane and additional right-of way to accommodate protected bicycle facilities.
- **TRA-1.5: Genesee Avenue from La Jolla Village Drive to Esplanade Court:** Repurpose the right-of-way to provide for a six-lane Prime Arterial with Class II bike facility with buffers.
- **TRA-1.6: Genesee Avenue from Nobel Drive to SR 52 WB Ramps:** Repurpose the right-of-way to provide for a modified six-lane Major Arterial from Nobel Drive to Decoro Street, modified six-lane Prime Arterial from Decoro Street to Centurion Square, and modified six-lane Major Arterial from Centurion Square to SR 52 WB Ramps with bicycle facilities that include a shared pedestrian-bicycle facility accommodated on widened sidewalks or Class II bike facility with buffers as right-of-way permits.
- **TRA-1.7: La Jolla Village Drive from I-5 Northbound Ramps to Towne Centre Drive:** Repurpose the right-of-way to a 6-lane Prime Arterial. This entails removal of

on-street parking and provides acceleration and deceleration lanes at existing driveways.

- **TRA-1.8: Genesee Avenue between SR 52 and North Torrey Pines Road:** Implement adaptive traffic control and transit signal priority measures.
- **TRA-1.9: La Jolla Village Drive between Torrey Pines Road and I-805:** Implement adaptive traffic control and transit signal priority measures.
- **TRA-1.10: Nobel Drive between La Jolla Village Square and Miramar Road:** Implement adaptive traffic control and transit signal priority measures.

MITIGATION MEASURE TRA-2: Intersections shall be enhanced with the following:

- **TRA-2.1: Genesee Avenue and John Hopkins Drive (Intersection 2):** Repurpose one of the five westbound through lanes on Genesee Avenue to become a second right-turn lane.
- **TRA-2.2: Genesee Avenue and Decoro Street (Intersection 15):** Stripe eastbound and westbound right-turn lanes on Decoro Street. On-street parking would need to be removed to add the right-turn pockets.
- **TRA-2.3: Genesee Avenue and Governor Drive (Intersection 17):** Construct of a grade-separated intersection (removing northbound and southbound through-movements), and construct two northbound and southbound through-lanes in the undercrossing.
- **TRA-2.4: Genesee Avenue and SR 52 Westbound Ramps (Intersection 18):** An Intersection Control Evaluation (ICE) will be conducted to determine the best measure for mitigation. One option is to signalize the intersection and square up ramps, adding a protected phase for northbound left-turns from Genesee Avenue to the SR 52 ramp, and add a second right-turn lane on the exit ramp.
- **TRA-2.5: La Jolla Village Drive and Torrey Pines Road (Intersection 21):** Relocate the pedestrian crossing from the east leg to the west leg of the intersection and implement signal phasing modification to improve operation.
- **TRA-2.6: La Jolla Village Drive Eastbound Ramps and Gilman Drive (Intersection 23b):** Signalize the intersection, install a protected southbound left-turn phase, and restripe eastbound ramp approach to have a shared left-right lane and an exclusive right-turn lane.
- **TRA-2.7: La Jolla Village Drive and Villa La Jolla Drive (Intersection 24):** Construct a second westbound right-turn lane from La Jolla Village Drive to Villa La Jolla Drive.

- **TRA-2.8: Miramar Road and Eastgate Mall (Intersection 34):** Modify the southbound Eastgate Mall approach to have two left-turn lanes and one right-turn lane.
- **TRA-2.9: Gilman Drive and I-5 Southbound Ramps (Intersection 69):** Convert one of the westbound through lanes to a second left-turn lane.
- **TRA-2.10: Towne Center Drive and Eastgate Mall (Intersection 73):** Construct a second westbound left-turn lane from Eastgate Mall to Towne Centre Drive.
- **TRA-2.11: Executive Way and Executive Drive (Intersection 76):** Traffic signal modification for eastbound and westbound left-turns to be “protected-permissive” instead of “permissive.”
- **TRA-2.12: Judicial Drive and Eastgate Mall (Intersection 77):** Traffic signal modification for northbound and southbound approach of Judicial Drive to be “split-phased” in the traffic signal, and restripe the northbound approach to have a left-turn lane, shared left-through-right lane, and right-turn lane.
- **TRA-2.13: Governor Drive and I-805 Northbound Ramps (Intersection 79):** An ICE will be conducted to determine the best measure for mitigation. One option is to install roundabout control at this roadway intersection.

4.2.4.4 Significance After Mitigation

~~Discretionary p~~Projects with the potential to substantially deteriorate traffic conditions would result in significant impacts. ~~Discretionary p~~Projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 ~~provided~~ would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

4.2.5 Impact Analysis

Issue 2: Would the Project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?

The City's CEQA Significance Determination Thresholds provide guidance for evaluation of environmental impacts related to transportation. Generally, a significant impact is identified when the addition of project traffic results in LOS dropping from LOS D or better to substandard LOS E or F. Table 4.2-15 summarizes the significant impact thresholds for freeway facilities operating at a substandard LOS with and without the Project. These thresholds, as applied to segments, are based upon an acceptable increase in the V/C ratio.

**Table 4.2-15
City of San Diego Measures of Significant Project Traffic Freeway Impacts**

LOS with Project	Allowable Change Due to Impact		
	Freeway Segments		Ramp Metering ¹ Delay (min)
	V/C	Speed decrease (mph)	
E	0.01	1.0	2.0
F	0.005	0.5	1.0

¹For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

Source: City of San Diego 2011a

4.2.5.1 Impact Analysis

Freeway Segments

Table 4.2-15 describes that a freeway segment impact is considered significant when the operation condition deteriorates to an unacceptable LOS of E or F. Or, when already operating at LOS E or F, a significant impact is caused when speeds decrease more than 1 mph at LOS E or 0.5 mph at LOS F.

Future Year with Adopted UCP

Table 4.2-16 outlines the significant impacts anticipated along study area freeway segments that would occur in the future year. This assumes that the Adopted UCP and all the transportation improvements associated with the current plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). Under these conditions, in the future year eight freeway segments would operate at an unacceptable LOS E or F.

**Table 4.2-16
Future Year Freeway Segments with Unacceptable LOS**

Freeway Segment	Direction	Existing				Future Year with Adopted UCP				Future Year with Project			
		Speed		LOS		Speed		LOS		Speed		LOS	
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
I-5													
SR 52 to Gilman Drive	NB	45.6	59.6	E	D	30.4	59.9	E	D	25.0	57.9	F	D
	SB	60.0	43.9	D	E	66.2	27.6	C	E	65.1	21.9	D	F
I-805													
SR 52 to Governor Drive	NB	47.6	59.7	E	D	20.1	55.4	F	D	17.0	54.3	F	D
	SB	60.0	34.5	D	F	70.0	5.0	B	F	70.0	5.0	B	F
Governor Drive to Nobel Drive	NB	41.3	60.0	E	D	7.4	59.9	F	D	5.0	59.0	F	D
	SB	60.0	48.4	D	E	69.4	22.2	C	F	69.3	19.3	C	F
Nobel Drive to La Jolla Village Drive	NB	49.6	60.0	E	D	32.1	65.5	E	C	30.5	65.2	E	D
	SB	60.0	54.3	D	E	70.0	41.8	B	E	70.0	40.5	B	E
La Jolla Village Drive to Mira Mesa Boulevard	NB	50.0	60.0	E	D	35.1	66.1	E	C	35.0	66.1	E	C
	SB	60.0	54.5	D	E	70.0	44.2	B	E	70.0	44.1	B	E
SR 52													
I-5 to Regents Road	EB	60.0	45.1	D	E	65.0	16.7	D	F	63.9	10.8	D	F
	WB	55.3	60.0	E	D	39.9	60.6	E	D	36.1	59.1	E	D
Regents Road to Genesee Avenue	EB	59.3	47.7	D	E	53.3	21.8	D	F	53.7	22.9	D	F
	WB	57.1	59.9	D	D	44.8	58.2	E	D	45.4	58.5	E	D
Genesee Avenue to I-805	EB	57.6	39.9	D	E	45.2	5.0	E	F	47.3	8.2	E	F
	WB	53.7	59.2	E	D	33.9	51.9	E	D	36.6	53.5	E	D

Bold = exceeds threshold indicating significant impact

Shaded Cell = Project results in a significant operational decrease as compared to Adopted UCP implementation in the future year

Future Year with Project

As detailed in Table 4.2-16, eight freeway segments included in the analysis would have significant impacts in the future year (same as the eight segments identified for Future Year with Adopted UCP). These impacts are a result of operating conditions worsening to unacceptable levels and also the continued deterioration in speed within segments already experiencing poor operating conditions.

As shown by the shaded cells in Table 4.2-16, five of the freeway segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP during at least one of the peak periods. These five freeway segments are considered to have a significant decrease in operation due to a decrease in speed which exceed the threshold (Table 4.2-15) when comparing the Project to the Future Year with Adopted UCP.

Freeway Ramp Metering

As outlined in Table 4.2-15, when assessing impacts at freeway ramps, an impact was considered significant when the traffic conditions result in an increase in delay of more than 2 minutes for ramps with less than a 15-minute delay, or an increase in delay of more than 1 minute for ramps with delays greater than 15 minutes.

Future Year with Adopted UCP

Table 4.2-17 outlines the significant impacts anticipated at study area freeway ramps that would occur in future year. Future Year with Adopted UCP assumes that the Adopted UCP and all the transportation improvements associated with the existing plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). Under these conditions, in the future year there would be a total of eight freeway ramps operating at an unacceptable LOS. All eight significant delays occur during the PM peak hour.

Future Year with Project

As shown in Table 4.2-17, eight freeway ramps would experience significant increases in delay in the future year (same as those identified under Future Year with Adopted UCP). The table provides the excess demand at the ramps and the resulting delay in minutes. As indicated in the table, all impacts would occur in the PM peak hour with the longest delay extending almost 2.5 hours.

**Table 4.2-17
Future Year Freeway Ramps with Unacceptable Delay**

Freeway Ramp	Existing		Future Year Adopted UCP		Future Year with Project	
	Excess Demand	Delay (min)	Excess Demand	Delay (min)	Excess Demand	Delay (min)
I-5 SB and Gilman Drive	22	2	556	70	656	82
I-5 SB and Nobel Drive	0	0	296	34	436	50
I-5 NB and La Jolla Village Drive WB to NB	0	0	252	27	192	21
I-5 NB and La Jolla Village Drive EB to NB	Ramp meter not on		492	46	517	48
I-5 NB and La Jolla Village Drive WB to SB	11	1	246	23	293	27
I-5 NB and La Jolla Village Drive EB to SB	89	9	736	129	823	144
I-5 NB and Genesee Avenue	Ramp meter not on		582	70	574	69
I-805 SB and Nobel Drive	80	21	88	23	130	34

Bold = exceeds threshold indicating significant impact

Shaded Cell	= Future Year with Project results in a significant operational decrease as compared to Future Year with Adopted UCP
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As shown by the shaded cells in Table 4.2-17, six of the freeway ramps that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP. These six segments are considered to have a significant decrease in operation due to an exceedance of the delay thresholds (Table 4.2-15) when comparing the Project to Future Year with Adopted UCP.

Implementation of the Project would significantly lessen the delay that would occur at the I-5 NB and La Jolla Village Drive WB to NB freeway ramp as compared to Future Year with Adopted UCP.

4.2.5.2 Significance of Impacts

Freeway Segments

Deteriorated traffic conditions would result in significant impacts at eight freeway segments with implementation of the Project in the future year and all of these impacts would also be anticipated to occur under Future Year with Adopted UCP. However, five of the freeway segments that would be operating at unacceptable LOS in the future year would be significantly

worse with implementation of the Project as compared to Future Year with Adopted UCP during at least one of the peak periods

Freeway Ramp Metering

Deteriorated operating conditions would result in significant impacts at eight freeway ramps with implementation of the Project in the future year and all of these impacts would also be anticipated to occur in the future year under Future Year with Adopted UCP. However, six of the freeway ramps that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP. Thus, the Project would result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp, and the impact would be significant.

4.2.5.3 Mitigation Framework

Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments and freeway ramps in the future year.

4.2.5.4 Significance After Mitigation

Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments in the future year. Thus, impacts at eight freeway segments would remain significant and unmitigated (Issues 2, 3, and 4):

- I-5: SR 52 to Gilman Drive
- I-805: SR 52 to Governor Drive
- I-805: Governor Drive to Nobel Drive
- I-805: Nobel Drive to La Jolla Village Drive
- I-805: La Jolla Village Drive to Mira Mesa Boulevard
- SR 52: I-5 to Regents Road
- SR 52: Regents Road to Genesee Ave
- SR 52: Genesee Avenue to I-805

Feasible mitigation is not available to reduce the significant impacts that would occur at freeway ramps in the future year. Thus, impacts at eight freeway ramps would remain significant and unmitigated (Issues 2, 3, and 4):

- I-5 SB and Gilman Drive

- I-5 SB and Nobel Drive
- I-5 NB and La Jolla Village Drive WB to NB
- I-5 NB and La Jolla Village Drive EB to NB
- I-5 NB and La Jolla Village Drive WB to SB
- I-5 NB and La Jolla Village Drive EB to SB
- I-5 NB and Genesee Avenue
- I-805 SB and Nobel Drive

4.2.6 Impact Analysis

Issue 3: Would the Project result in a substantial impact upon existing or planned transportation systems?

4.2.6.1 Impact Analysis

As shown in the analysis of Issues 1 and 2, there would be significant traffic impacts to roadway segments, intersections, freeway ramps, and freeway segments by future year with implementation of the Project. As described in the analysis above, some transportation impacts would occur regardless of implementation of the Project, and some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of Mitigation Measures TRA-1 and TRA-2, significant traffic impacts would still result.

4.2.6.2 Significance of Impacts

The Project would result in a substantial impact upon existing or planned transportation systems, and the impact would be significant.

4.2.6.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation-Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and

approval of the Project as part of the amendment to the Transportation Element. Project-level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented.

4.2.6.4 Significance after Mitigation

~~Discretionary p~~Projects with the potential to substantially deteriorate traffic conditions would result in significant impacts. ~~Discretionary p~~Projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 ~~provided~~ would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

4.2.7 Impact Analysis

Issue 4: Would the Project result in substantial alterations to present circulation movements, including effects on existing public access to beaches, parks, or other open space areas?

4.2.7.1 Impact Analysis

As shown in the analysis of Issues 1 and 2, significant traffic impacts would occur to existing circulation movements. With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by the future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP.

The Project proposes Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3, that would make alterations to the existing roadway network in an effort to improve areas of poor operation. None of the mitigation measures would substantially change the existing roadway

network or circulation movements, but would make adjustments to the existing roadways to improve traffic operations. Even with implementation of the mitigation measures, significant traffic impacts would still result and would present increased difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds, and other traffic-related delays. While these traffic-related delays would be significant, all public or private locations would still be accessible via the transportation network with implementation of the Project.

4.2.7.2 Significance of Impacts

The Project would result in a substantial impact to present circulation movements, including effects on existing public access areas and the impact would be significant.

4.2.7.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project-level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented.

4.2.7.4 Significance after Mitigation

Discretionary projects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation

~~measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time.~~ Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

4.2.8 Impact Analysis

Issue 5: Would the Project conflict with adopted policies, plans, or programs supporting alternative transportation modes?

4.2.8.1 Impact Analysis

Bicycle Facilities

As shown in Figure 4.2-2, Genesee Avenue currently includes a Class II Bike Lane along almost the entire length of the roadway from North Torrey Pines Road to SR 52. The City Bicycle Master Plan does not include additional bicycle facilities along Genesee Avenue. The removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not eliminate any plans to expand the bicycle facilities along the roadway. The Class II Bike Lane would remain in place along Genesee Avenue.

The City Bicycle Master Plan proposes Regents Road as a Class II (Bike Lane) or Class III (Bike Route) facility south of Nobel Drive and north of Governor Drive. Specifically, a Class II Bike Lane is shown crossing Rose Canyon on Regents Road in the Bicycle Master Plan (City of San Diego 2013a). The removal of the planned Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity between the north and south sides of Rose Canyon. The elimination of this potential north-south bicycle connection across Rose Canyon would be in conflict with some of the overarching goals and policies of transit plans to provide balanced and safe bicycle networks within and between communities. Thus, removal of the planned Regents Road Bridge from the UCP would be in conflict with planned bicycle network improvements as envisioned in local alternative transportation planning documents.

A variety of improvements in Mitigation Measures TRA-1 and TRA-2 include the accommodation of bicycle facilities along widened or improved roadways. The mitigation measures are based on planning documents such as the San Diego Regional Bike Plan, City of San Diego Pedestrian Planning Effort, Low-Stress Bicycling and Network Connectivity, and the UCP. Implementation of the mitigation measures would not conflict with policies or plans

related to bicycle facilities, but would serve to implement some of the planned bicycle facilities and work toward achieving more complete bicycle networks as envisioned.

Pedestrian Facilities

Elimination of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would also remove any sidewalk improvements associated with those projects, including the new Regents Road pedestrian crossing over Rose Canyon. However, Mitigation Measures TRA-1 and TRA-2 have been based in part on the City of San Diego Pedestrian Planning Effort and would provide improvements to pedestrian facilities such as widened sidewalks and relocation of pedestrian crossings, as well as a grade-separated intersection at Genesee Avenue and Governor Drive as (Mitigation Measure TRA-2.3). Such improvements would result in better accessibility and safety for pedestrians.

Alternative Transit Modes

The Genesee Avenue Corridor and Regents Road Corridor both serve as transit routes for bus service (see Figure 4.2-3). The removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not alter the ability of these roadways to continue serving as transportation corridors for public transit in the same capacity that they currently do. The Project would not impact service or access associated with rail service in Sorrento Valley.

4.2.8.2 Significance of Impacts

With implementation of the Project, the alternative modes of transit in the UCP Area would continue to operate in the same capacity as they do under current conditions. The removal of the planned Genesee Avenue Widening from the UCP would not be in conflict with alternative transportation policies and would not impede the ability to implement bicycle, pedestrian, or other alternative transit improvements in the future.

Implementation of Mitigation Measures TRA-1 and TRA-2 would be consistent with the applicable plans and policies related to alternative transportation and would serve to implement some of the planned improvements and work toward achieving the overall goals.

The removal of the planned Regents Road Bridge from the UCP would eliminate the planned crossing of Rose Canyon that would have been designed to accommodate pedestrians and bicyclists. This connection was identified in the Bicycle Master Plan. Because this future linkage would no longer occur with implementation of the Project, the loss of this planned pedestrian and

bicycle connection would conflict with adopted policies, plans, or programs supporting alternative transportation modes, and the impact would be significant.

4.2.8.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project-level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented.

4.2.8.4 Significance After Mitigation

~~Discretionary projects with the potential to substantially deteriorate traffic conditions would result in significant impacts. Discretionary projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or Capital Improvements Program (CIP), and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.~~

4.3 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

This section describes the aesthetic setting and regulatory framework and discusses the potential effects of the Project on views and visual character and in relation to light and glare.

4.3.1 Existing Conditions

4.3.1.1 UCP Area

Views and Visual Character²

The visual character of the UCP Area consists of built-up urban areas interspersed with canyons, hillsides, bluffs and other unique landforms that provide visual amenities, which separate and define urban areas. The area's steepest slopes occur along the coastline, on the south side of Sorrento Valley and along the southern slopes of Rose Canyon and San Clemente Canyon. The coastal bluffs are the most scenic landform in the community, providing expansive ocean views and lying entirely within the Torrey Pines State Natural Reserve and Torrey Pines City Park. The UCP Area also includes over 14,000 feet of shoreline, most of which consists of a sandy beach bordered by sheer cliffs or relatively undisturbed coastal canyons. Major canyon systems in the community include Sorrento Valley, Soledad Canyon, Rose Canyon, and San Clemente Canyon. In the vicinity of the Westfield UTC shopping center, the topography is a series of side canyons and rounded ridges that form the transition from the more pronounced major canyons to the mesa tops that generally lie in the vicinity of Miramar Road, north of Westfield UTC shopping center and UCSD UC San Diego. In addition, the wide valley floors and adjacent hillsides of Rose Canyon and San Clemente Canyon provide a unique character to the adjacent neighborhoods and to the community as a whole (City of San Diego 2014b).

The San Diego region includes several officially designated scenic highways protected by the California Scenic Highway Program, administered by Caltrans. Designated scenic highways are located in areas of outstanding natural beauty and are provided with special conservation treatment to keep the natural views protected. No designated scenic highways are located within the UCP Area.

Neighborhood Character

The 2014 UCP divides the community into four subareas (see Figure 4.1-2). The four subareas consist of Subarea 1: Torrey Pines; Subarea 2: Central; Subarea 3: Miramar; and Subarea 4:

² In this CEQA context, views include specific views from publicly accessible areas, and visual character includes the general visual context from publicly accessible areas.

South University. The Torrey Pines Subarea includes the Torrey Pines Mesa and surrounding slopes, and the ~~UCSD~~ UC San Diego campus. The area is bounded on the west by the Pacific Ocean and by North Torrey Pines Road adjacent to the campus, on the south by La Jolla Village Drive, on the east by Genesee Avenue and Regents Road, and on the north by Sorrento Valley and Los Peñasquitos Lagoon. ~~UCSD~~ UC San Diego is the urban focal point of this subarea and is known as a major center of scientific research. The ~~UCSD~~ UC San Diego campus, Salk Institute, and Scripps Clinic and Research Foundation are some examples of the uses currently located within the community. However, the Torrey Pines Subarea is also characterized by the open space areas of the Torrey Pines State Natural Reserve. This subarea consists of low-scale buildings set in a space dominated by the natural coastal landscape. The Central Subarea is the most urban subarea characterized by intense, multi-use urban development. It also consists of major residential, commercial, and office nodes in the City. The bold, contemporary high-rise residential, commercial, and office structures of the Golden Triangle provide a strong identity for this subarea. The Miramar Subarea is dominated by open spaces with restricted industrial development. This subarea is impacted by overflights of MCAS Miramar. The South University Subarea is characterized as a homogeneous, single-family residential neighborhood that draws its distinct identity from Rose Canyon to its north and San Clemente Canyon (Marian Bear Memorial Park) to its south (City of San Diego 2014b).

Light and Glare

The portions of the UCP Area near ~~UCSD~~ UC San Diego, large commercial retail areas (e.g. the Costa Verde and Westfield UTC shopping centers) are typically associated with groups of mid-rise commercial, office, and residential buildings. These facilities are internally lit and have associated outdoor entry and security lighting, parking lot lighting, lit signage, and landscape lighting. The area is also extensively lit by streetlights, motor vehicles, and transit vehicles traveling through the area.

4.3.1.2 Genesee Avenue Corridor

Views and Visual Character

The Genesee Avenue Corridor is presently used as a four-lane road from approximately Las Palmas Square Drive south to SR 52. The Genesee Avenue Corridor is bisected by the AT&SF railroad tracks and crosses Rose Canyon. Views along the Genesee Avenue Corridor are generally from motorists and pedestrians traversing Genesee Avenue and from residents who live along the Genesee Avenue Corridor. There are also views of the Genesee Avenue Corridor from intersecting streets. Views from motorists traveling along Genesee Avenue are direct and prolonged, particularly while idling during times of heavy congestion. Traveling south on

Genesee Avenue from Las Palmas Square Drive, views are dominated by commercial centers. The Costa Verde Center is to the west and a parking lot for the Westfield UTC shopping center is east of Genesee Avenue. South of Nobel Drive, views are of multi-family residential developments. Continuing south toward Rose Canyon, motorists can view the AT&SF railroad tracks below the Genesee Avenue overpass. From here, Genesee Avenue passes Rose Canyon, which provides a visually open space and natural vegetated setting. This portion of Genesee Avenue contains a landscaped median. To the east of the Genesee Avenue Corridor is University City High School. Heading farther south, views are dominated by multi-family and single-family residential developments. Marie Curie Elementary School is to the east. The intersection of Genesee Avenue and Governor Drive provides views of typical urban commercial roadway development; gas stations are located on each of the four corners. South of Governor Drive and the associated urban commercial and housing developments, the views are of vegetated embankments along both directions. This continues until the Genesee Avenue Corridor terminates at SR 52.

The level of urbanization surrounding the Genesee Avenue Corridor affects the quality of views from surrounding areas. For example, the multi-story residences provide views of the Genesee Avenue Corridor for a number of residences and block views from adjacent buildings. Unlike most residential uses, some residences on higher levels of the multi-story apartments may have clear views of the Genesee Avenue Corridor.

Neighborhood Character

The neighborhood character of the Genesee Avenue Corridor can be described as urban, with mid-rise and low-rise structures including multi-family and single-family residential, commercial, and public uses such as parks and schools. North of Rose Canyon, the character is largely high-density multi-family residential and commercial. South of Rose Canyon and north of Governor Drive the character is residential, with a combination of multi-family and single-family residential. At the intersection of Genesee Avenue with Governor Drive, the character is composed of several retail commercial uses. Farther south is characterized by single-family residential uses (City of San Diego 2014b).

Light and Glare

The Genesee Avenue Corridor is surrounded by diverse land uses, each contributing to sources of light and glare. The urban uses along the roadway incorporate lighting into their developments. The highly commercial areas (such as Costa Verde, Westfield UTC, and University Square shopping centers) are internally lit and also have associated outdoor entry and security lighting, parking lot lighting, signage that is lit, landscape lighting, and other sources of

night lighting. Residential areas have less intensive sources of light but can include parking lot lighting, outdoor security lighting, and landscape lighting. In addition to these light sources, the Genesee Avenue Corridor is also extensively lit by streetlights, motor vehicles, and transit vehicles traveling on the street and on SR 52. Mid-rise buildings along the Genesee Avenue Corridor are occasional sources of glare, during periods when their windows and light-colored reflective building materials reflect the sun's rays. However, these occurrences are relatively minor and intermittent.

4.3.1.3 Regents Road Corridor

Views and Visual Character

The Regents Road Corridor extends for approximately 1.6 miles and currently has four lanes of traffic, except over Rose Canyon where there is no roadway. The corridor extends along Regents Road from approximately Caminito Terviso on the north side of Rose Canyon south to San Clemente Canyon. Views along the Regents Road Corridor would generally be from motorists and pedestrians on Regents Road and residents living along the Regents Road Corridor. There are also views of the Regents Road Corridor from intersecting streets. Views from motorists traveling along Regents Road are direct and prolonged, particularly while idling during times of heavy congestion. The views north of Rose Canyon are dominated by multi-family residential developments. The Doyle Community Park is a prominent feature of this portion of the Regents Road Corridor, though many park elements are obstructed by the parking lot and landscaping adjacent to the road. Immediately south of Rose Canyon, Regents Road is two lanes, with views of the slopes of Rose Canyon to the west. Going south and passing Milliken Avenue, Regents Road turns into four lanes. Here, the views are dominated by single-family residential developments. Approaching Governor Drive, the viewshed consists of multi-family and commercial uses lining the roadway. South of Governor Drive, Regents Road becomes a depressed roadway with vegetated embankments along both directions. Single-family residential homes are set back and buffered from the road along this segment. This continues until the Regents Road Corridor terminates at SR 52.

Neighborhood Character

Similar to the Genesee Avenue Corridor, the neighborhood character can be described as urban, with mid-rise and low-rise structures including multi-family and single-family residential, commercial, and public uses such as parks and schools. At the northernmost end of the Regents Road Corridor are multi-family residential developments on both sides of Regents Road. Regents Road terminates just past the multi-family residential developments, although the pavement continues to the northern edge of Rose Canyon. South of Rose Canyon, Regents Road is

generally lined with a mix of single-family, multi-family, and commercial uses. The level of urbanization surrounding the Project site affects the quality of views from surrounding areas. For example, the multi-story residences provide views of the Regents Road Corridor for a number of residences and block views from adjacent buildings. Unlike most single-family residential uses, some residences on higher levels of the multi-story apartments may have clear views of the Regents Road Corridor.

Light and Glare

The Regents Road Corridor is surrounded by diverse land uses, each contributing to sources of light and glare similar to that described for the Genesee Avenue Corridor. The surrounding development has night lighting associated with existing buildings and developments, parking lots, and street lighting. The Regents Road Corridor does not have any other night-lighted areas, nor does it have nearby areas of substantial glare or shading from buildings.

4.3.2 Regulatory Framework

4.3.2.1 State

California Energy Code

The California Energy Code (24 CCR Part 6) creates standards to reduce energy consumption. The type of luminaries and the allowable wattage of certain outdoor lighting applications are regulated.

Scenic Highway Program

Recognizing the growing need to protect the state's scenic beauty, the California State legislature established the Scenic Highway Program in 1963. The program is administered by Caltrans and consists of laws, incentives, and guidelines that are intended to protect the scenic, historic, and recreational resources within designated scenic highway corridors. Scenic corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way, and is composed primarily of scenic and natural features. Topography, vegetation, viewing distance, and/or jurisdictional lines determine the corridor boundaries (Caltrans 2008). When a city or county nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway. Because a scenic corridor is the land generally adjacent to and visible from the highway, it is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon. No designated scenic highways are located within the UCP Area.

4.3.2.2 Local

City of San Diego Municipal Code

Lighting Regulations

Lighting within the City is controlled by the City's Outdoor Lighting Regulations per Section 142.0740 of the City's Municipal Code (City of San Diego 2014c). The City's Outdoor Lighting Regulations are intended to protect surrounding land uses as well as activities related to astronomy at the Palomar and Mount Laguna observatories from excessive light generated by new development.

Glare Regulations

Glare within the City is controlled by City's Municipal Code Section 142.0730 (Glare Regulations). The City's Glare Regulations (City of San Diego 2012c) include the following:

- A maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30 percent (Section 142.0730 (a)).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).

City of San Diego General Plan

The Urban Design Element of the City of San Diego General Plan guides physical development toward a desired scale and character consistent with the social, economic, and aesthetic values of the City, and addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages. The plan establishes goals and policies for the pattern and scale of development and the character of the built environment. It is intended that the urban design policies be further supplemented with site-specific community plan recommendations. Goals and policies related to visual effects and neighborhood character most specific to the Project are included in Table 4.3-1.

**Table 4.3-1
City of San Diego General Plan – Urban Design Element
Goals and Policies**

Goals: General Urban Design	A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects desirable community character and context.
Goals: General Urban Design	Utilization of landscape as an important aesthetic and unifying element throughout the City.
UD-A.1.	Preserve and protect natural landforms and features.
UD-A.2.	Use open space and landscape to define and link communities.
UD-A.3.	Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.
UD-A.5.	Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
UD-A.6.	Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
UD-A.8.	Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.
UD-A.9.	Incorporate existing and proposed transit stops or stations into project design. Provide attractively designed transit stops and stations that are adjacent to active uses, recognizable by the public, and reflect desired neighborhood character.
UD-A.11.	Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.
UD-A.12.	Reduce the amount and visual impact of surface parking lots.
UD-A.13.	Provide lighting from a variety of sources at appropriate intensities and qualities for safety.
UD-A.14.	Design project signage to effectively utilize sign area and complement the character of the structure and setting.
UD-A.16.	Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.
Goals: Distinctive Neighborhoods and Residential Design	Architectural design that contributes to the creation and preservation of neighborhood character and vitality.
UD-B.1.	Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.
UD-B.4.	Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.
UD-B.5.	Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.
UD-B.7.	Work with community groups and property owners to ensure adequate street maintenance, public landscape maintenance, law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.
UD-C.1.	In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.
UD-C.3.	Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.
UD-C.7.	Enhance the public streetscape for greater walkability and neighborhood aesthetics.

Source: City of San Diego, 2008 General Plan Urban Design Element

University Community Plan

The UCP was adopted by the San Diego City Council in July 1987 and was most recently amended in August 2014 amending the Local Coastal Program Land Use Maps to include the North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program Project Overlay Map. The UCP is a refinement of citywide goals contained in the General Plan and is intended to serve as a comprehensive guide for residential, recreational, industrial, commercial, office, and multi-use developments, open space preservation and recreation, and development of a transportation network within the plan area.

The UCP Urban Design Element provides the urban design guidelines as well as the Development Intensity Element for the UCP Area. These policies are used to guide the form of urban growth in the UCP Area. The applicable goals from the Urban Design Element include the following:

- Improve accessibility and use relationships within the community by establishing well-defined, multi-modal linkage systems.
- Establish standards which give physical design direction to private developments and public improvements.
- Provide for the needs of pedestrians in all future design and development decisions.
- Ensure that San Diego's climate and the community's unique topography and vegetation influence the planning and design of new projects.

Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones and the planned district ordinances that specify permitted land use and zoning based development standards.

The Community Plan Implementation Overlay Zone

The CPIOZ is contained in City of San Diego Municipal Code Chapter 13, Article 2, Division 14). The CPIOZ is implemented to provide supplemental development regulations that are tailored to specific sites within community plan areas of the City. The intent of these regulations is to ensure that development proposals are reviewed for consistency with the use and

development criteria that have been adopted for specific sites as part of the community plan update process. The UCP contains CPIOZ Type A & B

Coastal Zone Overlay

Portions of the UPC Area are located within the Coastal Zone Overlay (City of San Diego 2014d). This overlay is intended to protect and enhance the quality of public access and coastal resources.

Coastal Height Limit Overlay Zone

Generally, the area within the UPC Area west of I-5 is located within the Coastal Height Limit Overlay Zone. The Coastal Height Limit Overlay Zone provides supplemental height limitations and permit requirements for specific coastal areas (City of San Diego 2014d).

Sensitive Coastal Overlay Zone

The area generally located within the Torrey Pines State Natural Reserve is located within the Sensitive Coastal Overlay Zone (City of San Diego 2014d) as depicted in Diagram 132-06A). This overlay is intended to protect and enhance the quality of sensitive coastal bluffs, coastal beaches, and wetlands. The Torrey Pines State Natural Reserve is outside the zoning jurisdiction of the City but is in the UCP.

City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area

The San Diego County MSCP Subregional Plan is a comprehensive, long-term habitat conservation planning program designed to provide permit-issuance authority for “take” of covered species to local jurisdictions in the southwestern San Diego County region. Through implementation of its MSCP individual Subarea Plan, the City of San Diego is a participant in the County’s MSCP Subregional Plan. The Subarea Plan designates the City’s MHPA a preserve area established to delineate core biological resource areas and corridors targeted for conservation. Limited development in these areas is allowed to occur and is regulated by the City’s Biology Guidelines for ESLs (City of San Diego 2012a).

Section 1.4.2 of the City’s MSCP Subarea Plan includes general planning policies and design guidelines for the planning of projects adjacent to or within the MHPA, including land use adjacency guidelines in Section 1.4.3 and Appendix A of the City’s MSCP Subarea Plan. Portions of Rose Canyon and San Clemente Canyon are designated MHPA. Guidelines most

applicable to the Project regarding visual and neighborhood character include those directing night lighting away from MHPA lands.

4.3.3 Significance Determination Thresholds

Based on the City Significance Determination Thresholds (2011a), which have been modified to reflect a programmatic analysis for the Project, impacts related to visual effects and neighborhood character would be significant if the Project would:

1. Result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan;
2. Result in the creation of a negative aesthetic site or project;
3. Cause a substantial alteration to the existing or planned character of the area;
4. Cause a loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;
5. Create a substantial change in the existing landform; or
6. Create substantial light or glare which would adversely affect daytime or nighttime views in the area.

4.3.4 Impact Analysis

Issue 1: Would the Project create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

4.3.4.1 Impact Analysis

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor generally traverses through a highly urbanized setting not associated with scenic views. However, the Genesee Avenue Corridor crosses Rose Canyon, which is considered a natural scenic area. By removing the planned Genesee Avenue Widening from the UCP, the existing bridge and associated infrastructure would remain in place and there would be no visual change from existing conditions. The additional footings that would be necessary for a widened Genesee Avenue Bridge across Rose Canyon would not be installed and the bridge deck would not be expanded. The continued presence of the existing Genesee Avenue

roadway and bridge would not create new or increased view blockages of scenic public areas, views, or vistas.

Removal of Regents Road Bridge

The Regents Road Corridor generally traverses through a highly urbanized setting not associated with scenic views, as the roadway terminates on both the north and south sides of Rose Canyon. By removing the planned Regents Road Bridge from the UCP, there would be no visual change from existing conditions. No new bridge, footings, or other associated visual elements of a bridge or roadway structure that could have the potential to interfere, obstruct, or block views of scenic resources in the Rose Canyon area would be constructed. The continued presence of Regents Road in its existing condition would not create new or increased view blockages of scenic public areas, views, or vistas.

4.3.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

The unaltered presence of the existing Genesee Avenue roadway and bridge would not create new or increased view blockages of scenic public areas, views, or vistas. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would not create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the UCP. The impact would be less than significant.

Removal of Regents Road Bridge

The unaltered presence of the existing Regent Road roadway would not create new or increased view blockages of scenic public areas, views, or vistas. Therefore, the removal of the planned Regents Road Bridge from the UCP would not create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the UCP. The impact would be less than significant.

4.3.4.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.3.5 Impact Analysis

Issue 2: Would the Project result in the creation of a negative aesthetic site or project?

4.3.5.1 Impact Analysis

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor generally traverses through a highly urbanized setting, with the exception of the natural open space associated with Rose Canyon. There are many highly developed roadways and transportation-related facilities throughout and adjacent to the Genesee Avenue Corridor. Visually, the existing Genesee Avenue roadway is of an appropriate size and scale based on the urban setting it traverses and similar roadway facilities in the immediate area. It is a normal part of the existing urban visual environment. The removal of the planned Genesee Avenue Widening from the UCP would eliminate the need for some very large retaining walls, cut slopes, and other landform alterations that would cause visual modifications to the existing viewshed. The continued presence of Genesee Avenue in its existing built condition would not create a new or altered negative aesthetic or change to community character within the roadway corridor.

Removal of Regents Road Bridge

The Regents Road Corridor generally traverses through a highly urbanized setting. As currently included in the UCP, a new bridge would be constructed across Rose Canyon to connect Regents Road as a through roadway. Development of a bridge and associated roadway modifications would introduce a new large and urban visual element that would affect the natural aesthetic character of the Rose Canyon area. The bridge columns, footings, abutments, and bridge surface would add substantial visual mass, bulk, and height that do not currently exist in that area of the natural canyon open space.

By removing the planned Regents Road Bridge from the UCP, there would be no visual change from existing conditions. Under the Project, no new bridge, abutments, or other associated visual elements of a bridge or roadway structure that could have the potential to create a negative aesthetic in the natural visual setting of Rose Canyon would be constructed. The continued presence of Regents Road in its existing condition would not create a new or altered visual condition or change to community character.

4.3.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

Retaining Genesee Avenue in its current built condition would not cause visual modifications to the existing viewshed or change to the community character. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would not create a new or altered negative aesthetic within the UCP Area. The impact would be less than significant.

Removal of Regents Road Bridge

Retaining Regents Road in its current built condition with no new bridge structure across Rose Canyon would not cause visual modifications to the existing viewshed or change to the community character. Therefore, the removal of the planned Regents Road Bridge from the UCP would not create a new or altered negative aesthetic within the UCP Area. The impact would be less than significant.

4.3.5.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.3.6 Impact Analysis

Issue 3: Would the Project cause a substantial alteration to the existing or planned character of the area?

4.3.6.1 Impact Analysis

Removal of Genesee Avenue Widening

As described in Section 4.3.1, the Genesee Avenue Corridor is mostly located through a highly urbanized environment with many areas already developed or at least partially built out. The Rose Canyon and San Clemente Canyon areas provide natural open space areas that are traversed by Genesee Avenue.

Removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial alteration to the character of the area. The existing road currently serves the UCP Area and operates as a major thoroughfare. While traffic conditions would likely continue to worsen with increased volume on Genesee Avenue in the future, the roadway is currently very

busy and heavy traffic is already expected as a normal travel condition. Elimination of the planned Genesee Avenue Widening from the UCP and retention of the roadway in its current condition would not open up a new area for development or change the overall character of the community.

Removal of Regents Road Bridge

Similar to Genesee Avenue, the Regents Road Corridor is mostly located through a highly urbanized environment. The Rose Canyon and San Clemente Canyon areas provide natural open space areas in the vicinity of Regents Road.

Removal of the planned Regents Road Bridge from the UCP would not result in a substantial alteration to the character of the area. The existing road currently serves the University community independently on both the north and south sides of Rose Canyon. Rose Canyon would remain in its current natural state and would not be affected or modified by the introduction of new built elements such as bridge columns, abutments, and the bridge surface. Without the bridge, operating conditions of the Regents Road would continue to be impacted by ongoing growth and associated increases in traffic volumes, but would not have substantial changes due to the new connection that would be provided if the bridge were constructed. Thus, elimination of the planned Regents Road Bridge from the UCP and retention of the roadway in its current condition would not open up a new area for development or change the overall character of the community. In fact, the elimination of the planned Regents Road Bridge would continue to exclude the ability of travelers to access the opposite side of Rose Canyon via Regents Road, thus reducing access provided to and from the community.

4.3.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

Elimination of the planned Genesee Avenue Widening from the UCP and retention of the roadway in its current condition would not open up a new area for development or change the overall character of the community. The removal of the planned Genesee Avenue Widening from the UCP would not cause a substantial alteration to the existing or planned character of the area. The impact would be less than significant.

Removal of Regents Road Bridge

Elimination of the planned Regents Road Bridge from the UCP and retention of the roadway in its current condition would not open up a new area for development or change the overall

character of the community. The removal of the planned Regents Road Bridge from the UCP would not cause a substantial alteration to the existing or planned character of the area. The impact would be less than significant.

4.3.6.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.3.7 Impact Analysis

Issue 4: Would the Project cause a loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?

4.3.7.1 Impact Analysis

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would eliminate any construction or roadway modification that would have been required to implement the road widening and bridge over Rose Canyon. Because Genesee Avenue would remain in its current configuration, no trees or other unique or distinctive landmark features would be affected or lost.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge from the UCP would eliminate any construction that would have been required to install the new bridge and roadway approaches within and adjacent to the natural vegetated areas of Rose Canyon. Because Regents Road would remain in its current configuration with no construction activities required, no trees or other unique or distinctive landmark features would be affected or lost.

4.3.7.2 Significance of Impacts

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor would remain in its current configuration with no construction activities; thus, no trees or other unique or distinctive landmark features would be affected or lost. The removal of the planned Genesee Avenue Widening from the UCP would not cause a loss of any distinctive or landmark trees, or stand of mature trees as identified in the community plan. There would be no impact.

Removal of Regents Road Bridge

The Regents Road Corridor would remain in its current configuration with no construction activities or new bridge structure; thus, no trees or other unique or distinctive landmark features would be affected or lost. The removal of the planned Regents Road Bridge from the UCP would not cause a loss of any distinctive or landmark trees, or stand of mature trees as identified in the community plan. There would be no impact.

4.3.7.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.3.8 Impact Analysis

Issue 5: Would the Project create a substantial change in the existing landform?

4.3.8.1 Impact Analysis

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would eliminate any construction or roadway modification that would have been required to implement the road widening and bridge over Rose Canyon. Under the Project, Genesee Avenue would remain in its current configuration and would not require construction activities involving excavation or fill or other grading activities that could affect landforms or other scenic resources or alter more than 2,000 cubic yards (cy) of earth per graded acre.

Removal of Regents Road Bridge

Similar to Genesee Avenue, removal of the planned Regents Road Bridge from the UCP would eliminate any construction or roadway modifications that would have been required to install the bridge over Rose Canyon. Under the Project, Regents Road would remain in its current configuration and would not require construction activities involving excavation or fill or other grading activities that could affect landforms or other scenic resources or alter more than 2,000 cy of earth per graded acre.

4.3.8.2 Significance of Impacts

Removal of Genesee Avenue Widening

Genesee Avenue would remain in its current configuration and would not require construction activities involving excavation or fill or other grading activities that could affect landforms or other scenic resources or alter more than 2,000 cy of earth per graded acre. Thus, the removal of the planned Genesee Avenue Widening from the UCP would not create a substantial change in the existing landform. There would be no impact.

Removal of Regents Road Bridge

Regents Road would remain in its current configuration and would not require construction activities involving excavation or fill or other grading activities that could affect landforms or other scenic resources or alter more than 2,000 cy of earth per graded acre. Thus, the removal of the planned Regents Road Bridge from the UCP would not create a substantial change in the existing landform. There would be no impact.

4.3.8.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.3.9 Impact Analysis

Issue 6: Would the Project create substantial light or glare which would adversely affect daytime or nighttime views in the area?

4.3.9.1 Impact Analysis

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor generally traverses through a highly urbanized setting, with the exception of the natural open space associated with the local canyons. There are many sources of lights associated with the roadway as well as in the surrounding urban setting. With removal of the planned Genesee Avenue Widening from the UCP as proposed by the Project, the existing Genesee Avenue roadway would remain in its current condition, including the existing street lighting and lights emitted by vehicle headlights. The ambient light emitted into the nighttime sky due to roadway operation would remain the same as the current condition. Maintenance of

Genesee Avenue in its current built condition would not create a new or altered source of light or glare or require the use of highly reflective material.

Removal of Regents Road Bridge

Similar to the description of Genesee Avenue, the Regents Road Corridor is located through a highly urbanized setting with a wide variety of light and glare sources associated with both the roadway and the surrounding development. With removal of the planned Regents Road Bridge from the UCP as proposed by the Project, the existing Regents Road would remain in its current condition, including the existing street lighting and lights emitted by vehicle headlights. The ambient light emitted into the nighttime sky due to roadway operation would remain the same as the current condition and there would continue to be no lighting across Rose Canyon at this location. Maintenance of Regents Road in its current built condition would not create a new or altered source of light or glare or require the use of highly reflective material.

4.3.9.2 Significance of Impacts

Removal of Genesee Avenue Widening

Maintenance of Genesee Avenue in its current built condition would not create a new or altered source of light or glare or require the use of highly reflective material. The ambient light emitted into the nighttime sky due to street lighting and vehicle headlights would remain the same. Thus, the removal of the planned Genesee Avenue Widening from the UCP would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. There would be no impact.

Removal of Regents Road Bridge

Maintenance of Regents Road in its current built condition would not create a new or altered source of light or glare or require the use of highly reflective material. The ambient light emitted into the nighttime sky due to street lighting and vehicle headlights would remain the same. Thus, the removal of the planned Regents Road Bridge from the UCP would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. There would be no impact.

4.3.9.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.4 AIR QUALITY

This section describes existing air quality conditions, summarizes applicable regulations, and analyzes potential short-term construction and long-term operational air quality impacts of the Project. In addition, mitigation measures are recommended, as necessary, to reduce significant air quality impacts. The emissions calculations are provided in Appendix D.

4.4.1 Existing Conditions

Air quality is defined by the concentration of pollutants related to human health. Concentrations of air pollutants are determined by the rate and location of pollutant emissions released by pollution sources, and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, and sunlight. Therefore, ambient air quality conditions within the local air basin are influenced by such natural factors as topography, meteorology, and climate, in addition to the amount of air pollutant emissions released by existing air pollutant sources.

Climate, Topography, and Meteorology

Climate, topography, and meteorology influence regional and local ambient air quality. Southern California is characterized as a semiarid climate, although it contains three distinct zones of rainfall that coincide with the coast, mountain, and desert. The Project is located in the City of San Diego in the south coastal portion of San Diego County, and within the San Diego Air Basin (SDAB). The SDAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountain ranges to the east. The topography in the SDAB region varies greatly, from beaches on the west, to mountains and then desert to the east.

The climate of the SDAB is characterized by warm, dry summers and mild winters. One of the main determinants of its climatology is a semipermanent high-pressure area in the eastern Pacific Ocean. This high-pressure cell maintains clear skies for much of the year. During the winter, this pattern changes, and low-pressure storms are brought into the region, causing widespread precipitation. During fall, the region often experiences dry, warm easterly winds, locally referred to as Santa Ana winds, which raise temperatures and lower humidity, often to less than 20 percent.

The local meteorology of the area is represented by measurements recorded at the SDIA station. The normal annual precipitation, which occurs primarily from October through April, is approximately 9 inches. Normal January temperatures range from an average minimum of 50 degrees Fahrenheit (°F) to an average maximum of 65°F, and August temperatures range from an

average minimum of 67°F to an average maximum of 76°F (WRCC 2015). The predominant wind direction and speed, measured at the SDIA station, is from the west at approximately 6.0 mph (WRCC 2015).

A dominant characteristic of spring and summer is night and early morning cloudiness, locally known as the marine layer. Low clouds form regularly, frequently extending inland over the coastal foothills and valleys. These clouds usually dissipate during the morning, and afternoons are generally clear.

A common atmospheric condition known as a temperature inversion affects air quality in the SDAB. During an inversion, air temperatures get warmer rather than cooler with increasing height. Inversion layers are important for local air quality, because they inhibit the dispersion of pollutants and result in a temporary degradation of air quality. The pollution potential of an area is largely dependent on a combination of winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low-level inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 mph, the atmospheric pollution potential is greatly reduced.

Criteria Air Pollutants

The U.S. Environmental Protection Agency (USEPA) and ARB focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead, and particulate matter (PM), which is subdivided into two classes based on particle size: PM equal to or less than 10 micrometers in diameter (PM₁₀) and PM equal to or less than 2.5 micrometers in diameter (PM_{2.5}). Because the air quality standards for these air pollutants are regulated using human health and environmentally based criteria, they are commonly referred to as “criteria air pollutants.” The following paragraphs provide information on the source(s) and health effects of these pollutants:

Ozone. Ozone is the principal component of smog and is formed in the atmosphere through a series of reactions involving reactive organic gases (ROG) and nitrogen oxides (NO_x) in the presence of sunlight. ROG and NO_x are called precursors of ozone. NO_x includes various combinations of nitrogen and oxygen, including nitric oxide (NO), NO₂, and others. Significant ozone concentrations are usually produced only in the summer, when atmospheric inversions are greatest and temperatures are high. ROG and NO_x emissions are both considered critical in ozone formation.

Ozone is a principal cause of lung and eye irritation in the urban environment. Individuals exercising outdoors; children; and people with preexisting lung disease, such as asthma and

chronic pulmonary lung disease, are considered the most susceptible subgroups for ozone effects. Short-term exposure (lasting for a few hours) to ozone can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels.

Carbon Monoxide. CO is a colorless and odorless gas that, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Relatively high concentrations are typically found near crowded intersections and along heavily used roadways carrying slow-moving traffic. Even under most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Vehicle traffic emissions can cause localized CO impacts, and severe vehicle congestion at major signalized intersections can generate elevated CO levels, called “hot spots,” which can be hazardous to human receptors adjacent to the intersections.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes.

Nitrogen Dioxide. NO₂ is a product of combustion and is generated in vehicles and in stationary sources, such as power plants and boilers. It is also formed when ozone reacts with NO in the atmosphere. As noted above, NO₂ is part of the NO_x family and is a principal contributor to ozone and smog generation.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children, is associated with long-term exposure to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these subgroups.

Sulfur Dioxide. SO₂ is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. SO₂ is also a product of diesel engine combustion. SO₂ in the atmosphere contributes to the formation of acid rain.

In asthmatics, increased resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, is observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Lead. Lead is a highly toxic metal that may cause a range of human health effects. Previously, the lead used in gasoline anti-knock additives represented a major source of lead emissions to the atmosphere. USEPA began working to reduce lead emissions soon after its inception, issuing the first reduction standards in 1973. Lead emissions have significantly decreased due to the near elimination of leaded gasoline use.

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of lead on the respiratory system. This analysis does not directly evaluate lead because little to no quantifiable and foreseeable emissions of these substances would be generated by the Project. Lead emissions have significantly decreased due to the near elimination of leaded fuel use.

Particulate matter. PM is a complex mixture of extremely small particles and liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. Natural sources of PM include windblown dust and ocean spray.

The size of PM is directly linked to the potential for causing health problems. USEPA is concerned about particles that are 10 micrometers in diameter or smaller, because these particles generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Health studies have shown a significant association between exposure to PM and premature death. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung

function, asthma attacks, and certain cardiovascular problems, such as heart attacks and irregular heartbeat (USEPA 2007). Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children.

PM_{2.5}. Fine particles, such as those found in smoke and haze, are *PM_{2.5}*. Sources of fine particles include all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. *PM_{2.5}* is also formed through reactions of gases, such as SO_2 and NO_x , in the atmosphere. *PM_{2.5}* is the major cause of reduced visibility (haze) in California.

Daily fluctuations in *PM_{2.5}* concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with preexisting respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of *PM₁₀* and *PM_{2.5}*.

PM₁₀. *PM₁₀* includes both fine and coarse dust particles; the fine particles are *PM_{2.5}*. Coarse particles, such as those found near roadways and dusty industries, are larger than 2.5 micrometers and smaller than 10 micrometers in diameter. Sources of coarse particles include crushing or grinding operations and dust from paved or unpaved roads. Control of *PM₁₀* is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

Air Quality Standards

Health-based air quality standards have been established for the aforementioned pollutants by ARB at the state level and by USEPA at the national level. These standards were established to protect the public within a margin of safety from adverse health impacts due to exposure to air pollution. California has also established standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. Table 4.4-1 presents the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS).

Attainment Status in the SDAB

Both USEPA and ARB use ambient air quality monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. An “attainment”

**Table 4.4-1
National and California Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards ^a	National Standards ^b	
		Concentration ^c	Primary ^{cd}	Secondary ^{ce}
Ozone	1 hour	0.09 ppm (180 µg/m ³)	–	Same as primary standard
	8 hours	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	
Respirable particulate matter (PM ₁₀) ^f	24 hours	50 µg/m ³	150 µg/m ³	Same as primary standard
	Annual arithmetic mean	20 µg/m ³	–	
Fine particulate matter (PM _{2.5}) ^f	24 hours	–	35 µg/m ³	Same as primary standard
	Annual arithmetic mean	12 µg/m ³	12 µg/m ³	
Carbon monoxide	8 hours	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	None
	1 hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	
Nitrogen dioxide ^g	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as primary standard
	1 hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	None
Sulfur dioxide ^h	Annual arithmetic mean	–	0.030 ppm (for certain areas) ^h	–
	24 hours	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ^h	–
	3 hours	–	–	0.5 ppm (1,300 µg/m ³)
	1 hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	–
Lead ^{ij}	30-day average	1.5 µg/m ³	–	–
	Calendar quarter	–	1.5 µg/m ³ (for certain areas) ^j	Same as primary standard
	Rolling 3-month average	–	0.15 µg/m ³	
Visibility-reducing particles	8 hours	See footnote j	No national standards	
Sulfates	24 hours	25 µg/m ³		
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m ³)		
Vinyl chloride ⁱ	24 hours	0.01 ppm (26 µg/m ³)		

Notes: mg/m³ = milligrams per cubic meter; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ppb = parts per billion; ppm = parts per million; µg/m³ = micrograms per cubic meter

^a California standards for ozone, carbon monoxide, sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility-reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standards. Contact EPA for further clarification and current national policies.

^c Concentration expressed first in the units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and reference pressure of 760 torr; parts per million (ppm) in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

^e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^f On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

Source: ARB 2015a

^g To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note the national 1-hour standard is in units of parts per billion (ppb).

California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

^h On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard, the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

ⁱ The California Air Resources Board (ARB) has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

^j The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standards are approved.

designation for an area signifies that pollutant concentrations did not exceed the established standard. In most cases, areas designated or redesignated as attainment must develop and implement maintenance plans, which are designed to ensure continued compliance with the standard.

In contrast to attainment, a “nonattainment” designation indicates that a pollutant concentration has exceeded the established standard. Nonattainment may differ in severity. To identify the severity of the problem and the extent of planning and actions required to meet the standard, nonattainment areas are assigned a classification that is commensurate with the severity of their air quality problem (e.g., moderate, serious, severe, extreme). In addition, the California designations include a subcategory of nonattainment-transitional, which is given to nonattainment areas that are progressing and nearing attainment. Finally, an unclassified designation indicates that insufficient data exist to determine attainment or nonattainment.

As shown in Table 4.4-2, the SDAB currently meets NAAQS for all criteria air pollutants except ozone (8-hour), and meets the CAAQS for all criteria air pollutants except ozone, PM₁₀, and PM_{2.5}. The SDAB currently falls under a federal maintenance plan for 8-hour ozone. The SDAB is currently classified as a state nonattainment area for ozone, PM₁₀, and PM_{2.5}.

**Table 4.4-2
San Diego Air Basin Attainment Designations**

Pollutant	State (CAAQS)	Federal (NAAQS)
Ozone (1-hour)	Nonattainment	Attainment
Ozone (8-hour)	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Unclassified/Attainment
Nitrogen Dioxide	Unclassified/Attainment	Unclassified/Attainment
Sulfur Dioxide	Unclassified/Attainment	Unclassified/Attainment
PM ₁₀	Nonattainment	Unclassified
PM _{2.5}	Nonattainment	Unclassified
Sulfates	Attainment	N/A
Hydrogen Sulfide	Unclassified	N/A
Visibility Reducing Particles	Unclassified/Attainment	N/A
Lead	Unclassified/Attainment	Unclassified/Attainment

Source: ARB 2015b

N/A = not applicable; no standard.

Existing Air Quality in the SDAB

Ambient air pollutant concentrations in the SDAB are measured at air quality monitoring stations operated by ARB and SDAPCD. Ambient air quality data were taken from the closest station to the Project site with recent measurements located at 1110 Beardsley Street, San Diego, California. Table 4.4-3 presents the most recent data from the monitoring station as summaries of the exceedances of standards and the highest pollutant levels recorded for years 2013 through 2015. These concentrations represent the existing, or baseline conditions, for the Project.

**Table 4.4-3
Ambient Air Quality Summary – San Diego Monitoring Station**

Pollutant Standards	2013	2014	2015
Carbon Monoxide (CO)¹			
National maximum 8-hour concentration (ppm)	2.1	1.9	1.9
State maximum 8-hour concentration (ppm)	2.1	1.9	1.9
State maximum 1-hour concentration (ppm)	3.0	2.7	2.6
<u>Number of Days Standard Exceeded</u>			
NAAQS 8-hour (>9.0 ppm)	0	0	0
CAAQS 8-hour (>9.0 ppm)	0	0	0
CAAQS 1-hour (>20.0 ppm)	0	0	0
Nitrogen Dioxide (NO₂)			
State maximum 1-hour concentration (ppb)	72	75	62
Annual Average (ppb)	14	13	14
<u>Number of Days Standard Exceeded</u>			
CAAQS 1-hour	0	0	0
Ozone			
State maximum 1-hour concentration (ppm)	0.063	0.093	0.089
National maximum 8-hour concentration (ppm)	0.053	0.072	0.067
<u>Number of Days Standard Exceeded</u>			
CAAQS 1-hour (>0.09 ppm)	0	0	0
CAAQS 8-hour (>0.070 ppm)/NAAQS 8-hour (>0.075 ppm)	0/0	2/0	0/0
Particulate Matter (PM₁₀)			
National maximum 24-hour concentration (µg/m ³)	90.0	40.0	43.0
State maximum 24-hour concentration (µg/m ³)	92.0	41.0	42.0
State annual average concentration (µg/m ³)	25.4	23.8	*
<u>Estimated Number of Days Standard Exceeded</u>			
NAAQS 24-hour (>150 µg/m ³)	0	0	*
CAAQS 24-hour (>50 µg/m ³)	6	0	*
Particulate Matter (PM_{2.5})			
National maximum 24-hour concentration (µg/m ³)	37.4	36.7	33.4
State maximum 24-hour concentration (µg/m ³)	37.4	37.2	33.4
National annual average concentration (µg/m ³)	10.3	10.1	*
State annual average concentration (µg/m ³)	10.4	10.2	*
<u>Estimated Number of Days Standard Exceeded</u>			
NAAQS 24-hour (>35 µg/m ³)	1.1	1.0	*

¹ San Diego-1110 Beardsley Street Air Monitoring Station

* = Not Available µg/m³ = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; ppm = parts per million; ppb = parts per billion

Source: ARB 2016 (<http://www.arb.ca.gov/adam/topfour/topfour1.php>); USEPA 2016 (http://www.epa.gov/airdata/ad_rep_mon.html)

As shown in Table 4.4-3, ambient air concentrations of CO, NO₂, and 1-hour ozone at the San Diego air monitoring station have not exceeded the NAAQS or CAAQS in the past 3 years. PM₁₀ exceeded the CAAQS in 2013. Ozone 8-hour concentrations exceeded the CAAQS in 2014. PM_{2.5} concentrations exceeded the NAAQS in 2013 and 2014.

Toxic Air Contaminants

In addition to criteria pollutants, both federal and state air quality regulations also focus on toxic air contaminants (TACs). TACs can be separated into carcinogens and noncarcinogens based on the nature of the effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Noncarcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

TACs may be emitted by stationary, area, or mobile sources. Common stationary sources of TAC emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to local air district permit requirements. The other, often more significant, sources of TAC emissions are motor vehicles on freeways, high-volume roadways, or other areas with high numbers of diesel vehicles, such as distribution centers. Off-road mobile sources are also major contributors of TAC emissions and include construction equipment, ships, and trains.

Particulate exhaust emissions from diesel-fueled engines (diesel particulate matter, or DPM) were identified as a TAC by ARB in 1998. Federal and state efforts to reduce DPM emissions have focused on the use of improved fuels, adding particulate filters to engines, and requiring the production of new-technology engines that emit fewer exhaust particulates.

Diesel engines tend to produce a much higher ratio of fine particulates than other types of internal combustion engines. The fine particles that make up DPM tend to penetrate deep into the lungs, and the rough surfaces of these particles makes it easy for them to bind with other toxins within the exhaust, thus increasing the hazards of particle inhalation. Long-term exposure to DPM is known to lead to chronic, serious health problems including cardiovascular disease, cardiopulmonary disease, and lung cancer.

SDAPCD samples for TACs at the El Cajon and Chula Vista monitoring stations. Excluding DPM emissions, data from these stations indicate that the background ambient cancer risk in 2012 due to air toxics was 120 in one million in Chula Vista and 139 in one million in El Cajon. There is no current methodology for directly measuring DPM concentrations. Based on ARB estimates using measurements of elemental carbon, DPM emissions could add an additional 354

in one million to the ambient cancer risk levels in San Diego County (SDAPCD 2009). In addition, ARB estimates that risk from DPM decreased by about 50 percent from 870 in one million since 1990.

Odor

Odors are considered an air quality issue both at the local level (e.g., odor from wastewater treatment) and at the regional level (e.g., smoke from wildfires). Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

Several examples of common land use types that generate substantial odors include wastewater treatment plants, landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants.

Sensitive Receptors

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These include children, the elderly, people with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Air quality regulators typically define sensitive receptors as schools, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as the majority of the workers tend to stay indoors most of the time.

Within the corridor, Genesee Avenue extends for approximately 2 miles. The corridor begins just north of Nobel Drive. The Genesee Avenue Corridor encompasses a portion of SR 52, and a portion of the Marian Bear Memorial Park in San Clemente Canyon. The Genesee Avenue Corridor includes residential and commercial land uses. Included within the corridor on either

side of Genesee Avenue are many residences and small commercial uses, as well as a few public uses, railroad tracks, Rose Canyon, San Clemente Canyon, and SR 52. Schools and parks within the vicinity of the Genesee Avenue Corridor are listed below:

- University City High School (6949 Genesee Avenue)
- Curie Elementary School (4080 Governor Drive)
- Standley Middle School (6298 Radcliffe Drive)
- Rose Canyon Open Space Park
- Marian Bear Memorial Park

The Regents Road Corridor is also located in the central portion of the City of San Diego within the UCP Area. The corridor extends along Regents Road from approximately Caminito Terviso on the north side of Rose Canyon south to San Clemente Canyon and is approximately 1,000 feet wide. Existing uses within the corridor on either side of Regents Road include residential areas, a small amount of commercial uses, railroad tracks, Rose Canyon, San Clemente Canyon, and SR 52. Schools and parks within the vicinity of the Regents Road Corridor are listed below:

- Doyle Elementary School (3950 Berino Court)
- Speckles Elementary School (6033 Stadium Street)
- Doyle Community Park and Doyle Park Kidz Kamp (8175 Regents Road)
- Rose Canyon Open Space Park
- Marian Bear Memorial Park

Commercial lands proximate to the Project site are located to the north toward La Jolla Village Drive, along Nobel Drive, and along Governor Drive. Commercial land uses including offices, stores, and restaurants are considered the least sensitive to air pollution.

4.4.2 Regulatory Framework

4.4.2.1 Federal

Clean Air Act

USEPA, under the provisions of the Clean Air Act (CAA), requires each state with regions that have not attained the NAAQS to prepare a State Implementation Plan (SIP), detailing how these standards are to be met in each local area. The SIP is a legal agreement between each state and the federal government to commit resources to improving air quality. It serves as the template for conducting regional and project-level air quality analysis. The SIP is not a single document, but a

compilation of new and previously submitted attainment plans, emissions reduction programs, district rules, state regulations, and federal controls.

4.4.2.2 State

California Air Resources Board

ARB is the lead agency for developing the SIP in California. Local air districts and other agencies prepare Air Quality Attainment Plans (AQAPs) or Air Quality Management Plans (AQMPs), and submit them to ARB for review, approval, and incorporation into the applicable SIP. ARB also maintains air quality monitoring stations throughout the state in conjunction with local air districts. Data collected at these stations are used by ARB to classify air basins as being in attainment or nonattainment with respect to each pollutant and to monitor progress in attaining air quality standards.

The California CAA requires that each area exceeding the CAAQS for ozone, CO, SO₂, and NO₂ develop a plan aimed at achieving those standards (California Health and Safety Code [HSC] 40911 et seq.). The California HSC, Section 40914, requires air districts to design a plan that achieves an annual reduction in district-wide emissions of 5 percent or more, averaged every consecutive 3-year period. To satisfy this requirement, the local air districts have to develop and implement air pollution reduction measures, which are described in their AQAPs/AQMPs, and outline strategies for achieving the CAAQS for any criteria pollutants for which the region is classified as nonattainment.

ARB has established emission standards for vehicles sold in California and for various types of equipment. California gasoline specifications are governed by both state and federal agencies. During the past decade, federal and state agencies have imposed numerous requirements on the production and sale of gasoline in California. ARB has also adopted control measures for DPM and more stringent emissions standards for various on-road mobile sources of emissions, including transit buses and off-road diesel equipment (e.g., tractors, generators).

Toxic Air Contaminants

The CAA Amendments of 1990 expanded the regulation of hazardous air pollutants (HAPs), which is the federal government terminology for TACs, establishing a list of 172 individual compounds and 17 compound categories to be regulated as HAPs. USEPA established stringent, technology-based emissions standards for stationary sources of emissions of these listed substances.

At the state level, TACs in California are regulated primarily through the Tanner Air Toxics Act AB 1807 [Chapter 1047, Statutes of 1983] and the Air Toxics Hot Spots Information and Assessment Act (AB 2588 [Chapter 1252, Statutes of 1987]). ARB continues to implement an ongoing program to identify TACs, assess their public health risks, and develop air toxics control measures to reduce toxic emissions from specific source categories statewide. Local air districts then must adopt and implement the state-approved emission reduction measures.

4.4.2.3 Local

San Diego Air Pollution Control District

SDAPCD is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. Included in SDAPCD's tasks are the monitoring of air pollution, the preparation of San Diego County's portion of the SIP, and the promulgation of rules and regulations. The SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in San Diego County; this list of strategies is called the San Diego Regional Air Quality Strategy (RAQS) (SDAPCD 2009). The rules and regulations include procedures and requirements to control the emission of pollutants and prevent significant adverse impacts.

The following SDAPCD rules and regulations would apply to the Project:

- Regulation IV: Prohibitions; Rule 51: Nuisance. Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
- Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

University Community Plan

The UCP provides a series of general goals for the development of land that has been established by the City of San Diego General Plan. These include goals related to air quality and are outlined below:

General Plan Goals

- A. Preservation of Environmental Quality
 - 1. Reduction of air, noise, and water pollution.

City of San Diego General Plan

The City of San Diego adopted an updated General Plan in 2008. The following policies contained in the Conservation Element of the General Plan are applicable to the Project:

- CE-F.6 Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.

4.4.3 Significance Determination Thresholds

The City (2011a) has approved guidelines for determining significance based on Appendix G.III of the State CEQA Guidelines, which provide guidance that a project would have a significant environmental impact if it would:

- 1. Conflict with or obstruct implementation of the applicable air quality plan;
- 2. Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- 3. Expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations;
- 4. Exceed 100 pounds per day of PM₁₀ dust; or
- 5. Create objectionable odors affecting a substantial number of people.

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management board or air pollution control district may be relied on to make the impact determinations for specific program elements. SDAPCD has not developed quantitative significance thresholds for CEQA projects. However, the City of San Diego has established recommended screening level thresholds of significance for regional pollutant emissions. Therefore, the City of San Diego screening thresholds of significance for regional pollutant emissions were used to analyze the impacts of the Project.

4.4.4 Impact Analysis

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

4.4.4.1 Impact Analysis

A significant impact related to air quality would occur if implementation of the Project would conflict with or obstruct implementation of the applicable air quality plan.

Air quality plans describe air pollution control strategies to be implemented by a city, county, or regional air district. The primary purpose of an air quality plan is to bring an area that does not attain federal or state ambient air quality standards into compliance with those standards pursuant to the requirements of the CAA and California CAA.

At the time of this analysis, the air quality plans for the SDAB include the CO maintenance plan, the federal 2012 maintenance plan for the ozone NAAQS, and the RAQS (SDAB is in nonattainment for state ozone standards). While the SDAB is designated as a nonattainment area for the state PM₁₀, and PM_{2.5} standards, the California CAA does not require preparation of attainment plans for these pollutants, and no such plans have been prepared. There are no other air quality attainment plans or maintenance plans for the SDAB.

The RAQS includes emission control programs for mobile sources to reduce NO_x and ROG within the region. These measures include incentive programs, Transportation Control Measures (TCMs), and an Indirect Source Program. Under these categories, specific programs are included as part of the RAQS.

The RAQS Incentive Programs provide funding to reduce emissions of ozone precursors and include the Carl Moyer Memorial Air Quality Attainment Program and the Vehicle Registration Fund Program. TCMs are designed to reduce emissions from motor vehicles through alternative transportation modes, reducing congestion, and traffic flow improvements. TCMs included within the RAQS include the Transit Improvement and Expansion Program, Vanpool Program, HOV Lanes, Park-and-Ride Facilities, Bicycle Facilities, and Traffic Signal Improvements. Indirect Source Programs include outreach and assistance to local governments to reduce vehicle miles traveled and encourage smart growth policies.

Projects that are consistent with the assumptions used in the development of the RAQS would not conflict with or obstruct attainment of the air quality levels, which would help the region achieve ambient air quality standards. The Project would remove the widening of Genesee

Avenue and construction of the planned Regents Road Bridge from the UCP. Therefore, construction-related emissions associated with those activities would not occur and contribute to regional air quality emissions.

Long-term operational emissions forecasts rely on projections of vehicle miles traveled (VMT) by the MPOs, such as SANDAG, and population, employment, and land use projections made by local jurisdictions in their respective general plans. The Project does not include the construction of new residential or commercial buildings; therefore, it would not directly increase population or regional employment that would cause a net increase in regional VMT. However, the transportation network changes as a result of the Project have not been included in the regional emissions analysis of the RAQS.

The Project requires an amendment to the General Plan and as determined in this analysis (see Issue 2 and in Section 4.2, Transportation/Circulation), would increase the total regional VMT compared to the Adopted UCP. SANDAGSDAPCD is currently developing an update to the RAQS and an ozone attainment plan for the 8-hour ozone NAAQS. Any changes to the transportation network and the General Plan as a result of the Project would be incorporated in the updates to future air quality attainment plans. However, the increase in VMT as a result of the Project has not been accounted for in the current RAQS.

4.4.4.2 Significance of Impacts

Because the Project would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS, the Project would conflict with or obstruct implementation of the applicable air quality plan. Therefore, the impact would be significant.

4.4.4.3 Mitigation Framework

There are no mitigation measures available that could reduce this impact at the program level.

4.4.4.4 Significance After Mitigation

~~Discretionary~~ Projects implemented in accordance with the UCP shall be required to demonstrate their consistency with applicable air quality plans. Impacts related to criteria pollutant and precursor emissions compared to the current assumptions in the RAQS would conflict with or obstruct implementation of the applicable air quality plan and would be significant and unmitigated at the program-level.

4.4.5 Impact Analysis

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

4.4.5.1 Impact Analysis

If the emissions of the Project are found to be below the screening level thresholds, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The screening level thresholds are shown in Table 4.4-4.

**Table 4.4-4
Regional Pollutant Emission Screening Level Thresholds of Significance**

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5} ¹	Lead
Pounds per hour	–	25	100	25	–	–	–
Pounds per day	137	250	550	250	100	55	3.2
Tons per year	15	40	100	40	15	10	0.6

¹Threshold for PM_{2.5} from South Coast Air Quality Management District

ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = suspended particulate matter; PM_{2.5} = fine particulate matter

- = No threshold proposed

Source: City of San Diego 2011a

The Project does not develop land uses, but rather would affect the future roadway network and subsequent traffic operations. This analysis evaluates the impacts of not building the planned Regents Road Bridge or widening Genesee Avenue together. The finding of significance for the CEQA thresholds cannot be determined separately and must be based on emissions for the entire Project.

Construction

The Project would remove the widening of Genesee Avenue and construction of the planned Regents Road Bridge from the UCP. Therefore, construction-related emissions associated with those activities would not occur.

Any construction activities would comply with all construction-related SDAPCD rules and regulations, including Rules 50 and 55. Projects tiering off this PEIR would be subject to subsequent project-level environmental review to evaluate construction-related emissions. Projects with the potential to result in a substantial increase in emissions (i.e., exceed screening thresholds shown in Table 4.4-4) would result in significant impacts.

Operational

The Project would remove planned changes to the physical roadway network that would affect future vehicle circulation on local roadways and freeways. As on-road vehicles would need to reroute future trips without the planned changes in the Adopted UCP (e.g., Regents Road Bridge), it is anticipated that the Project would affect the average daily volumes on various local roadway segments. Re-routed trips would cause changes to average daily volumes on roadways that would affect V/C ratios, LOS, and ultimately average vehicle speeds on those roadway segments in the Project area. The operational analysis evaluates how the change in traffic volumes and vehicle speeds on the local roadway network as result of the Project would affect air quality emissions.

Section 4.2, Transportation/Circulation, provide additional detail on the traffic modeling analysis and describes various freeway and arterial segments that would be affected as a result of the Project (Kimley-Horn 2016). For the freeway analysis, the traffic analysis modeled ADT and peak hour speeds along affected freeway segments for I-5, I-805, and SR 52. For the arterials analysis, the ADT and peak hour speeds were modeled along affected arterial segments for Genesee Avenue, La Jolla Village Drive, Nobel Drive, and Regents Road, which are the largest arterials affected by the Project.

The modeled ADTs were multiplied by the segment lengths to determine VMT associated with each freeway and arterial segment affected by the Project. Average daily vehicle speeds were calculated for each freeway and arterial segment using an average of peak hour speeds. The changes in emission estimates are based on the VMT for the freeway and arterial segments and changes in average daily vehicle speeds on those segments as a result of the Project.

ARB's Emissions Factor (EMFAC) model can be used to develop vehicle emission factors based on the location, operational year, vehicle type, fuel type, and vehicle speed. EMFAC2014 is the most current on-road mobile source emissions model at the time of this analysis. For this analysis, all traffic modeling was conducted for the future year as discussed in Section 4.2, Transportation/Circulation. San Diego County was selected as the geographical location, which is the most specific geography to the Project available in EMFAC. Emission factors for each vehicle class by speed bin (e.g., 5, 10, 15 mph) were obtained from EMFAC. A composite emission factor was developed for each speed bin, weighted by the percentage of VMT for each vehicle type within that speed bin. For each freeway or arterial segment, the appropriate speed bin emission factor was selected and multiplied by the corresponding VMT to calculate annual emissions on the segment.

Considering that the Adopted UCP roadway projects have not yet been completed at the time of this analysis, an analysis of existing emissions compared with Project-related improvements, which would be the same current roadway network, would not fully disclose the impacts of the Project. Rather, comparing future traffic operations with the Adopted UCP and the UCP without the planned Regents Road Bridge and Genesee Avenue Widening (i.e., Project) provides the best indicator of the Project's long-term effect on mobile-source emissions. Furthermore, the full implications of the Project versus the Adopted UCP are better demonstrated at a future year that accounts for increased roadway demands from cumulative planned growth that would affect traffic operations (e.g., VMT and vehicle speeds).

This analysis compares daily and annual criteria pollutant and precursor emissions associated with the Project and Adopted UCP traffic operations in the future year. Table 4.4-5 shows the estimated daily and annual emissions for the freeways and arterials in the Project area in the future year.

**Table 4.4-5
Freeway and Arterial – Daily and Annual Operational Emissions**

	ROG	NO _x	CO	PM ₁₀ ¹	PM _{2.5} ^{1,2}
Daily Emissions					
Adopted UCP	240.56	1,407.36	4,233.28	12.15	11.36
Project	248.38	1,426.83	4,315.64	12.46	11.64
Net Daily Emissions (lbs/day)	7.82	19.47	82.35	0.31	0.28
Threshold of Significance (lbs/day)	137	250	550	100	55
<i>Significant Impact?</i>	No	No	No	No	No
Annual Emissions					
Adopted UCP	39.06	222.72	707.45	1.98	1.85
Project	45.33	260.40	787.60	2.27	2.12
Net Annual Emissions (tons/year)	6.27	37.68	80.15	0.29	0.27
Threshold of Significance (tons/year)	15	40	100	100	55
<i>Significant Impact?</i>	No	No	No	No	No

¹ PM₁₀ emissions shown include the sum of particulate matter with aerodynamic diameter 0 to 2.5 microns and particulate matter with aerodynamic diameter 2.5 to 10 microns.

ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = suspended particulate matter; PM_{2.5} = fine particulate matter

Source: Estimated by AECOM in 2016

As shown in Table 4.4-5, the net change in emissions of ROG, NO_x, CO, PM₁₀, and PM_{2.5} associated with the Project would not exceed applicable daily or annual thresholds established by the City of San Diego. However, the emission estimates were based on available detailed traffic data for freeways and arterials (e.g., peak hour speeds) that only account for 75 percent of the total VMT in the Project area. Therefore, to fully account for the impacts of the Project, including VMT on additional roadways such as collectors, the net changes in emissions were adjusted by 25 percent to account for the total VMT in the Project area. This is considered

conservative because it assumes the change in ~~VMT and~~ speeds on those additional roadways would be similar in magnitude with arterial and freeways. However, it is possible that the smaller roadways would not experience the same magnitude of ~~VMT and~~ speed change and could potentially be beneficial for Project-related emissions. Nevertheless, because specific information (e.g., peak hour speeds) is not available to support this assumption, it was conservatively assumed that the emissions would increase based on the percentage of VMT. Table 4.4-6 shows the adjusted total operational emissions from the Project.

**Table 4.4-6
Estimated Net Change Based on Total Project VMT**

	ROG	NO _x	CO	PM ₁₀ ¹	PM _{2.5} ¹
Daily Emissions					
Net Daily Emissions (lbs/day)	14.33	48.63	178.13	0.61	0.56
Threshold of Significance (lbs/day)	137	250	550	100	55
<i>Significant Impact?</i>	No	No	No	No	No
Annual Emissions					
Net Annual Emissions (tons/year)	9.01	53.99	118.62	0.42	0.39
Threshold of Significance (tons/year)	15	40	100	100	55
<i>Significant Impact?</i>	No	Yes	Yes	No	No

¹PM₁₀ emissions shown include the sum of particulate matter with aerodynamic diameter 0 to 2.5 microns and particulate matter with aerodynamic diameter 2.5 to 10 microns.

ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = suspended particulate matter;

PM_{2.5} = fine particulate matter

Source: Estimated by AECOM in 2016

As shown in Table 4.4-6, the net increase in emissions of ROG, PM₁₀, and PM_{2.5} would not exceed applicable daily or annual thresholds established by the City of San Diego. However, the net increase in emissions of NO_x and CO for the total Project area VMT would exceed the applicable annual thresholds established by the City of San Diego.

4.4.5.2 Significance of Impacts

Considering that the Project’s long-term operations would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area), operation of the Project could violate an ambient air quality standard or contribute substantially to an existing or projected air quality violation. This impact would be significant.

4.4.5.3 Mitigation Framework

The City of San Diego’s General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level air quality mitigation measures for discretionary projects. All projects with the potential to result in significant impacts related to air

quality are subject to site-specific review in accordance with the City's General Plan; the UCP; the City's Municipal Code; and the City's CEQA Significance Determination Thresholds, through the discretionary process.

In general, implementation of these policies would preclude or reduce air quality impacts. Compliance with all applicable local, state, and federal standards is required of all projects and is not considered mitigation. However, it is possible that, for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation. Mitigation Measures TRA-1 and TRA-2 ~~provided~~ would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). ~~However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, t~~These improvements to the transportation network would also affect criteria air pollutant emissions. Project-level analysis of the potential impacts of the proposed mitigation measures will be completed at such a time the improvements are implemented. Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. No additional feasible mitigation is available to reduce impacts associated with the Project.

4.4.5.4 Significance after Mitigation

Air quality impacts associated with the Project would remain significant and unmitigated at the program level.

4.4.6 Impact Analysis

Issue 3: Would the Project expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations?

4.4.6.1 Impact Analysis

A significant impact related to air quality would occur if implementation of the Project would generate emissions on a local level that expose sensitive receptors to pollutant concentrations that exceed ambient air quality standards or established health risk thresholds.

The primary mobile-source pollutant of localized concern is CO. Local mobile-source CO emissions near roadway intersections and segments are a direct function of traffic volume, speed, and delay. Transport of CO is limited since it disperses rapidly with distance from the source under normal meteorological conditions. However, under specific meteorological conditions, CO concentrations near roadways and/or intersections may reach unhealthy levels related to local sensitive land uses such as residential areas, hospitals, schools, and childcare facilities.

CO concentration is a direct function of motor vehicle activity, particularly during peak commute hours, and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses, such as residential areas, schools, preschools, playgrounds, and hospitals. As a result, air districts typically recommend analysis of CO emissions at a local rather than a regional level.

Because increased CO concentrations are usually associated with roadways that are congested and with heavy traffic volumes, many agencies have established conservative screening criteria to determine with fair certainty that, if not violated, project-generated, long-term operational local mobile-source emissions of CO would not result in, or substantially contribute to, emissions concentrations that exceed the 1-hour ambient air quality standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm.

The City of San Diego indicates that if a proposed development causes a four- or six-lane road to deteriorate to LOS E or worse, the resulting longer queue at the traffic signals could cause a localized significant air quality impact. Implementation of the Project would eliminate significant traffic impacts associated with the Adopted UCP that would occur in the future year along two segments of Regents Road and at three intersections along Regents Road.

However, according to the traffic analysis and as discussed in Section 4.2, Transportation/Circulation, several roadway segments would operate at LOS E or F in the future year in the future year with implementation of the Project. Under the Project in the future year, the ~~three~~ two following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur with implementation of the Adopted UCP. Thus, the impact at these roadway segments can be specifically attributed to the Project.

- Genesee Avenue: Nobel Drive to Centurion Square (LOS F) 46,500 ADT
- Genesee Avenue: Centurion Square to Governor Drive (LOS F) 54,600 ADT
- ~~La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E) 55,000 ADT~~

Under the Project in the future year, the ~~nine~~ seven following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, in the future year with implementation of the Adopted UCP, these intersections would continue to operate at acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue/Governor Drive (PM)
- ~~Genesee Avenue/SR 52 WB Ramps (AM)~~
- Genesee Avenue/SR 52 EB Ramps (AM and PM)
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~
- Gilman Drive/I-5 SB Ramps (PM)

In addition to the changes in LOS as required by the City of San Diego CEQA Significance Thresholds, overall traffic volumes and how they affect V/C ratio also affect the ability of a roadway or intersection to result in a CO hot spot. While the City of San Diego does not provide additional guidance on traffic volumes, other agencies throughout the state have provided estimates of traffic volumes that could result in a CO hot spot. The Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines (BAAQMD 2012) suggest that projects would not result in a CO impact if the project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. Furthermore, the Sacramento Metropolitan Air Quality Management District's (SMAQMD) screening criteria find that a project would not result in significant localized CO impacts if it would not result in an affected intersection experiencing more than 31,600 vehicles per hour (SMAQMD 2013).

Genesee Avenue and La Jolla Village Drive, which are the roadway segments that have unacceptable LOS and the highest daily volumes, have a maximum volume of approximately 55,000 vehicles per day. Therefore, the peak hour volume at any point during the day, which is typically 10 percent of the daily volume, would not exceed any of the screening thresholds that are anticipated to result in a CO hot spot.

Furthermore, as shown in Table 4.4-3, the maximum CO concentration registered in the Project area in the last 3 years (i.e., 2.1 ppm) is approximately 23 percent of the CAAQS/NAAQS. As a result of improvements in technology and vehicle emission standards, CO emission factors are projected to decrease in future years. These improvements would also reduce the concentration of CO emissions. Thus, it is unlikely that the Project would cause an exceedance of the CAAQS.

4.4.6.2 Significance of Impacts

The CO concentrations resulting from the Project would not violate the CAAQS for either the 1-hour period (20 ppm) or the 8-hour period (9.0 ppm). This impact would be less than significant.

4.4.6.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.4.7 Impact Analysis

Issue 4: Would the Project exceed 100 pounds per day of PM₁₀ dust?

4.4.7.1 Impact Analysis

A significant impact would occur if implementation of the Project would exceed 100 pounds per day of PM dust.

Construction grading and demolition dust accounts for approximately 30 percent of all PM₁₀ emissions in the SDAB (City of San Diego 2011a). Road dust from paved and unpaved roads, accounts for approximately 47 percent of all PM₁₀ emissions (City of San Diego 2011a). The Project would generate PM₁₀ emissions from operational activities, including increased on-road motor vehicles activities as described above. However, as indicated in Table 4.4-6, the net increase in total operational PM₁₀ emissions, even considering the conservative scaling of emission, was estimated to be less than 1 pound per day.

4.4.7.2 Significance of Impacts

The Project would not exceed 100 pounds per day of PM dust. This impact would be less than significant.

4.4.7.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.4.8 Impact Analysis

Issue 5: Would the project create objectionable odors affecting a substantial number of people?

4.4.8.1 Impact Analysis

Two situations increase the potential for odor problems. The first occurs when a new odor source is located near existing receptors. The second occurs when new receptors are developed near existing sources of odors.

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

The Project would remove the widening of Genesee Avenue and construction of the Regents Road Bridge from the UCP.

The Project would remove planned changes to the physical roadway network and would not develop any odor-producing land uses. The current operation of the transportation network does not generate objectionable odors, and any odors generated by the Project would be similar to existing odors associated with on-road mobile sources in the area.

4.4.8.2 Significance of Impacts

The Project would not create objectionable odors affecting a substantial number of people. The impact would be less than significant.

4.4.8.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

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4.5 GREENHOUSE GAS EMISSIONS

This section describes global climate change and existing greenhouse gas (GHG) emission sources; summarizes applicable federal, state, and local regulations; and analyzes the potential effects of GHGs from the Project on global climate change.

4.5.1 Existing Conditions

GHGs are present in the atmosphere naturally, are released by natural and anthropogenic sources, and are formed from secondary reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of humans, animals, and plants; decomposition of organic matter; and evaporation from the oceans. Anthropogenic sources include the combustion of fossil fuels, waste treatment, and agricultural processes. The following are GHGs that are widely accepted as the principal contributors to human-induced global climate change:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF₆)
- Nitrogen trifluoride (NF₃)

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO₂. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time (i.e., lifetime) that the gas remains in the atmosphere (“atmospheric lifetime”). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of 1. The other main GHGs attributed to human activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265 (IPCC 2013). For example, 1 ton of CH₄ has the same contribution to the greenhouse effect as approximately 28 tons of CO₂. GHGs with lower emissions rates than CO₂ may still contribute to climate change, because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP). The concept of CO₂-equivalents (CO₂e) is used to account for the different GWP potentials of GHGs to absorb infrared radiation.

The UCP Area is currently a source of anthropogenic GHG emissions, with emissions generated by vehicular traffic and by energy use, water use, and solid waste disposal practices of existing development.

GHG Emissions Sources

GHG emissions contributing to global climate change are attributable in large part to human activities. For purposes of accounting for and regulating GHG emissions, sources of GHG emissions are grouped into emission categories. ARB identifies the following main GHG emission categories that account for most anthropogenic GHG emissions generated within California:

- *Transportation:* On-road motor vehicles, off-road equipment, recreational vehicles, aviation, ships, and rail
- *Electric Power:* Use and production of electrical energy
- *Industrial:* Mainly stationary sources (e.g., boilers and engines) associated with process emissions
- *Commercial and Residential:* Area sources, such as landscape maintenance equipment, fireplaces, and consumption of natural gas for space and water heating
- *Agriculture:* Agricultural sources that include off-road farm equipment; irrigation pumps; crop residue burning (CO₂); and emissions from flooded soils, livestock waste, crop residue decomposition, and fertilizer volatilization (CH₄ and N₂O)
- *High GWP:* Refrigerants for stationary and mobile-source air conditioning and refrigeration, electrical insulation (e.g., SF₆), and various consumer products that use pressurized containers
- *Recycling and Waste:* Waste management facilities and landfills; primary emissions are CO₂ from combustion and CH₄ from landfills and wastewater treatment

California

ARB performs an annual GHG inventory for emissions and sinks of the six major GHGs. As shown in Figure 4.5-1, California produced approximately 459 million metric tons (MMT) of CO₂e in 2013. Combustion of fossil fuel in the transportation category was the single largest source of California's GHG emissions in 2013, accounting for 37 percent of total GHG emissions in the state. The transportation category was followed by the industrial category, which accounts for 23 percent of California's total GHG emissions, and the electric power category (including in-state and out-of-state sources), which accounts for 20 percent of total GHG emissions in California, and (ARB 2013).

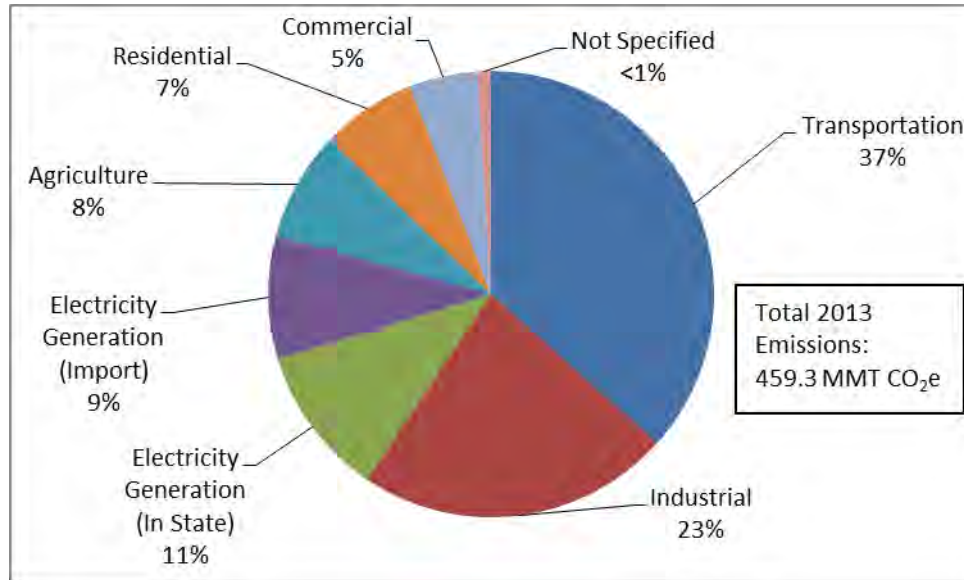


Figure 4.5-1. 2013 California GHG Emissions by Category

San Diego County

The University of San Diego School of Law, Energy Policy Initiative Center, prepared a GHG inventory for San Diego County in 2008. The inventory was updated using the best available data, and total GHG emissions in San Diego County in 2012 were estimated to be 32.9 MMT of CO₂e. This represents an 11 percent increase compared to 1990 emissions levels of 29.5 MMT CO₂e (University of San Diego 2014). Transportation is the largest emissions sector, accounting for approximately 14 MMT of CO₂e, or 41 percent of total emissions. Energy consumption, including electricity and natural gas use, is the next largest source of emissions, at 32 percent of the total.

In July 2015, San Diego County Planning & Development Services (PDS) initiated development of a Climate Action Plan (CAP). The CAP is intended to be a comprehensive plan to reduce GHG emissions in the unincorporated communities of San Diego County. The CAP is anticipated to be adopted in the fall of 2017.

City of San Diego

The City of San Diego CAP includes a quantitative inventory of GHG emissions for the baseline year of 2010 and a projection of emissions for 2020 and 2035. The most recent GHG inventory for the year 2010 estimated the total emissions at 13.0 MMT CO₂e per year (City of San Diego 2015a). Transportation is the largest emissions sector, accounting for approximately 55 percent of total emissions. Energy consumption is the next largest source of emissions, at 40 percent of

the total. Accounting for future population and economic growth, the City estimates that GHG emissions will increase to approximately 14.1 MMT CO₂e in 2020 and 16.7 MMT CO₂e in 2035.

The CAP includes City-specific targets to reduce GHGs by 2020 and 2035, helping to achieve statewide 2020 and 2030 targets, and putting the City on the trajectory of meeting its share of the 2050 statewide target. The City's reduction targets are 11.0 MMT CO₂e in 2020, 7.8 MMT of CO₂e in 2030, and 6.5 MMT of CO₂e in 2035.

4.5.2 Regulatory Framework

4.5.2.1 Federal

U.S. Environmental Protection Agency

USEPA is the federal agency responsible for implementing the federal CAA. The Supreme Court of the United States ruled on April 2, 2007, that CO₂ is an air pollutant as defined under the CAA, and that USEPA has the authority to regulate emissions of GHGs.

Greenhouse Gas Findings under the Federal Clean Air Act

On December 7, 2009, USEPA signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs in the atmosphere—CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

Although these findings did not themselves impose any requirements on industries or other entities, this action was a prerequisite to finalizing USEPA's *Proposed Greenhouse Gas Emission Standards for Light-Duty Vehicles*. On May 7, 2010, the final *Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards* were published in the Federal Register. The emissions standards will require model year 2016 vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, which is

equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO₂ level solely through fuel economy improvements.

On August 28, 2012, the U.S. Department of Transportation (DOT) and USEPA issued a joint Final Rulemaking requiring additional federal GHG and fuel economy standards for model year 2017 through 2025 passenger cars and light-duty trucks. The standards would require these vehicles to meet an estimated combined average emissions level of 163 grams of CO₂ per mile in model year 2025, which is equivalent to 54.5 miles per gallon if the improvements were made solely through fuel efficiency.

In addition to the standards for light-duty vehicles, DOT and USEPA adopted complementary standards to reduce GHG emissions and improve the fuel efficiency of heavy-duty trucks and buses on September 15, 2011. These standards together form a comprehensive heavy-duty national program for all on-road vehicles rated at a gross vehicle weight at or above 8,500 pounds for model years 2014 through 2018. The standards will phase in with increasing stringency in each model year from 2014 to 2018. The USEPA standards adopted for 2018 will represent an average per-vehicle reduction in GHG emissions of 17 percent for diesel vehicles and 12 percent for gasoline vehicles (USEPA 2011).

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, USEPA published the Final Mandatory Greenhouse Gas Reporting Rule (Reporting Rule) in the Federal Register. The Reporting Rule requires reporting of GHG data and other relevant information from fossil fuel and industrial GHG suppliers, vehicle and engine manufacturers, and all facilities that would emit 25,000 metric tons (MT) or more of CO₂e per year. Facility owners are required to submit an annual report with detailed calculations of facility GHG emissions on March 31 for emissions from the previous calendar year. The Reporting Rule also mandates recordkeeping and administrative requirements to enable USEPA to verify the annual GHG emissions reports.

Council on Environmental Quality Guidance

On December 18, 2014, the Council on Environmental Quality (CEQ) released revised draft guidance that supersedes the draft GHG and climate change guidance released by CEQ in February 2010. The revised draft guidance applies to all proposed federal agency actions, including land and resource management actions. This guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action (CEQ 2014). The guidance encourages agencies to draw from their

experience and expertise to determine the appropriate level (broad, programmatic or project- or site-specific) and type (quantitative or qualitative) of analysis required to comply with the National Environmental Policy Act. The guidance recommends that agencies consider 25,000 MT CO₂e on an annual basis as a reference point below which a quantitative analysis of GHG emissions is not recommended unless it is easily accomplished based on available tools and data (CEQ 2014).

4.5.2.2 State

ARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California CAA.

Assembly Bill 1493

AB 1493 requires ARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with model year 2009. In June 2009, the USEPA Administrator granted a CAA waiver of preemption to California. This waiver allowed California to implement its own GHG emissions standards for motor vehicles beginning with model year 2009. California agencies worked with federal agencies to conduct joint rulemaking to reduce GHG emissions for passenger car model years 2017 to 2025.

Executive Order S-3-05

Executive Order S-3-05, signed in June 2005, proclaimed that California is vulnerable to the impacts of climate change. Executive Order S-3-05 declared that increased temperatures could reduce the Sierra Nevada's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the executive order established total GHG emissions targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

Assembly Bill 32

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California HSC Division 25.5, Sections 38500, et seq.). AB 32 further details and puts into law the mid-term GHG reduction target established in Executive Order S-3-05: reduce GHG emissions to 1990 levels by 2020. AB 32 also identifies ARB as the state agency responsible for the design and implementation of emissions limits, regulations, and other measures to meet the target.

In December 2008, ARB adopted its *Climate Change Scoping Plan* (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32 (ARB 2008). The Scoping Plan also includes ARB-recommended GHG reductions for each emissions sector of California's GHG inventory. ARB further acknowledges that decisions about how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors.

ARB is required to update the Scoping Plan at least once every 5 years to evaluate progress and develop future inventories that may guide this process. ARB approved the first update to the Climate Change Scoping Plan: *Building on the Framework* in June 2014 (ARB 2014). The Scoping Plan update includes a status of the 2008 Scoping Plan measures and other federal, state, and local efforts to reduce GHG emissions in California, and potential actions to further reduce GHG emissions by 2020.

Executive Order S-1-07

Executive Order S-1-07, which was signed by then California governor Arnold Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, at more than 40 percent of statewide emissions. Executive Order S-1-07 establishes a goal that the carbon intensity of transportation fuels sold in California should be reduced by a minimum of 10 percent by 2020. ARB adopted the low carbon fuel standard (LCFS) on April 23, 2009. In November 2015, the Office of Administrative Law (OAL) approved readoption of the LCFS.

Senate Bill 97

SB 97 required the Governor's Office of Planning and Research to develop recommended amendments to the CEQA Guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.

Senate Bill 375

SB 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires MPOs to adopt an SCS or an Alternative Planning Strategy (APS), which will prescribe land use allocation in that MPO's RTP. On September 23, 2010, ARB adopted regional GHG targets for passenger vehicles and light trucks for 2020 and 2035 for the 18 MPOs in California. If MPOs do not meet the GHG

reduction targets, transportation projects would not be eligible for funding programmed after January 1, 2012.

This bill also extends the minimum time period for the Regional Housing Needs Allocation cycle from 5 years to 8 years for local governments located within an MPO that meet certain requirements. City or county land use policies (including general plans) are not required to be consistent with the RTP (and associated SCS or APS). However, new provisions of CEQA would incentivize qualified projects that are consistent with an approved SCS or APS, categorized as “transit priority projects.”

SANDAG’s current GHG targets are per capita CO₂ emission reductions from passenger vehicles of 7 percent by 2020 and 13 percent by 2035, relative to 2005 levels. SANDAG adopted San Diego Forward: The Regional Plan (2015 RTP/SCS), which is the current version of the RTP/SCS in October 2015. SANDAG’s estimate of GHG emissions reductions from the 2015 RTP/SCS indicates that the plan would result in per capita emissions reductions of 15 percent by 2020 and 21 percent by 2035 from a base year of 2005. Therefore, ARB determined that, if implemented, it would achieve the reduction targets for the San Diego region in compliance with SB 375.

ARB is required to update the regional GHG targets at least every 8 years, and may revise them every 4 years. ARB is revising the 2035 GHG targets for the four largest MPOs, including SANDAG, by the end of 2016.

Executive Order B-30-15

In April 2015, Governor Edmund Brown issued an executive order establishing a statewide GHG reduction goal of 40 percent below 1990 levels by 2030. The emission reduction target acts as an interim goal between the AB 32 goal (i.e., achieve 1990 emission levels by 2020) and Governor Brown’s Executive Order S-03-05 goal of reducing statewide emissions 80 percent below 1990 levels by 2050. In addition, the executive order aligns California’s 2030 GHG reduction goal with the European Union’s reduction target (i.e., 40 percent below 1990 levels by 2030) that was adopted in October 2014.

4.4.2.3 Local

ARB also acknowledges that local governments have broad influence and, in some cases, exclusive jurisdiction over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations.

San Diego Air Pollution Control District

In San Diego County, SDAPCD is the agency responsible for protecting public health and welfare through the administration of federal and state air quality laws and policies. SDAPCD has no regulations relative to GHG emissions.

City of San Diego

General Plan

The City of San Diego adopted an updated General Plan in 2008. Table 4.5-1 contains policies in the Conservation Element of the General Plan that are applicable to the Project.

**Table 4.5-1
City of San Diego General Plan Relevant Elements and Policies**

Conservation Element
CE-A.2. Reduce the City’s carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:
o Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space;
o Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;
o Improve energy efficiency, especially in the transportation sector and buildings and appliances;
o Reduce the Urban Heat Island effect through sustainable design and building practices;
o Reduce waste by improving management and recycling programs.
CE-A.5. Employ sustainable or “green” building techniques for the construction and operation of buildings.
o Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings.
CE-A.8. Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.
CE-A.9. Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:
o Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
o Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system.
CE-A.10. Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.
o Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.
o Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.

Conservation Element
CE-A.11. Implement sustainable landscape design and maintenance.
<ul style="list-style-type: none"> ○ Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. ○ Reduce use of lawn types that require high levels of irrigation. ○ Minimize the use of landscape equipment powered by fossil fuels. ○ Implement water conservation measures in site/building design and landscaping. ○ Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.
CE-A.12. Reduce the San Diego Urban Heat Island, through actions such as:
<ul style="list-style-type: none"> ○ Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; ○ Planting trees and other vegetation, to provide shade and cool air temperatures; ○ Reducing heat build-up in parking lots through increased shading or use of cool paving materials as feasible.

Climate Action Plan

As discussed earlier, the City of San Diego adopted a CAP in December 2015 (City of San Diego 2015a). The CAP quantifies GHG emissions; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives that the City can use to reduce GHG emissions. The CAP includes goals, actions and targets to achieve the following strategies (1) water and energy efficiency buildings, (2) clean and renewable energy, (3) bicycling, walking, transit and land use, (4) zero waste, and (5) climate resiliency.

4.5.3 Significance Determination Thresholds

The CEQA Guidelines, Appendix G Environmental Checklist, includes the following two questions regarding assessment of GHG emissions:

- 1) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?

As stated in the Guidelines, these questions are “intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance” (Title 14, Division 6, Chapter 3 Guidelines for Implementation of the CEQA, Appendix G, VII Greenhouse Gas Emissions). The CEQA Guidelines require lead agencies to adopt GHG thresholds of

significance. When adopting these thresholds, the Guidelines allow lead agencies to develop their own significance threshold and/or to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence.

Section 15064.4 of the amended Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

- (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
 - (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
 - (2) Rely on a qualitative analysis or performance-based standards.

While the amendments require calculation of a project's contribution, they do not establish a standard by which to judge a significant effect or a means to establish such a standard. Project GHG emissions were developed as outlined above. In order to determine significance of the impacts associated with implementation of the Project, an inventory was also developed based on the Adopted UCP (No Project). Emissions from the Project were then compared to the GHG emissions inventory for the Adopted UCP. If emissions from buildout of the Project are less than those that would be generated by the Adopted UCP, impacts related to GHG emissions are considered to be less than significant provided the Project otherwise implements the land use-related strategies identified in the CAP. If emissions from buildout of the Project are greater than those of the Adopted UCP, impacts related to GHG emissions could still be less than significant if the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy.

As discussed above, implementation of the City's CAP would result in citywide GHG reductions consistent with its proportionate share of Statewide GHG emissions targets. The CAP assumes future population and economic growth based on the community plans that were in effect at the

time the CAP was being developed. Therefore, community plan amendments that would result in a reduction in GHG at buildout compared to GHG emissions at buildout under the adopted community plan would result in further GHG reductions. However, the CAP is a Citywide program and the General Plan City of Villages Strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system. Concentrating new growth in an area can result in that area having greater GHG emissions than allowing the less intensive land uses to remain. Thus, consistency with the City of Villages Strategy can result in specific areas having an increase in GHG emissions, while Citywide resulting in a decrease of GHG emissions. This is why this section will take a two-tiered approach in discussing GHG emissions: 1) a quantitative analysis of emissions associated with the Project and emissions associated with the Adopted UCP (No Project); and 2) a discussion of whether or not the Project is consistent with the CAP.

Methodology and Assumptions

Operational

The Project would remove planned changes to the physical roadway network that would affect future vehicle circulation on local roadways and freeways. As on-road vehicles would need to reroute future trips without the planned changes in the Adopted UCP (e.g., Regents Road Bridge), it is anticipated that the Project would affect the average daily volumes on various local roadway segments. Rerouted trips would cause changes to average daily volumes on roadways that would affect average vehicle speeds on those roadway segments in the Project area. The operational analysis evaluates how the change in traffic volumes and vehicle speeds on the local roadway network as result of the Project would affect GHG emissions.

Section 4.2, Transportation/Circulation, and Appendix C provide additional detail on the traffic modeling analysis and indicate how various freeway and arterial segments would be affected as a result of the Project (Kimley-Horn 2016). For the freeway analysis, the traffic analysis modeled ADT and peak hour speeds along affected freeway segments for I-5, I-805, and SR 52. For the arterials analysis, the ADT and peak hour speeds were modeled along affected arterial segments for Genesee Avenue, La Jolla Village Drive, Nobel Drive, and Regents Road, which are the largest arterials affected by the Project.

The modeled ADT was multiplied by the segment lengths to determine the VMT associated with each freeway and arterial segment affected by the Project. Average daily vehicle speeds were calculated for each freeway and arterial segment using an average of peak hour speeds. The changes in emission estimates are based on the VMT for the freeway and arterial segments and changes in average daily vehicle speeds on those segments as a result of the Project.

ARB's Emissions Factor (EMFAC) model can be used to develop vehicle emission factors based on the location, operational year, vehicle type, fuel type, and vehicle speed. EMFAC2014 is the most current on-road mobile source emissions model at the time of this analysis. For this analysis, all traffic modeling was conducted for the future year. San Diego County was selected as the geographical location, which is the most specific geographical location to the Project available in EMFAC. Emission factors for each vehicle class by speed bin (e.g., 5, 10, 15 mph) were obtained from EMFAC. A composite emission factor was developed for each speed bin, weighted by the percentage of VMT for each vehicle type within that speed bin. For each freeway or arterial segment, the appropriate speed bin emission factor was selected and multiplied by the corresponding VMT to calculate annual emissions on the segment.

The Project does not alter or develop land uses, but rather would affect the future roadway network and subsequent traffic operations. This analysis evaluates the impacts of not building the planned Regents Road Bridge or widening Genesee Avenue. The finding of significance for the CEQA thresholds cannot be determined separately and must be based on emissions for the entire project.

Considering that the Adopted UCP roadway projects have not yet been completed at the time of this analysis, an analysis of existing emissions compared with Project-related improvements, which would be the same current roadway network, would not fully disclose the impacts of the Project. Rather, comparing traffic operations with the Adopted UCP (i.e., No Project) and the UCP without the planned Regents Road Bridge and Genesee Avenue Widening (i.e., Project) provides the best indicator of the Project's long-term effect on mobile-source GHG emissions. Furthermore, the full implications of the Project versus the Adopted UCP are better demonstrated at a future year that accounts for increased roadway demands from cumulative planned growth that would affect traffic operations (e.g., VMT and vehicle speeds). Therefore, this analysis compares annual GHG emissions associated with the Project and Adopted UCP traffic operations in the future year to determine if the Project would result in significant GHG emissions.

4.5.4 Impact Analysis

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

4.5.4.1 Impact Analysis

Changes to community plans, such as the UCP, present unique challenges for assessing GHG impacts, as these plans include strategies for horizons of 20 years or longer. Due to the interaction of land use development and roadway design, transportation-related GHG emissions

are most effectively analyzed at a regional level (e.g., SANDAG RTP/SCS) to determine significant impacts. To achieve regional targets for GHG emission reductions, future land use development and transportation infrastructure must be planned and implemented in the most GHG-efficient manner possible. Travel forecasting models are used to estimate changes to traffic operations (e.g., volumes, VMT, vehicle speed) as a result of implementing regional plans and are designed to be responsive to development density, transit service levels, induced travel and land development, and bicycle and pedestrian travel. Table 4.5-2 shows the estimated annual GHG emissions for the Adopted UCP and the Project in the future year.

**Table 4.5-2
Estimated Annual GHG Emissions**

Roadway Type	Adopted UCP (MT CO ₂ e)	Future Year with Project (MT CO ₂ e)	Net Change (MT CO ₂ e)
Freeway	253,963	258,429	4,466
Arterial	139,748	137,875	(1,874)
<i>Genesee Avenue</i>	<i>35,264</i>	<i>41,375</i>	<i>6,110</i>
<i>La Jolla Village Drive</i>	<i>60,598</i>	<i>61,349</i>	<i>751</i>
<i>Nobel Drive</i>	<i>24,095</i>	<i>24,543</i>	<i>447</i>
<i>Regents Road</i>	<i>19,790</i>	<i>10,608</i>	<i>(9,182)</i>
Total	393,711	396,304	2,593

GHG = greenhouse gases; MT CO₂e = metric tons of carbon dioxide equivalent

Note: The “Arterial” category includes a summary of all individual roadway segments. The Total is based on the sum of the “Freeway” and “Arterial” categories. Totals may not add due to rounding.

Source: Modeled by AECOM in 2016

As shown in Table 4.5-2, the changes in VMT and average speed associated with the Project result in a net increase of 4,466 MT CO₂e per year on freeways and a net decrease of approximately 1,874 MT CO₂e per year on arterials. The decrease in arterial-related GHG emissions is primarily associated with changes to Regents Road (i.e., deletion of the bridge and associated roadway segment). Although the Project would reduce GHG emissions on Regents Road without the planned Regents Road Bridge, other affected arterials and freeway segments would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments. Overall, the Project results in a net increase of 2,593 MT CO₂e per year.

Given that transportation is the largest emission sector in California and the City of San Diego, one of the main strategies to reduce GHG emissions is to make California’s transportation system more efficient. The highest levels of CO₂ from mobile sources, such as automobiles, occur at stop-and-go speeds (0 to 25 mph) and speeds faster than 55 mph. To the extent that a project relieves congestion (e.g., less idling/wait time, higher average vehicle speeds) and improves travel times in high-congestion travel corridors, GHG emissions, particularly CO₂, may

be reduced. Based on the analysis of the change in VMT and speeds on freeway and arterial segments in the Project area, the Project would not improve overall traffic operations and would result in a net increase in overall GHG emissions in the Project area.

4.5.4.2 Significance of Impacts

The total GHG emissions for the Project would increase compared to the Adopted UCP. In addition, the analysis does not include all vehicle travel and operations in the area as a result of the Project, and additional vehicle travel and congestion, similar to the overall trend identified in this analysis, could further increase the Project's estimated change in GHG emissions. These changes would be analyzed during the next update to the 2015 RTP/SCS for consistency with the long-term GHG reduction goals in AB 32 and SB 375. There are no additional measures that could reduce emissions in the Project area. Since the Project increases emissions compared the Adopted UCP and the regional GHG impacts have not yet been analyzed in the 2015 RTP/SCS, the Project would generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.

4.5.4.3 Mitigation Framework

There are no mitigation measures available that could reduce this impact at the program level.

4.5.4.4 Significance after Mitigation

~~Discretionary~~ Projects implemented in accordance with the UCP shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Project's impact on GHG emissions would be significant and unmitigated at the program level.

4.5.5 Impact Analysis

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

4.5.5.1 Impact Analysis

A significant impact would occur if implementation of the project would conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions.

SANDAG RTP/SCS

SB 375 includes emission reduction goals for 2020 and 2035, and aligns regional transportation planning efforts and land use and housing allocations to achieve regional GHG reduction targets. As discussed earlier, SANDAG adopted the 2015 RTP/SCS in October 2015. The 2015 RTP/SCS provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region.

The 2015 RTP/SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. SANDAG's estimate of GHG emissions reductions from the 2015 RTP/SCS indicates that the plan would result in per capita emissions reductions of 15 percent by 2020 and 21 percent by 2035 from a base year of 2005.

SANDAG plans are developed based on land use, population, and commercial/industrial growth projections from local jurisdictions in the region, including the City of San Diego. The City of San Diego General Plan was approved in 2008 and includes strategies that focus growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system.

The UCP is guided by the framework and policy direction in the City's General Plan and reflects new citywide policies and programs from the General Plan for the UCP Area. The Project would amend the UCP and in particular, the UCP Transportation Element. The Project would require an amendment to the UCP Transportation Element and General Plan Mobility Element to remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge.

Projects consistent with the City of San Diego's General Plan would be considered to comply with the planning efforts in the 2015 RTP/SCS, which was designed to achieve the region's fair-share GHG emission reductions pursuant to SB 375. The changes in the planned transportation network that would occur as a result of the Project have not been included in the regional emissions analysis of the 2015 RTP/SCS. Since the Project requires an amendment to the General Plan and also results in a net increase in overall GHG emissions compared to the Adopted UCP and General Plan, the Project is not consistent with the 2015 RTP/SCS. Consistency with SB 375 would be determined during the next update to the 2015 RTP/SCS.

SANDAG Climate Action Strategy

At the time of this writing, SANDAG has not adopted a CAP that meets the requirements identified in CEQA Guidelines Section 15183.5. However, SANDAG published a Climate Action Strategy (Strategy) in 2010 that was prepared under a partnership with the California Energy Commission (CEC) (SANDAG 2010). The Strategy acts as a guide for SANDAG and local governments and policymakers in addressing climate change.

The Strategy identifies goals, objectives, and policy measures in the areas of transportation, land use, buildings, and energy use. The Strategy emphasizes those areas where the greatest impact and GHG reductions can be made at the local and regional levels, including land use pattern and transportation infrastructure. The goals of the Strategy include reducing total VMT and minimizing GHG emissions when vehicles are used. Table 4.5-3 shows the daily VMT associated with the Adopted UCP and the Project.

**Table 4.5-3
Estimated VMT**

	Adopted UCP	Project
Daily VMT	3,827,967	3,864,082

Source: Kimley-Horn 2016

As shown in Tables 4.5-2 and 4.5-3, the Project would increase the total regional VMT and GHG emissions compared to the Adopted UCP. Therefore, the Project would not be consistent with the Strategy.

City of San Diego Climate Action Plan

~~The CAP does not include any goals or measures that directly relate to the Project or transportation infrastructure projects.~~ Strategy 3 of the CAP includes actions to increase mass transit, implement the Bicycle Master Plan, and promote transit oriented development. These, and other measures in the CAP, do not directly relate to the removal of a planned improvement from the UCP. Actions 3.4 and 3.5 of the CAP, which relate to the implementation of Traffic Signal and Roundabouts Master Plans, aim to reduce vehicle miles traveled and promote effective land use by implementing transit-oriented development within Transit Priority Areas. These actions do not directly pertain to roadway projects. However, the CAP does include a goal to promote effective land use so as to reduce VMT. Action 3.6 of the CAP (Implement transit-oriented development within Transit Priority Areas) is intended to meet that goal and has a target to “reduce average vehicle commute distance by 2 miles through implementation of the General Plan City of Villages Strategy by 2035.”

As discussed earlier, the overall VMT is projected to increase as a result of the Project. Although changes in trip distance were not directly evaluated for the Project, the Project could affect commute routes for local residents by increasing future trip distances as a result of rerouting trips to other existing local arterials. ~~Therefore, it is conservatively assumed that the overall increase in VMT is not consistent with the goals of the CAP.~~

~~In addition, the removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon. Thus, removal of the planned Regents Road Bridge from the UCP would be in conflict with planned bicycle network improvements as envisioned in local alternative transportation planning documents.~~

4.5.5.2 Significance of Impacts

~~Given the increase in VMT and GHG emissions from mobile sources, the Project would not be consistent with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP. Because the overall VMT is projected to increase as a result of the Project, the Project could affect commute routes for local residents by increasing future trip distances as a result of rerouting trips to other existing local arterials. Further, the removal of the Regents Road Bridge from the UCP would eliminate the plans to include a 6-foot-wide striped bike lane along each side of the bridge that would provide bicycle connectivity from the north and south sides of Rose Canyon. Therefore, the Project could conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The impact would be significant and unmitigated at the program level.~~

4.5.5.3 Mitigation Framework

There are no mitigation measures available that could reduce this impact at the program level.

4.5.5.4 Significance After Mitigation

~~Discretionary p~~Projects implemented in accordance with the UPC shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Project's impact on GHG emissions would be significant and unmitigated at the program level.

4.6 ENERGY

PRC Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy use and conservation as applicable to a project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of energy caused by a project, along with a description of applicable feasible mitigation measures.

The analysis of energy conservation consists of a summary of the energy regulatory framework, the existing conditions within the UCP Area and a discussion of the Project's potential impacts on energy resources. This section evaluates potential impacts to energy conservation in accordance with Appendix F of the CEQA Guidelines and federal, state, and regional regulations.

4.6.1 Existing Conditions

In 2013, total energy usage of the State of California was 7,684 trillion British thermal units (BTUs). This energy use can be broken down by sector with the largest user being Transportation at 37.8 percent, followed by Industrial at 23.6 percent, and both Residential and Commercial sectors at 19.3 percent (DOE 2014).

Electricity

Electricity generation is typically measured in gigawatt-hours (GWh), megawatt-hours (MWh), or kilowatt-hours (kWh). In 2012, total electricity consumed in California was 302,113 GWh (CEC 2014). Nuclear power typically provided 20 percent of the state's total electricity generation. However, the reactors at the San Onofre nuclear plant were shut down in 2012, reducing the amount of electricity generation from nuclear power. California's electrical system has also become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, and hydroelectric plants. However, the recent drought has led to less hydropower (reduced from 20 percent to 10 percent of California's total electricity generation) and increased natural gas generation. In 2014, 9.9 million megawatts (MW) were produced by utility-scale solar plants in California, an increase of 6.1 million MWh from 2013 (DOE 2015).

Natural Gas

In 2013, California consumed 2,414,518 million cubic feet of natural gas and produced 252,310 million cubic feet. With the state's natural gas reserves declining, California production satisfies about one-tenth of state demand (DOE 2012).

Transportation Fuels

Although gasoline consumption has been declining since 2008, it is still the dominant fuel used in transportation (CEC 2014). In 2012, total gasoline consumed in the state was 14.6 billion gallons (BOE 2014a). Diesel fuel is the second most used transportation fuel in California behind gasoline. In 2012, more than 2.6 billion gallons of diesel were sold in California (BOE 2014b). Passenger cars and light-duty trucks are the largest consumers of transportation fuel in the state and the San Diego region. Passenger cars and light-duty trucks account for 1.6 billion gallons of gasoline and diesel fuel per year, or approximately 85 percent of total energy consumption by on-road vehicles in the San Diego region (SANDAG 2014a).

California leads the nation in registered alternatively fueled vehicles and requires all California motorists to use, at a minimum, a specific blend of gasoline called California Reformulated Gasoline (CaRFG). In ozone nonattainment areas, motorists face even stricter requirements and must use California Oxygenated Reformulated Gasoline. As a result, California leads the nation in retail sales of reformulated gasoline. In 2013, California was also home to almost half of all of the nation's 104,000 plug-in hybrid electric vehicles.

4.6.2 Regulatory Framework

4.6.2.1 Federal

National Energy Act

The National Energy Act was approved by the U.S. Congress in 1978. The Act included the Public Utility Regulatory Policies Act (Public Law 95-617), Energy Tax Act (Public Law 95-318), National Energy Conservation Policy Act (NECPA) (Public Law 95-619), Power Plant and Industrial Fuel Use Act (Public Law 95-620), and the Natural Gas Policy Act (Public Law 95-621). The intent of the National Energy Act was to promote greater use of renewable energy, provide residential consumers with energy conservation audits to encourage slower growth of electricity demand, and promote fuel efficiency.

Energy Policy Act

Adopted in 2005, the Energy Policy Act included a comprehensive set of provisions to address energy issues. The Energy Policy Act included tax incentives for the following: energy conservation improvements in commercial and residential buildings; fossil fuel production and clean coal facilities; and construction and operation of nuclear power plants. Subsidies were also included for geothermal, wind energy, and other alternative energy producers.

Energy Independence and Security Act

Signed into law in December 2007, the Energy Independence and Security Act included an increase in auto mileage standards and addressed conservation measures and building efficiency. The Energy Independence and Security Act also included a new energy grant program for use by local governments in implementing energy-efficiency initiatives, as well as a variety of green building incentives and programs.

4.6.2.2 State

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately owned electric, natural gas, telecommunication, water, railroad, rail transit, and passenger transportation companies. CEC is California's energy policy and planning agency. It was established by the Warren-Alquist Act in 1974, in response to the energy crisis of the early 1970s and the state's unsustainable growing demand for energy resources. CEC is committed to reducing energy costs and environmental impacts of energy use, such as GHG emissions, while ensuring a safe, resilient, and reliable supply of energy (CEC 2015).

California Energy Code

The California Energy Code (CCR Title 24) provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. These energy efficiency building standards are updated approximately every 3 years. On July 1, 2014, the California Building Standards Commission adopted the current 2013 California Green Building Standards Code for all new construction statewide. The code sets targets for energy efficiency, water consumption, diversion of construction waste from landfills, and use of environmentally sensitive materials in construction and design.

Senate Bill 1078

SB 1078 established California's Renewable Portfolio Standard in 2002. SB 1078 required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 changed the target date to 2010. Executive Order S-14-08 expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This new goal was codified in 2011 with the passage of SB X1-2.

Executive Order B-16-12

Executive Order B-16-12 orders state entities under the direction of the governor, including ARB, CEC, and CPUC, to support the rapid commercialization of zero emission vehicles (ZEVs). The executive order calls for infrastructure to support up to one million ZEVs by 2020, over 1.5 million ZEVs on California roads by 2025, and annual displacement of at least 1.5 billion gallons of petroleum fuels by 2025 (State of California 2015).

4.6.2.3 Local

City of San Diego General Plan

The City of San Diego adopted an updated General Plan in 2008. Section I. Sustainable Energy in the Conservation Element of the City's General Plan discusses conservation measures, such as establishing more local energy sources or promoting more land uses and transportation policies that promote energy efficiency.

Applicable policies from the Sustainable Energy section of the Conservation Element are:

- CE-I.1. Maintain a centralized Energy Conservation and Management Program and Comprehensive Plan for all City operations.
- CE-I.8. Improve fuel-efficiency to reduce consumption of fossil fuels.
- CE-I.9. Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.
- CE-I.13. Promote and conduct energy conservation education.

University Community Plan

While existing service to the region is adequate, energy is a regional resource in limited supply, and conservation is critical to future supply. The relevant energy goal from the UCP's Resource Management Element is:

- Develop a transportation system designed to move people and goods safely and efficiently within the community, including linkages with other communities, and with due consideration for energy conservation.

4.6.3 Significance Determination Thresholds

Section 15126.4 (a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy.

CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project.

Based on the City's Significance Determination Thresholds for the purpose of this PEIR, impacts to energy resources would be significant if the Project would:

1. Result in the use of excessive amounts of electrical power; or
2. Result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.).

4.6.4 Impact Analysis

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

4.6.4.1 Impact Analysis

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not involve construction or modification of the existing roadway. As such, the removal of the planned Genesee Avenue Widening from the UCP would not result in significant impacts to energy supply as no development or population growth is anticipated to occur. Energy resources would not be consumed as this would not involve construction or operation of development. As such, the removal of the planned Genesee Avenue Widening from the UCP would not result in the excess use of electrical power compared to existing conditions.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway. As such, the removal of the planned Regents Road Bridge from the UCP would not result in significant impacts to energy supply as no development or population growth is anticipated to occur. Energy resources would not be consumed as this would not involve construction or operation of development. As such, the removal of the planned Regents Road Bridge would not result in the excess use of electrical power compared to existing conditions.

4.6.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

There would be no increase in demand for electrical power, above that of existing conditions, as a result of the removal of the planned Genesee Avenue Widening from the UCP. Therefore, no use of excessive amounts of electrical power would occur, and no significant impacts would occur.

Removal of Regents Road Bridge

There would be no increased demand or use of excessive amounts of electrical power, above that of existing conditions, due to the removal of the planned Regents Road Bridge from the UCP. Therefore, no significant impacts would occur.

4.6.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.6.5 Impact Analysis

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

4.6.5.1 Impact Analysis

Impacts on energy conservation are considered significant if implementation of the Project would result in an increased reliance on fossil fuels and decreased reliance on renewable energy sources.

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not involve construction or modification of the existing roadway. This would neither result in an increased reliance on fossil fuels nor a decreased reliance on renewable energy resources above that which already exists under current conditions. As such, the removal of the planned Genesee Avenue Widening from the UCP would not use excessive amounts of fuel or other forms of energy.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway. This would neither result in an increased reliance on fossil fuels nor a decreased reliance on renewable energy resources above that which already exists under current conditions. As such, the removal of the planned Regents Road Bridge from the UCP would not use excessive amounts of fuel or other forms of energy.

4.6.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not result in the use of excessive amounts of fuel or other forms of energy above those of existing conditions. Therefore, no significant impacts would occur.

Removal of Regents Road Bridge

The removal of planned Regents Road Bridge from the UCP would not result in the use of excessive amounts of fuel or other forms of energy above those of existing conditions. Therefore, no significant impact would occur.

4.6.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.7 NOISE

This section evaluates potential noise impacts associated with the Project, specifically the potential for the Project to cause a substantial temporary or permanent increase in ambient noise levels within or around the Project site, or to expose people to noise levels that exceed applicable noise standards.

4.7.1 Existing Conditions

4.7.1.1 Fundamentals of Environmental Acoustics

Noise is generally defined as unwanted or objectionable sound. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB); decibels are measured on a logarithmic scale that quantifies sound amplitude in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

Human Perception of Noise

The human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called “A-weighting” is used to filter sound level at higher and lower frequencies, approximating the frequency response of an average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the A-scale levels of those sounds. Therefore, the “A-weighted” noise scale is used for measurements and standards involving the human perception of noise. In this report, all noise levels are A-weighted and “dBA” is understood to identify the A-weighted dB. Table 4.7-1 provides typical noise levels associated with common activities.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two noise sources do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA (increase or decrease); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds about twice (or half) as loud (Caltrans 2011).

**Table 4.7-1
Common Indoor and Outdoor Noise Levels**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Fly-over at 1,000 feet	100	
Gas Lawn Mower at 3 feet	90	
Diesel Truck at 50 feet, at 50 mph	80	Food Blender at 3 feet Garbage Disposal at 3 feet
Noisy Urban Area, Daytime Gas Lawn Mower at 100 feet	70	Vacuum Cleaner at 10 feet
Commercial Area Heavy Traffic at 300 feet	60	Normal Speech at 3 feet
Quiet Urban Daytime	50	Large Business Office Dishwasher in Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (Background)
Quiet Suburban Nighttime	30	Library
Quiet Rural Nighttime	20	Bedroom at Night, Concert Hall (Background)
	10	Broadcast/Recording Studio
	0	Lowest Threshold of Human Hearing

Source: Caltrans 2013

Averaging Noise Levels

In addition to noise levels at any given moment, the duration and averaging of noise levels over time is also important for the assessment of potential noise disturbance. Community noise levels vary continuously and most environmental noise includes a conglomeration of frequencies from distant sources that create a relatively steady background noise in which no particular source is identifiable. Noise levels varying over time are averaged over a period of time, usually hour(s), expressed as dBA L_{eq} , which typically assumes a 1-hour average noise level, as used in this analysis. The maximum noise level (L_{max}) is the highest sound level occurring during the averaging period, while L_{min} is the minimum noise level.

Time of day is also an important factor to consider when assessing potential community noise impacts, as noise levels that may be acceptable during the daytime (i.e., 7:00 a.m. to 7:00 p.m.) may create disturbance during evening (i.e., 7:00 p.m. to 10:00 p.m.) or at night (i.e., 10:00 p.m. to 7:00 a.m.), when people are typically at home engaging in noise sensitive activities such as sleeping. To characterize average noise levels over a 24-hour period, the Community Noise Equivalent Level (CNEL) descriptor is used, which is calculated from hourly L_{eq} values, adding

5 dBA to each of the evening hourly L_{eq} levels and adding 10 dBA to each of the night hourly L_{eq} levels, to reflect the heightened noise sensitivity and greater disturbance potential from evening and nighttime noise, respectively.

Noise-Sensitive Receptors

Noise-sensitive receptors are land uses associated with indoor and/or outdoor activities that may be subject to stress and/or significant interference from noise on sleeping, studying, or convalescing activities. The 2015 amendments to the Noise Element of the City's General Plan defines noise-sensitive land uses to include, but not necessarily be limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, parks and recreation facilities, and museums (City of San Diego 2015).

In addition to human receptors, special-status wildlife species have been afforded protection or special recognition by federal, state, or local resource agencies or organizations. Special-status species typically have relatively limited distribution and may require specialized habitat conditions. Special-status bird species may be considered noise-sensitive, specifically, during their breeding season. Temporary, indirect impacts are likely to arise from construction-generated noise resulting in destruction and/or avoidance of habitat by wildlife. Impacts to noise sensitive biological resources and habitat are discussed in Section 4.9, Biological Resources.

Noise Attenuation

From the noise source to the receiver, noise level changes both in level and frequency as it traverses the path between these two points. The most obvious change is the decrease in noise levels as the distance from the source increases. For a stationary noise source (or point source), the attenuation rate or drop-off in noise level would be at least -6 dBA for each doubling of unobstructed distance between source and the receiver. For a linear noise source, such as vehicle traffic on a major roadway, the attenuation rate or drop-off in noise level would be approximately -3 dBA for each doubling of unobstructed distance between source and the receiver.

In addition to distance, noise levels may be further reduced due to ground absorption, atmospheric effects and refraction, shielding by natural terrain and man-made geographic features (e.g., noise barriers), diffraction, and reflection. An acoustically "soft" ground surface, characterized as being porous and, thus, sound absorptive, between source and receiver can further reduce noise levels by up to -5 dBA. In addition, a large barrier between a noise source and a receiver can significantly attenuate noise levels (i.e., from 5 to 10 dBA) at that receiver. The amount of attenuation provided by this "shielding" depends on many factors that include

barrier height, length, materials of composition, and its proximity to either the source or the receiver. Barriers can include natural terrain features, such as hills and dense woods, as well as man-made features, such as buildings and walls. Walls or berms are often specifically created to reduce noise.

4.7.1.2 Existing Noise Sources

The existing noise environment of the Project site is primarily influenced by noise from vehicle traffic on the roadways adjacent to and in proximity to the Project site, aircraft from MCAS Miramar, and railroad trains along the AT&SF in Rose Canyon. Traffic noise levels from roadways adjacent to the Project site are based primarily on traffic volume in ADT, vehicle mix percentage (i.e., automobiles, trucks, etc.), and vehicle speed.

Primary

The predominant source of traffic noise is from the Genesee Avenue and Regents Road Corridors, I-5, I-805, and SR 52.

- **Genesee Avenue.** Genesee Avenue is a north-south, 4- and 6-lane Arterial. Between Nobel Drive and Lehrer Drive, Genesee Avenue is classified as a 4-lane Major Arterial. Access to SR 52 is provided at these interchanges with Genesee Avenue. The ultimate street classification in the adopted Community Plan for Genesee Avenue is a 6-lane Collector between Nobel Drive and SR 52 Ramps. Genesee Avenue has reached the ultimate street classification in the adopted Community Plan on all other road segments. The posted speed limit is 45 mph. Genesee Avenue experiences poor LOS from the I-5 interchange and south of Nobel Drive to the SR 52 interchange during both the AM and PM peak periods. In addition, from the I-5 southbound ramps to the I-5 northbound ramp, the anticipated ADT is 49,051, which is above existing capacity.
- **Regents Road.** Regents Road is classified as a 6-lane Prime Arterial; however, near Rose Canyon Regents Road is a two-way, north-south roadway divided by Rose Canyon. South of Nobel Drive, Regents Road is classified as a 4-lane Major Arterial. South of Rose Canyon, north of Governor Drive, Regents Road is classified as a 2-lane Collector. Between Governor Drive and Luna Avenue, Regents Road is classified as a 4-lane Major Arterial. Access to SR 52 is provided along Regents Road. The ultimate street classification in the adopted Community Plan for Regents Road is a 4-lane Major Arterial. The posted speed limits along Regents Road are between 25 mph to 50 mph. Regents Road experiences poor LOS at the SR 52 interchange during both the AM and

PM peak periods. All roadway study segments along Regents Road were found to operate at an acceptable LOS D or better, and generate ADT below existing capacity.

- **I-5.** I-5 is a significant north-south interstate highway that is located on the western half of the UCP Area and has interchanges at Genesee Avenue, La Jolla Village Drive, Gilman Drive, and Nobel Drive. I-5 operates at LOS E northbound during AM peak periods and LOS F during PM peak periods between SR 52 and Gilman Drive (see Table 4.7-2).
- **I-805.** I-805 is located on the eastern half of the UCP Area and has interchanges at La Jolla Village Drive/Miramar Road, Nobel Drive, and Governor Drive. I-805 generally operates at LOS E or LOS F during both AM and PM peak periods (see Table 4.7-2).
- **SR 52.** SR 52 is an east-west state highway that connects La Jolla on the west end at the termini with I-5 and Santee on the east end. SR 52 is located on the south side of the University community with interchanges at Regents Road and Genesee Avenue. SR 52 operates as LOS E for the segment between Genesee Avenue and I-805 during the AM peak period, and LOS F between the segments of Regents Road and I-5 during the PM peak period. All failing segments are in the eastbound direction (see Table 4.7-2).

Secondary

The secondary noise sources on the Project site result from aircraft noise from MCAS Miramar, and train activity along railroad tracks through Rose Canyon including AMTRAK and COASTER passenger trains, and freight trains. MCAS Miramar is located east and southeast of the Project area. The MCAS Miramar ALUCP has noise contours and a compatibility matrix for aircraft-produced noise impacts. The Genesee Avenue and Regents Road Corridors are located well outside the 65 dBA CNEL contour boundary. Single-event noise may be periodically audible within the corridor from jet aircraft take-off or helicopter flyover activities; however, MCAS aircraft noise is not a major contributor to the noise environment of the Project.

Noise levels from MCAS Miramar exceeding 65 dBA CNEL impact land uses in the northern and eastern portions of the UCP Area. The most severe noise levels, up to 75 dBA CNEL, impact land uses along Eastgate Mall and Miramar Road east of I-805. The land in this area consists of level mesas, partially developed industrial land uses, and the slopes along Soledad Canyon and Sorrento Valley. The only existing land uses that are incompatible with the ALUCP are the residential units near the eastern edge of the South UCP Area and the Torrey Pines Inn. Both of these developments were approved prior to the establishment of aircraft noise compatibility standards (City of San Diego 2014b).

The AT&SF is a source of passenger and freight train noise along Rose Canyon and Sorrento Valley. Peak noise levels from passing trains can generate 85 dBA at 100 feet from passing train. However, noise levels currently do not exceed 65 dBA as close as 25 feet from the train activity because of the intermittent nature of the train noise based on the frequency of passing trains (City of San Diego 2014b).

Human activities in residential areas also generate noise from landscaping, home and vehicle maintenance, and voices.

4.7.1.3 Noise-Sensitive Land Uses

As discussed in Section 4.7.1.1, the City defines noise-sensitive land uses to include, but not necessarily be limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, parks and recreation facilities, and museums (City of San Diego 2015b). In addition, special-status wildlife species may be considered noise sensitive, specifically, during their breeding season. Noise-sensitive receptors applicable to the Project are identified below for the Genesee Avenue Corridor and Regents Road Corridor in the South University Subarea of the UCP Area.

The South University Subarea is an urbanized area bordered by I-5 on the west, I-805 on the east, SR 52 on the south, and Rose Canyon on the north. The two major canyons, Rose Canyon on the north and San Clemente Canyon on the south, isolate as well as define the South University Subarea. Access to the subarea is available from Regents Road and Genesee Avenue from the south, Genesee Avenue from the north and Governor Drive off of I-805 from the east. Governor Drive connects most land uses in the subarea as it is the only major east-west street, which terminates at Stresemann Street to the west (City of San Diego 2014b).

Noise-sensitive receptors along the Project roadway corridors include single-family residential development and educational facilities that include University High School (6949 Genesee Avenue) and Marie Curie Elementary School (4080 Governor Drive). Park and recreation facilities are also found within the South University Subarea. Rose Canyon forms the northern boundary, while San Clemente Canyon (Marian Bear Memorial Park) forms the southern boundary of the subarea. Standley Community Park (3585 Governor Drive) is located south of Governor Drive between Stadium Street and Radcliffe Drive.

Other noise-sensitive receptors include medical facilities (Partners Urgent Care UTC at 4085 Governor Drive); a library (University Community Branch Library at 4155 Governor Drive); and child care facilities (Curie Extended Day Child Care at 4080 Governor Drive and Lighthouse Early Childhood Center at 5055 Governor Drive).

4.7.1.4 Project Roadway Corridors

Genesee Avenue Corridor

The dominant noise source in the Genesee Avenue Corridor is vehicle traffic. Secondary sources of noise are related to train and aircraft activity. Periodic train noise is generated as trains pass through Rose Canyon and cross under the Genesee Avenue Corridor.

Aircraft noise is generated from aircraft activity from MCAS Miramar, which is located east and southeast of the Project site. The Genesee Avenue Corridor is located well outside of the 65 dB CNEL contour boundary. Single-event noise may be periodically audible within the corridor from jet aircraft take-off or helicopter flyover activities, but not at levels that significantly change CNEL levels in the community.

Regents Road Corridor

The primary sources of noise along the Regents Road Corridor, north and south of Rose Canyon, are primarily from distant transportation-related activities, due to its division in both directions at Rose Canyon (i.e., no through traffic). Secondary noise sources include train traffic intermittently emanating from the rail line depressed within Rose Canyon. The canyon shields off-site nearby residential land uses from train noise such that baseline noise levels are moderately low at most residences within the Regents Road Corridor.

An additional secondary source of noise is aircraft activity related to MCAS Miramar, which is located east and southeast of the Project site. The Regents Road Corridor is located well outside the 65 dBA CNEL contour boundary. Single-event noise may be periodically audible within the corridor from jet aircraft take-off or helicopter flyover activities, but not at levels that significantly change CNEL levels in the community.

Project Traffic Volumes

Project traffic data, including ADT volumes and peak hour AM and PM volumes for Project roadways and freeways, are provided in Table 4.7-2 for Existing Conditions, Future Year with Adopted UCP, and Future Year with Project. Future Year with Adopted UCP assumes that the Adopted UCP and all the transportation improvements associated with the current plan would continue to be implemented (including planned Genesee Avenue Widening and Regents Road Bridge). Future Year with Project assumes the removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP.

**Table 4.7-2
Existing and Future Project Roadway Traffic Volumes**

Roadway/ Freeway	Project Segment	ADT Volumes			Peak Hour Volumes								
		Adopted UCP	Future Year with Adopted UCP	Future Year with Project	Direction	Peak Period	Adopted UCP	Future Year with Adopted UCP	Future Year with Project				
		No Bridge No Widening	Bridge & Widening	No Bridge No Widening			No Bridge No Widening	Bridge & Widening	No Bridge No Widening				
Regents Road	Nobel Drive to Rose Canyon	10,688	27,000	11,600	NB	AM	93	1,499	97				
						PM	122	1,738	121				
					SB	AM	382	888	422				
						PM	747	1,699	685				
					NB	AM	93	1,499	97				
						PM	122	1,738	121				
	SB	AM	382	888	422								
		PM	747	1,699	685								
	Rose Canyon to Governors Drive	1,940	30,000	2,400	NB	AM	93	1,499	97				
						PM	122	1,738	121				
					SB	AM	382	888	422				
						PM	747	1,699	685				
NB					AM	828	1,629	909					
					PM	697	926	754					
SB	AM	384	897	472									
	PM	460	1,410	527									
Regents Road to SR 52	Governors Drive to SR 52	16,181	30,300	17,800	NB	AM	828	1,629	909				
						PM	697	926	754				
					SB	AM	384	897	472				
						PM	460	1,410	527				
					Noble Drive to Centurion Square	30,922	39,600	46,500	NB	AM	2,264	2,225	2,918
										PM	923	1,048	1,378
	SB	AM	393	565					700				
		PM	1,709	2,365					2,798				
	NB	AM	1,357	1,629					2,918				
		PM	786	920					1,378				
	SB	AM	1,090	990	1,294								
		PM	2,351	2,755	3,483								
SR 52	Regents Road to Genesee Avenue (EB)	42,541	53,666	52,954	EB	AM	3,119	4,515	4,484				
						PM	4,316	6,092	6,051				
	Regents Road to Genesee Avenue (WB)	45,063	56,428	56,383	WB	AM	3,564	5,030	4,996				
						PM	2,945	4,157	4,129				

Source: Kimley-Horn 2016

Note: Roadway segment traffic volumes (i.e., Genesee Avenue and Regents Road) provided as ADT; freeway segment (i.e., SR 52) provided as peak hour volumes. With Project = Removal of both Regents Road Bridge and Genesee Avenue Widening (existing condition). Without Project = Construction of Regents Road Bridge and widening of Genesee Avenue (from 4 to 6 lanes). ADT = average daily traffic EB = Eastbound WB = Westbound

As shown in Table 4.7-2, in Future Year with Adopted UCP in comparison to existing conditions, the ADT and peak hour volumes substantially increase along the Genesee Avenue Corridor and Regents Road Corridor. In Future Year with Project, the ADT and peak hour traffic volumes moderately increase along the Regents Road Corridor in comparison to existing conditions, while the Genesee Avenue Corridor and SR 52 are projected to experience a significant increase in ADT and peak hour traffic volumes in comparison to existing conditions.

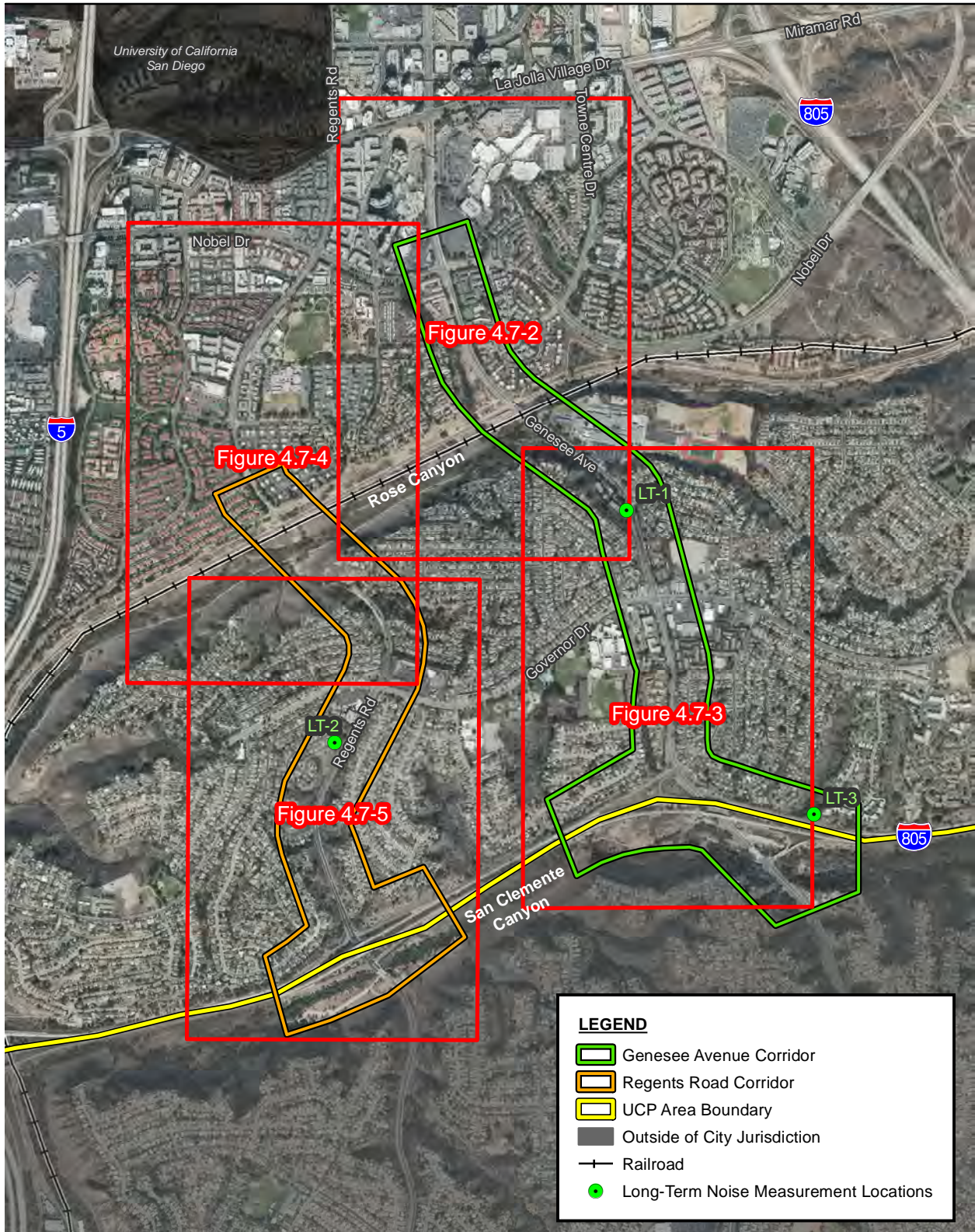
As shown in Table 4.7-2, Future Year with Project in comparison to Future Year with Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor substantially decrease (i.e., more than half). The Genesee Avenue Corridor shows a moderate increase in peak hour traffic volumes. SR 52 volumes would decrease slightly.

Traffic noise levels provide an estimate of the contribution of traffic noise on ambient noise levels at noise-sensitive receptors (i.e., residences) along roadway/freeway segments. Traffic noise is approximated as a line source, which attenuates with distance at a rate of 3 dBA per doubling of distance. Ambient noise levels within the UCP Area would also include the contribution of noise levels from other sources (i.e., aircraft, commercial, industrial, residential) on-site and surrounding areas.

4.7.1.5 Ambient Noise Measurements

To provide a traffic noise baseline for the Project roadway segments affected by the Project and to document the relationship between hourly and 24-hour CNEL levels, ambient noise level measurements and observations were performed at noise-sensitive receptors in proximity to the Project segments of the affected roadways. Noise measurements were conducted using ANSI Type 1 or 2 sound level meters (SLMs), which were programmed in “slow” response mode, and to measure noise levels in A-weighted mode. All noise measurements were conducted approximately 5 feet above ground level using stationary tripods. SLMs were calibrated before and after each measurement.

On Thursday, February 5, 2016, a long-term (LT) continuous 24-hour noise measurement was conducted at residences in proximity and/or adjacent to each of the three Project roadway segment corridors of Genesee Avenue (LT-1), Regents Road (LT-2), and SR 52 (LT-3). The noise measurement locations are shown in Figure 4.7-1. The primary noise source at each location was vehicle traffic. Noise level measurements and observations are summarized in Table 4.7-3.



Source: SanGIS 2015; SANDAG 2014; Esri.

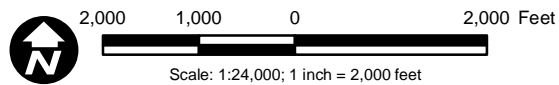


Figure 4.7.1
Project Traffic Noise Corridors Overview

**Table 4.7-3
Ambient Noise Measurement Summary**

Site ID*	Measurement Location	CNEL	Peak Hour	L _{eq} (peak hour)	CNEL minus L _{eq} (peak hour)
LT-1	Genesee Avenue	71.9	12:30 PM	70.9	1.0
LT-2	Regents Road	57.7	6:50 AM	57.3	0.5
LT-3	SR 52	73.9	4:20 PM	71.6	2.3

The CNEL values ranged from 57.7 to 73.9 dBA CNEL. The peak hour (i.e., the hour with the greatest traffic volumes at full speed) occurs during the midday and late afternoon commute period for LT-1 and LT-3, respectively, and early morning for LT-2. The peak hour L_{eq} noise levels ranged from 57.3 to 71.6 dBA L_{eq} (peak hour).

4.7.1.6 Noise Modeling

No detailed traffic noise model analysis (e.g., modeling of specific roadways using the FHWA Traffic Noise Model [TNM]) was conducted. Noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. As shown in Table 4.7-3, the calculated difference between measured CNEL and L_{eq} peak hour values recorded at each discrete measurement location during the field survey were used to convert future modeled L_{eq} levels to future dBA CNEL. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4.

As shown in Table 4.7-4, With Project compared to With Adopted UCP, the distance of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City's residential exterior CNEL noise standards with the Project. Figures 4.7-2 through 4.7-5 illustrate the changes in the CNEL contour distances along the Genesee Avenue and Regents Road Corridors. Figure 4.7-1 provides a key to the location of Figures 4.7-2 through 4.7-5.

**Table 4.7-4
CNEL Noise Contour Distances**

CNEL (dBA L _{eq})	Distance From Roadway Centerline (feet)		Change
	With Adopted UCP	With Project	
Genesee Avenue – Nobel Drive to Centurion Square			
70	66	84	+18
65	145	170	+25
60	228	270	+45
Genesee Avenue – Centurion Square to SR 52			
70	80	96	+16
65	162	176	+14
60	241	270	+29
Regents Road – Nobel Drive to Rose Canyon			
70	61	15	-46
65	138	69	-69
60	235	153	-82
Regents Road – Rose Canyon to Governor Drive			
70	52	23	-29
65	101	58	-43
60	175	107	-68
Regents Road – Governor Drive to SR 52			
70	61	41	-20
65	147	93	-54
60	242	191	-51
SR 52 – Regents Road to Genesee Avenue			
70	330	330	0
65	487	484	-3
60	720	720	0

4.7.2 Regulatory Framework

4.7.2.1 Federal

The federal government actively advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that “noise-sensitive” uses are prohibited from being sited adjacent to a highway or, alternately, that the developments are planned and constructed in such a manner that potential noise impacts are minimized. Federal noise and vibration policies, programs, and/or guidelines developed by the Federal Transit Administration (FTA) and the FHWA are used to calculate construction noise and vibration levels and perform impact analyses.



Source: SanGIS 2015; SANDAG 2014; Esri.

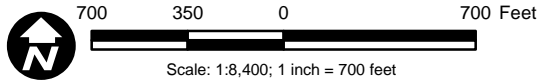


Figure 4.7-2
Genesee Avenue Corridor- Nobel Drive to Centurion Square
Future 65 dBA CNEL Noise Contours



Source: SanGIS 2015; SANDAG 2014; Esri.

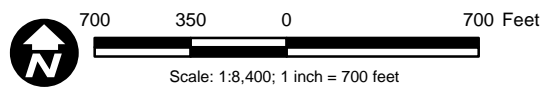
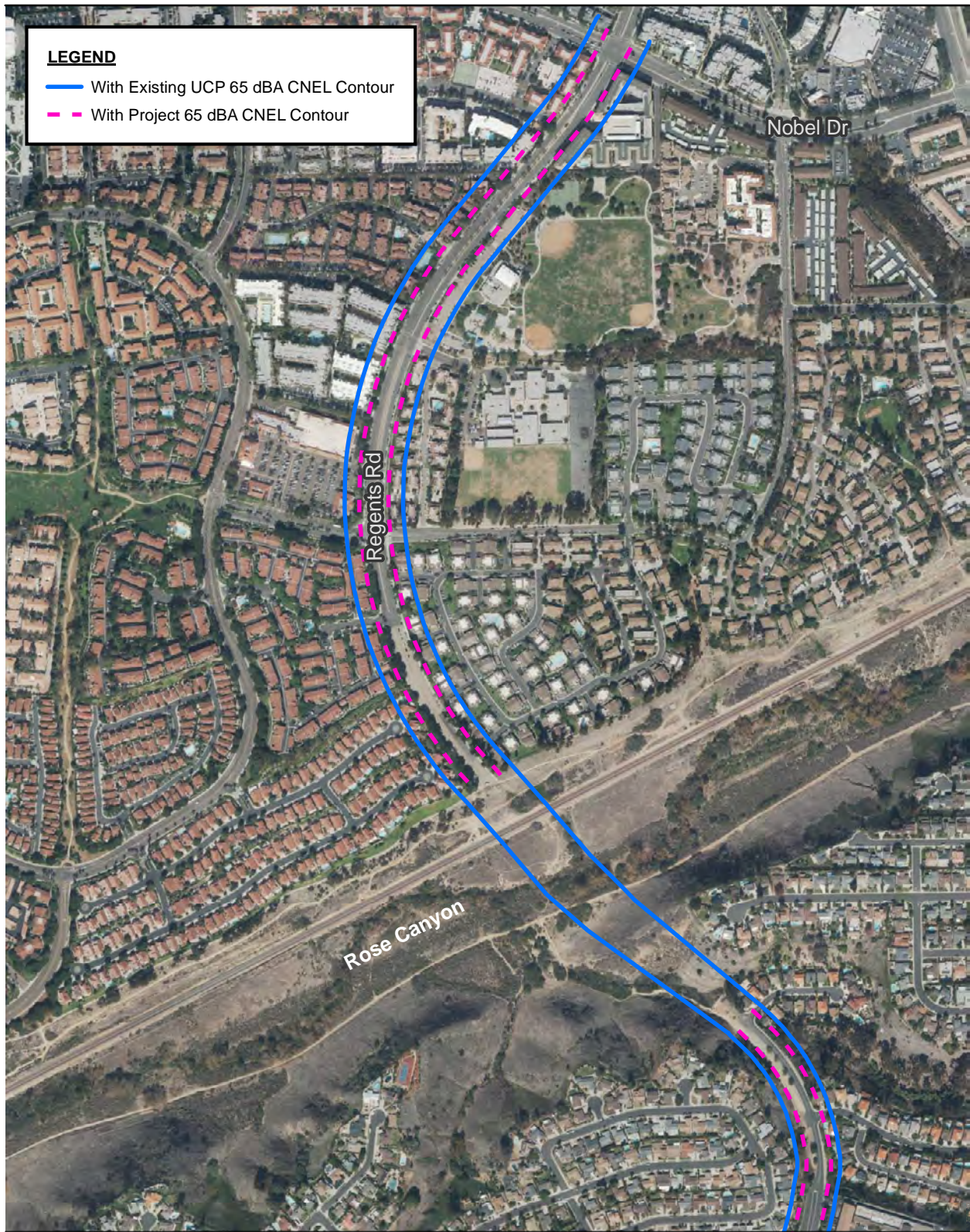


Figure 4.7-3
Genesee Avenue Corridor Centurion Square to SR 52
Future 65 dBA CNEL Noise Contours



Source: SanGIS 2015; SANDAG 2014; Esri.

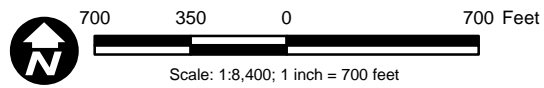


Figure 4.7-4
Regents Road Corridor - Nobel Drive to Governor Drive
Future 65 dBA CNEL Noise Contours



Source: SanGIS 2015; SANDAG 2014; Esri.

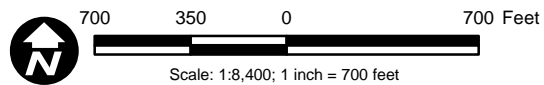


Figure 4.7-5
Regents Road Corridor Governor to SR 52
Future 65 dBA CNEL Noise Contours

4.7.2.2 State

Title 24 of the California Administrative Code

Title 24 of the California Administrative Code requires that residential structures, other than detached single-family dwellings, be designed to prevent the intrusion of exterior noise so that the interior noise level with windows closed and attributable to exterior sources does not exceed 45 dBA CNEL in any habitable room. The California State Building Code Section 1208A.8.2 implements this standard by stating that “interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room.”

California Environmental Quality Act

Appendix G of CEQA Guidelines (CCR, Title 14, Division 6, Chapter 3, Sections 15000–15387) provides thresholds of significance for noise, although specific lead agencies may develop their own threshold of significance. This report uses thresholds established by the City of San Diego.

4.7.2.3 Local

Applicable plans and ordinances with respect to noise include the City’s General Plan, Noise Element, including the City’s 2015 General Plan Amendments; the UCP, Noise Element; the City’s Municipal Code, Noise Ordinance; and the City’s CEQA Significance Determination Thresholds.

City of San Diego General Plan

2008 City of San Diego General Plan – Noise Element. The Noise Element of the City of San Diego General Plan (City of San Diego 2008a) provides goals and policies to guide compatible land uses and incorporate noise attenuation measures for new uses, which was amended by the City’s 2015 General Plan Amendments (City of San Diego 2015b). The goal of the Noise Element is controlling noise to acceptable levels at its source. Specific goals and policies of the Noise Element applicable to the Project include noise and land use compatibility, motor vehicle traffic noise, trolley and train noise, commercial and mixed-use activity noise, construction and public activity noise, and noise attenuating measures provided to guide development.

Noise and Land Use Compatibility. The Noise Element provides land use and noise compatibility guidelines for land use categories and exterior exposure levels, as shown below in Table 4.7-5 Land Use – Noise Compatibility Guidelines. The land uses described provide examples of uses under each land use category.

**Table 4.7-5
Land Use – Noise Compatibility Guidelines**

Land Use Category	Exterior Noise Exposure (dBA CNEL)			
	60	65	70	75
<i>Parks and Recreational</i>				
Parks, Active and Passive Recreation				
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities				
<i>Agricultural</i>				
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables				
<i>Residential</i>				
Single Dwelling Units; Mobile Homes		45		
Multiple Dwelling Units <i>*For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.</i>		45	45*	
<i>Institutional</i>				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12; Libraries; Museums; Child Care Facilities		45		
Educational Facilities including Vocational./Trade Schools and Colleges and Universities		45	45	
Cemeteries				
<i>Retail Sales</i>				
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50
<i>Commercial Services</i>				
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair, Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50
Visitor Accommodations		45	45	45
<i>Offices</i>				
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50
<i>Vehicle and Vehicular Equipment Sales and Services Use</i>				
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking				
<i>Wholesale, Distribution, Storage Use Category</i>				
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution				
<i>Industrial</i>				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries				
Research & Development			50	

Land Use Category			Exterior Noise Exposure (dBA CNEL)			
			60	65	70	75
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.			
		Outdoor Uses	Activities associated with the land use may be carried out.			
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.			
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.			
	Incompatible	Indoor Uses	New construction should not be undertaken.			
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.			

Source: City of San Diego 2015b

As shown in Table 4.7-5, single and multiple dwelling units are “compatible” in areas with exterior noise levels up to 60 dBA CNEL, and “conditionally compatible” for single dwelling units in areas with exterior noise levels of 65 dBA CNEL, and multiple dwelling units of 60 to 70 dBA CNEL, provided that the building structure attenuates interior noise levels to 45 dBA CNEL.

The City of San Diego assumes that standard construction techniques would provide a 15 dB reduction of exterior noise levels to an interior receiver (City of San Diego 2015b). With these criteria, standard construction could be assumed to result in interior noise levels of 45 dBA CNEL or less when exterior sources are 60 dBA CNEL or less. When exterior noise levels are greater than 60 dBA CNEL and the interior threshold is 45 dBA CNEL, consideration of specific construction techniques is required.

Motor Vehicle Traffic Noise

Traffic noise level is dependent upon traffic volume, speed, flow, vehicle mix, pavement type and condition, and the use of barriers, as well as distance to the receptor. At higher speeds, typically on freeways, highways, and Prime Arterials, the noise from tire/pavement interaction can be greater than from vehicle exhaust and engine noise. Noise-sensitive land uses adjacent to freeways and highways should be buffered from excessive noise levels by intervening, less sensitive, industrial-commercial uses or shielded by sound walls or landscaped berms. The City can, however, influence daily traffic volumes and reduce peak hour traffic by promoting alternative transportation modes and integration of mixed-use infill development. The peak hour

traffic may or may not be the worst-case noise levels since higher traffic volumes can lead to higher congestion and lower operating speeds. The worst-case noise levels may occur in hours with lower volumes and higher speeds.

Although not generally considered “compatible,” the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses.

UCP Noise Element

The Noise Element of the UCP identified that noise within the UCP Area is primarily caused by transportation functions, which consists of aircraft activity from MCAS Miramar, vehicle traffic on local major roadways, and train activity on the local AT&SF rail line (City of San Diego 2014b).

Noise Ordinance

The City’s Noise Ordinance is contained in the City’s Municipal Code, Chapter 5, Article 9.5, Noise Abatement and Control (City of San Diego 2010a). The noise ordinance regulates noise generated by on-site sources associated with Project operation, such as heating, ventilation, and air conditioning (HVAC) units. The noise limits of the City Noise Ordinance for various land uses by time of day are shown in Table 4.7-6.

**Table 4.7-6
Property Line Noise-Level Limits by Land Use and Time of Day**

Land Use Zone	Time of Day	One-Hour Average Sound Level (dBA L_{eq})
1. Single-Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
2. Multi-Family Residential (Up to a maximum density of 1/2,000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
3. All Other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
4. Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
5. Industrial or Agricultural	Any time	75

Source: City of San Diego 2010a

The City's Noise Ordinance also regulates noise produced by construction activities. Construction activities are prohibited between the hours of 7 p.m. of any day and 7 a.m. the following day, and legal holidays, except in the case of an emergency. Section 59.5.0404 of the Noise Ordinance limits construction noise to an average sound level of 75 dBA at the affected property line during the 12-hour period from 7 a.m. to 7 p.m. (City of San Diego 2010a).

Significance Determination Thresholds

The City's CEQA Significance Determination Thresholds outline the criteria and thresholds used to determine whether Project impacts are significant (City of San Diego 2011a). Thresholds applicable to the Project include traffic noise, stationary noise generators, sensitive wildlife, construction noise, and noise/land use compatibility, which have been used in this analysis for identifying significant noise impacts applicable to the Project. Traffic Noise Significance Thresholds are provided for structures affected by traffic noise to determine interior and exterior noise impacts from traffic-generated noise in Table 4.7-7.

**Table 4.7-7
Traffic Noise Significance Thresholds (dBA CNEL)**

Structure of Proposed Use That Would Be Impacted by Traffic Noise	Interior Space	Exterior Usable Space¹	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	
Multi-family, school, library, hospital, day care center, hotel, motel, park, convalescent home	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	Structure or outdoor usable area ² is <50 feet from the center of the closest (outside) lane on a street with existing or future ADTs >7,500
Office, church, business, professional uses	n/a	70 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000
Commercial, retail, industrial, outdoor spectator sports uses	n/a	75 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000

¹ If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3-dB increase, then the impact is not considered significant.

² Exterior usable areas do not include residential front yards or balconies unless the areas such as balconies are part of the required usable open space calculation for multi-family units.

Source: City of San Diego 2011a

As shown in Table 4.7-7, the noise level at exterior usable open space for single- and multi-family residences should not exceed 65 dBA CNEL and for commercial or retail space should not exceed 75 dBA CNEL. Table 4.7-7 further specifies that outdoor usable areas would generally indicate a significant noise impact if located closer than 50 feet from the centerline of the closest traffic lane of a street with existing or future daily traffic volumes greater than 20,000 ADT.

Noise significance thresholds for noise generated by adjacent stationary sources such as HVAC units are identified in the City's Noise Ordinance. A project that would generate noise levels at the property line that exceed the City's Noise Ordinance Standards, as reflected in Property Line Noise-Level Limits by Land Use and Time of Day (Table 4.7-6), is considered potentially significant. Although noise levels could be consistent with the City's Noise Ordinance Standards, a noise level above 65 dBA CNEL at the residential property line could be considered a significant environmental impact.

Noise significance thresholds for noise impacts to sensitive wildlife are provided for certain avian species during their breeding season, depending upon the location of the project, such as in or adjacent to an MHPA, whether or not the project is occupied by California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird, or western snowy plover, and whether or not noise levels from the project, including construction during the breeding season of these species, would exceed 60 dBA or an existing ambient noise level if above 60 dBA. In addition, significant noise impacts to the California gnatcatcher are only analyzed if the project is within an MHPA; there are no restrictions for the gnatcatcher outside the MHPA any time of year.

Noise significance thresholds for construction noise are provided by the allowable construction hours and noise level limit identified in the City's Noise Ordinance (City of San Diego 2010a). Construction activity is prohibited between the hours of 7 p.m. of any day and 7 a.m. of the following day, and on legal holidays, except in the case of an emergency. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB during the 12-hour period from 7 a.m. to 7 p.m. (City of San Diego 2010a). Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified.

Noise significance thresholds for noise/land use compatibility are provided in the City's General Plan Noise Element (City of San Diego 2015b), as shown in Table 4.7-2, which indicates the City's exterior unconditional "compatible" noise level standard for residential uses (single-family and multi-family dwelling units) of 60 dBA CNEL. The City assumes that standard

construction design techniques would provide a 15 dB reduction of exterior noise levels to interior noise levels of 45 dBA CNEL or less when exterior sources are 60 dBA CNEL or less. When exterior noise levels are greater than 60 dBA CNEL, consideration of specific construction techniques is required. Multi-family dwelling units with exterior noise levels of up to 70 dBA CNEL are “conditionally compatible” provided that the building structure attenuates interior noise levels to 45 dBA CNEL (City of San Diego 2015b).

4.7.3 Significance Determination Thresholds

The following thresholds are based on the City’s Significance Determination Thresholds and Noise Ordinance, as applicable to the Project.

A significant noise impact would occur if the Project would:

1. Result in or create a significant increase in the existing ambient noise levels;
2. Expose people to noise levels which exceed the City’s adopted noise ordinance; or
3. Expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan.

4.7.4 Impact Analysis

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

4.7.4.1 Impact Analysis

Construction

Construction noise is considered temporary and short term. Construction noise at its source varies depending on construction activities and duration, and the type and use of equipment involved. Noise impacts from construction are dependent on the construction noise levels generated, the timing and duration of the construction activities, proximity to sensitive receptors, and noise regulations and standards. Construction equipment can be stationary or mobile. Stationary equipment operates in one location for various periods of time with fixed-power operation, such as pumps, generators, and compressors, or a variable noise operation, such as pile drivers, rock drills, and pavement breakers. Mobile equipment such as bulldozers, graders, and loaders moves around the construction site (FTA 2006). Heavy construction equipment typically operates for short periods at full power followed by extended periods of operation at

lower power, idling, or powered-off conditions. Typically, site preparation involves demolition, grading, compacting, and excavating, which would include the use of backhoes, bulldozers, loaders, excavation equipment (e.g., graders and scrapers), pile drivers, and compaction equipment. Finishing activities may include the use of pneumatic hand tools, scrapers, concrete trucks, vibrators, and haul trucks. Typical maximum noise levels generated by various pieces of construction equipment are listed in Table 4.7-8.

**Table 4.7-8
Construction Equipment Noise Levels**

Equipment	Noise Level (dBA L_{max}) at 50 Feet
Auger Drill Rig	85
Backhoe	80
Blasting	94
Chain Saw	85
Clam Shovel	93
Compactor (ground)	80
Compressor (air)	80
Concrete Batch Plant *	80
Concrete Crushing Plant **	86
Concrete Mixer Truck	85
Concrete Pump	82
Concrete Saw	90
Crane (mobile or stationary)	85
Dozer	85
Dump Truck	84
Excavator	85
Front End Loader	80
Generator (25 KVA or less)	70
Generator (more than 25 KVA)	82
Grader	85
Hydra Break Ram	90
Impact Pile Driver (diesel or drop)	95
Insitu Soil Sampling Rig	84
Jackhammer	85
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tools	85
Pumps	77
Rock Drill	85
Scraper	85
Tractor	84
Vacuum Excavator (vac-truck)	85
Vibratory Concrete Mixer	80
Vibratory Pile Driver	95

Source: Thalheimer 2000, FTA 2006,
KVA = kilovolt amps

As shown in Table 4.7-8, maximum construction equipment noise levels range from 70 to 95 dBA L_{max} , depending upon the piece of equipment operating (FTA 2006). In typical construction projects, grading and impact activities typically generate the highest noise levels. Grading involves the largest, heaviest equipment and typically includes bulldozers, excavators, dump trucks, front-end loaders, and graders with maximum noise levels range from 80 to 85 dBA L_{max} . Impact equipment includes pile drivers, rock drills, pavement breakers, concrete crushers, and industrial/concrete saws with maximum noise levels range from 90 to 95 dBA L_{max} . Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some phases would have higher continuous noise levels than others, and some have high-impact noise levels.

Typical construction projects, with equipment moving from one point to another, work breaks, and idle time, have hourly average noise levels (L_{eq}) that are lower than loud short-term, or instantaneous, peak noise events shown in Table 4.7-7. The L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2006). Therefore, typically, hourly average noise levels from heavy construction equipment would be approximately 75 to 80 dBA L_{eq} at 50 feet from the center of the construction activities, and approximately 90 dBA L_{eq} at 50 feet for impact equipment. Noise levels of other construction activities would be less.

Roadway widening and bridge construction includes various demolition and construction activities, such as demolition of structures and pavement, site preparation including import and placement of fill, pile driving for the bridge foundation, and construction of the bridge and roadways widening. Construction noise is generated during the construction phases.

Noise levels from construction activities attenuate with distance at a rate of 6 dBA per doubling of distance over acoustically hard sites, such as streets and parking lots. Intervening structures and/or topography between noise source and receptor would further attenuate noise levels. These factors generally limit the distance construction noise travels and ensure noise impacts from construction are localized.

Project construction noise can be predicted at the representative nearby noise-sensitive receivers based on the “general assessment” methodology (FTA 2006), which presumes the two loudest pieces of equipment associated with an activity are operating at full power and located at the geographic center of a construction area or zone. The expected major noise producer(s) is based on the available anticipated roster of project construction equipment and schedule, and their location for each construction activity phase. Reference data from the FHWA’s *Roadway Construction Noise Model (RCNM) User’s Guide* (FHWA 2006) can be used to define the sound

source levels and acoustical usage factors (i.e., what percentage of time would equipment operate at full power) of construction equipment or activities.

Operation

Operational noise is typically considered permanent, i.e., for the duration of the operation of the constructed facilities. A significant permanent increase is conservatively defined as a direct Project-related permanent ambient increase of 3 dBA CNEL or greater. An increase of 3 dBA is perceived by the human ear as a barely perceptible increase.

Removal of Genesee Avenue Widening

Construction

The Project would remove the widening of Genesee Avenue from the UCP. As such, construction activities would not occur in proximity to nearby residences. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity.

Operation

The Project would remove the widening of Genesee Avenue from the UCP. Traffic volumes on Genesee Avenue would not substantially increase (i.e., more than double) in the future year with the Project compared to existing traffic volumes on Genesee Avenue, as shown in Table 4.7-2. Therefore, existing ambient noise levels would not increase by 3 dBA CNEL on Genesee Avenue. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial permanent increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity due to the Project.

Removal of Regents Road Bridge

Construction

The Project would remove the construction of the planned Regents Road Bridge from the UCP. As such, construction activities would not occur in proximity to nearby residences along the Regents Road Corridor. Therefore, the removal of the planned Regents Road Bridge from the UCP would not result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity.

Operation

The Project would remove the construction of the planned Regents Road Bridge from the UCP. Traffic volumes on the Regents Road Corridor would not substantially increase (i.e., more than double) in the future year with the Project compared to existing traffic volumes on Regents Road, as shown in Table 4.7-2. Therefore, existing ambient noise levels would not increase by 3 dBA CNEL or greater on the Regents Road Corridor with the Project. Therefore, the removal of the planned Regents Road Bridge from the UCP would not result in a substantial permanent increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity due to the Project.

4.7.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial temporary or periodic, or permanent increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity due to Project construction and operation. No impacts would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not result in a substantial temporary or periodic, or permanent increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity due to Project construction and operation. No impacts would occur.

4.7.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.7.5 Impact Analysis

Issue 2: Would the Project expose people to noise levels which exceed the City's adopted noise ordinance?

4.7.5.1 Impact Analysis

Removal of Genesee Avenue Widening

Construction

The removal of the planned Genesee Avenue Widening from the UCP would not involve construction or modification of the existing roadway that would result in the exposure of sensitive receptors to construction-related noise levels that exceed the City's adopted noise ordinance for construction.

Operation

The City's noise ordinance limits operational noise levels at adjacent property lines for various land uses (i.e., residential, commercial, and industrial) by time of day (i.e., day, evening, and night) for noise generated on-site (Table 4.7-6) (City of San Diego 2010a). The City's noise ordinance does not regulate traffic noise on roadways. The removal of the planned Genesee Avenue Widening would not construct facilities on adjacent land uses (i.e., residential, commercial, or industrial) that would generate operational noise applicable to the sound level limits in the City's noise ordinance.

Removal of Regents Road Bridge

Construction

The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway that would result in the exposure of sensitive receptors to construction-related noise levels that exceed the City's adopted noise ordinance for construction.

Operation

The City's noise ordinance limits operational noise levels at adjacent property lines for various land uses (i.e., residential, commercial, and industrial) by time of day (i.e., day, evening, and night) for noise generated on-site (Table 4.7-6) (City of San Diego 2010a). The City's noise ordinance does not regulate traffic noise on roadways. The removal of the planned Regents Road Bridge would not construct facilities on adjacent land uses (i.e., residential, commercial, or industrial) that would generate operational noise applicable to the sound level limits in the City's noise ordinance.

4.7.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not expose people to noise levels that exceed the City's adopted noise ordinance for construction and operation. No impacts would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not expose people to noise levels that exceed the City's adopted noise ordinance for construction and operation. No impacts would occur.

4.7.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.7.6 Impact Analysis

Issue 3: Would the project expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan?

4.7.6.1 Impact Analysis

Removal of Genesee Avenue Widening and Regents Road Bridge

Under the Project, the planned widening of Genesee Avenue and the construction of the Regents Road Bridge would not occur. As shown in Table 4.7-2, the Genesee Avenue Corridor shows a moderate increase in peak hour traffic volumes and SR 52 volumes would decrease slightly. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (i.e., exterior standard of up to 65 dBA CNEL residential; interior standard of 45 dBA CNEL residential) (City of San Diego 2008a).

As shown in Table 4.7-2, Future Year With Project in comparison to Future Year With Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor would substantially

decrease by more than half. SR 52 volumes would decrease slightly. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour decreases from the centerline of the Regents Road Corridor With Project compared to With Adopted UCP, at distances ranging from 43 to 69 feet to the residences along the corridor. Figures 4.7-4 through 4.7-5 illustrate the changes in the 65 dBA CNEL contour distances along the Regents Road Corridor. The distance of the 65 dBA CNEL contour from the centerline of the Project segment of SR 52 essentially remains unchanged. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a).

4.7.6.2 Significance of Impacts

Removal of Genesee Avenue Widening and Regents Road Bridge

As shown in Table 4.7-2, the Genesee Avenue Corridor shows a moderate increase in peak hour traffic volumes. SR 52 volumes would decrease slightly. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour increases from the centerline of the Genesee Avenue Corridor to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). This is a potentially significant impact. Therefore, mitigation is required.

As shown in Table 4.7-2, Future Year with Project in comparison to Future Year With Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor would substantially decrease by more than half. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Impacts would be less than significant. Therefore, no mitigation is required.

4.7.6.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level noise mitigation measures for ~~Discretionary projects.~~ ~~Discretionary p~~Projects with the potential to result in significant noise impacts are subject to site-specific review in accordance with the City's General Plan, Noise Element, including the City's 2015 General Plan Amendments; the UCP, Noise Element; the

City's Municipal Code, Noise Ordinance; and the City's CEQA Significance Determination Thresholds, through the discretionary process. The following Mitigation Framework (Mitigation Measure NOI-1) shall be required of all ~~discretionary~~ projects on a case by case basis with the potential to result in significant noise impacts. Noise impacts would be significant with the removal of the widening of Genesee Avenue from the UCP. Mitigation Measure NOI-1 would address the significant impacts related to operational noise along the Genesee Avenue Corridor.

MITIGATION MEASURE NOI-1 (IMPLEMENT NOISE CONTROL MEASURES): Prior to the issuance of building permits, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise-sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings; placing HVAC in noise-reducing enclosures; or designing buildings so that no windows face freeways or major roadways may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Prior to the issuance of building permits, site-specific exterior noise analyses that demonstrate that the Project would not place future residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

4.7.6.4 Significance After Mitigation

Development implemented in accordance with the Project that would potentially result in significant noise impacts shall be required to implement Mitigation Measure NOI-1, which addresses the significant impacts related to operational noise along the Genesee Avenue Corridor. If effective noise measures cannot be implemented for existing and future residences along the Genesee Avenue Corridor, operational noise impacts would be significant and unmitigated at the program level.

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4.8 HISTORICAL RESOURCES

In accordance with the City of San Diego's Historical Resource Guidelines (City of San Diego 2001) and Land Development Code, this section describes the environmental effects of the construction and use of the Project on historical resources under the jurisdiction of the lead agency, the City of San Diego. For purposes of this analysis, historical resources include various types of cultural resources, including historical buildings, structures, objects, districts, and landscapes; traditional cultural places; and prehistoric and historic archaeological sites. The following provides a summary analysis of the steps taken to identify, evaluate, and consider the impacts to historical resources within and near the Project corridors.

4.8.1 Existing Conditions

Historical resources (also referred to as cultural resources) are physical features, both natural and constructed, which reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of archaeological sites, tribal cultural resources, and the built environment resources that are determined to be significant under CEQA.

Background – Archaeological Resources

Prehistoric Setting

The prehistoric cultural sequence in San Diego County is generally thought of in three basic periods: the Paleoindian, locally characterized by the San Dieguito complex; the Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and the Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials found in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay.

Paleoindian Period

In San Diego County, the Paleoindian period is represented by the San Dieguito complex, as identified by Rogers (1929, 1939, 1945) and Warren (1966, 1968; Warren et al. 1993). The earliest well-documented sites in the San Diego area belonging to the San Dieguito complex are

thought to be older than 9,000 years (Warren 1967). Related materials, sometimes called the Lake Mojave complex, have been found in the Mojave Desert and in the Great Basin (e.g., Campbell et al. 1937; Warren and Ore 1978). Diagnostic artifact types and categories associated with the San Dieguito complex include scraper planes, choppers, scraping tools, crescentics, and elongated bifacial knives, as well as Silver Lake, Lake Mojave, and leaf-shaped projectile points (Rogers 1939; Warren 1967). Like the Lake Mojave complex, the San Dieguito complex is thought to represent an early emphasis on generalized hunting. There are few or no milling implements in most San Dieguito components. In areas adjacent to the coast, many Paleoindian period sites have probably been covered by rising sea levels since the end of the Pleistocene. In more inland regions, alluvial sedimentation in valley areas may have covered these materials. The stable mesa landforms in the region, the abundance of appropriate lithic material, and soil column exposures along areas such as the San Dieguito River have made the foothills an important area for Paleoindian research.

Archaic Period

The Archaic period (8000 to 1500 B.P.) brought a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic period are called the La Jollan complex along the coast and the Pauma complex inland (True 1958). Pauma complex sites lack the shell that dominates many La Jollan complex site assemblages. The La Jollan tool assemblage is dominated by rough, cobble-based choppers and scrapers, as well as slab and basin metates. There has been considerable debate about whether San Dieguito and La Jollan patterns might represent the same people using different environments and subsistence techniques, or whether they are separate cultural patterns (e.g., Bull 1983; Gallegos 1987; Warren et al. 1993). However, there seems to have been some reorientation in settlement from coastal sites to inland settings during the latter portion of this period in what is now northern San Diego County. This appears at approximately 4,000 years ago and is thought to relate to the final phases of Holocene sea level rise and resultant siltation of the formerly productive coastal lagoons in what is now northern San Diego County. Conversely, there appears to be no significant silting in Mission Bay and San Diego Bay, and no reduction in settlement along the coast south of Mission Bay (Gallegos 1987; Warren et al. 1993).

Late Prehistoric Period

The Late Prehistoric period (1500 B.P. to 200 B.P.) is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive but effective technological innovations. Subsistence is thought to have focused on acorns and grass seeds,

with small game serving as a primary protein resource and big game as a secondary resource. Fish and shellfish were also secondary resources, except in areas immediately adjacent to the coast where they assumed primary importance (Bean and Shipek 1978:552; Sparkman 1908:200). The settlement system was characterized by seasonal villages where people used a central-based collecting subsistence strategy. Artifactual material is characterized by the presence of arrow shaft straighteners, pendants, comales (heating stones), Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic “Yuman bow pipes,” ceramic rattles, miniature pottery vessels, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, and mortars and pestles. The arrow-point assemblage is dominated by the Desert Side-notched series, but the Cottonwood series and the Dos Cabazas Serrated type also occur. Late Prehistoric materials found in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay.

Ethnohistory

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. The coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. These accounts were often based on limited interviews or biased data collection techniques. Later researchers and local Native Americans began to uncover and make public significant contributions in the understanding of native culture and language. These studies have continued to the present day, and involve archaeologists and ethnographers working in conjunction with Native Americans to address the continued cultural significance of sites and landscapes across San Diego County. The Kumeyaay are the identified Most Likely Descendants for all Native American human remains found in the City.

The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. Grass seeds were probably the primary food, supplemented by various other seeds such as sage (*Salvia* spp.), sagebrush (*Artemisia californica*), lamb’s quarters (*Chenopodium album*), and pine nuts (*Pinus* sp.). Small game was a major source of protein, but deer were hunted as well. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used (Kroeber 1925; Luomala 1978). Shellfish and other littoral resources also were important to coastal people. Settlements were moved to areas where wild foods were in season. For example, inland bands might move into desert areas in the spring to gather agave (*Agave deserti*), then to higher-altitude areas in the fall to gather acorns (Cline 1984). Coastal bands lived in semi-permanent villages focused on more seasonally stable inshore and littoral

resources. However, they still often travelled to what is now Torrey Pines and La Rumarosa (in northern Baja California) to harvest pine nuts, and to Cuyamaca and Mount Laguna for acorns (Shipek 1970:27–28).

Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego, Tijuana, and Otay Rivers provided important resources for local inhabitants, not only as a reliable source of water, but also as a major transportation corridor through the region. Creeks acted in a similar way, providing fresh water resources and transportation routes between the coastal and mountain regions. The village of La Rinconada was located near Mission Bay and Rose Creek, just a few miles southwest of the Project area. It is believed to have been occupied for over 3,000 years, from the Archaic period up until historic times (Garcia-Herbst 2009). Recorded as CA-SDI-5017, La Rinconada was originally documented by Malcom Rogers in 1929 as two sites: SDM-W-150 and SDM-W-152. Rogers excavated four trenches at the site and encountered a subsurface midden that ranged in thickness from 30 to 91 centimeters. He documented several cobble hearths and house pits in the site as well.

Ystagua (CA-SDI-4513, CA-SDI-4609; CA-SDI-5443), a National Register of Historic Places (NRHP) listed site, is another major village site in the vicinity of the Project area, located just inland from the coast near the mouth of Peñasquitos Creek in present-day Sorrento Valley. The site today has been impacted by construction of homes and the railroad, but extensive intact midden deposits are known to exist throughout the site. Lithic tools, ceramics, shell beads, trade beads, bone tools, and faunal bone, are just some of the artifacts that have been documented at Ystagua. Human remains have also been encountered and the site has a high level of cultural sensitivity (RBF Consulting 2009).

Background – Historic Setting

Post-contact historic occupation within San Diego County between the late 1700s to the present can be divided into three major periods: the Spanish Period from 1769-1821, the Mexican Period from 1821-1848, and the American Period from 1848-present. Each historic period is discussed below.

Spanish Period (1769-1821)

The Spanish period represents a time of European exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the Mission San Diego de Alcalá. The mission system used Native American labor to build the infrastructure needed for European settlement. By about 1821, the traditional lifeways were disrupted and Native American

populations were tied economically to the missions. In addition to providing new construction methods and architectural styles, the mission system introduced horses, cattle, and other agricultural goods and implements to the area. The cultural systems and institutions established by the Spanish continued to influence the region beyond 1821, when California came under Mexican rule.

Mexican Period (1821-1848)

The Mexican period retained many of the Spanish institutions and laws; however, in 1834, the mission system was secularized. This allowed for increased Mexican settlement, but it also meant that many Native Americans were dispossessed. After secularization, large tracts of land were granted to individuals and families, and a rancho system was established. The land was used primarily for grazing cattle (Pourade 1961:73). Cattle ranching dominated the agricultural activities, and the development of the hide and tallow trade within the United States increased during the early part of this period. The Pueblo of San Diego was established at this time, and Native American influence greatly declined. The Mexican period ended when Mexico ceded California to the United States after the Mexican-American War (1846–1848).

American Period (1848-present)

Very early in the American period, gold was discovered in California. Few Mexican ranchos remained intact because of land claim disputes. Development of the railroads opened up much of the country to settlement. The homestead system encouraged American settlement beyond the coastal plain. The growth and decline of communities occurred in response to an increasing and shifting population, fostering a “boom and bust” cycle. As early as 1868, San Diego was promoted as a natural sanitarium, and many people suffering from tuberculosis came to the area seeking a cure in the moderate climate.

History of Rose Canyon

In 1769, the first explorers of Rose Canyon, Governor Gaspar de Portolá and Friar Francisco Junipero Serra, noted a large Native American population in the area. The route the Portolá expedition traveled north up the coast was named “El Camino Real” (“The Royal Road” or “The King’s Highway”). El Camino Real became a major road used during the Spanish Period of the early 1800s, and stagecoaches used the road during the late 1800s, until 1883 when the railroad was built.

By the mid-1800s Rose Canyon was settled by ranchers and dairymen. In 1852, Louis Rose, one of San Diego’s original pioneers, acquired 740 acres that included the mouth of San Clemente

Canyon. By 1856, Rose's ranch grew to 1,920 acres, and included a tannery and a brickyard. The importance of Rose Canyon includes the centuries of Native American occupation of the area, the continuation of historic ranching activities into the 1940s, and the development of the railroad system through the canyon in 1883 (City of San Diego 2006).

4.8.1.1 Prehistoric Cultural Resources Constraints Results

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those dating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures. A archival records search and literature review was conducted at the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) in March 2016 to identify previously conducted cultural resources investigations and previously identified cultural resources within the Project corridors and a 1/4-mile radius. The results of the records search indicated that a total of 42 previous investigations have been conducted, dating to between 1968 and 2013 and 18 cultural resources have been recorded within a 1/4-mile radius of the Project corridors. Previous archival research in the UCP Area dates back to 1982 and 2004. In March 2004, Gallegos & Associates prepared a cultural resources study for the Project in support of the University City North/South Transportation Corridor Study EIR (City of San Diego 2006). The study included background research on the history of Rose Canyon, an archaeological records search and literature review, and an intensive archaeological field survey of the Project corridors. The following discussion summarizes the results of these investigations.

Based on the record searches conducted in 1982, 2004, and 2016, the majority of the previously recorded sites occur along the mesa areas overlooking Sorrento Valley and on the Torrey Pines Mesa. Several sites have also been recorded on the UCSD UC San Diego campus (City of San Diego 2006/2016). The records search provides background information about the number and types of archaeological sites that might be present in the Project corridors and vicinity. Three prehistoric archaeological sites and a single isolate have been recorded within the Project corridors, and five prehistoric archaeological sites and nine isolates were identified in the 1/4-mile search buffer. In addition to the records search, historic maps were reviewed to identify built environment resources. The railroad tracks originally belonging to the Atchison, Topeka, and Santa Fe (AT&SF) Railroad was identified within both Project corridors (City of San Diego 2006).

Cultural sensitivity levels for the Project impact area are rated low, moderate, or high based on the results of an archival records search using the CHRIS data, Sacred Lands File check by the Native American Heritage Commission (NAHC), and regional environmental factors. A low sensitivity rating indicates that there are few or no previously recorded resources within the area. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate.

Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

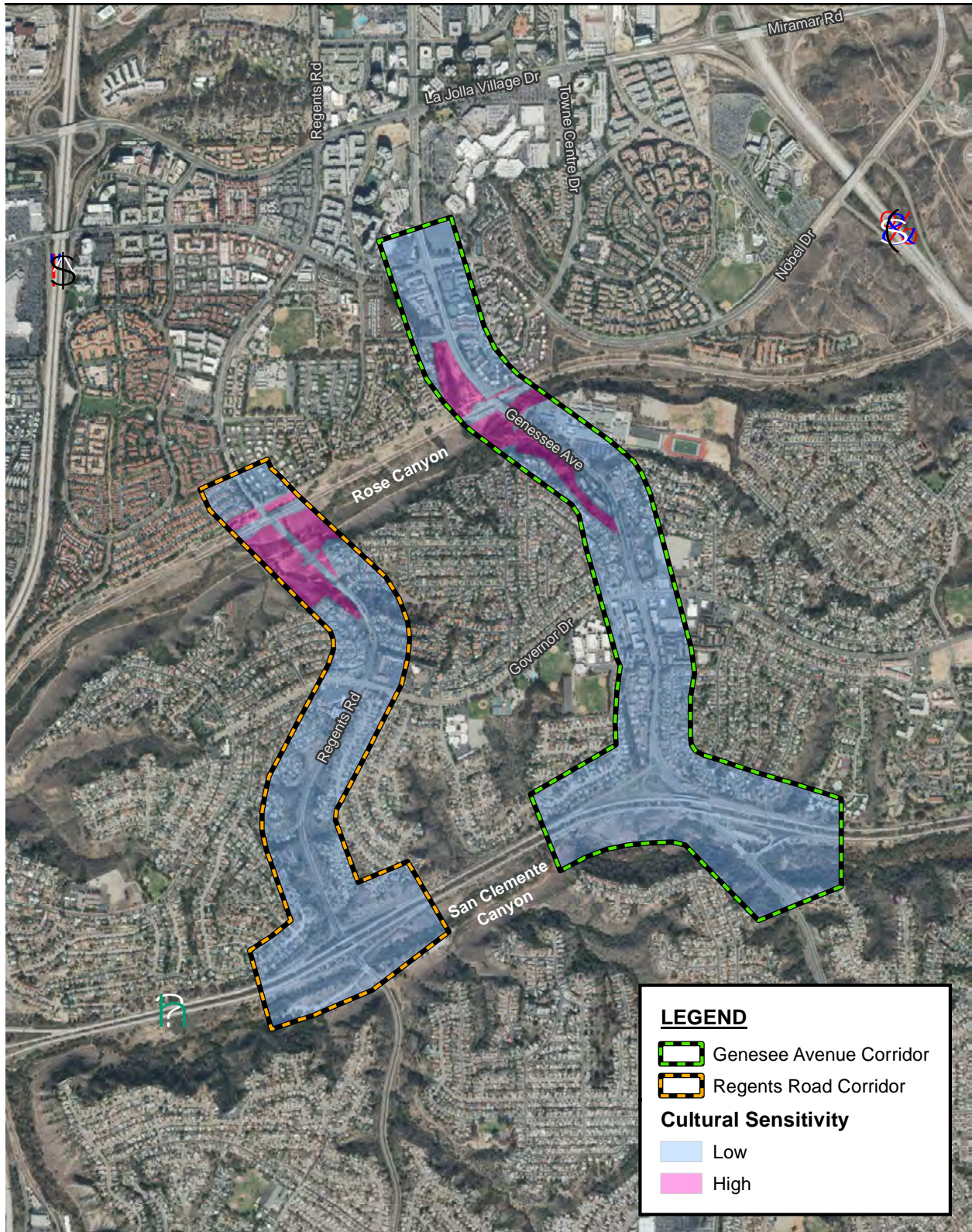
Because the majority of the community is developed and there is very little undeveloped land within the Project impact area, with the exception of canyon areas, the cultural sensitivity for the overall Project impact area is considered low. However, within the Rose Canyon, multiple cultural resources are present; therefore, the cultural sensitivity rating in these areas is considered high. As such, the Project impact area contains two sensitivity ratings as illustrated in Figure 4.8-1.

4.8.2 Regulatory Framework

4.8.2.1 State

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) applies to all ~~discretionary~~ projects undertaken or subject to approval by the public agencies in California (CEQA Guidelines Section 15002(i)). CEQA (Public Resources Code [PRC] Section 21001(b), (c)) states that it is the policy of the State of California to “take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations examples of the major periods of California history.” The CEQA Guidelines require that historical and unique archaeological resources be taken into account during the environmental review process. Section 15064.5 of the Guidelines states that “a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”



Source: SanGIS 2015; SANDAG 2014; Esri.

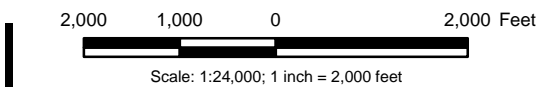


Figure 4.8-1
Cultural Sensitivity of Project Impact Areas

Historical Resources

The CEQA Guidelines (Section 15064.5(a)) define a “historical resource” as including the following:

- A resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR);
- A resource listed in a local register of historical resources (as defined at PRC Section 5020.1(k));
- A resource identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. (Generally, a resource is considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the CRHR. See further discussion of the CRHR below.)

A project that causes a “substantial adverse change” in the significance of a historical resource may have a significant effect on the environment (CEQA Guidelines Section 15064.5(b)). The CEQA Guidelines (Section 15064.5(b)(1)) define “substantial adverse change” as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Generally, the significance of a historical resource is “materially impaired” when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in or eligibility for the CRHR, or its inclusion in a local register of historical resources (CEQA Guidelines Section 15064.5(b)(2)).

Mitigation measures are discussed in CEQA Guidelines Section 15126.4. Generally, by following the Secretary of the Interior’s Standards for the Treatment of Historic Properties or the Secretary of the Interior’s Standards for Rehabilitation (Weeks and Grimmer 1995), impacts can be considered as mitigated to below a level of significance (CEQA Section 15064.5(b)).

Archaeological Resources

If the resource in question is an archaeological site, CEQA Guidelines (Section 15064.5(c)(1)) require that the lead agency first determine if the site is a historical resource as defined in Section

15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource (CEQA Guidelines Section 15064.5(c)(2)). If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological resource, then the archaeological site is treated in accordance with CEQA Section 21083.2 (CEQA Guidelines Section 15064.5(c)(3)). In practice, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource.

The CEQA Guidelines Section 21083.2(g) defines a “unique archaeological resource” as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions, and there is public information in that information.
- Has a special and particular quality, such as being the oldest or best example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Tribal Cultural Resources

The CEQA Guidelines Section 21074(a)(1) defines “tribal cultural resources” as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible to the California Register of Historical Resources, or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; or a resource determined by the local agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Section 5024.1 and shall consider the significance of the resource to a California Native American tribe. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Register of Historical Resources

The CRHR program was designed for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. A historical resource can include any object, building, structure, site, area, or place that is determined to be historically or archaeologically significant. The CRHR is an authoritative guide to the state's significant archaeological and historic architectural resources. The list of these resources can be used for state and local planning purposes, the eligibility determinations can be used for state historic preservation grant funding, and listing in the CRHR provides a certain measure of protection under CEQA. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR. A historical resource must be significant at the local, state, or national level under one or more of the following criteria defined in the California Code of Regulations Title 14, Chapter 11.5, Section 4850:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Public Resources Code Section 5097.5, Section 5097.9 and Section 622.5

Public Resources Code Section 5097.5 states that a person shall not knowingly excavate, harm, or destroy any historic or prehistoric ruins or sites on public lands, unless granted permission by the public agency that has jurisdiction over those lands. Violations are classified as a misdemeanor, punishable by fine and/or imprisonment. The section outlines the specific parameters of addressing the violation.

Public Resources Code Section 5097.9 states consultation with the Native American Heritage Commission (NAHC) is required whenever Native American graves are found. Pursuant to Health and Safety Code (HSC) subdivision c of Section 7050.5 (see below), when the NAHC is notified of human remains, it shall immediately notify those persons it believes to be the Most Likely Descendants (MLDs). Section 5097.98 1(b) states: "Upon the discovery of the Native

American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment." It also states possible preferences the MLD may have for treatments, including preservation in place, nondestructive removal and analysis, relinquishment to the MLD, or other appropriate treatment.

Public Resources Code Section 622.5 establishes that any person, who is not the owner thereof, who willfully injures, disfigures, defaces, or destroys an object of archaeological or historical value on private or public lands is guilty of a misdemeanor.

Public Notice to California Native American Indian Tribes (Government Code Section 65092)

In the event of a public hearing, Government Code Section 65092 states that California Native American tribes on the contact list of the NAHC are included in the definition of "person" to whom notice of the public hearing will be sent to by local governments or agencies.

Health and Safety Code Section 7050.5

Health and Safety Code Section 7050.5 requires that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. If the Coroner determines, or has reason to believe, the remains to be those of a Native American, the Coroner shall contact the NAHC by telephone within 24 hours. In addition, any person who mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor.

Senate Bill (SB) 18

SB 18 requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan, or designating land as open space. On January 29, 2016, the City initiated SB 18 and sent notices to 19 local tribes based on the list provided by the NAHC. The notice included information that a PEIR was being prepared for this Project, giving the tribes 90 days to request consultation or additional information. One response was received from the Pala Tribal Historic Preservation Office on behalf of Robert

Smith, Tribal Chairman for the Pala Band of Mission Indians. The letter acknowledges that the project is not within the boundaries of the recognized Pala Indian Reservation, as well as the territory the tribe considers as its Traditional Use Area. The letter indicates no objection to the continuation of project activities and defers to the wishes of tribes in closer proximity to the project area. The 45-day notice would be sent in accordance with SB18 requirements.

Assembly Bill (AB) 52

AB 52 (Chapter 532, Statutes of 2014) was passed on September 25, 2014, and applies to all projects that file a notice of preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. The bill requires that a lead agency begin consultation with a California Native American tribe if that tribe has requested, in writing, to be kept informed of Projects by the lead agency, prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. Additionally, AB 52 directs the Office of Planning and Research to revise Appendix G of the CEQA Guidelines to separate the consideration of tribal cultural resources from paleontological resources by July 1, 2016.

The Project was initiated by the San Diego City Council in October 2014, after the passing of AB 52 and the NOP was distributed in December 2015. Although both actions occurred after the passing of AB 52, to date, the City of San Diego has not received any formal consultation request letters by a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Project. Therefore, consultation was not required. However, the City informally consulted with the Director of Cultural Resources for the Iipay Nation of Santa Ysabel in response to an email on another project in the same area. The project scope and proposed mitigation framework was discussed and agreement was reached regarding proper treatment of Tribal Cultural Resources and no further consultation is required.

4.8.2.2 Local

City of San Diego General Plan – Historic Preservation Element

The City of San Diego's Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego and sets a series of goals for the City for the preservation of historic resources, the first of which is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources. Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes

policies to provide for comprehensive historic resource planning and integration into citywide planning documents. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources.

City of San Diego Municipal Code: Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations (Regulations), part of the SDMC (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners.

The Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

The Regulations authorize promulgation and publishing of the Historical Resources Guidelines (Guidelines) and are incorporated in the San Diego LDC - Land Development Manual by reference. These Guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Regulations, explained below, and the determination of impacts and mitigation under CEQA.

Compliance with the Regulations begins with the determination of the need for a site-specific survey for a project. Section 143.0212(b) of the Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing archaeological sites. These maps are based on records maintained by the SCIC of the California Historic Resources Information System and San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known

resource is recorded on the parcel or within a one-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

Historical Resources Register

As compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated a historical resource by the City of San Diego's Historical Resources Board (HRB) if it meets any of the following criteria:"

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- b. Is identified with persons or events significant in local, state or national history;
- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. Is listed or has been determined eligible by the National Park Service for listing in the NRHP or is listed or has been determined eligible by the State Historical Preservation Office (SHPO) for listing in the CRHR; or
- f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value, or which represent one or more architectural periods or styles in the history and development of the City.

4.8.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation. Based on the City's Significance Determination Thresholds, impacts related to historical resources would be significant if the Project would result in:

1. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site;
2. Any impact on existing religious or sacred uses within the potential impact area; or
3. The disturbance of any human remains, including those interred outside of formal cemeteries.

The City of San Diego's CEQA Significance Determination Thresholds define a significant historic resource as one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code; though even a resource that is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. The City's Historical Resources Guidelines (HRG) state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site specific technical report prepared as part of the environmental review process.

Research priorities for the prehistoric, ethnohistoric and historic periods of San Diego history are discussed in Appendix A to the Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site

size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

- The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.
- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

4.8.4 Impact Analysis

Issue 1: Would implementation of the Project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?

4.8.4.1 Impacts

Prehistoric and Historic Archaeological Resources

The records search and literature review identified a total of 18 previously recorded archaeological resources within ¼-mile of the Project, eight are prehistoric sites and 10 are prehistoric isolates. Of the 18 archaeological resources, only four overlap with the Project impact area and may be directly impacted by project activities, including: CA-SDI-4956 (P-37-004956), CA-SDI-10,437 (P-37-010437), CA-SDI-12,556 (P-37-012556) and P-37-013716. In addition to the records search, historic maps were reviewed to identify built environment resources. The railroad tracks originally belonging to the Atchison, Topeka, and Santa Fe (AT&SF) Railroad was identified within both Project corridors. These five resources are discussed below.

Genesee Avenue Corridor

Two previously recorded archaeological resources [(CA-SDI-4956 (P-37-004956) and CA-SDI-12,556 (P-37-012556)] and the AT&SF Railroad tracks were identified within the Genesee Avenue Corridor.

- **CA-SDI-4956 (P-37-004956).** CA-SDI-4956 (P-37-004956) was first recorded in 1977 as a 60 by 20 meter disturbed quarry site, consisting of incomplete stone tools and debitage (the waste material from manufacturing stone tools). A testing program in support of the University City High School project evaluated the site as not significant. The site was destroyed by development of University City High School.
- **CA-SDI-12,556 (P-37-012556).** CA-SDI-12,556 (P-37-012556) was originally recorded in 1992 for the Rose Canyon Trunk Sewer project. The site was described as a widely dispersed artifact scatter with a possible buried midden deposit. A testing program resulted in the recovery of 1,753 artifacts, including: debitage, cores, stone tools, manos, metates, and pottery. Three radiocarbon dates on materials recovered from the site dated prehistoric occupation of the site from approximately 3,000 B.C. to 1100 A.D. CA-SDI-12,556 was evaluated as significant under CEQA and eligible for nomination to the National Register under criteria 36 CFR 60.4. Installation of the Rose Canyon Trunk Sewer resulted in minimal damage to the periphery of the site.
- **AT&SF Railroad.** The AT&SF Railroad was part of the original California Southern Railroad that connected National City to Oceanside, then on into San Bernardino, and eventually connecting with the Atlantic and Pacific Railroad in Arizona. By the late 19th century, the tracks traveled through Rose Canyon and depots were built in National City, San Diego, Del Mar, Encinitas, Carlsbad, Oceanside, Vista, San Marcos, Escondido, and Fallbrook. Remains of railroad sidings, trestles, and the original route along the south side of the canyon still exist.

Regents Road Corridor

One previously recorded prehistoric archaeological site [CA-SDI-10,437 (P-37-010437)], one previously recorded isolate (P-37-013716), and the historic AT&SF Railroad were identified within the Regents Road Corridor.

- **CA-SDI-10,437 (P-37-010437).** CA-SDI-10,437 (P-37-010437) was originally recorded next to Rose Creek in 1986 and consisted of a lithic scatter of debitage and stone tools. A testing program of the site was conducted in 1992 for the Rose Canyon Trunk Sewer project, which recovered 547 artifacts, including: stone tools, debitage, manos, metates, and pottery. The site was classified as a campsite and evaluated as significant under CEQA. Installation of the Rose Canyon Trunk Sewer caused only minimal damage to the periphery of the site. The site was revisited in 1994 during which additional artifacts were identified north of the railroad tracks, extending the site boundary approximately 200 feet to the north.

- **P-37-013716.** A single quartzite flake was identified near Rose Creek, as part of the Rose Canyon Trunk Sewer Pretrenching project. Isolated artifacts are not considered significant cultural resources under CEQA.
- **AT&SF Railroad.** Between 1926 and 1927 a small railroad installation called the “Elvira Station” (CA-SDI-11,783H) was constructed west of the Regents Road Corridor. It was demolished in 1959 during the transition from steam to diesel locomotives. During the 1992 cultural resources study for the Rose Canyon Trunk Sewer Project, foundations of the caretaker’s house and portions of the barracks used by railroad maintenance workers were located just outside of the Regents Road Corridor.

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not result in the alteration and/or the destruction of a prehistoric or historic building, including an architecturally significant building or site. Therefore, no impacts to prehistoric or historic buildings or sites would result from the removal of the planned Genesee Avenue Widening from the UCP.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge from the UCP would not result in the alteration and/or the destruction of a prehistoric or historic building, including an architecturally significant building or site. Therefore, no impacts to prehistoric or historic buildings or sites would result from the removal of the planned Regents Road Bridge from the UCP.

4.8.4.2 Significance of Impacts

No impacts to prehistoric or historic buildings or sites would result from the removal of the planned Genesee Avenue Widening or the Regents Road Bridge from the UCP.

4.8.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.8.5 Impact Analysis

Issue 2 and 3: Would implementation of the Project result in any impact to existing religious or sacred uses or the disturbance of any human remains, including those interred outside of formal cemeteries within the potential impact area?

4.8.5.1 Impact Analysis

Removal of planned Genesee Avenue Widening and Regents Road Bridge would not result in any impacts on religious or sacred use, or the disturbance of any human remains, including those interred outside of formal cemeteries. The Project supports the historic preservation goals of the City's General Plan which contains policies that address the treatment of religious or sacred sites and human remains. Native American consultation early in the subsequent project review process would be required to identify tribal cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines. The City's regulatory framework, along with federal and state regulations, also addresses these issues and provides for the development of mitigation measures in the case that such resources are encountered.

4.8.5.2 Significance of Impacts

Removal of planned Genesee Avenue Widening and Regents Road Bridge would not result in any impacts on religious or sacred uses, or the disturbance of any human remains, including those interred outside of formal cemeteries. No significant impact would occur.

4.8.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9 BIOLOGICAL RESOURCES

The following discussion summarizes the key points of the University City Transportation Corridor Biological Resources Report and Impact Analysis (City of San Diego 2006), included in the Environmental Impact Report for the University City North/South Transportation Corridor Study from June 2006 (2006 EIR), which analyzed the construction of the planned Genesee Avenue Widening and the Regents Road Bridge. Information in this section has been summarized from the 2006 EIR (City of San Diego 2006). In addition, an assessment of the potential federal and state jurisdictional waters, included as Appendix E, was conducted in 2016 to observe whether site conditions for these aquatic resources have changed since the previous delineation which was conducted in 2004 (AECOM 2016). This assessment did not include a formal delineation based on the U.S. Army Corps of Engineers (USACE) guidelines (1987). Site conditions have changed in some instances resulting in some differences in the presence/absence of some communities and their extent since 2004. Additionally, the 2016 assessment was restricted to the areas of permanent and temporary impacts previously identified in the 2006 EIR and did not cover the entire UCP Area. As such, discrepancies in the communities and acreages between the Vegetation Communities and Waters of the U.S. and State subsections below is the result of the use of different databases and sources for the vegetation communities (based on 2006 reports) and the potential waters of the U.S. and State (based on 2016 assessment which was over a smaller area than the area assessed in 2004).

4.9.1 Existing Conditions

4.9.1.1 UCP Area

The biological resources within the UCP Area occur primarily in the undeveloped canyon bottoms and adjacent steep slopes. Rose Canyon and San Clemente Canyon contain riparian vegetation, consisting of oak and sycamore trees with associated undergrowth. The north- and east-facing canyon slopes are vegetated with dense chaparral while more open vegetation and grasslands occur on the drier, west- and south-facing slopes. The hillsides along Sorrento Valley contain native vegetation, while areas near Eastgate Mall east of I-805 contain vernal pool resources. The Torrey pines mesa, coastal canyons and bluffs, as well as the slopes and mesas bordering Peñasquitos Lagoon contain diverse plant species, such as the Torrey pine tree, and several types of native chaparral associations, coastal sage scrub, and inland sage scrub (City of San Diego 2006).

The existing conditions investigation conducted for the 2006 EIR and documented in the biological resources report (Merkel 2006) confirmed the presence of biological resources typical of the canyon/mesa complex within the urban interface. Rose Canyon and San Clemente Canyon

are riparian corridors generally running east and west through the UCP Area. The canyon slopes and much of the floor are covered with a patchwork of non-native grassland and native habitats. Various riparian habitats occupy the bottomlands and various forms of chaparral and sage scrub extend up from the canyon bottoms to the urbanized mesas. Rose Canyon contains the majority of the sensitive resources in the UCP Area. The native habitats in both Rose Canyon and San Clemente Canyon are part of the City of San Diego's Multiple Species Conservation Program (MSCP)/Multi-Habitat Planning Area (MHPA) Urban Subarea.

4.9.1.2 Genesee Avenue Corridor

Existing biological resources conditions in the Genesee Avenue Corridor are summarized below as vegetation communities, waters of the U.S. and State, wildlife, sensitive resources, and wildlife corridors.

Vegetation Communities

Fourteen vegetation communities were identified and mapped within the Genesee Avenue Corridor: Southern Cottonwood-Willow Riparian Forest, Southern Willow Scrub, Mule Fat Scrub, Coast Live Oak Woodland, Diegan Coastal Sage Scrub, Chamise Chaparral, Coastal Sage/Chaparral Scrub, Native Grassland, Non-Native Grassland, Eucalyptus Woodland, Exotic Plantings, Urban/Developed, Ruderal Disturbed Lands, and Native Plant Garden. Vegetation communities are mapped in Figure 4.9-1. The vegetation communities are described below. Acreages of occurrence of the various vegetation communities are presented in Table 4.9-1. Detailed descriptions of the vegetation types are contained in Section 4.9.1.1.

The City's Biology Guidelines document assigns a "Tier" rating to denote the importance of upland vegetation types. Tier I indicates rare uplands habitats including native grassland, maritime chaparral and oak woodlands. Tier II represents uncommon uplands including coastal sage scrub. Tier IIIA is assigned to common uplands including mixed Chaparral and Chamise Chaparral. Tier III B is also common upland habitat including non-native grasslands. Tier IV encompasses other uplands including disturbed, agriculture and eucalyptus.

Southern Cottonwood-Willow Riparian Forest

This broad-leaved riparian vegetation type is well developed in both San Clemente and Rose Canyon. Dominant canopy species include Western Sycamore (*Platanus racemosa*), Arroyo Willow (*Salix lasiolepis*), and Lance-leaf Willow (*Salix lucida* ssp. *lasiandra*). Other tall canopy trees include Goodding's Black Willow (*Salix gooddingii*) and Fremont Cottonwood (*Populus fremontii* ssp. *fremontii*). Coast Live Oak (*Quercus agrifolia*) occurs sporadically along the upper



Source: SanGIS 2015; SANDAG 2014; Esri; SanGIS 2009 Vegetation Communities.

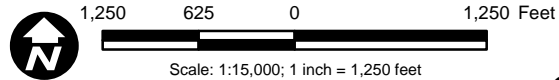


Figure 4.3-1

Genesee Avenue Corridor Vegetation Communities

University Community Plan Amendment Final PEIR

Path: P:_6044\60446078_University_Com_Plan_Amend_EIR\900-CAD-GIS\922_Maps\UCP_EIR_BioVeg_Genesee.mxd, 4/1/2016, daniel_arellano

embankments of the creeks. It should be noted that although Western Sycamore and Coast Live Oak are not typical components of Southern Cottonwood-Willow Riparian Forest, no other Holland/Oberbauer category better suits the on-site conditions. A high diversity of understory shrubs and herbaceous species are also present. These include Mule Fat (*Baccharis salicifolia*), Poison Oak (*Toxicodendron diversilobum*), California Rose (*Rosa californica*), San Diego Sagewort (*Artemisia palmeri*), and Spiny Rush (*Juncus acutus* ssp. *leopoldii*).

**Table 4.9-1
Acreage Summary of Vegetation Communities**

Vegetation Community	City of San Diego Vegetation Community Tier ¹	Genesee Ave. Corridor (acres)	Regents Rd. Corridor (acres)	Total (acres)
Riparian Vegetation Communities				
Southern Cottonwood -Willow Riparian Forest (Holland Code 61330)	N/A	16.76	12.40	29.16
Southern Willow Scrub (Holland Code 63320)	N/A	1.91	1.41	3.32
Coastal and Valley Freshwater Marsh (Holland Code 52410)	N/A	0.00	0.08	0.08
Mule Fat Scrub (Holland Code 63310)	N/A	0.06	0.00	0.06
Native Grassland (Wet Meadow) (Holland Code 42100)	Tier I	0.00	0.33	0.33
Upland Vegetation Communities and Other Cover Types				
Coast Live Oak Woodland (Holland Code 71160)	Tier I	15.59	1.28	16.87
Diegan Coastal Sage Scrub (Holland Code 32500)	Tier II	16.83	30.07	46.90
Chamise Chaparral (Holland Code 37200)	Tier IIIA	0.22	0.19	0.41
Coastal Sage/Chaparral Scrub (Holland Code 37G00)	Tier II	0.54	0.00	0.54
Native Grassland (Holland/Oberbauer Code 42100)	Tier I	0.04	0.00	0.04
Non-Native Grassland (Holland Code 42200)	Tier IIIB	25.42	19.89	45.31
Eucalyptus Woodland (Holland/Oberbauer Code 79100)	Tier IV	9.46	3.30	12.76
Exotic Plantings (Holland/Oberbauer Code 11000)	Tier IV	44.37	32.49	76.86
Urban Developed (Holland/Oberbauer Code 12000)	N/A	191.86	121.55	313.41
Disturbed Habitat (Holland/Oberbauer Code 11300)	Tier IV	0.66	4.70	5.36
Native Plant Garden	Tier IIIA	0.76	0.00	0.76
Total		324.48	227.69	552.17

Source: City of San Diego 2012

Southern Willow Scrub

Southern Willow Scrub habitat occurs within tributary drainages to both San Clemente and Rose Canyon and typically lacks taller trees such as Western Sycamore and Fremont Cottonwood found in Southern Cottonwood-Willow Riparian Forest. This habitat is dominated by Arroyo Willow, which typically varies from 15 to 25 feet in height. Secondary canopy species include taller trees such as Goodding's Black Willow and Lance-leaf Willow. Understory species include Narrow-leaved Willow (*Salix exigua*), Mule Fat, Poison Oak, Great Marsh Evening Primrose (*Oenothera elata* ssp. *hirsutissima*), and Tall Flatsedge (*Cyperus eragrostis*).

Mule Fat Scrub

One small area of narrowly configured Mule Fat Scrub is found along an unvegetated cobblestone drainage channel in San Clemente Canyon within the Genesee Avenue Corridor. This vegetation type is dominated by Mule Fat. The understory consists of Coyote Bush (*Baccharis pilularis*), and non-native grasses such as Slender Wild Oat, both non-wetland indicator plants.

Coast Live Oak Woodland

Large stands of Coast Live Oak Woodland occur on the relatively mesic north-facing slopes of San Clemente Canyon. A dense canopy of mature Coast Live Oak trees occurs in this area. The understory consists mostly of leaf litter. Coast Live Oaks have cupped leaves with spine-tipped margins, which secure the leaves to the ground and provide the trees with a natural mulch. This mulch keeps the tree's roots cool and moist, as well as precludes competition from other potentially invasive species. As a result, understory plants are naturally limited but include several shade-adapted species such as Fuchsia-flowered Gooseberry (*Ribes speciosum*), Meadow Rue (*Thalictrum fendleri* var. *polycarpum*), and California Rose. Coast Live Oak Woodland is a Tier I habitat.

Diegan Coastal Sage Scrub

Diegan Coastal Sage Scrub is comprised of mostly drought deciduous subshrubs, which range from two to four feet in height. Various forms of this habitat occur on-site. Most commonly represented is a type that is dominated by Poison Oak. This type is typical of steep north and east-facing slopes occurring immediately below urban landscaping, where moist soil conditions support thick stands of Poison Oak. Other species include California Sagebrush (*Artemisia californica*), San Diego Monkeyflower (*Mimulus aurantiacus*), as well as taller shrubs such as

Lemonadeberry (*Rhus integrifolia*), Toyon (*Heteromeles arbutifolia*), and Blue Elderberry (*Sambucus mexicana*). Diegan Coastal Sage Scrub is a Tier II habitat.

On drier south-and west-facing slopes, this habitat is more characteristic of typical Coastal Sage Scrub. Dominant species include California Sagebrush, Flat-top Buckwheat (*Eriogonum fasciculatum* var. *foliolosum*), White Sage (*Salvia apiana*), and Laurel Sumac (*Malosma laurina*).

Chamise Chaparral

Small areas of Common Chamise (*Adenostoma fasciculatum*) surrounded by Diegan Coastal Sage Scrub vegetation occur on a west-facing slope just east of Regents Road and south of Governor Drive. Chamise Chaparral is a Tier IIIA habitat.

Coastal Sage/Chaparral Scrub

An ecotone of coastal sage scrub and chaparral plant species occurs on a north-facing slope just south of University City High School. The area is relatively disturbed with various pedestrian trails. Species include typical sage scrub plants, such as California Sagebrush, Flat-top Buckwheat, and Black Sage as well as chaparral associates, such as Common Chamise and Toyon. Coastal Sage/Chaparral Scrub is a Tier II habitat.

Native Grassland

Small patches of Native Grassland were identified within the UCP Area. In some of these areas, clay soils support typical native perennial grassland habitat consisting mostly of Purple Needlegrass (*Nassella pulchra*) mixed with some Non-Native Grasses such as Wild Oat (*Avena barbata*) and Red Brome (*Bromus madritensis* ssp. *rubens*). Other clay associates including bulbs/corms such as Sharp-toothed Sanicle (*Sanicula arguta*), Wild Hyacinth (*Dichelostemma capitatum* ssp. *capitatum*), and Common Goldenstar (*Bloomeria crocea*) would also be expected in these areas during the spring. This habitat also includes an area of Beardless Wild Ryegrass (*Leymus triticoides*), which occurs in moist soils adjacent to Southern Cottonwood-Willow Riparian Forest habitat. Native Grassland is a Tier I habitat.

Non-Native Grassland

Non-Native Grassland is mapped for extensive areas within the Genesee Avenue Corridor and supports mostly Non-Native Grass and forb species. Weedy grass species include Ripgut Grass (*Bromus diandrus*), Slender Wild Oat, Red Brome, and Soft Chess (*Bromus hordeceus*). Non-

native forbs include Short-pod Mustard (*Hirschfeldia incana*), Horseweed (*Conyza bonariensis*), and Common Sow Thistle (*Sonchus oleraceus*). Native forbs with weedy tendencies such as Doveweed (*Eremocarpus setigerus*) and Telegraph Weed (*Heterotheca grandiflora*) are also present. Non-Native Grassland is a Tier IIIB habitat.

Eucalyptus Woodland

Eucalyptus Woodland is mapped for areas dominated by Eucalyptus trees (*Eucalyptus* spp.) generally adjacent to urban/developed lands in the Genesee Avenue Corridor. These non-native species release allelopathic chemicals from their stems and leaves which precludes most understory growth. The understory includes mostly leaf litter or in some cases exotic ground cover species such as Hottentot-fig (*Carpobrotus edulis*). Eucalyptus Woodland is a Tier IV habitat.

Exotic Plantings

The Genesee Avenue Corridor includes various landscaped slopes adjacent to urban development. Numerous exotic tree and shrub species, including invasive species such as Acacia (*Acacia latifolia*), Peruvian Pepper (*Schinus molle*), Ngaio (*Myoporum laetum*), Hottentot-fig, and Pampas Grass (*Cortaderia jubata*), are present in these areas. Exotic plantings account for a total of approximately 44 acres within the Genesee Avenue Corridor. Exotic plantings is a Tier IV habitat.

Urban/Developed

Much of the Genesee Avenue Corridor is comprised of residential and urban development that is devoid of native habitats. Vegetation within these developed areas includes mostly ornamental vegetation, which is of little biological value. Urban/Developed is a Tier IV habitat.

Disturbed Land

Disturbed Land includes areas that consist of bare ground or non-native ruderal species such as Russian Thistle (*Salsola tragus*), Garland Chrysanthemum (*Chrysanthemum coronarium*), or Horseweed (*Conyza Canadensis*). In the Genesee Avenue Corridor, disturbed land occurs in the southernmost portion of the Corridor, south of SR 52 and west of Genesee Avenue. These areas typically have less than 30 percent cover attributable to annual Non-Native Grasses. Disturbed Land is a Tier IV habitat.

Native Plant Garden

A native plant garden is located on the south side of Rose Creek, just west of Genesee Avenue. Several sage scrub and chaparral-associated species have been planted in this area including Nuttall’s Scrub Oak (*Quercus dumosa*), Wart-stemmed Ceanothus (*Ceanothus verrucosus*), Coulter’s Matilija Poppy (*Romneya coulteri*), Holly-leaved Cherry (*Prunus ilicifolia* spp. *ilicifolia*), and Bladderpod (*Isomeris arborea*). The native plant garden covers less than one acre.

Wetlands and Waters of the U.S. and State

Within the Genesee Avenue Corridor, jurisdictional wetlands and waters of the US and state resources are distinguished by the canyon in which they were found. Potential federal and state jurisdictional wetlands/waters were found within both the Rose Canyon/Genesee Avenue and San Clemente Canyon/Genesee Avenue Corridors with wetlands consisting of Southern Cottonwood-Willow Riparian Forest, Southern Willow Scrub and waters as unvegetated waters of the U.S./streambeds. The total area that falls under USACE jurisdiction is 1.34 acres. The California Department of Fish and Wildlife (CDFW) and Regional Water Quality Control Board (RWQCB) have jurisdiction over 3.20 acres. The total area that falls under the City of San Diego jurisdiction is 3.20 acres (Table 4.9-2). Potential federal and state jurisdictional waters in the Rose Canyon portion and the San Clemente Canyon portion of the Genesee Avenue Corridor are mapped in Figures 4.9-2A and 4.9-2B, respectively.

**Table 4.9-2
Waters of the U.S. and State for the Genesee Avenue Corridor**

Jurisdiction	U.S. Army Corps of Engineers	California Department of Fish and Game	City of San Diego	Maximum Jurisdictional Area
Southern Willow Scrub (acres) ¹	0.03	0.18	0.18	0.18
Southern Cottonwood-Willow Riparian Forest (acres)	1.28	2.99	2.99	2.99
Unvegetated Waters of the U.S./ Streambeds (acres)	0.03	0.03	0.03	0.03
Total by Jurisdiction (acres)	1.34	3.20	3.20	3.20

¹ includes mulefat scrub

Wildlife

Amphibians and Reptiles

No amphibians were observed or detected within the UCP Area. However, species such as the Baja California Treefrog (*Pseudacris hypochondriaca hypochondriaca*), Western Spadefoot



Source: SanGIS 2015; SANDAG 2014; Esri.

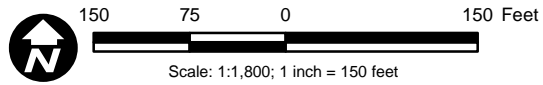


Figure 4.9-2A
Potential Federal & State Jurisdictional Aquatic Resources
Genesee Avenue Corridor at Rose Canyon



Source: SanGIS 2015; SANDAG 2014; Esri.

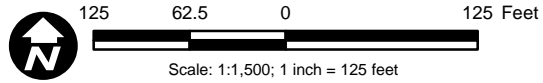


Figure 4.9-2B
Potential Federal & State Jurisdictional Aquatic Resources
Genesee Avenue Corridor at San Clemente Canyon

(*Spea hammondi*), and Garden Slender Salamander (*Batrachoseps major*) have potential to occur on-site due to the presence of suitable habitat.

Reptile species observed within a variety of habitats include Western Fence Lizard (*Sceloporous occidentalis*), Side-blotched Lizard (*Uta stansburiana*), Common Kingsnake (*Lampropeltis getula*), and Western Rattlesnake (*Crotalus viridis*). Additionally, the Ring-necked Snake (*Diadophis punctatus*), Two-striped Garter Snake (*Thamnophis hammondi*), Night Snake (*Hypsiglena torquata*), Long-nosed Snake (*Rhinocheilus lecontei*), and Yellow-bellied Racer (*Coluber constrictor mormon*) were recorded in Rose Canyon by herpetologist Laurence Klauber (Klauber, unpub. field notes). Other reptile species expected to be found on-site include the Coronado Skink (*Plestiodon skiltonianus interparietalis*), coast horned lizard (*Phrynosoma coronatum*), Southern Alligator Lizard (*Eligaria multicaudata webbi*), Red Diamond Rattlesnake (*Crotalus ruber*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), and Striped Racer (*Masticophis lateralis*). The Orange-throated Whiptail (*Aspidoscelis hyperythra*) and the Coastal Rosy Boa (*Lichanura trivirgata roseofusca*) may also occur in the canyons in limited numbers. The UCP Area is located outside of (west of) the current range of the Quino Checkerspot Butterfly per the USFWS Quino Survey Areas Map (USFWS 2005).

Birds

A total of 48 species of birds was observed within the UCP Area and surrounding habitat. Generally, findings were consistent with web-published “Friends of Rose Canyon Bird Species List” based on San Diego County Bird Atlas coverage of the canyon (Friends of Rose Canyon 2003).

White-tailed Kite (*Elanus leucurus*), Red-tailed Hawk (*Buteo jamaicensis*), Red-shouldered Hawk (*Buteo lineatus*), Cooper’s Hawk (*Accipiter cooperii*), Common Raven (*Corax corax*), and American Crow (*Corvus brachyrhynchos*) were observed on-site. Each of these species likely nests on-site as suitable habitat exists; however, no nests were observed. Fledgling White-tailed Kites were seen with adults at the tops of the tallest Western Sycamores. Additionally, in the spring of 2003, successful nesting by Red-shouldered Hawks resulted in three fledglings along the urbanized southern edge of Rose Canyon between Regents Road and Genesee Avenue.

Other species observed in the riparian habitat during the surveys included Downy Woodpecker (*Picoides pubescens*), Acorn Woodpecker (*Melanerpes formicivorus*), Ash-throated Flycatcher (*Myiarchus cinerascens*), Yellow Warbler (*Dendroica petechia*), Black-headed Grosbeak (*Pheucticus melanocephalus*), Hooded Oriole (*Icterus cucullatus*), Bewick’s Wren (*Thryomanes bewickii*), Wrentit (*Chamaea fasciata*), Common Yellowthroat (*Geothlypis trichas*), Song Sparrow (*Melospiza melodia*), and House Wren (*Troglodytes aedon*). The Southern Cottonwood-

Willow Riparian Forest and Southern Willow Scrub habitats on-site offer potentially suitable habitat to both the Least Bell's Vireo (*Vireo bellii pusillus*) and Southwestern Willow Flycatcher (*Empidonax traillii extimus*), which are federally listed endangered species. However, the focused, protocol surveys conducted for the Project and documented in the biological resources report (Merkel 2004) did not conclude either species' presence on-site.

The following species were also recorded in sage scrub habitat: Wrentit (*Chamaea fasciata*), Bewick's Wren (*Thryomanes bewickii*), California Towhee (*Pipilo crissalis*), Spotted Towhee (*Pipilo maculates*), California Thrasher (*Toxostoma redivivum*), and California Gnatcatcher (*Polioptila californica*).

The Eucalyptus Woodland that exists off-site, but in the vicinity of the UCP Area, is relatively expansive. This habitat is broadly utilized by larger birds for nesting (*e.g.*, corvids and raptors), and by smaller species for perching (*e.g.*, flycatchers). However, the Eucalyptus Woodland on-site is relatively small and patchy; thus, uses by avian species are expected to be limited to perching and occasional foraging.

Mammals

Relatively few mammalian species were observed onsite. This is, in part, due to the fact that most native mammal species are primarily nocturnal and not easily observed during diurnal surveys. The California Ground Squirrel (*Spermophilus beecheyi*) and Desert Cottontail (*Sylvilagus audubonii*) were both infrequently seen onsite, although both are considered common to the area. Exposed soil occurs in many disturbed areas and is conducive to the presence of Botta's Pocket Gopher (*Thomomys bottae*), which is expected to be found on-site. Mid-level predators such as Opossum (*Didelphis virginiana*), Long-tailed Weasel (*Mustela frenata*), Raccoon (*Procyon lotor*), Gray Fox (*Urocyon cinereoargenteus*), and Striped Skunk (*Mephitis mephitis*) were either observed or expected to occur. However, their populations are expected to be moderated by higher-level predators such as Coyote (*Canis latrans*) and Bobcat (*Felis rufus*), both of which were detected on-site during the biological resources surveys. The presence of higher-level predators such as Bobcat verifies the value of the canyon in providing habitat for all species throughout the food chain.

Several rodent species are also expected to occur within the UCP Area, including: San Diego Pocket Mouse (*Chaetodipus fallax fallax*), Deer Mouse (*Peromyscus maniculatus*), Cactus Mouse (*Peromyscus eremicus*), California Vole (*Microtus californicus*), and House Mouse (*Mus musculus*). Although not observed, various bat species (Order *Chiroptera*) are expected to use the canyon habitats within the UCP Area. Such species include California Leaf-nosed Bat (*Macrotis californicus*), Mexican Long-tongued Bat (*Choeronycteris mexicana*), Western

Mastiff Bat (*Eumops perotis*), Hoary Bat (*Lasiurus cinereus*), and Yuma Myotis (*Myotis yumanensis*).

Urban proximity dictates the occasional presence of domestic species of dog and cat (*Canis familiaris* and *Felis catus*, respectively). On several occasions dogs were seen on and off-leash in the canyon. Dogs do not carry out levels of predation that cats do since they are largely retained under the control of their owners and not given to independent nocturnal foraging. Cats are considered mid-level predators, and by virtue of their independent and nocturnal habits form a viable threat to birds and small mammals. The presence of higher-level predators serves to moderate this threat.

Sensitive Resources

Sensitive Plant Species

Sensitive plants include those listed by the USFWS (USFWS) (2016), CDFW (2016), the California Native Plant Society (CNPS) (CNPS 2016), and MSCP Narrow Endemic Species (City of San Diego 1999 amended 2012). Six sensitive plant species were identified within the Genesee Avenue Corridor, and each is discussed below.

San Diego Sagewort (*Artemisia palmeri*). Dense populations occur along Rose Creek at the Genesee Avenue crossing area. It is listed as CNPS Category 4.2 and is found in the Cottonwood-willow Riparian Forest.

Clay-field Goldenbush (*Isocoma menziesii* var. *decumbens*). This plant is sporadic in areas of Non-native and Native Grassland habitats. It is listed as CNPS Category 1B.2.

Spiny Rush (*Juncus acutus* ssp. *leopardii*). This plant occurs sporadically within wetland habitats of Rose Canyon and San Clemente Canyon. It is listed by CNPS as Category 4.2.

Nuttall's Scrub Oak (*Quercus dumosa*). This plant is found in the native plant garden located south of Rose Creek and west of Genesee Avenue. It is listed as CNPS Category 1B.1.

Coulter's Matilija Poppy (*Romneya coulteri*). This plant is also found in the native plant garden located south of Rose Creek and west of Genesee Avenue. It is listed as CNPS Category 4.2.

Wart-stemmed Ceanothus (*Ceanothus verrucosus*). This plant is also part of the native plant garden located south of Rose Creek and west of Genesee Avenue. It is covered by the MSCP and is listed by the CNPS as Category 2B.2.

Willow Monardella (Monardella viminea). It should be noted that historic populations of willow monardella are known from San Clemente Canyon. The nearest historic locations are approximately one-half mile to the west, and just east of Genesee Avenue south of SR 52, but well out of the impact area of the modifications to Genesee Avenue. The latter population was searched for as part of the field survey for this analysis, but was not found. Similarly, the general botanical survey conducted within the boundaries of the UCP Area did not reveal the presence of this species.

Sensitive Animal Species

A total of seven sensitive wildlife species were identified within the Project site during biological resources surveys. They include White-tailed Kite, Cooper's Hawk, Nuttall's Woodpecker (*Picoides nuttallii*), California Gnatcatcher (in Regents Road Corridor only), California Thrasher, Yellow Warbler, and Yellow-breasted Chat (*Icteria virens*).

Several raptors were observed or reported from the UCP Area, and many are suspected or known to nest on-site. Such species include Red-shouldered Hawk, Red-tailed Hawk, Barn Owl (*Tyto alba*), and Great Horned Owl (*Bubo virginianus*). Although none of the aforementioned species are considered sensitive, any active raptor nests are afforded protection under the California Fish and Game Code Section 3503.5, and native nesting birds are also protected more generally by Section 3503. Native nesting birds area also protected more generally under Code Section 3503. Additionally, although it was not concluded that all the sensitive species observed/detected on-site are nesting in the area, there is a high likelihood that they do given the available, suitable habitat.

Focused, protocol surveys were conducted for three federally listed avian species: Southwestern Willow Flycatcher, Least Bell's Vireo, and California Gnatcatcher. The results of these surveys are included in Appendices 4 and 5 of the biological resources report. Neither Southwestern Willow Flycatcher nor Least Bell's Vireo were detected in or near the UCP Area. California Gnatcatcher was not observed in the Genesee Avenue Corridor.

Other sensitive species not observed during the biological resources survey work have been reported from the UCP Area by local residents or other interested parties. Such species include, but are not limited to Rufous-crowned Sparrow (*Aimophila ruficeps*), Black-chinned Sparrow (*Spizella atrogularis*), and Northern Harrier (*Circus cyaneus*).

Although Southwestern Pond Turtle (*Emys marmorata pallida*) and Arroyo Toad (*Bufo californicus*) are known from the region in habitats such as those that occur on-site, neither species was observed/detected during the biological resources surveys nor have they been

historically reported from the area. They are not expected to occur due to the absence of specific habitat conditions that are required by these species. The area lacks substantial, permanent ponding areas and sandy washes along stream courses that are necessary to support the pond turtle and Arroyo Toad, respectively.

The Burrowing Owl (*Athene cunicularia*) is a species that generally occurs in disturbed land and/or grasslands. This species occupies ground squirrel burrows, which are present on-site. The Burrowing Owl was not observed/detected during the recent surveys, nor has it been historically reported from the area. The grasslands and disturbed habitat on-site lack the specific habitat conditions that preferred by this species, such as open, flat terrain. Furthermore, the site's location amongst urban development may also preclude the presence of this species. This species is not expected to be found on-site.

No vernal pools were found within the Project area. The area lacks appropriate conditions for vernal pools; thus, no sensitive species associated with vernal pools (*i.e.*, San Diego Fairy Shrimp [*Branchinecta sandiegonensis*]) are expected to occur on-site.

A literature search of previously completed vernal pool surveys (Bauder 1986, U.S. Fish and Wildlife Service 1997, and City of San Diego 2004) revealed no historic locations of vernal pools within the UCP Area or its immediate vicinity. The nearest extant vernal pools are over one mile to the northeast in the vicinity of Nobel Drive and MCAS Miramar.

Wildlife Corridors

A wildlife corridor is a linear landscape feature utilized by resident or transient wildlife, and can be regional or local in nature. The corridor allows animal movement between two patches of more suitable habitat. A corridor is not expected to provide sufficient space and resources to meet all of the life history needs of its target species. Wildlife corridors are important insofar as they play a role in preserving species diversity. In the absence of corridors, habitats become isolated islands surrounded by development. Fragmented habitats support significantly lower numbers of species and increase the likelihood of extinction for species restricted to small areas. Connections between areas of open space are integral to maintaining biological diversity and population viability.

The native habitats of Rose and San Clemente canyons are part of the City's MSCP MHPA. Rose Canyon stretches westward from military lands east of I-805 to I-5. Here, the Rose Canyon habitats bend southward to the vicinity of the SR 52/I-5 interchange and form a constrained connection to San Clemente Canyon (Marian Bear Memorial Park), which in turn connects to the

eastern military lands. Both canyons are part of the MSCP's Biological Core and Linkage Areas and Core Resource Areas.

The MCAS Miramar Integrated Natural Resources Management Plan (INRMP) states, in part, "The entire eastern portion of MCAS Miramar provides important habitat linkage with adjacent open spaces. Rose and San Clemente canyons provide important corridors through western MCAS Miramar that connect open space areas west of the Station to eastern MCAS Miramar. These corridors link the wildlife (and to a lesser extent plants) of the Station to adjacent or nearby open space and regional corridors through Mission Trails Regional Park, Sycamore Canyon County Park, Marian Bear Regional Park, and Los Peñasquitos Canyon Preserve" (MCAS Miramar 2011). Mule deer, bobcat, and mountain lion have been documented in Rose Canyon in the western portion of MCAS Miramar (MCAS Miramar 2011). The INRMP goes on to say "...(wildlife) corridors connect western Miramar with open space west of I-805. San Clemente Canyon, which runs from the northeast corner of MCAS Miramar to the southwest corner, apparently dead ends into the I-805 and SR 52 interchange. However, there is a system of open drainages with dirt trails along the borders that provide access through the interchange into Marian Bear Regional Park on the west side of I-805. Rose Canyon, another east-west corridor within the open space of MCAS Miramar, funnels the movement of wildlife under the I-805 bridge over the railroad easement within Rose Canyon. On the west side of I-805, this wildlife corridor continues along the railroad easement to the west until it connects with Marian Bear Regional Park at the end of San Clemente Canyon and continues south."

The portions of Rose Canyon and San Clemente Canyon associated with the Project lay within the MSCP's "Urban Areas." Urban MHPA areas contribute to the overall MHPA by providing habitat for native species to continue to reproduce and find new territories, or by providing necessary shelter and forage for migrating species. Rose Canyon, in conjunction with San Clemente Canyon, provides for the reproduction and dispersal of a variety of species. Plants and animals may disperse along the streamside habitats eastward toward the open space owned by the military, or between the two canyons through either the eastern, broad, military lands or the western, constrained corridor. The MCAS Miramar INRMP documents corridor use by Mule Deer, Mountain Lion, and Bobcat; the latter has been documented in Rose Canyon by residents living near the Project area. Evidence of Mule Deer was seen by Merkel & Associates biologists during fieldwork for the Nobel Drive Extension study in the mid- to late-90s in Rose Canyon just west of I-805. It would not be unreasonable to expect intermittent sightings of Mule Deer in the western portions of Rose Canyon, although the biologists have received no recent reports as of the date of this report. No evidence of Mule Deer was found during the course of field surveys for this Project. However, Mule Deer were seen in Rose Canyon in 2002.

The other large mammal known to inhabit MCAS Miramar, the Mountain Lion, could possibly use Rose Canyon and San Clemente Canyon as a movement corridor, and possibly a hunting area, but its occurrence is far less probable than that of Mule Deer. In 2002, as part of a study of sensitivities of mammalian carnivores in fragmented habitats in coastal southern California, Crooks reported no Mountain Lions in urban fragments.

Rose Canyon functions as a wildlife corridor supporting movement of individuals (and thus genetic material) from within Rose Canyon to open space eastward and into San Clemente Canyon and vice versa.

4.9.1.3 Regents Road Corridor

Existing biological resources conditions in the Regents Road Corridor are summarized below as vegetation communities, waters of the U.S. and State, wildlife, sensitive resources, and wildlife corridors.

Vegetation Communities

Twelve vegetation communities were identified and mapped within the Regents Road Corridor: Southern Cottonwood-Willow Riparian Forest, Southern Willow Scrub, Native Grassland (Wet Meadow), Coast Live Oak Woodland, Diegan Coastal Sage Scrub, Chamise Chaparral, Native Grassland, Non-Native Grassland, Eucalyptus Woodland, Exotic Plantings Urban/Developed, and Disturbed Lands (Figure 4.9-3). Refer to Table 4.9-1 for acreages of occurrence in the mapped corridor area. Detailed descriptions of the vegetation types are contained in Section 4.9.1.1.

The Rose Canyon Open Space Park has been subject to riparian habitat enhancement and restoration. In 1997, the City of San Diego applied for and received a Habitat Conservation Fund grant from the State of California Department of Parks and Recreation Local Agency Program. A major goal of the grant program was to remove noxious non-native species (e.g., Giant Reed [*Arundo donax*], Pampas Grass [*Cortaderia jubata*], Eucalyptus [*Eucalyptus* spp.], Acacia [*Acacia* spp.], German Ivy [*Delairea odorata*], Pepper Tree [*Schinus* spp.], Fennel [*Foeniculum vulgare*], and Castor-bean [*Ricinus communis*]) from Rose Creek and replace them with native plant material (Fremont Cottonwood, Willows [*Salix* spp.], and Mule Fat). The restoration effort also included some upland areas, which were planted with Mission Manzanita (*Xylococcus bicolor*), California Sagebrush, Laurel Sumac and Chamise (*Adenostoma fasciculatum*). The enhancement/restoration efforts were completed in 2002. Much of the restoration activity is unmapped and unmarked, and in many cases indistinguishable from native habitats. Therefore, these restoration areas have not been called out separately in the following vegetation table or discussion.



Source: SanGIS 2015; SANDAG 2014; Esri; SanGIS 2009 Vegetation Communities.

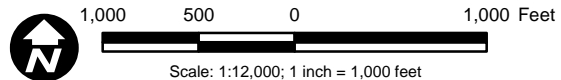


Figure 4.9-3
Regents Road Corridor Vegetation Communities

University Community Plan Amendment Final PEIR

Path: P:_6044\60446078_University_Com_Plan_Amend_EIR\900-CAD-GIS\922_Maps\UCP_EIR_BioVeg_Regents.mxd, 4/1/2016, daniel_arellano

The 1996 Rose Canyon Trunk Sewer project also resulted in habitat restoration in Rose Canyon Open Space Park. Examination of the biological mitigation “as-built” plans for this project show that a high percentage of the Trunk Sewer line in the vicinity of Genesee Avenue and the Regents Road Bridge has been subject to vegetation restoration efforts. While most of the line was treated with an upland seed mix, some sections were also re-planted with riparian forest elements. While these impacts are noted in the Impact section of this report under the appropriate vegetation categories, they are also noted separately because the resource agencies may require higher mitigation ratios for impacts to previously restored areas.

Southern Cottonwood-Willow Riparian Forest

As discussed in Section 4.9.1.1, the Southern Cottonwood-Willow Riparian Forest is a broad-leaved riparian vegetation type that is well-developed in both the San Clemente and Rose canyons.

Southern Willow Scrub

The Southern Willow Scrub habitat within the Regents Road Corridor occurs within a tributary drainage to Rose Canyon, south of the railroad tracks.

Coast Live Oak Woodland

A stand of Coast Live Oak Woodland occurs in the southwest corner of the Regents Road Corridor. More specifically, this vegetation type is located in the San Clemente Canyon south of SR 52.

Coastal and Valley Freshwater Marsh

Several small stands were found within the incised canyons at the base of the slopes of Rose Canyon. Another small stand was found in San Clemente Canyon. This habitat is dominated by Broad-leaved Cattail (*Typha latifolia*).

Diegan Coastal Sage Scrub

This vegetation type occurs in Rose Canyon, along Regents Road, and in San Clemente Canyon south of SR 52.

Chamise Chaparral

Small areas of Common Chamise (*Adenostoma fasciculatum*) surrounded by Coastal Sage Scrub vegetation occur on a west-facing slope just east of Regents Road and north of Governor Drive.

Native Grassland (Wet Meadow)

This habitat classification includes an approximately 0.18-acre area of Beardless Wild Ryegrass (*Leymus triticoides*) which occurs in moist soils adjacent to Southern Cottonwood-Willow Riparian Forest habitat.

Non-Native Grassland

Non-Native Grassland is largely concentrated near Rose and San Clemente Canyons in the Regents Road Corridor.

Eucalyptus Woodland

Eucalyptus Woodland is mapped for areas dominated by Eucalyptus trees and is generally found adjacent to urban/developed lands in the Regents Road Corridor.

Exotic Plantings

The Regents Road Corridor includes various landscaped slopes adjacent to urban development which contain exotic tree and shrub species. Exotic plantings are notable along SR 52 near San Clemente Canyon, and in total cover more than 32 acres in the mapped corridor.

Urban/Developed

Much of the Regents Road Corridor is comprised of residential and urban development that is devoid of native habitats. Vegetation within these developed areas includes mostly ornamental vegetation that is of little biological value.

Disturbed Land

Disturbed Land includes areas that consist of bare ground or non-native ruderal species. In the Regents Road Corridor, disturbed land occurs north of SR 52, east of Regents Road.

Wetlands and Waters of the U.S. and State

Potential wetlands and waters of the U.S. and State were found within the Regents Road Corridor: Southern Willow Scrub, Southern Cottonwood-Willow Riparian Forest, Herbaceous Riparian (equals the Native Grassland/Wet Meadow) and Unvegetated Waters of the U.S./streambed. The total area that falls under USACE jurisdiction is 0.97 acre. The CDFW and RWQCB have jurisdiction over 4.65 acres, and the City of San Diego has jurisdiction over 4.65 acres (Table 4.9-3). Potential jurisdictional federal and state waters in the Regents Road Corridor are mapped in Figures 4.9-4A and B.

Table 4.9-3
Waters of the U.S. and State for the Regents Road Corridor

Jurisdiction	U.S. Army Corps of Engineers	California Department of Fish and Game	City of San Diego	Maximum Wetland Area
Southern Willow Scrub (acres)	0.33	3.23	3.23	3.23
Southern Cottonwood-Willow Riparian Forest (acres)	0.61	1.23	1.23	1.23
Herbaceous Riparian ¹ (acres)	0	0.16	0.16	0.16
Unvegetated Waters of the U.S./Streambeds (acres)	0.03	0.03	0.03	0.03
Total by Jurisdiction (acres)	0.97	4.65	4.65	4.65

¹ Includes Native Grassland – Wet Meadow

Wildlife

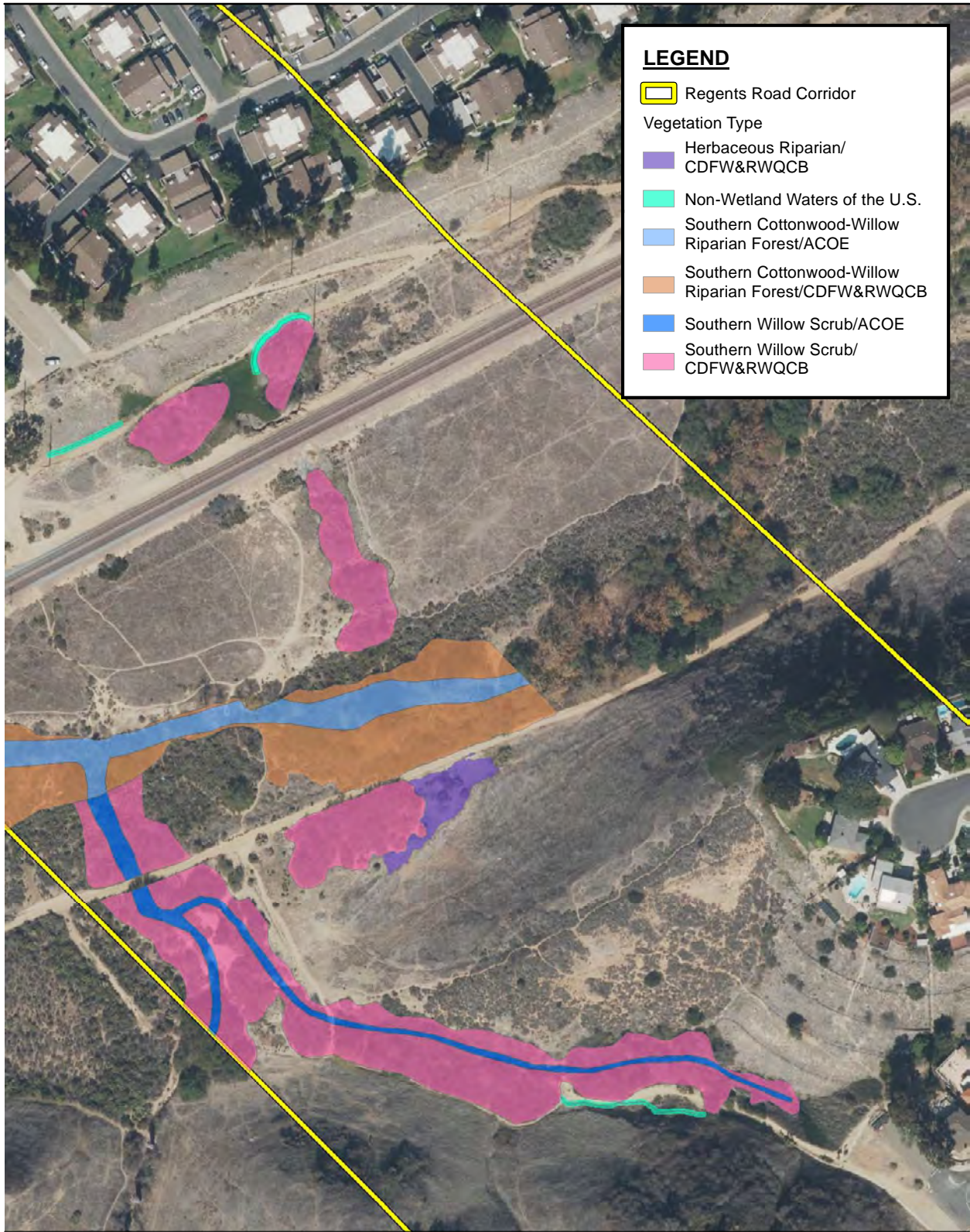
Refer to Section 4.9.1.1 and the discussion of wildlife in the Genesee Avenue Corridor. Wildlife found in the Regents Road Corridor would be the same as discussed in Section 4.9.1.1.

Sensitive Resources

Sensitive Plant Species

Sensitive plants include those listed by USFWS (2016), CDFW (2016), CNPS (2016), and MSCP Narrow Endemic Species (City of San Diego 1997). Three sensitive plant species were identified within the Regents Road Corridor, and each is discussed below. In addition, one historic plant species was identified for the Regents Road Corridor.

San Diego Sagewort. Dense populations occur along Rose Creek at both the Genesee and Regents Road crossing areas. It is listed as CNPS Category 4.2 and is found in the Cottonwood-willow Riparian Forest



LEGEND

 Regents Road Corridor

Vegetation Type

-  Herbaceous Riparian/
CDFW&RWQCB
-  Non-Wetland Waters of the U.S.
-  Southern Cottonwood-Willow
Riparian Forest/ACOE
-  Southern Cottonwood-Willow
Riparian Forest/CDFW&RWQCB
-  Southern Willow Scrub/ACOE
-  Southern Willow Scrub/
CDFW&RWQCB

Source: SanGIS 2015; SANDAG 2014; Esri.

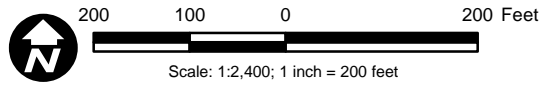


Figure 4.9-4A
Potential Federal & State Jurisdictional Aquatic Resources
Regents Road Corridor at Rose Canyon



Source: SanGIS 2015; SANDAG 2014; Esri.

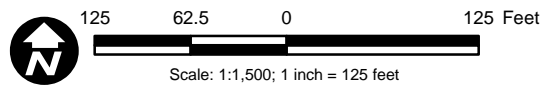


Figure 4.9-4B
Potential Federal & State Jurisdictional Aquatic Resources
Genesee Avenue Corridor at San Clemente Canyon

Clay-field Goldenbush. This plant is sporadic in areas of Non-native and Native Grassland habitats. It is listed as CNPS Category 1B.2.

Spiny Rush. This plant occurs sporadically within wetland habitats of Rose Canyon and San Clemente Canyon. It is listed by CNPS as Category 4.2.

Willowy Monardella. It should be noted that historic populations of willowy monardella are known from San Clemente Canyon. The nearest historic location is approximately one-quarter mile to the east of the corridor boundary, south of SR 52. This location is outside of the Project boundary.

Sensitive Animal Species

Refer to Section 4.9.1.1 and the discussion of sensitive animal species in the Genesee Avenue Corridor. Wildlife found in the Regents Road Corridor would be the same as discussed therein. Specifically, two male/female pairs of California gnatcatchers were found within the Regents Road Corridor in Rose Canyon. Although nesting was not confirmed, it was strongly suspected that at least one pair breeds onsite or in the vicinity, as juvenile birds were seen with one pair during early surveys.

A eucalyptus tree in the Regents Road Corridor near Lahitte Court has been a historic nesting site for Coopers hawk, and in the spring of 2004 was a nesting site for great horned owl.

Wildlife Corridors

Refer to Section 4.9.1.1, Genesee Avenue Corridor, Wildlife Corridors for a full discussion of wildlife corridors within the Regents Road Corridor.

4.9.2 Regulatory Framework

Several regulations have been established by federal, state, and local agencies to protect and conserve biological resources. The descriptions below provide a brief overview of agency regulations that may or may not be applicable based on determination of impacts to the resources that occur within the Project area.

4.9.2.1 Federal

Endangered Species Act

The Federal Endangered Species Act (FESA) provides protections for species endangered or threatened with extinction. FESA prohibits the “take” of endangered or threatened wildlife species. “Take” is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (FESA Section 3 [(3)(19)]). Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 Code of Federal Regulations [CFR] Section 17.3). Harass is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns (50 CFR Section 17.3). Actions that result in take can result in civil or criminal penalties. See Section 4.2.2.3 for a discussion of the habitat conservation plan (HCP) that addresses federally endangered and threatened species in the City of San Diego (i.e., the City of San Diego’s MSCP). Projects that are implemented consistent with San Diego Municipal Code, Land Development Code, Biology Guidelines (City of San Diego 2012a) would be allowed to “take” listed species with the City of San Diego’s authorization and approval.

Clean Water Act

Pursuant to Section 404 of the Clean Water Act (CWA), the USACE is authorized to regulate any activity that would result in the discharge of dredged or fill material into jurisdictional waters of the U.S., which include those waters listed in 33 CFR Part 328 (Definitions). USACE, with oversight by the U.S. Environmental Protection Agency (USEPA), has the principal authority to issue CWA Section 404 Permits.

Pursuant to Section 401 of the CWA, the RWQCB, Region 9, certifies that any discharge into jurisdictional waters of the U.S. will comply with state water quality standards. RWQCB, as delegated by USEPA, has the principal authority to issue a CWA Section 401 water quality certification or waiver.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits any person unless permitted by regulations, to “pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means

whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention...for the protection of migratory birds...or any part, nest, or egg of any such bird” (16 U.S. Code 703). The list of migratory birds protected by the MBTA includes nearly all bird species native to the United States. The statute was extended in 1974 to include parts of birds, as well as eggs and nests. Thus, it is illegal under the MBTA to directly kill, or destroy a nest of, nearly any bird species, not just endangered species. Activities that result in removal or destruction of an active nest (a nest with eggs or young being attended by one or more adults) would violate the MBTA. Removal of unoccupied nests, or bird mortality resulting indirectly from a project, is not considered a violation of the MBTA.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) is the primary law protecting eagles, including individuals, and their nests and eggs (16 USC Section 668 et seq.). It defines “take” to include “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (16 USC 668c). “Disturb” is defined by regulation at 50 CFR 22.3 in 2007 as “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause,...(1) injury to an eagle, (2) a decrease in productivity..., or (3) nest abandonment...” (USFWS 2009). Under the BGEPA Eagle Permit Rule (50 CFR 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Executive Order 11988, Floodplain Management

Executive Order (EO) 11988 requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. This EO provides an eight-step process that agencies carry out as part of their decision-making process for projects that have potential impacts to or within a floodplain.

Executive Order 11990, Protection of Wetlands

Pursuant to EO 11990, each federal agency is responsible for preparing implementing procedures for carrying out the provisions of the EO. The purpose of this EO is to “minimize the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands.” Each agency, to the extent permitted by law, must avoid undertaking or providing assistance for any activity located in wetlands, unless the head of the agency finds that there is no practical alternative to such activity, and the proposed action includes all practical measures to minimize harm to wetlands that may result from such actions. In making this finding, the head of

the agency may take into account economic, environmental, and other pertinent factors. Each agency must also provide opportunity for early public review of any plans or proposals for new construction in wetlands.

Executive Order 13112, Invasive Species

EO 13112 requires federal agencies to “prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health effects that invasive species cause.” An invasive species is defined by the EO as “an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health.” Alien species are defined, with respect to a particular ecosystem, as any species (including its seeds, eggs, spores, or other biological material capable of propagating that species) that is not native to that ecosystem.

4.9.2.2 State

California Fish and Game Code

The California Fish and Game Code (CFGF) regulate the taking or possession of birds, mammals, fish, amphibians, and reptiles, as well as natural resources such as wetlands and waters of the state. Applicable sections of the CFGF are discussed in turn below.

Section 1600 Et. Seq. – Streambed Alteration Agreement.

Pursuant to Section 1600 et seq. of the CFGF, CDFW regulates activities of an applicant’s project that would substantially alter the flow, bed, channel, or bank of streams or lakes, unless certain conditions outlined by CDFW are met by the applicant. The limits of CDFW jurisdiction are defined in CFGF Section 1600 et seq. as the “bed, channel, or bank of any river, stream,³ or lake designated by CDFW in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit.”⁴ However, in practice, CDFW usually extends its jurisdictional limit and assertion to the top of a bank of a stream, the bank of a lake, or outer edge of the riparian vegetation, whichever is wider.

³ Title 14 California Code of Regulations (CCR) 1.72 defines a stream as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation.”

⁴ This also includes the habitat upon which they depend for continued viability (California Fish and Game Code Division 5, Chapter 1, Section 45, and Division 2, Chapter 1, Section 711.2[a]).

In some cases, drainage ditches and retention ponds⁵ can be potentially considered under the regulatory administration of CDFW. CDFW provides specific guidance concerning its regulatory administration in California Code of Regulations Title 14 Section 720 (Designation of Waters of Department Interest):

For the purpose of implementing Sections 1601 and 1603 of the Fish and Game Code, which requires submission to the department of general plans sufficient to indicate the nature of a project for construction by or on behalf of any person, governmental agency, state or local, and any public utility, of any project which will divert, obstruct, or change the natural flow or bed of any river, stream, or lake designated by the department, or will use material from the streambeds designated by the department, all rivers, streams, lakes, and streambeds in the State of California, including all rivers, streams, and streambeds, which may have intermittent flows of water, are hereby designated for such purpose.=

Section 1900 Et. Seq. – Native Plant Protection Act

The Native Plant Protection Act (NPPA) (CFGF Section 1900 et seq.) includes measures to preserve, protect, and enhance rare and endangered native plant species. Definitions for “rare and endangered” are different from those contained in the California Endangered Species Act (CESA), although CESA-listed rare and endangered species are included in the list of species protected under the NPPA.

Section 2050 Et Seq. – California Endangered Species Act

CESA (Section 2050 et seq.) prohibits the “take” (defined as “to hunt, pursue, catch, capture, or kill”) of state-listed species except as otherwise provided in state law. CESA is administered by and is similar to FESA. State lead agencies are required to consult with CDFW to ensure that their authorized actions are not likely to jeopardize the continued existence of any state-listed species or result in the degradation of occupied habitat.

Under Section 2081, CDFW authorizes “take” of state-listed endangered, threatened, or candidate species through incidental take permits or memoranda of understanding if (1) the take is incidental to otherwise lawful activities, (2) impacts of the take are minimized and fully mitigated, (3) the permit is consistent with regulations adopted in accordance with any recovery plan for the species in questions, and (4) the applicant ensures suitable funding to implement the measures required by CDFW.

⁵ Title 14 CCR 1.56 defines a lake as a feature that “includes lakes or man-made reservoirs.”

See Section 4.2.2.3 for a discussion of the Natural Community Conservation Plan (NCCP) that addresses state endangered and threatened species in the City of San Diego (i.e., the City of San Diego's MSCP). Projects that are implemented consistent with *San Diego Municipal Code, Land Development Code, Biology Guidelines* (City of San Diego 2012a) would be allowed to "take" state listed species with the City of San Diego's authorization and approval.

Section 3503 and 3503.5 – Protection of Birds, Nests, and Raptors

CFGC Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs. Typical violations of these codes include destruction of active nests resulting from removal of vegetation in which the nests are located. Violation of Section 3503.5 could also include failure of active raptor nests resulting from disturbance of nesting pairs by nearby project construction. This statute does not provide for the issuance of any type of incidental take permit.

Section 3511, 4700, 5050, and 5515 – Fully Protected Species

Protection of fully protected species is described in CFGC Sections 3511, 4700, 5050, and 5515. These species include certain fish, amphibian and reptile, bird, and mammal species. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take of fully protected species.

Section 3513 – Migratory Birds

This code protects California's migratory birds by making it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame birds.

Porter-Cologne Water Quality Act

Pursuant to Section 13000 et seq. of the California Water Code (the 1969 Porter-Cologne Water Quality Control Act), RWQCB is authorized to regulate any activity that would result in discharges of waste or fill material to waters of the state, including "isolated" waters and wetlands (e.g., vernal pools and seeps). Waters of the state include any surface water or groundwater within the boundaries of the state (California Water Code Section 13050[e]). RWQCB also adopts and implements water quality control plans (basin plans) that recognize and are designed to maintain the unique characteristics of each region with regard to natural water

quality, actual and potential beneficial uses, maintaining water quality, and addressing the water quality problems of that region.

Designated beneficial uses of state waters that may be protected against quality degradation include preservation and enhancement of fish, wildlife, designated biological habitats of special significance, and other aquatic resources or preserves.

California Environmental Quality Act

The California Environmental Quality Act of 1970 (CEQA), Public Resources Code 21100 et seq., requires lead agencies to evaluate the environmental impact associated with a Project. CEQA requires that a local agency prepare a PEIR on any project it proposes to approve that may have a significant effect on the environment. The purpose of a PEIR is to provide decision makers, public agencies, and the general public with an objective document that fully discloses the potential environmental effects of a Project. The PEIR process is specifically designed to objectively evaluate and disclose potentially significant direct, indirect, and cumulative impacts of a Project; to identify alternatives that may reduce or eliminate a project's significant effects; and to identify feasible measures that mitigate significant effects of a project. In addition, CEQA requires that an EIR identify those adverse impacts that remain significant after mitigation.

4.9.2.3 Local

City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan

The City of San Diego adopted the MSCP Subarea Plan in 1997. The goal of the City of San Diego's MSCP was to create a habitat preserve system known as the MHPA in order to coordinate conservation efforts on a regional scale while allowing development projects to occur.

The City of San Diego's MSCP Subarea Plan (City of San Diego 1997) was prepared pursuant to the general outline for NCCP/HCP documents developed by USFWS and CDFW to meet the requirements of the California Natural Communities Conservation Planning Act of 1992 and the FESA. The City's NCCP/HCP fulfilled the requirements for issuance of incidental take authorization under Section 2835 of the state's NCCP Act and an incidental take permit under Section 10 of the FESA. The MSCP identifies certain species as "covered," that are adequately conserved, within the MHPA. The Subarea Plan specifies conditions of coverage for each covered species that must be applied when those species occur in a project area.

The City of San Diego Municipal Code established (Environmentally Sensitive Lands) ESL Regulations to ensure protection of sensitive biological resources consistent with CEQA and the

City of San Diego's MSCP. The ESL Regulations include lands within the MHPA, wetlands and waters, sensitive upland vegetation communities, habitat for state and federally listed and MSCP covered species, lands supporting narrow endemic plant species, steep hillsides and floodplains. The regulations encourage avoidance and minimization of impacts to ESLs. In addition, the City's Biology Guidelines (City of San Diego 2012a) serve as standards for the determination of impacts and mitigation under CEQA and the Coastal Act. The Biology Guidelines also serve to implement the MSCP by placing priority on the preservation of biological resources within the MHPA. The City's Biology Guidelines also define the survey and impact assessment methodologies and mitigation requirements for unavoidable impacts (City of San Diego 2012a).

Sensitive biological resources are defined by the San Diego Municipal Code (City of San Diego 2012a) as:

- Lands that have been included in the MHPA as identified in the City of San Diego's MSCP Subarea Plan;
- Wetlands (as defined by the Municipal Code, Section 113.0103);
- Lands outside of the MHPA that contain Tier I habitats, Tier II habitats, Tier IIIA habitats, or Tier IIIB habitats as identified in the Biology Guidelines;
- Lands supporting species or subspecies listed as rare, endangered, or threatened;
- Lands containing habitats with narrow endemic species as listed in the Biology Guidelines; and
- Lands containing habitats of covered species as listed in the Biology Guidelines.

Upon compliance with the MSCP Subarea Plan and the Biology Guidelines, the City is able to issue "take" authorization for covered species. Prior to the adoption of the MSCP, this "take" authorization would have required project-by-project review with the regulatory agencies. Thus, the MSCP provides for the preservation of a network of habitat and open space, protecting biodiversity, and enhancing the region's quality of life. The plan is designed to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. By identifying priority areas for conservation and other areas for development, the MSCP streamlined permit procedures for development projects that impact habitat. It also provides an economic benefit by reducing constraints on development and decreasing the costs of compliance with federal and state laws that protect biological resources.

4.9.3 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a potential significant impact to biological resources would occur if implementation of the Project would:

1. Result in substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS;
2. Result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA or Tier IIIB habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;
3. Result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;
5. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional or state habitat conservation plan, either within the MSCP plan area or in the surrounding region
6. Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects;
7. Conflict with any local policies or ordinances protecting biological resources; or
8. Introduce invasive species of plants into a natural open space area;

4.9.4 Impact Analysis

Issue 1: Would the Project result in substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

4.9.4.1 Impact Analysis

Direct impacts to plant and wildlife species include temporary or permanent loss of individuals or their habitat. Indirect impacts to plant and wildlife species include edge effects such as noise or introducing humans and/or pets to an area where access was previously limited. Direct impacts on state or federally listed species and all narrow endemics should be considered significant. Impacts on certain species covered by the MSCP and other species not covered by the MSCP should be considered significant on a case-by-case basis, taking into consideration extent of the impact and all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP. Indirect impacts to species should be considered significant on a case-by-case basis taking into consideration all pertinent information regarding the species' ecology.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of the existing Rose Canyon trailhead at Regent Road and Lahitte Court would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, there would be no significant impacts.

4.9.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.5 Impact Analysis

Issue 2: Would the Project result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA or Tier IIIB habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?

4.9.5.1 Impact Analysis

Sensitive vegetation communities may be directly or indirectly impacted. Direct impacts to sensitive vegetation communities include permanent or temporary ground disturbance, including removal of vegetation. Indirect impacts to sensitive vegetation communities include edge effects such as introduction of nonnative plant species. Tier I, II, IIIA, and IIIB upland habitats and all wetland and waters habitats are considered sensitive. Direct and indirect impacts to these resources are considered significant. Total upland (Tiers I–IIIB) impacts of 0.1 acre or greater and wetland (including riparian) impacts of 0.01 acre or greater are considered significant. However, total upland (Tiers I–IIIB) and wetland impacts of less than 0.01 acre are not considered significant. Additionally, impacts to nonnative grasslands (Tier IIIB) that are completely surrounded by existing urban development and totaling less than 1.0 acre are not considered significant. Indirect impacts should be considered significant on a case-by-case basis, taking into consideration all pertinent information regarding vegetation requirements.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would result in no addition of travel lanes, no construction of retaining walls, no changes to the existing 126-foot wide road cross section at Governor Drive, no grading associated with the

Genesee Avenue Widening, and no widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not result in substantial adverse impacts, on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or on other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not result in substantial adverse impacts, on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or on other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, there would be no significant impacts.

4.9.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.6 Impact Analysis

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

4.9.6.1 Impact Analysis

Wetlands may be directly or indirectly impacted. Direct impacts to wetlands include permanent or temporary ground disturbance, including removal of vegetation. Indirect impacts to wetlands include edge effects such as introduction of nonnative species. Wetlands are considered sensitive and declining habitats and direct impacts to these resources should be considered significant. Total wetland impacts of 0.01 acre or greater are considered significant. Indirect impacts should be considered significant on a case-by-case basis taking into consideration all pertinent information regarding wetland ecosystems.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not result in substantial adverse impacts on federal and-or state waters or wetland habitats through direct removal, filling, hydrological interruption, or other means. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not result in substantial adverse impacts on federal and-or state waters or wetland habitats through direct

removal, filling, hydrological interruption, or other means. Therefore, there would be no significant impacts.

4.9.6.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.7 Impact Analysis

Issue 4: Would the Project substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

4.9.7.1 Impact Analysis

Regional or local wildlife corridors/linkages may be directly or indirectly impacted. Direct impacts to wildlife corridors include permanent or temporary removal of vegetation or development of barriers to movement. Indirect impacts to wildlife corridors include edge effects such as noise and lighting. The City's Significance Determination Thresholds do not provide specific thresholds for impacts to corridors; therefore, direct and indirect impacts should be considered significant on a case-by-case basis, taking into consideration all pertinent ecological information regarding the plant and animal genetics and movement requirements.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.7.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites. Therefore, there would be no significant impacts.

4.9.7.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.8 Impact Analysis

Issue 5: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Issue 6: Would the Project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

4.9.8.1 Impact Analysis

The City's Significance Determination Thresholds do not provide specific thresholds for conflicts with the adopted conservation plan; therefore, conflicts with adopted conservation plans should be considered significant on a case-by-case basis. Determining the level of consistency with adopted conservation plans provides a means for evaluating significance of impacts under Issue 5. Issue 6 is related to Issue 5 since the MHPA is designated by the MSCP, an adopted conservation plan within the City's jurisdiction. Per the City's Significance Determination

Thresholds, any encroachment into the MHPA would be considered a significant direct impact. In addition, introducing land use within an area adjacent to the MHPA that would result in adverse edge effects would also be considered a significant indirect impact.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.8.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region. The removal of the planned Genesee Avenue Widening from the UCP would not introduce land use within an area adjacent to the MHPA that would result in adverse edge effects. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region. The removal of the planned Regents Road Bridge from the UCP would not introduce land use within an area adjacent to the MHPA that would result in adverse edge effects. Therefore, there would be no significant impacts.

4.9.8.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.9 Impact Analysis

Issue 7: Would the Project conflict with any local policies or ordinances protecting biological resources?

4.9.9.1 Impact Analysis

The City's Significance Determination Thresholds do not provide specific thresholds for conflicts with local policies or ordinances; therefore, conflicts with local policies and ordinances should be considered significant on a case-by-case basis. Determining the level of consistency with adopted policies and ordinances provides a means for evaluating significance of impacts under Issue 7.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.9.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not conflict with any local policies or ordinances protecting biological resources. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not conflict with any local policies or ordinances protecting biological resources. Therefore, there would be no significant impacts.

4.9.9.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.9.10 Impact Analysis

Issue 8: Would the Project introduce invasive species of plants into a natural open space area?

4.9.10.1 Impact Analysis

The City's Significance Determination Thresholds do not provide specific thresholds for impacts associated with introduction of invasive plant species. For the purposes of this analysis, the introduction of any invasive plant species to natural open spaces is considered a significant impact. The introduction of invasive plant species can be considered either a direct or indirect impact on sensitive biological resources, depending on circumstances.

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not result in the addition of travel lanes, construction of retaining walls, changes to the existing 126-foot wide road cross section at Governor Drive, grading associated with the Genesee Avenue Widening, and widening of the existing bridge over the railroad tracks in Rose Canyon. Genesee Avenue would continue to exist as it does under current conditions.

Removal of Regents Road Bridge

New roadway construction, expansion and resurfacing of existing roadway, construction of retaining walls along Milliken Avenue and Lahitte Court, construction of a small parking lot, and displacement of an existing trailhead would not occur with the construction of the planned Regents Road Bridge. The Regents Road Corridor would continue to exist as it does under current conditions.

4.9.10.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening from the UCP would not introduce invasive species of plants into natural open space areas. Therefore, there would be no significant impacts.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction from the UCP would not introduce invasive species of plants into natural open space areas. Therefore, there would be no significant impacts.

4.9.10.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.10 GEOLOGIC CONDITIONS

This section of the PEIR discusses potential impacts related to the Project associated with geologic and soil conditions.

4.10.1 Existing Conditions

4.10.1.1 Site Topography

The UCP Area is located in an area characterized by canyons, mesas, and coastal bluffs. Major canyon systems in the community include Sorrento Valley, Soledad Canyon, Rose Canyon, and San Clemente Canyon. Various canyon open space systems with steep hillsides weave their way through the Project area. In the vicinity of the Westfield UTC shopping center, the topography is a series of side canyons and rounded ridges, which form the transition from the more pronounced major canyons to the mesa tops that generally lie in the vicinity of Miramar Road, north of the Westfield UTC shopping center and north of UCSD UC San Diego. The coastal bluffs are the most scenic landform in the community and lie entirely within the Torrey Pines State Natural Reserve and Torrey Pines City Park (City of San Diego 2014b).

Most specific to the Project area is Rose Canyon and San Clemente Canyon. Rose Canyon, which consists of a well-defined valley floor bordered on the south by steep slopes, generally trends east-west and transects both the Genesee Avenue Corridor and Regents Road Corridor. San Clemente Canyon is located along the southern side of SR 52 and consists of a fairly broad floodplain and steep slopes.

4.10.1.2 Geologic Setting

The UCP Area is located in the coastal plain subprovince of the Peninsular Ranges physiographic province. The Peninsular Ranges are an elongate, northwest-trending mountain range formed by Mesozoic-age crystalline rocks. Following the mountain building event there was uplift, tilting, and erosion of the western margin of the Peninsular Ranges. These processes led to the formation of low relief topography west of the mountains (Kennedy and Tan 2008).

Geologic Units

The Project area is underlain by a variety of geologic units. The majority of the Genesee Avenue Corridor and Regents Road Corridor are underlain by Scripps Formation with very old paralic deposits (unit 10) surrounding the general area and located directly under the roadway in the northern portion near Governor Drive. Like the Genesee Avenue Corridor, a band of young

alluvial floodplain deposits cross the Regents Road Corridor near SR 52. Ardath Shale is also present along the Regents Road Corridor near SR 52 and is described below (Kennedy and Tan 2008).

Ardath Shale (Ta) – This unit is mostly uniform, weakly fissile olive gray silty shale. The upper layer contains thin beds of medium-grained sandstone, similar to thicker ones in the overlying Scripps Formation, and concretionary beds with molluscan fossils.

Scripps Formation (Tsc) – The majority of the Genesee Avenue Corridor is directly underlain by the Scripps Formation. The Scripps Formation is mostly pale-yellowish-brown, medium-grained sandstone containing occasional cobble-conglomerate interbeds.

Young Alluvial Floodplain Deposits (Qya) – A band of these deposits underlie the Genesee Avenue Corridor just south of SR 52. Young surficial deposits are sedimentary units that are slightly consolidated to cement and slightly to moderately dissected. Specifically, these alluvial floodplain deposits are poorly consolidated, poorly sorted, permeable floodplain deposits of sandy, silty or clay-bearing alluvium.

Very Old Paralic Deposits (Qvop₉) – These deposits surround a large area of the Genesee Avenue Corridor and directly under the roadway near Governor Drive. These very old surficial units are poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach, estuarine and colluvial deposits composed of siltstone, sandstone and conglomerate. These deposits rest on the Linda Vista terrace.

Soils

The National Resource Conservation Service (NRCS) is the branch of the United States Department of Agriculture (USDA) that maps and summarizes general information regarding soils in the United States. Based on the NRCS data, the soil map units displayed in Table 4.10-1 below show the various soil types underlying the Project site.

4.10.1.3 Geologic Hazards

The geologic hazards considered in relation to the Project as part of this PEIR include seismic, soil, and slope stability considerations. This evaluation is based on published information and subsurface information in the Project vicinity, including the City of San Diego Seismic Safety Study (2008b).

**Table 4.10-1
Soils**

Map Symbol	Soil Name	Description
AtF	Altamont clay, 30 to 50% slopes	Well drained with very high runoff. Typically found on hills.
CfB	Chesterton fine sandy loam, 2 to 5% slopes	Moderately well drained with very high runoff. Typically found on hillslopes.
GaF	Gaviota fine sandy loam, 30 to 50 % slopes	Well drained with medium runoff. Typically found on hillslopes.
HrD2	Huerhuero loam, 9 to 15% slopes, eroded	Moderately well drained with very high runoff. Typically found on marine terraces.
HrE2	Huerhuero loam, 15 to 30% slopes, eroded	Moderately well drained with very high runoff. Typically found on marine terraces.
RfF	Redding cobbly loam, 15 to 50% slopes	Well drained with very high runoff. Typically found on terraces.
RhC	Redding-Urban Land complex, 2 to 9% slopes	Well drained with very high runoff. Typically found on marine terraces.
SbC	Salinas clay loam, 2 to 9% slopes	Well drained with high runoff. Typically found on alluvial fans.

Source: NRCS 2015

Faulting and Seismicity

The UCP Area, along with the entire Southern California region, is located within a seismically active region with multiple major fault lines in the vicinity and is subject to moderate to severe seismic ground shaking.

Ground Surface Rupture

An active fault is generally defined as a fault that has had evidence of movement in Holocene time (last 11,000 years). These faults present the greatest risk of fault rupture hazard as well as being the potential sources of strong ground shaking in the region. Major known fault lines in the vicinity are generally located in the northern and western portions of the UCP Area, north of La Jolla Village Drive, and near I-5. The nearest active fault that appears capable of generating a damaging earthquake is the Rose Canyon Fault, which is mapped approximately 1 mile west of the Project near I-5. The City of San Diego Seismic Safety Maps also delineate a fault immediately west of Genesee Avenue at the intersection with Nobel Drive (City of San Diego 2008a, 2014b).

A fault is also mapped east of Regents Road near Millikin Avenue. Active faults are zoned by the State of California within Alquist-Priolo Special Studies Zones, or Earthquake Fault Zones (EFZs) and are mapped as active fault zones (Zone 11) on City of San Diego Seismic Safety Study maps (2008b). Genesee Avenue and Regents Road are not directly within an EFZ;

however, EFZs are mapped in the areas immediately surrounding the two local faults described in the paragraph above (City of San Diego 2008a).

Liquefaction and Secondary Effects

Liquefaction is a phenomenon where loose, saturated coarse-grained soils lose their strength and acquire some mobility from strong ground motion induced by earthquakes. The secondary effects of liquefaction include sand boils, settlement, reduced soil shear strength, lateral spreading, and global instability (flow slides in areas with sloping ground). Seismic settlement can also occur in dry sands. The City of San Diego Seismic Safety Study maps do not categorize the Genesee Avenue Corridor or Regents Road Corridor as having a high potential for liquefaction (City of San Diego 2008a).

Geologic Instability and Landslides

Slopes with a moderate or high risk of slope failure occur along the coastal bluffs and canyons west of Torrey Pines Mesa and along the south side of Sorrento Valley. The Ardath Shale formation found on both the north and south sides of Rose Canyon along the Regents Road Corridor is listed as a slide-prone formation. However, in these areas it is mapped as having a neutral or favorable geologic structure per the City of San Diego Seismic Safety Study map (2008). The coastal bluffs west of Torrey Pines Mesa are highly unstable because joints and fractures inherent in the formation material are weakened by erosion from mesa-top runoff and groundwater seepage. In the southern reaches of the Genesee Avenue Corridor and Regents Road Corridor (generally south of Governor Drive), the City of San Diego Seismic Safety Study map categorizes the land as Unit 53, which is described as low or sloping terrain, unfavorable geologic structure, low to moderate risk. Northern stretches of the roadway corridors (generally north of Governor Drive) are located in lands mapped as Unit 54, described as steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk. North of Nobel Drive are areas mapped as Unit 51, described as level mesas underlain by terrace deposits and bedrock. Unit 51 areas are categorized as having nominal risk (City of San Diego 2008a).

Landslides, block falls, and talus failures are among the identified hazards (City of San Diego 2014b). Some slopes along Rose Canyon and San Clemente Canyon have a moderate or high risk of landslides (City of San Diego 2014b). Both the Genesee Avenue Corridor and Regents Road Corridor have small areas of landslide hazard zones mapped near the roadway alignments, based on the City of San Diego Seismic Safety Study map (2008b). Along Genesee Avenue, just east of the Rose Canyon crossing, a small area is mapped as Geologic Hazard Category 21, Confirmed, known, or highly suspected landslide. This area is also mapped as a landslide deposit on the geologic map of the area (Kennedy and Tan 2008). Two small areas also mapped as Geologic

Hazard Category 21 are located along the eastern edge of Regents Road, just south of Lahitte Court (City of San Diego 2008a).

Tsunamis and Seiches

The Project location is at an inland location with elevations ranging from 200 to 300 feet above sea level and is outside of the tsunami inundation area. Based on Tsunami Inundation Maps for Emergency Planning prepared by the California Emergency Management Agency, the nearest area mapped to potentially be inundated by a tsunami is approximately 3 miles to the west near the coastal bluffs of La Jolla (CalEMA 2009).

A wave created by earthquake shaking in an enclosed body of water is called a seiche. There are no significant enclosed bodies of water near the site.

4.10.2 Regulatory Framework

4.10.2.1 State

Alquist-Priolo Earthquake Fault Zoning Act of 1972, and Amendments

The Alquist-Priolo Earthquake Fault Zoning Act was implemented by the State of California to mitigate the potential for surface faulting to cause distress to buildings used for human occupancy.

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act is a companion to the Alquist-Priolo Earthquake Fault Zoning Act that addresses public safety in California as it relates to seismic hazards, including strong ground shaking, liquefaction, landslides, and other hazards. The Seismic Hazards Mapping Act requires mitigation of earthquake hazards to an acceptable level of risk.⁶ The first Official Seismic Hazard Zone Maps showing areas of potential liquefaction and landslides were issued in 1997.

California Building Code

The 2013 edition of the California Building Code (CBC) is based on the 2012 edition of the International Building Code, with revisions specifically tailored to geologic hazards in California.

⁶ “Acceptable level” of risk means that level that provides reasonable protection of the public safety, though it does not necessarily ensure continued structural integrity and functionality of a project [CCR Title 14, Section 3721(a)].

Chapter 16, Structural Design, of the CBC requires structural designs to be based on geologic information for seismic parameters, soil characteristics, and site geology. Chapter 18, Soils and Foundations, of the CBC defines the criteria for preparation of a geotechnical report. It also sets requirements for excavations and fills, foundations, and retaining structures with regard to expansive soils, subgrade bearing capacity, and seismic parameters, and also addresses waterproofing and damp-proofing foundations. Liquefaction potential at the site should be evaluated, if warranted.

4.10.2.2 Local

City of San Diego Municipal Code

In conjunction with the CBC, the City's Municipal Code requires the preparation of a geotechnical investigation report in accordance with the criteria in Section 145.1803 (City of San Diego 2016c). The City also requires the preparation of a preliminary geotechnical report in order to obtain development or construction permits. The City uses the San Diego Seismic Safety Study (2008b), which includes hazard maps and requirements for the level of geotechnical investigation, to evaluate the relative hazard of the site. The geotechnical report must address the hazards identified in the Seismic Safety Study and satisfy State of California requirements, including the Alquist-Priolo Earthquake Fault Zone Act of 1972. Geotechnical reports submitted in support of building and grading permits must present geotechnical recommendations specific to the Project and reference the Project drawings.

University Community Plan

The following policies contained in the Safety Element of the UCP are applicable to the Project:

- Protect the public health and safety by guiding future development so that land use is compatible with identified geologic risks, including seismic and landslide hazards; and
- Ensure that proposed development does not create or increase geologic hazards either on- or off-site.

4.10.3 Significance Determination Thresholds

Based on the City Significance Determination Thresholds (2011), which have been modified to reflect a programmatic analysis for the Project, impacts related to geology and soils would be significant if the Project would:

1. Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;
2. Result in a substantial increase in wind or water erosion of soils, either on or off site; or
3. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

4.10.4 Impact Analysis

Issue 1: Would the Project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

4.10.4.1 Impact Analysis

Removal of Genesee Avenue Widening

The UCP Area is located within a seismically active region with multiple major fault lines in the vicinity. This includes the Rose Canyon Fault, which is located approximately 1 mile west of the Project, and a fault immediately west of Genesee Avenue at the intersection with Nobel Drive (City of San Diego 2008a, 2014b). The entire area is subject to moderate to severe seismic ground shaking. In the southern reaches of the Genesee Avenue Corridor, the land is described as low or sloping terrain, unfavorable geologic structure, low to moderate risk. In the northern portion of the roadway corridor, the geologic features are described as steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk. The Genesee Avenue Corridor has small areas of landslide hazard zones, and the area along Genesee Avenue just east of the Rose Canyon crossing is confirmed, known, or highly suspected to have a landslide.

While these geologic hazards exist, the proposed removal of the planned Genesee Avenue Widening would not expose people or structures to those geologic hazards beyond existing conditions. The Project site is currently developed and not constructing the planned Genesee Avenue Widening and its associated features would not lead to additional exposure to hazards.

Removal of Regents Road Bridge

The UCP Area is located within a seismically active region with multiple major fault lines in the vicinity. This includes the Rose Canyon Fault, which is located approximately 1 mile west of the Project, and a fault east of Regents Road near Millikin Avenue. The entire area is subject to

moderate to severe seismic ground shaking. In the southern reaches of the Regents Road Corridor, the land is described as low or sloping terrain, unfavorable geologic structure, low to moderate risk. In the northern portion of the roadway corridor, the geologic features are described as steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk. The Regents Road Corridor has small areas of landslide hazard zones. Two small areas also mapped as Confirmed, known, or highly suspected landslide are located along the eastern edge of Regents Road, just south of Lahitte Court.

Not constructing the planned Regents Road Bridge and its associated Project components would not expose people or structures to additional geologic hazards beyond those they are already exposed to.

4.10.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening would not expose people or structures to additional geologic hazards beyond existing conditions; therefore, no significant impact would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge construction would not expose people or structures to additional geologic hazards beyond existing conditions; therefore, no significant impact would occur.

4.10.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.10.5 Impact Analysis

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

4.10.5.1 Impact Analysis

Removal of Genesee Avenue Widening

Soils in the Project area are generally well drained with very high runoff. Because there would be no construction, demolition, or grading activities associated with the removal of the Genesee Avenue Widening, there would be no potential for increases in soil erosions. Operations of the Project site would continue as they do under existing conditions; therefore, no increase would occur in the potential for soil erosion over existing conditions.

Removal of Regents Road Bridge

Soils in the Project area are generally well drained with very high runoff. Because there would be no construction, demolition, or grading activities associated with the removal of the planned Regents Road Bridge construction, there would be no potential for increases in soil erosions. Operations of the Project site would continue as they do under existing conditions; therefore, no increase would occur in the potential for soil erosion over existing conditions.

4.10.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The Project would not lead to a substantial increase in wind or water erosion of soils, either on-site or off-site, above existing conditions. Therefore, there would be no significant impact.

Removal of Regents Road Bridge

The Project would not lead to a substantial increase wind or water erosion of soils, either on-site or off-site, above existing conditions. Therefore, there would be no significant impact.

4.10.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.10.6 Impact Analysis

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

4.10.6.1 Impact Analysis

Removal of Genesee Avenue Widening

The majority of the Genesee Avenue Corridor is underlain by the Scripps Formation, while there is a band of young alluvial floodplain deposits south of SR 52. Very old paralic deposits surround a large area of the corridor. The geologic units in the UCP Area are susceptible to landslides (City of San Diego 2008a). Soils at the Project site include various types of clays and loams on varying degrees of slopes. Generally, steeper slopes are more unstable and more susceptible to landslides. Loams, which make up the majority of the Project site, are generally more stable for building.

The removal of the planned Genesee Avenue Widening from the UCP would not lead to the construction of any new facilities, and the Project site would continue to operate as it does under existing conditions.

Removal of Regents Road Bridge

The majority of the Regents Road Corridor is underlain by the Scripps Formation, while there are bands of young alluvial floodplain deposits and Ardath Shale near SR 52. Very old paralic deposits surround a large area of the corridor. It is common for areas of San Diego County underlain by Ardath Shale to experience landslides, and the other geologic units found in the UCP Area are susceptible to landslides (City of San Diego 2008a). Soils at the Project site include various types of clays and loams on varying degrees of slopes. Generally, steeper slopes are more unstable and more susceptible to landslides.

The removal of the planned Regents Road Bridge from the UCP construction would not lead to the construction of any new facilities, and the Project site would continue to operate as it does under existing conditions.

4.10.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening would not lead to any new construction, and would not cause a geologic unit or soil to become unstable. Geologic risk would not be greater than it is under existing conditions. Therefore, no significant impact would occur.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction would not lead to any new construction, and would not cause a geologic unit or soil to become unstable. Geologic risk would not be greater than it is under existing conditions. Therefore, no significant impact would occur.

4.10.6.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.11 PALEONTOLOGICAL RESOURCES

This section discusses potential impacts to paleontological resources resulting from implementation of the Project. No paleontological survey was conducted for the Project due to complete development of the Project site and lack of any native ground or soil exposures to examine. This section is based on a geotechnical investigation prepared by Geocon, Inc. detailed in the 2006 EIR. The geotechnical investigation discussed the paleontological sensitivity within the Project site. Additionally, the analysis is also based on a review of available literature, including the City's General Plan, Kennedy maps, the City's Paleontological Guidelines (2002), and the publication of *Paleontological Resources, County of San Diego* by Deméré and Walsh (1993).

4.11.1 Existing Conditions

Paleontological resources are nonrenewable resources that contribute to our knowledge of extinct and extant organisms and their past environments. Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts that are generally older than 10,000 years, which marks the end of the last late Pleistocene glacial event and the beginning of the current period of warmer climatic conditions. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (rock formations) in which they were originally buried.

Within San Diego County, there are a number of distinct geologic rock units (i.e., formations) that record portions of the past 450 million years of the earth's history. However, the record is most complete for only the past 75 million years. In San Diego County, many sedimentary rock units containing paleontological resources are within the Coastal Plain Province, which contains marine and nonmarine sedimentary rock units deposited over the last 75 million years. Many of the level surfaces in the coastal areas, including most of the mesa tops and coastal benches, are elevated terraces from earlier marine sedimentary deposits.

Local marine terrace deposits of the Lindavista Formation have produced large and diverse assemblages of marine invertebrate fossils along the coast and inland to elevations of about 300 feet. Fossils known from the Coastal Plain Province are widespread and locally abundant and consist of remarkably diverse assemblages of marine invertebrates (e.g., clams, oysters, snails, cowries, crabs, and sea urchins) and marine vertebrates (e.g., sharks, rays, and bony fish). The existing ground surface elevation at the Project site ranges from approximately 17 to 35 feet AMSL and is approximately 300 feet below the mesa tops on the south and north rims of the valley.

Several areas within the City of San Diego contain accessible paleontological resources. Although no specific areas within the UCP Area are known to have produced significant paleontological resources, the community contains several geological rock units that have a recognized resource potential. In the UCP Area, the most abundant geologic formations containing fossils include the Scripps Formation and Ardath Shale. The Scripps Formation includes marine sediments and has a “medium” resource potential. The Ardath Shale contains some important marine invertebrate fossils and the resource potential is considered “medium to high.” The Bay Point Formation and Stadium Conglomerate occur near the future surface in a few isolated locations in the planning area, and these geologic units have a “low to medium” resource potential. The Scripps Formation and Ardath Shale are relatively common near the surface of the major slopes in the UCP Area. These formations occur along the coastline, on the slopes bordering San Clemente and Rose Canyons, and on adjacent finger canyons. Most of the Villa La Jolla area and slopes bordering I-5 also have these geologic formations near the ground surface.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered. Genesee Avenue Corridor

4.11.1.1 Genesee Avenue Corridor

The Genesee Avenue Corridor is underlain by Terrace Deposits, Lindavista Formation, Stadium Conglomerate, and Scripps Foundation. Paleontological resource sensitivities, the potential for these formations, and their potential for occurrence at the site in its existing conditions are outlined below (City of San Diego 2006):

- **Terrace Deposits.** Quaternary Terrace Deposits can be found in a thin discontinuous veneer along the sides of San Clemente and Rose Canyons in the Genesee Avenue Corridor. Important vertebrate fossils have been encountered in Terrace Deposits, including pond turtle, passenger pigeon, hawk, mole, gopher, squirrel, rabbit, and horse, as well as a diverse assemblage of “Ice Age” mammals, including ground sloth, shrew, mice, wolf, camel, deer, mastodon, and mammoth. Terrace Deposits are assigned a low resource sensitivity in this area.
- **Lindavista Formation.** The Pleistocene age sedimentary deposits of the Lindavista Formation are located throughout the Genesee Avenue Corridor. Fossil localities are rare in the Lindavista Formation and have only been recorded in a few areas of

San Diego, such as Tierrasanta and Mira Mesa. However, fossils that have been recovered include clams, scallops, snails, barnacles, and sand dollars, as well as sparse remains of sharks and baleen whales. The Lindavista Formation is assigned a moderate paleontological resource sensitivity.

- **Stadium Conglomerate.** A pocket of Stadium Conglomerate is located on the east side of Genesee Avenue, north of the railroad tracks within the Genesee Avenue Corridor. The Cypress Canyon member of Stadium Conglomerate has yielded abundant and diverse assemblages of fossil land mammals, including opossums, insectivores, bats, primates, rodents, carnivores, tapirs, brontotheres, protoreodonts, and other artiodactyls. Stadium Conglomerate is assigned a high paleontological resource sensitivity.
- **Scripps Formation.** The Eocene-age Scripps Formation deposits are found throughout the length of the Genesee Avenue Corridor. The formation is entirely of marine origin and is considered to be potentially fossil-bearing nearly everywhere it occurs. Fossils encountered in this formation include clams, snails, crabs, sharks, rays, and bony fishes. Remains of fossil reptiles, such as crocodile and turtle; land mammals, such as uinathere, brontothere, rhinoceros, and artiodactyls; and pieces of fossil wood have also been recovered from this formation. The Scripps Formation is assigned a high paleontological sensitivity.

4.11.1.2 Regents Road Corridor

The Regents Road Corridor is also underlain by Terrace Deposits, Lindavista Formation, and Scripps Formation (see the preceding descriptions of these geologic formations). The Regents Road Corridor is also underlain by Ardath Shale, which is not present in the Genesee Avenue Corridor (City of San Diego 2006):

- **Terrace Deposits.** The Terrace Deposits are found along the northern edge of Rose Canyon. This geologic unit is assigned a low resource sensitivity in this area.
- **Lindavista Formation.** These deposits are found throughout the Regents Road Corridor. The Lindavista Formation has a moderate paleontological resource sensitivity.
- **Scripps Formation.** These deposits are also found throughout the Regents Road Corridor. The Scripps Formation has a high resource sensitivity.
- **Ardath Shale.** The Eocene-age Ardath Shale is found on the southern edge of Rose Canyon between alluvium/slopewash soil and the Scripps Formation. Ardath Shale has produced diverse and well-preserved assemblages of marine

microfossils; macroinvertebrates; and vertebrates, such as sharks, rays, and bony fish. Ardath Shale is assigned a high paleontological resource sensitivity.

4.11.2 Regulatory Framework

4.11.2.1 State

California Environmental Quality Act

The City of San Diego is the CEQA lead agency for the Project. CEQA Guidelines require a determination as to whether a Project would directly or indirectly destroy a unique paleontological resource or site. If a project would destroy a unique paleontological resource or site, a paleontological assessment and mitigation and monitoring plan should be designed and implemented.

Public Resources Code

State requirements for paleontological resources assessment and management are codified in California PRC Chapter 1.7 Sections 5097.5 and 30244. Section 5097.5 defines any unauthorized disturbance or removal of a fossil site or fossil remains on public lands, including land under the jurisdiction of any city or city agency, as a misdemeanor and specifies that state agencies may undertake surveys, excavations, or other operations as necessary on state lands to preserve or record paleontological resources. Section 30244 requires reasonable mitigation of adverse impacts on paleontological resources that occur as a result of development on public lands.

4.11.2.2 Local

City of San Diego

Neither the City of San Diego General Plan nor the City's Municipal Code mentions paleontological resources. However, the City of San Diego Paleontological Guidelines (2002) provides steps to identify and mitigate significant impacts to paleontological resources, including implementation of MMRPs for both public and private projects. The UCP Resource Management Element includes a policy to "provide for the identification and recovery of significant paleontological resources." It also recommends that "impacts to paleontological resources should be identified and mitigated, if necessary, through the environmental review process" (City of San Diego 2014b).

4.11.3 Significance Determination Thresholds

The City of San Diego's CEQA Significance Thresholds provides guidance to determine potential significance to paleontological resources. Based on the City's Thresholds, a significant impact related to paleontological resources would occur if the Project would:

Result in development that requires:

- over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
- over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Thresholds also includes a Paleontological Determination Matrix to support the City's significance thresholds (City of San Diego 2011a). Additionally, the significance thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

4.11.4 Impact Analysis

Issue 1: Would the Project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?)

4.11.4.1 Impact Analysis

~~Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, activities that excavate or grade geologic formations which could contain fossil resources would be significant. The Project impact area is underlain by geological formations which are considered to have a high and/or moderate potential for containing fossil resources.~~

~~Excavation and/or grading activities implemented in accordance with the Project that involve excavation into the underlying geologic formation could expose the formations and associated fossil remains. These projects, both ministerial and discretionary could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, discretionary projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a potentially significant impact. Thus, impacts resulting from discretionary development would be potentially significant.~~

~~Ministerial Projects implemented in accordance with the Project would likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to ministerial activities associated with the Project would be potentially significant.~~

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor is underlain by Terrace Deposits, Lindavista Formation, Stadium Conglomerate, and Scripps Formation. Of these geologic formations, Lindavista Formation has moderate resource sensitivity while Stadium Conglomerate and Scripps Formation have high resource sensitivity. These types of formations are thought to have a strong potential, or are known for producing important fossil remains, respectively. However, the Project would not require over 2,000 cy of excavation in the Lindavista Formation, nor would it require over 1,000 cy of excavation in the Stadium Conglomerate or Scripps Formation. The removal of the planned Genesee Avenue Widening from the UCP would not require any construction, demolition, or grading activities within a moderate or high sensitivity formation. The Genesee Avenue Corridor would continue to remain in its currently developed state.

Removal of Regents Road Bridge

The Regents Road Corridor is underlain by Terrace Deposits, Lindavista Formation, Scripps Formation, and Ardath Shale. Of these geologic formations, the Lindavista Formation has moderate resource sensitivity while the Scripps Formation and Ardath Shale have high resource sensitivity. These types of formations are thought to have a strong potential, or are known for producing important fossil remains, respectively. However, the Project would not require over 2,000 cy of excavation in the Lindavista Formation, nor would it require over 1,000 cy of excavation in the Scripps Formation or Ardath Shale. The removal of the planned Regents Road Bridge construction would not require any construction, demolition, or grading activities

within a moderate or high sensitivity formation. The Regents Road Corridor would continue to remain in its currently developed state.

4.11.4.2 Significance of Impacts

Implementation of the Project associated with the removal of planned Genesee Avenue Widening and removal of the Regents Road Bridge would not require excavation into a high or moderate sensitivity formation which could potentially destroy fossil resources. Therefore, there would be no significant impact.

4.11.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.12 HYDROLOGY AND WATER QUALITY

This section describes the existing hydrologic and water quality conditions within the UCP Area, identifies current applicable regulations, and evaluates potential hydrology and water quality impacts associated with implementation of the Project. Avoidance and minimization measures are included as necessary.

4.12.1 Existing Conditions

Climate

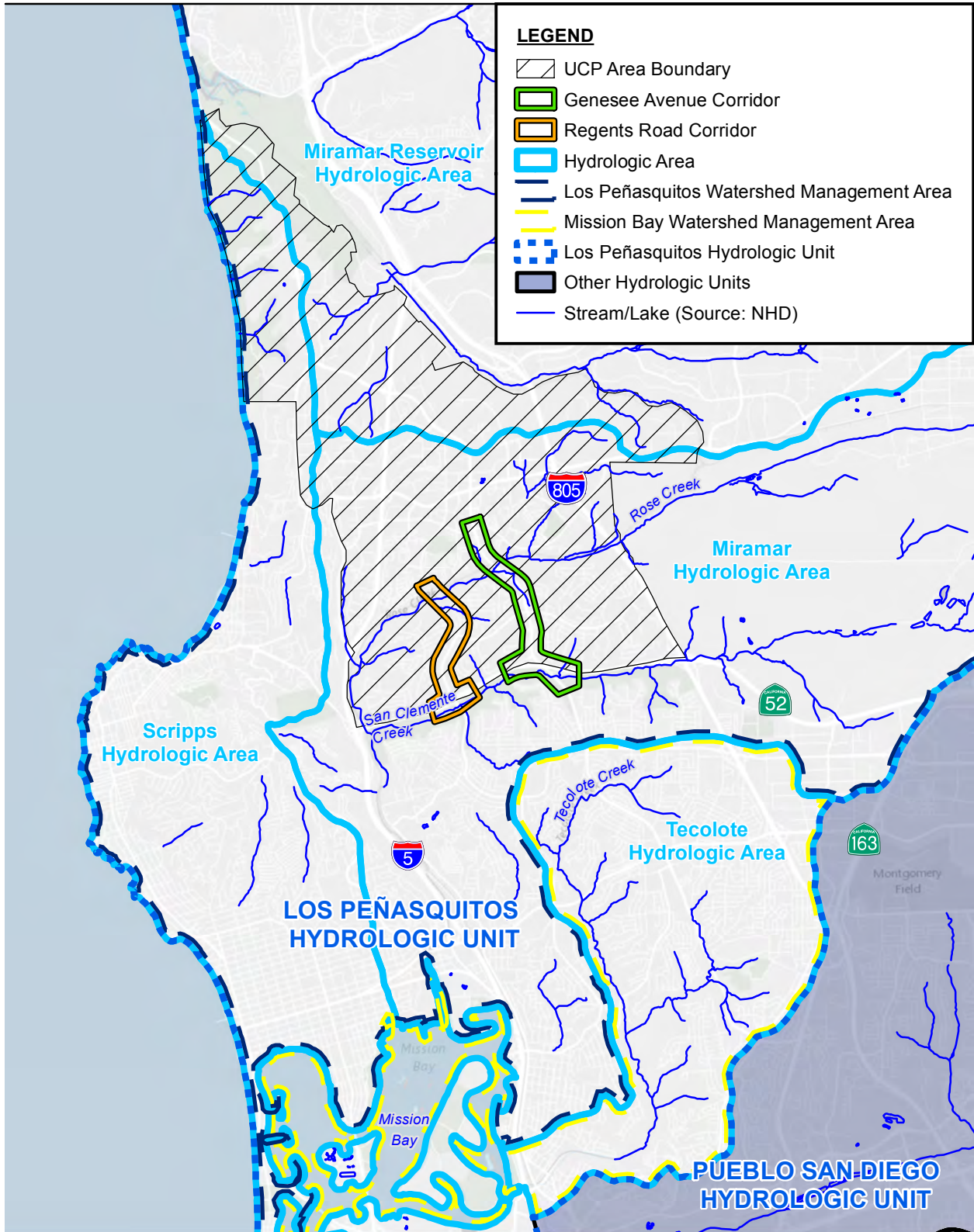
San Diego is characterized by a semiarid Mediterranean climate with rainfall averaging approximately 10 inches annually, mostly occurring between December and March. Winter storms can unexpectedly create flash-flood conditions in the canyons and floodplains adjacent to the Project site. Flooding in the Project area can occur during winter storm events, and occasionally during the summer when monsoonal moisture migrates northward from equatorial tropical storms. Temperatures range from an average summer temperature of 75 degrees °F to an average winter temperature of 65°F.

Hydrology

The Project area is located within the Miramar Hydrologic Area (HA) (906.40), Miramar Reservoir HA (906.10), and Scripps HA (906.30) of the Los Peñasquitos Hydrologic Unit (HU) (Figure 4.12-1). The Los Peñasquitos HU drains a highly urbanized area located in San Diego County. The Miramar HA drains to Mission Bay, a saltwater bay that is hydraulically connected to the Pacific Ocean. The Miramar Reservoir HA drains toward Los Peñasquitos Creek, which discharges to the Los Peñasquitos Lagoon, and ultimately the Pacific Ocean. The portion of the Scripps HA within the University Community drains toward the Pacific Ocean. The Miramar HA and Scripps HA are part of the Mission Bay Watershed Management Area, while the Miramar Reservoir HA is part of the Los Peñasquitos Watershed Management Area.

Local Surface Drainage Features

Rose Creek passes through the north end of the Project area, and San Clemente Creek passes through the southern end of the Project area. Rose Creek generally flows east to west, until it reaches I-5, where it turns southward and runs parallel along the east side of I-5. Rose Creek then converges with San Clemente Creek and discharges into Mission Bay, and ultimately the Pacific Ocean.



Source: Esri; USGS National Hydrography Dataset (NHD); CalWater/California Department of Water Resources.

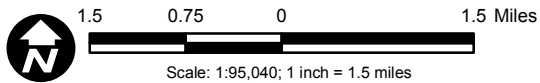


Figure 4.12-1
Watershed Areas

Governor Drive, which intersects the Project area, is a local topographic high point between Rose Canyon and San Clemente Canyon. In general, the Project area north of Governor Drive drains to Rose Creek and the Project area south of Governor Drive drains to San Clemente Creek.

Groundwater Resources

Groundwater beneath the study area within Rose Canyon and San Clemente Canyon is most likely relatively shallow (less than 20 feet below ground). In non-perched areas outside of the canyons, groundwater is likely relatively deep (100 feet or more below ground). Groundwater flows in a generally westward direction, but may also have a component of flow toward Rose Canyon. Groundwater depth and flow direction beneath the study area may vary due to proximity to creeks and streams, local irrigation practices, seasonal rainfall, and fracture systems in the underlying bedrock units.

Floodplains

Portions of the Project area are located within the FEMA 100-year and 500-year floodplains of Rose Creek and San Clemente Creek (Figure 4.12-2).

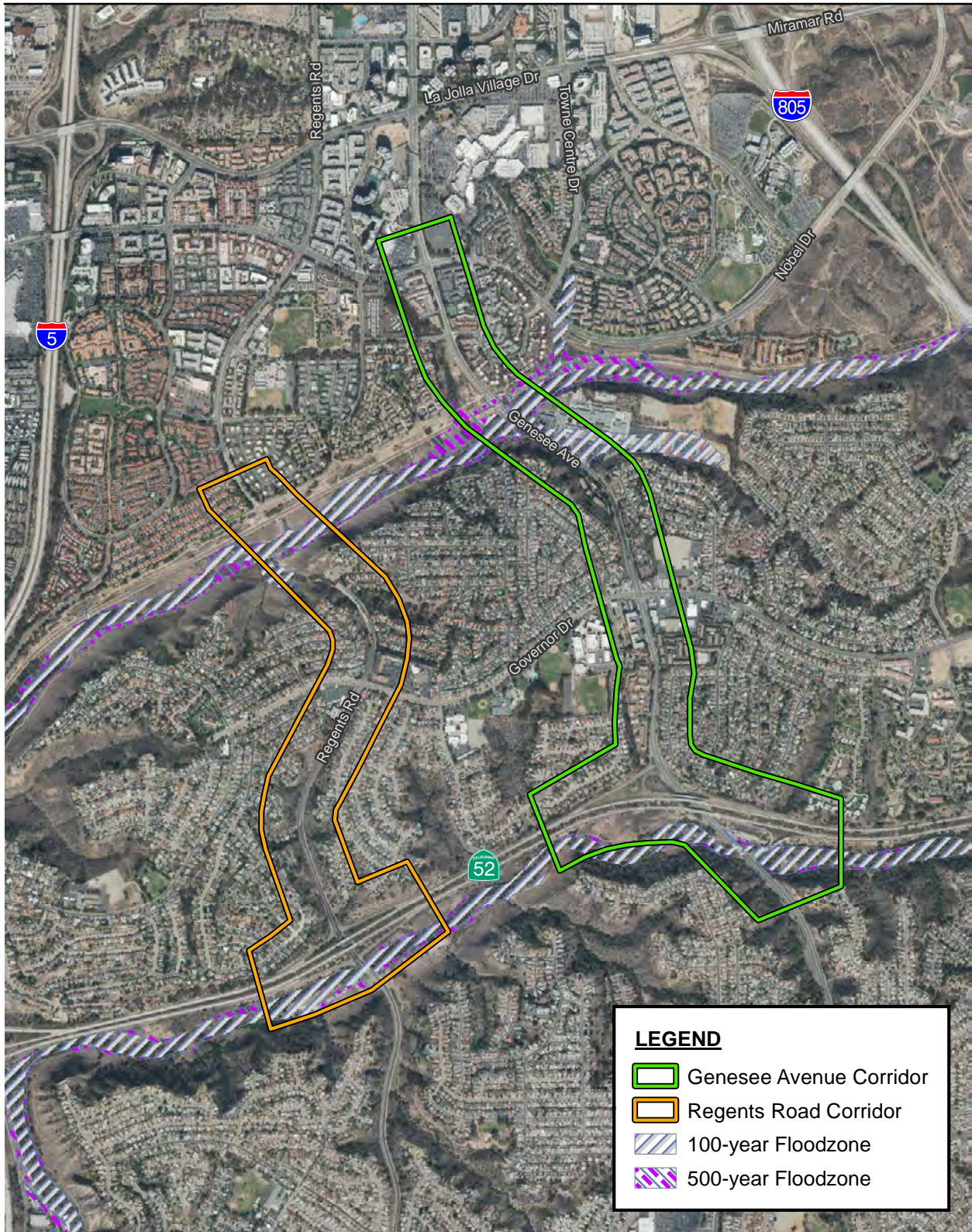
Water Quality

Pollutants in storm water runoff are a primary cause of water quality degradation in urbanized areas due to inadequate runoff treatment and control prior to discharging to a natural drainage or watercourse (e.g., Creek). Rapid growth and urbanization in the San Diego region have placed increased pressure on improving the quality of storm water runoff and protecting local surface water resources. Urbanization has the potential to introduce more anthropogenic pollutants within a watershed area, while also contributing to higher runoff volume (and subsequent receiving water impacts) from the increase in hardscape (impervious surfaces) that would impede water from otherwise infiltrating into the soil and being filtered naturally.

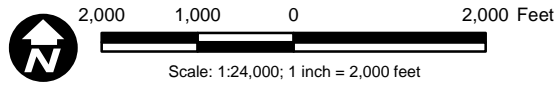
The Project area is surrounded by major roadways, interstates, and existing development. Typical pollutants that can be expected from these land uses (human or wildlife) include sediment, nutrients, metals, organic compounds, trash and debris, oxygen-demanding substances, oil and grease, fertilizers, and bacteria.

Beneficial Uses and Water Quality Objectives

Beneficial uses are the uses of water necessary for the survival or well-being of humans, plants, and wildlife.



Source: SanGIS 2015; SANDAG 2014; FEMA.



**Figure 4.12-2
Floodzone**

Beneficial uses identified in the Water Quality Control Plan for the San Diego Basin (Basin Plan) (RWQCB 2011) for Rose Creek are:

- REC-1: Contact Water Recreation
- REC-2: Non-Contact Water Recreation
- WARM: Warm Freshwater Habitat
- WILD: Wildlife Habitat

Beneficial uses identified in the Basin Plan (RWQCB 2011) for San Clemente Creek are:

- REC-1: Contact Water Recreation
- REC-2: Non-Contact Water Recreation
- WARM: Warm Freshwater Habitat
- COLD: Cold Freshwater Habitat
- WILD: Wildlife Habitat
- RARE: Rare, Threatened, or Endangered Species
- SPWN: Spawning, Reproduction, and/or Early Development

Beneficial uses identified in the Basin Plan (RWQCB 2011) for Mission Bay are:

- IND: Industrial Service Supply
- REC-1: Contact Water Recreation
- REC-2: Non-Contact Water Recreation
- COMM: Commercial and Sport Fishing
- EST: Estuarine Habitat
- WILD: Wildlife Habitat
- RARE: Rare, Threatened, or Endangered Species
- MAR: Marine Habitat
- MIGR: Migration of Aquatic Organisms
- SPWN: Spawning, Reproduction, and/or Early Development
- SHELL: Shellfish Harvesting

Beneficial uses identified in the Basin Plan (RWQCB 2011) for the Pacific Ocean shoreline are:

- IND: Industrial Service Supply
- NAV: Navigation
- REC-1: Contact Water Recreation

- REC-2: Non-Contact Water Recreation
- COMM: Commercial and Sport Fishing
- BIOL: Preservation of Biological Habitats of Special Significance
- WILD: Wildlife Habitat
- RARE: Rare, Threatened, or Endangered Species
- MAR: Marine Habitat
- AQUA: Aquaculture
- MIGR: Migration of Aquatic Organisms
- SPWN: Spawning, Reproduction, and/or Early Development
- SHELL: Shellfish Harvesting

Under Section 303(d) of the 1972 CWA, states, territories, and authorized tribes are required to develop a list of water quality limited segments. Waters on the list do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires that states establish priority rankings for water bodies on the list and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. Rose Creek is listed as impaired on the CWA Section 303(d) list (SWRCB 2015) for selenium and toxicity. Mission Bay at the mouth of Rose Creek is listed as impaired on the CWA Section 303(d) list (SWRCB 2015) for eutrophic conditions and lead. The Los Peñasquitos Lagoon Sediment TMDL is the first "third party stakeholder driven" TMDL adopted in the San Diego Region. The San Diego Regional Water Quality Control Board adopted Resolution No. R9-2012-0033, an amendment incorporating the Los Peñasquitos Lagoon Sediment TMDL into the San Diego Basin Plan, on June 13, 2012. This TMDL Basin Plan Amendment was approved by the State Water Resources Control Board on January 21, 2014, and by the Office of Administrative Law (OAL) on July 14, 2014. The United States Environmental Protection Agency (USEPA) approved the TMDL Basin Plan Amendment on October 30, 2014.

There are no beneficial uses identified for groundwater within the Miramar HA and Scripps HA. The Miramar Reservoir HA does have existing beneficial uses (RWQCB 2011).

Narrative and numeric water quality objectives (WQOs) for all surface waters and groundwater within the San Diego region are established for a variety of constituents (RWQCB 2011). WQOs for surface waters within the Miramar HA are established for total dissolved solids (TDS), chlorides, sulfate, percent sodium, nitrogen, phosphorus, iron, manganese, methylene blue activated substances (MBAS), boron, turbidity, color, and fluoride. See Table 3-2 in the Basin Plan (RWQCB 2011) for specific WQO thresholds for surface waters within the Miramar HA. WQOs for groundwater within the Miramar HA (east of I-15) and Miramar Reservoir HA are

established for TDS, chlorides, sulfate, percent sodium, nitrate, iron, manganese, MBAS, boron, turbidity, color, and fluoride. Scripps HA has no established WQOs for groundwater. See Table 3-3 in the Basin Plan (RWQCB 2011) for specific WQO thresholds for groundwater within the Miramar HA, Miramar Reservoir HA, and Scripps HA.

Two adjacent Areas of Special Biological Significance (ASBS), now called the Scripps ASBS and the La Jolla ASBS, were created along the La Jolla area coast in 1974. The California Ocean Plan was amended in 1983 to prohibit waste discharge into an ASBS.

4.12.2 Regulatory Framework

Various governing laws and regulations serve to protect surface water quality and hydrology by establishing water quality compliance standards or waste discharge requirements (WDRs). These mandates require implementation of a number of design, construction, and operational controls that include structural and nonstructural BMP requirements for proper management and water quality treatment/protection. Applicable regulations and the associated agencies with regulatory authority and oversight are described below.

4.12.2.1 Federal

Federal Clean Water Act of 1972

The federal CWA of 1972 regulates surface water quality control and protection of beneficial uses of water. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of the nation's waters through prevention and elimination of pollution. The CWA applies to discharges of pollutants into waters of the U.S. The CWA establishes a framework for regulating storm water discharges from municipal, industrial, and construction activities under National Pollutant Discharge Elimination System (NPDES) regulations. In California, the State Water Resources Control Board (SWRCB) administers the NPDES program. The following CWA sections are most relevant to the regulation of surface water in the Project area:

CWA Section 208

Section 208 of the CWA requires all states to assess damages to water quality from nonpoint source pollution and to develop either regulatory or nonregulatory programs to control the pollution. The state's Section 208 program must meet USEPA approval.

CWA Section 303(d)

CWA Section 303 requires states to adopt water quality standards for all surface waters of the U.S. As defined by the CWA, water quality standards consist of four elements:

- Designated beneficial uses of water bodies,
- Water quality criteria to protect designated uses,
- An anti-degradation policy to maintain and protect existing uses and high quality waters, and
- General policies addressing implementation issues.

Under CWA Section 303(d), states, territories, and authorized tribes are required to develop a list of water bodies that are considered to be “impaired” from a water quality standpoint. Water bodies included on this list either do not meet or are not expected to meet water quality standards, even after the minimum required levels of pollution control technology have been implemented to reduce point-source discharges. The law requires that respective jurisdictions establish priority rankings for surface water bodies on the list and develop action plans to improve water quality and manage TMDLs of pollutants to surface waters. A TMDL is a calculation of the maximum amount of a specific pollutant that a water body can receive and still meet federal water quality standards as provided in the CWA (USEPA 2012). TMDLs account for all sources of pollution, including point sources, nonpoint sources, and natural background sources.

The CWA Section 303(d) list of impaired water bodies provides a prioritization and schedule for development of TMDLs for states. The SWRCB, in compliance with CWA Section 303(d), publishes the list of water quality-limited segments in California, which includes a priority schedule for development of TMDLs for each contaminant or “stressor” affecting the water body (SWRCB 2015).

CWA Section 401

Every applicant for a federal permit or license for any activity that may result in a discharge to a water body must obtain a CWA Section 401 Water Quality Certification for the proposed activity and must comply with state water quality standards prescribed in the certification. In California, these certifications are issued by the SWRCB under the auspices of nine RWQCBs. Most certifications are issued in connection with CWA Section 404 USACE permits for dredge and fill discharges.

CWA Section 402

CWA Section 402 sets forth regulations that prohibit the discharge of pollutants into waters of the U.S. from any point source without first obtaining an NPDES Permit. The SWRCB and nine RWQCBs administer the NPDES Permit program. The SWRCB implements the NPDES and the state's water quality programs by regulating point-source discharges of wastewater and agricultural runoff to land and surface waters to protect their beneficial uses. To comply with the CWA water quality regulations, nine RWQCBs in California develop and enforce water quality objectives and implementation plans, issue waste discharge permits, take enforcement action, and monitor water quality within their hydrologic areas.

Permitting the construction or modification of outfall structures, where the discharged effluent is authorized or otherwise complies with an NPDES Permit, also is governed under Section 404 as described below.

Although the NPDES Permit program initially focused on point source discharges of municipal and industrial wastewater that were assigned individual permits for specific outfalls, results of the Nationwide Urban Runoff Program identified contaminated storm water as one of the primary causes of water quality impairment. To regulate storm water discharges, the SWRCB and San Diego RWQCB have issued permits for controlling industrial, construction, and municipal storm water discharges.

CWA Section 404

CWA Section 404 establishes a permit program, administered by USACE, regulating discharge of dredged or fill materials into waters of the U.S., including wetlands. Activities in waters of the U.S. that are regulated under this program include fills for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports), and conversion of wetlands to uplands for farming and forestry. CWA Section 404 permits are issued by USACE.

Under CWA Section 404(e), USACE can issue general permits to authorize activities that have minimal individual and cumulative adverse environmental effects. USACE can issue nationwide permits, which is a general permit that authorizes activities across the country, unless revoked by a district or division commander. Nationwide permits authorize a wide variety of activities such as linear transportation projects, residential development, commercial and industrial developments, utility lines, road crossings, bank stabilization activities, wetland and stream restoration activities, and certain maintenance activities.

Federal Antidegradation Policy

The federal antidegradation policy, now a part of the CWA, has been in existence since 1968. The policy protects existing uses, water quality, and national water resources. It directs states to adopt a statewide policy that includes the following primary provisions:

- Existing instream uses and the water quality necessary to protect those uses shall be maintained and protected.
- Where existing water quality is better than necessary to support fishing and swimming conditions, that quality shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development.
- Where high-quality waters constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and waters of exceptional recreational or ecological significance, water quality shall be maintained and protected.

National Flood Insurance Act of 1968

New construction and redevelopment in potentially hazardous floodplain areas is principally regulated under local zoning codes that consider FEMA floodplain mapping. The FIRM is the official map created and distributed by FEMA and the National Flood Insurance Program (NFIP) that delineates the Special Flood Hazard Areas (SFHAs) (areas subject to inundation by the base flood) for every county and community that participates in the NFIP. FIRMs contain flood risk information based on historic, meteorological, hydrologic, and hydraulic data, as well as open-space conditions, flood control works, and development.

The National Flood Insurance Act of 1968 established the NFIP. The NFIP is a federal program administered by the Flood Insurance Administration of FEMA. It enables individuals who have property within the 100-year floodplain to purchase insurance against flood losses. Community participation and eligibility, flood hazard identification, mapping, and floodplain management aspects are administered by state and local programs and support directorate within FEMA. FEMA works with the states and local communities to identify flood hazard areas and publishes a flood hazard boundary map of those areas.

Projects that affect the hydrologic or hydraulic characteristics of a flooding source and modify an existing regulatory floodway, effective Base Flood Elevations (BFEs), or a SFHA, may trigger the FEMA conditional letter of map revision (CLOMR)/letter of map revision (LOMR) process.

4.12.2.2 State

Porter-Cologne Water Quality Control Act of 1969

Division 7 of the California Water Code governs water quality. This law, titled the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and enacted in 1969, establishes a regulatory program to protect water quality and beneficial uses of state waters.

The Porter-Cologne Act is California's comprehensive water quality control law and is a complete regulatory program, designed to protect water quality and beneficial uses of the state's waters. It requires the nine RWQCBs to adopt water quality control plans (basin plans) for watersheds areas within their regions. These basin plans are reviewed triennially and amended as necessary by the RWQCBs, subject to the approval of the California Office of Administrative Law, the SWRCB, and ultimately USEPA. Moreover, pursuant to the Porter-Cologne Act, these basin plans become part of the California Water Plan when such plans have been reported to the legislature (California Water Code, Section 13141). The Porter-Cologne Act also regulates discharges into a state water body that are not under federal jurisdiction.

In some cases, an RWQCB may issue WDRs under the Porter-Cologne Act that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. WDRs can be issued to address both permanent and temporary discharges of a project.

State Antidegradation Policy (Resolution 68-16)

The state's Antidegradation Policy restricts degradation of surface and ground waters. This policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. The state policy establishes three conditions that must be met before the quality of high-quality waters may be lowered by waste discharges. The state must determine that lowering the quality of high-quality waters:

- Will be consistent with the maximum benefit to the people of the state,
- Will not unreasonably affect present and anticipated beneficial uses of such water, and
- Will not result in water quality less than that prescribed in state policies (e.g., water quality objectives in Water Quality Control Plans).

Any activities that result in discharges to high-quality waters are required to:

- Meet WDRs that will result in the best practicable treatment or control of the discharge necessary to avoid pollution or nuisance, and
- Maintain the highest water quality consistent with the maximum benefit to the people of the state.

The discharge would not be allowed under Resolution 68-16 if the discharge, even after treatment, would unreasonably affect beneficial uses or would not comply with applicable provisions of water quality control plans.

Cobey-Alquist Flood Plain Management Act

The Cobey-Alquist Act of 1967 encourages local governments to plan, adopt, and enforce land use regulations to accomplish floodplain management, in order to protect people and property from flooding hazards. This act also provides state financial assistance for flood control projects.

Although not a regulation, floodplain management in the state is also assisted by the California's Flood Future Report (DWR 2013), which includes information from more than 140 local, state, and federal agencies throughout California on exposure to flood risk, and identifies and addresses the barriers to improved flood management. The Flood Future Report provides information to assist decision making about policies and financial investments to improve public safety, foster environmental stewardship, and support economic stability.

Construction General Permit

Dischargers whose projects disturb 1 or more acres of soil, or less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the SWRCB's Order 2009-0009-DWQ (as amended by Orders 2010-0014-DWQ and 2012-0006-DWQ), the Construction General Permit (SWRCB 2009). Construction and demolition (C&D) activities subject to this permit include clearing, grading, grubbing, and excavation, or any other activity that results in a land disturbance equal to or greater than 1 acre.

Permit applicants are required to submit a Notice of Intent (NOI) to the SWRCB and to prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must identify BMPs that are to be implemented to reduce construction impacts on receiving water quality based on potential pollutants. The Construction General Permit also includes requirements for risk-level assessment

for construction sites, a storm water effluent monitoring and reporting program, rain event action plans, and numeric action levels for pH and turbidity.

California Fish and Game Code Section 1602

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that supports wildlife resources are subject to regulation by CDFW, pursuant to CFGC Section 1602. Section 1602 makes it unlawful for an entity (i.e., any person, state, local governmental agency, or public utility) to substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake without first notifying CDFW of such activity. The regulatory definition of a stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation. CDFW's jurisdiction within altered or artificial waterways is based on the value of those waterways to fish and wildlife. A Lake or Streambed Alteration Agreement must be obtained from CDFW for any activity that may substantially adversely affect an existing fish or wildlife resource.

Water Quality Control Plan for the San Diego Basin (Basin Plan)

As described above, the Porter-Cologne Act requires that RWQCBs adopt water quality control plans (basin plans) for watersheds areas within their jurisdiction. These plans establish water quality standards for particular surface water bodies and groundwater resources.

The San Diego RWQCB (Region 9) is responsible for the basin plan for the San Diego Basin. The RWQCB implements management plans to modify and adopt standards under provisions set forth in Section 303(c) of the CWA and California Water Code (Division 7, Section 13240). In addition to basin plan requirements, the RWQCB issues water quality certifications under CWA Section 401. The RWQCB also regulates discharges to, and the quality of, groundwater resources through the issuance of WDRs. WDRs are issued for discharges that specify limitations relative to the Basin Plan (RWQCB 2011).

The basin plan for the San Diego Basin (RWQCB 2011) establishes WQOs for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. Specifically, the basin plan:

- Designates beneficial uses for surface and ground waters.

- Sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to California’s anti-degradation policy.
- Describes implementation programs to protect beneficial uses of all waters in the region.
- Describes surveillance and monitoring activities to evaluate the effectiveness of the basin plan.
- Incorporates by reference all applicable State and Regional Board plans and policies.

San Diego Regional Municipal Storm Water Permit

The San Diego Regional Municipal Storm Water Permit (Order R9-2013-0001 [as amended by Order R9-2015-0001 and Order R9-2015-0100]) (Municipal Permit) regulates the conditions under which storm water and non-storm water discharges into and from municipal separate storm water systems (MS4s) are prohibited or limited. The 18 incorporated cities, County of San Diego, SDCRAA, and San Diego Unified Port District each owns or operates an MS4, through which it discharges storm water and non-storm water into waters of the U.S. within the San Diego region. These entities are the County of San Diego Copermittees (Copermittees) which, along with the applicable Orange County and Riverside County Copermittees, are subject to the requirements of the Municipal Permit.

The Municipal Permit establishes prohibitions and limitations with the goal of protecting water quality and designated beneficial uses of waters of the U.S. from adverse impacts caused by or contributed to by MS4 discharges. The Municipal Permit requires that each jurisdiction covered under the permit implement a Jurisdictional Runoff Management Program (JRMP) to control the contribution of pollutants to and the discharges from the MS4. The goal of the JRMPs is to implement water quality improvement strategies and runoff management programs that effectively prohibit non-storm water discharges into the Copermittees’ MS4s and reduce pollutants in discharges from the Copermittees’ MS4s to the maximum extent practicable (MEP).

The Municipal Permit requires that the Copermittees develop a Water Quality Improvement Plan (WQIP) for each of 10 Watershed Management Areas (WMAs) in the San Diego region. These plans identify the highest priority water quality conditions within each watershed area and specific goals, strategies, and schedules to address those priorities, including numeric goals and action levels, and requirements for water quality monitoring and assessment. The Copermittees will implement strategies through their JRMPs to achieve the goals of the WQIPs. The Mission Bay WQIP and Los Peñasquitos WQIP ⊕ apply to the Project area, and are described in further detail below under 4.12.2.3.

The Copermittees have developed a Model BMP Design Manual (County of San Diego 2016) to conform to new development requirements of the Municipal Permit (Order R9-2013-0001). The Model BMP Design Manual provides procedures for planning, selecting, and designing on-site structural BMPs for new development and significant redevelopment projects in accordance with Provision E.3 of Order R9-2013-0001. The Model BMP Design Manual is being implemented, replacing the Standard Urban Storm Water Mitigation Plan (SUSMP) previously in effect.

The Model BMP Design Manual requires all projects to implement source-control BMPs to address specific sources of pollutants and apply site design BMPs to the development project site. If the project is a Priority Development Project (PDP), storm water pollutant control BMPs must be implemented and meet the following performance standards:

- Retain on-site the pollutants contained in the volume of storm water runoff produced from a 24-hour, 85th percentile storm event by infiltration, evaporation, evapotranspiration, or harvest and reuse, and
 - Treat the remaining volume infeasible to retain on-site through biofiltration, and
 - Treat the remaining volume infeasible to treat through biofiltration with flow-through treatment control BMPs and participate in alternative compliance methods to mitigate for the pollutants not being retained on-site.
- Or, the project may be allowed to participate in an alternative compliance program in lieu of fully complying with the on-site performance standards if such a program is available in the jurisdiction of the project. Flow-through treatment control BMPs would also need to be implemented on-site.

Under the Municipal Permit, Copermittees are required to implement storm water management requirements and controls, which include requirements for storm water BMPs during construction and post-construction, including implementing LID BMPs for development and significant redevelopment to reduce pollutants in storm water runoff from sites through more natural processes such as infiltration and biofiltration. The Model BMP Design Manual (County of San Diego 2016) provides guidance for the BMP selection process. Design techniques include minimizing impervious areas, conserving natural areas, and utilizing vegetation and landscaping for water quality treatment benefits.

Copermittees are also required to comply with hydromodification management requirements per the Model BMP Design Manual to mitigate the potential for increased erosion in receiving waters due to increased runoff rates and durations often caused by development and increased impervious surfaces.

4.12.2.3 Local

2013 San Diego Integrated Regional Water Management Plan

The 2013 San Diego Integrated Regional Water Management (IRWM) Plan (San Diego IRWM Program 2013) was prepared under the direction of a Regional Water Management Group consisting of the San Diego County Water Authority (SDCWA), the County of San Diego, and the City of San Diego. The IRWM Plan builds on local water and regional management plans within the San Diego region and is aimed at developing long-term water supply reliability, improving water quality, and protecting natural resources. The statewide IRWM Program is supported by bond funding provided by the California Department of Water Resources (DWR) to fund competitive grants for projects that improve water resources management. IRWM Plan goals are to:

- Improve the reliability and sustainability of regional water supplies.
- Protect and enhance water quality.
- Protect and enhance our watersheds areas and natural resources.
- Promote and support sustainable integrated water resource management.

Integrated Flood Management Planning Study

Appendix 7-B of the 2013 San Diego IRWM Plan (i.e., the Integrated Flood Management Planning Study) is a guidance document meant to facilitate an integrated water resources approach to flood management. The planning document defines general applicable strategies and approaches and provides planning level tools to guide flood management decision making on a watershed area basis. The focus of integrated planning is on balancing community flood management needs with environmental constraints and watershed area resources to ensure an acceptable solution with the flexibility to adapt to future changes.

Dewatering Permits

Discharges from specified groundwater extraction activities (such as construction dewatering) must be permitted either by the San Diego RWQCB under the General Order R9-2015-0013 for groundwater waste discharges to surface waters or authorized by the agency with jurisdiction if discharged to an MS4. Discharges via either of these mechanisms must meet applicable WQOs, constituent limitations, and pretreatment requirements.

City of San Diego General Plan – Conservation Element

The stated urban runoff management goals of the City of San Diego General Plan’s Conservation Element are to protect and restore all water bodies and to preserve the natural attributes of both the floodplain and floodway without endangering life and property. The policies that have been adopted to meet these goals are as follows (City of San Diego 2008a):

- Continue to develop and implement public education programs.
- Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.
- Require contractors to comply with accepted storm water pollution prevention planning practices for all projects.
- Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.
- Assure that City departments continue to use “Best Practice” procedures so that water quality objectives are routinely implemented.
- Continue to encourage “Pollution Control” measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.
- Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

City of San Diego Municipal Code

The City’s Municipal Code defines the regulations concerning hydrology, water quality, and floodways/floodplains in Chapter 4, Article 3, Division 3; Stormwater Management and Discharge Control (Water Quality Controls), Chapter 14, Article 2, Division 2, Storm Water Runoff and Drainage Regulations (Drainage Regulations); and Chapter 14, Article 3, Division 1 (Environmentally Sensitive Lands Regulations).

The purpose of the Water Quality Controls Regulations are to further ensure the health, safety, and general welfare of the citizens of the City of San Diego by controlling and eliminating non-storm water discharges to the storm water conveyance system and reducing the pollutants in

urban storm water discharges to the MEP. The Water Quality Controls are pursuant to the Federal Water Pollution Control Act (CWA, 33 USC Section 1251 et seq.) and Municipal Permit Order R9-2013-0001 (as amended) in order to protect and enhance the water quality of the City's watercourses, water bodies, and wetlands. The Water Quality Controls prohibit most non-storm water discharges to the MS4 and any discharge that results in or contributes to the violation of the Municipal Permit. Any activities that could introduce pollutants to the MS4 are required to implement BMPs to reduce pollutant discharges to the MEP.

All development must comply with the Drainage Regulations and implement measures designed to prevent erosion and control sediment, which serve to:

- regulate the development of, and impacts to, drainage facilities;
- limit water quality impacts from development;
- minimize hazards due to flooding while minimizing the need for construction of flood control facilities;
- minimize impacts to environmentally sensitive lands;
- implement the provisions of federal and state regulations; and
- protect the public health, safety, and welfare.

The purpose of development regulations for environmentally sensitive lands, including SFHAs, is to protect, preserve, and where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners.

Development regulations for SFHAs are to provide regulations for development proposed within the floodway and floodplains. Development within SFHAs is allowed only if specific conditions are met.

City of San Diego Drainage Design Requirements Council Policies

Drainage Design Manual

The 1984 City of San Diego Drainage Design Manual provides policies and procedures for projects to implement regarding hydrology, hydraulics, and design of associated infrastructure to attain reasonable standardization of drainage design throughout the City. The basic considerations are to protect the roadway and property against damage from artificial, storm, and subsurface waters; to provide for public health and safety; and to provide for low maintenance while taking into account the effect of the proposed improvement on traffic and property.

Council Policy 800-04

The purpose of Council Policy 800-04 Drainage Facilities is to establish guidelines for the construction and maintenance of storm water drainage facilities and to identify and assign general financial responsibilities for the construction of various types of drainage facilities.

City of San Diego Storm Water Standards Manual

The primary objectives of the City Storm Water Standards Manual are to:

- Prohibit non-storm water discharges.
- Reduce the discharge of pollutants to storm water conveyance systems to the maximum extent practicable by implementing BMPs during the project's construction and post-development (permanent) phases.
- Provide consistency with the new Model BMP Design Manual.
- Provide guidance for proper implementation of LID facilities and design approaches.
- Provide guidance for conformance with regional hydromodification management requirements.

This manual was updated, and was adopted and took effect in February 2016 to meet the requirements of the new Model BMP Design Manual in compliance with the Municipal Permit.

City of San Diego Flood Mitigation Plan

The City of San Diego prepared a citywide Flood Mitigation Plan (FMP) to meet the requirements of the FEMA Disaster Mitigation Act of 2000. The FMP meets the requirements

for plans prepared under the FEMA program and addresses options for reducing flood hazards to repetitive loss properties (RLPs) and other properties insured under the NFIP.

The FMP has been developed to:

- identify the flooding sources affecting the City of San Diego's RLPs and Severe Repetitive Loss Properties (SRLPs),
- provide specific guidance for potential mitigation measures and activities to best address the problems and needs associated with RLPs and SRLPs,
- establish floodplain management goals that minimize flood damage to areas vulnerable to natural and human-caused flood disasters,
- ensure the natural and beneficial functions of our floodplains are protected, and
- promote flood insurance awareness throughout the City of San Diego and neighboring communities.

Attainment of these objectives is accomplished through the utilization of existing programs and resources, involving those public agencies responsible for regulating development in SFHAs, and through verifying that policies and programs identified in the capabilities assessment are carried out.

The FMP is intended to facilitate cooperation between state and local authorities, prompting them to work together. It encourages and rewards local and state pre-disaster planning and promotes sustainability as a strategy for disaster resistance. This enhanced planning network is intended to enable local and state governments to articulate accurate needs for mitigation, resulting in faster allocation of funding and more effective risk reduction projects.

Mission Bay and Los Peñasquitos Water Quality Improvement Plans

Provision B of the Municipal Permit requires development and implementation of Water Quality Improvement Plans (WQIPs) for watershed management areas, including those for the Mission Bay and Los Peñasquitos Watershed Management Areas. As mentioned earlier in the municipal storm water permit section above, the Mission Bay and Los Peñasquitos WQIPs apply to the Project area. These collaboratively developed WQIPs guide affected Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The City of San Diego was the lead in producing the Mission Bay and Los Peñasquitos WQIPs. The plans address only water flows and discharges from the storm drain systems maintained by the local agencies sharing authority in each area. Other discharges and

pollution sources are considered to the extent they affect conditions in the storm drain system. Improvements to water quality are achieved through evaluation, goal setting, and monitoring and reporting, including determining the highest priority water quality conditions, identifying sources, and formulating goals and strategies to address highest priority water quality conditions.

The highest priority water quality conditions identified in the Mission Bay WQIP are:

- High bacteria levels in creeks
- Bacteria accumulations as measured during both wet and dry weather at beaches
- Erosion and transport of soil and sediment into the Area of Special Biological Significance (ASBS) near La Jolla.

The highest priority water quality conditions identified in the Los Peñasquitos WQIP are:

- Freshwater discharges during dry weather
- Transport of sediment from upstream sources (current and historical) during rain events
- Bacteria accumulations as measured during both wet and dry weather at Torrey Pines State Beach near the Los Peñasquitos Lagoon mouth.

4.12.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (2011), which have been adapted to guide a programmatic analysis of the Project, a significant hydrology/water quality impact would occur if implementation of the Project would:

1. Result in a substantial increase in impervious surfaces and associated increased runoff;
2. Result in substantial alteration to on- and offsite drainage patterns due to changes in runoff flow rates or volumes;
3. Result in an increase in pollutant discharge to receiving waters during construction or operation; or
4. Violate any water quality standards or waste discharge requirements.

4.12.4 Impact Analysis

Issue 1: Would the Project result in a substantial increase in impervious surfaces and associated increased runoff?

4.12.4.1 Impact Analysis

Removal of Genesee Avenue Widening

With the removal of the planned Genesee Avenue Widening from the UCP, no increase would occur in impervious area or associated increased runoff. Impervious area and runoff rates and amounts would remain the same as existing conditions. Flooding would not be increased compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

With the removal of the planned Regents Road Bridge from the UCP, no increase would occur in impervious area or associated increased runoff. Impervious area and runoff rates and amounts would remain the same as existing conditions. Flooding would not be increased compared to existing conditions. No impacts would occur.

4.12.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

Since no development would occur, impervious surface area and associated runoff would not increase compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

Since no development would occur, impervious surface area and associated runoff would not increase compared to existing conditions. No impacts would occur.

4.12.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.12.5 Impact Analysis

Issue 2: Would the Project result in substantial alteration to on- and offsite drainage patterns due to changes in runoff flow rates or volumes?

4.12.5.1 Impact Analysis

Removal of Genesee Avenue Widening

With the removal of the planned Genesee Avenue Widening from the UCP, no development would occur. Impervious surface area, runoff rates and amounts, and flooding would not increase and drainage patterns would not change compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

With the removal of the planned Regents Road Bridge from the UCP, no development would occur. Impervious surface area, runoff rates and amounts, and flooding would not increase and drainage patterns would not change compared to existing conditions. No impacts would occur.

4.12.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

Since no development would occur, impervious surface area and associated runoff would not increase compared to existing conditions. Drainage patterns and the potential for flooding would remain the same as existing conditions. No impacts would occur.

Removal of Regents Road Bridge

Since no development would occur, impervious surface area and associated runoff would not increase compared to existing conditions. Drainage patterns and the potential for flooding would remain the same as existing conditions. No impacts would occur.

4.12.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.12.6 Impact Analysis

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

4.12.6.1 Impact Analysis

Removal of Genesee Avenue Widening

No construction would occur; therefore, no increase would occur in pollutant discharge to receiving waters compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

No construction would occur; therefore, no increase would occur in pollutant discharge to receiving waters compared to existing conditions. No impacts would occur.

4.12.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

Since no development would occur, there would be no increase in pollutant discharge compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

Since no development would occur, there would be no increase in pollutant discharge compared to existing conditions. No impacts would occur.

4.12.6.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.12.7 Impact Analysis

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

4.12.7.1 Impact Analysis

Removal of Genesee Avenue Widening

No construction would occur; therefore, the Project would not violate water quality standards or WDRs. No impacts would occur.

Removal of Regents Road Bridge

No construction would occur; therefore, the Project would not violate water quality standards or WDRs. No impacts would occur.

4.12.7.2 Significance of Impacts

Removal of Genesee Avenue Widening

Since no development would occur, the Project would not violate water quality standards or WDRs compared to existing conditions. No impacts would occur.

Removal of Regents Road Bridge

Since no development would occur, the Project would not violate water quality standards or WDRs compared to existing conditions. No impacts would occur.

4.12.7.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.13 PUBLIC SERVICES AND FACILITIES

This section includes a description of existing public services, a summary of applicable regulations, and analyses of potential short-term and long-term impacts of the Project.

4.13.1 Existing Conditions

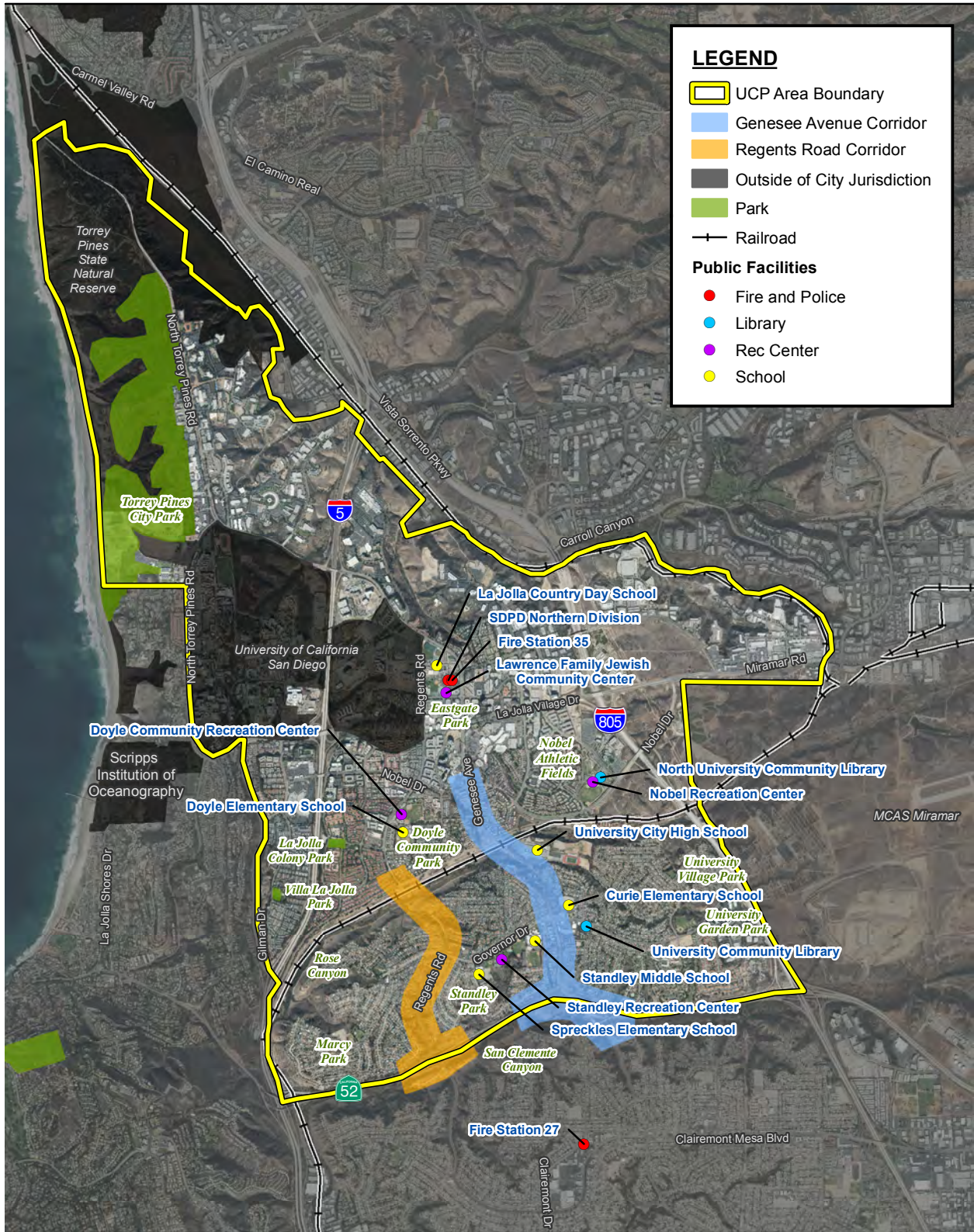
4.13.1.1 UCP Area

Public services are functions that serve residents on a community-wide basis (Figure 4.13-1). Public services are generally provided to an area based on population, although each public service provider has their own set of service standards. SANDAG demographic and socioeconomic estimates for the UCP Area in 2015 show that the total population of the UCP Area is 70,450 people with an average 2.18 persons per household. The area has 26,412 existing housing units (SANDAG 2015b).

a. Police Protection Services

The UCP Area is served by the SDPD, specifically the Northern Division located at 4275 Eastgate Mall. The Northern Division serves 11 San Diego neighborhoods totaling a population of 225,234 people and encompasses 41.3 square miles. The Project site is located specifically in Beat 115 of the Northern Division (SDPD 2016). The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County. The SDPD currently utilizes a five-level priority calls dispatch system, which includes Priority E (Imminent Threat to Life), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury. Priority Two calls include vandalism, disturbances, and property crimes. Priority Three includes calls after a crime has been committed, such as cold burglaries and loud music. Priority Four calls include parking complaints or lost and found reports.

As of ~~February~~ June 2016, a total of ~~409~~ 118 sworn police officers and one civilian employee were assigned to Northern Patrol Operations. Of those, approximately 90 full-duty officers are performing field operations. On average, approximately 45 43 officers are divided among three shifts per day, who patrol the Northern Division (approximately ~~15~~ 14 patrolling officers at any given time). The Northern Division is currently staffed at 83 percent of its recommended staffing level (recommended staffing is derived from a formula based on call for service, response times, etc.) and frequently operates at one to two officers below its recommended staffing level for each work shift (SDPD 2016).



**Figure 4.13-1
Public Facilities**

Response times on average for the Northern Division are 7.3 minutes for Priority E (Imminent Threat to Life) calls and 16.6 minutes for Priority One calls. Table 4.13-1 provides recent average response times for police services compared for each call priority category in 2015 for both the Northern Division and Beat 115.

**Table 4.13-1
Average Response Time for Police Service**

Call Priority	2015 Target Average Response Time¹	2015 Northern Division Average Response Time²	2015 Northern Division, Beat 115 Average Response Time²
Priority E – Imminent threat to life	7.0 minutes	7.3 minutes	8.3 minutes
Priority One – Serious crimes in progress	12.0 minutes	16.6 minutes	18.3 minutes
Priority Two – Less serious crimes with no threat to life	25.0 minutes	36.0 minutes	37.8 minutes
Priority Three – Reported after a crime has been committed	60.0 minutes	93.8 minutes	107.8 minutes
Priority Four – Parking complaints, lost/found report	70.0 minutes	93.3 minutes	121.5 minutes

¹ Target calendar year 2015 average response times taken from Key Performance Indicators in City of San Diego Fiscal Year 2016 Adopted Budget, Police (City of San Diego 2016f).

² Numbers represent the average of the Quarterly Management Reports from Fiscal 3Q2015, 4Q2015, and 1Q2016.

Sources: SDPD 2016a and 2016b

As shown in the table, the Northern Division response times as well as Beat 115 response times exceed the City's target average response times for all priority type calls for year 2015 (SDPD 2016b). The SDPD strives to maintain the response time goals as one of various other measures used to assess the level of service to the community.

a. Fire and Emergency Services

The SDFRD provides fire protection and emergency services to the UCP Area. The SDFRD's goal is one firefighter per 1,000 citizens. The SDFRD currently utilizes a four-level priority calls dispatch system. Level 1 is the most serious (e.g., heart attack, shortness of breath), and the closest fire engine and an advanced life support ambulance respond to this type of call. In this case, the fire crew response goal is within 8 minutes of being dispatched, and the ambulance response goal is within 12 minutes for Level 1 (the most serious) calls. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advanced life support ambulance responds to Level 2 calls; no fire station staff or equipment is deployed. The target response time for SDFRD to treat medical patients and/or control small fires is within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in

fire dispatch. This equates to 2.5 minutes of turn-out time and 5 minutes of drive time in the most populated areas (Citygate 2011).

Three fire stations primarily service the UCP Area: Station 35, Station 27, and Station 9. Fire Station 35 is located at 4285 Eastgate Mall and serves the UCP Area and its surrounding areas. Fire Station 35's administrative district is 11.32 square miles. Fire Station 35 apparatus includes one fire engine, one aerial truck, one chemical rig, one brush engine (Type III) rig, and one Battalion Chief vehicle. In fiscal year 2015, the fire engine made 4,017 responses, the aerial truck made 1,785 responses, and the Battalion Chief vehicle made 546 responses (SDFRD 2016a). Four firefighters staff the engine at all times, and four firefighters staff the truck company at all times. Station 35 is also staffed with a Battalion Chief and two medics, for a total of 11 people.

Fire Station 27 is located at 5064 Clairemont Drive and primarily serves West Clairemont, the UCP Area, and surrounding areas. Fire Station 27's administrative district is 5.8 square miles and houses one fire engine. The fire engine made 2,600 responses in fiscal year 2015 (SDFRD 2016b). The station is staffed by four firefighters per 24-hour shift.

Fire Station 9 is located at 7870 Ardath Lane and serves La Jolla and its surrounding areas. Engine 9's district is 4.72 square miles and houses a fire engine and a Paramedic Unit. The fire engine made 1,824 responses in fiscal year 2015 (SDFRD 2016b).

The City of San Diego conducted a study to evaluate fire services deployment. One of the goals was to analyze whether the SDFRD's performance measures are appropriate and achievable given the risks, topography, and special hazards to be protected in the City of San Diego (Citygate 2011). The study called out 19 gaps in service in the City of San Diego. Of these 19 sites, the study identified six areas as most critical in improving response capabilities. One of these six most critical areas was located in the UCP Area (Stresemann Street and Governor Drive). Table 4.13-2 provides recent average response times for SDFRD compared to the 2015 target average response time. For years 2014 and 2015, the 90th fractile response time was utilized⁷. A fractile analysis of response times is one of the most commonly used criteria to measure response effectiveness. The study recommended a 90th fractile arrival near the 7th minute of total response (Citygate 2011).

⁷ Fractile is used synonymously with percent, however SDFRD uses "fractile" in their reporting.

**Table 4.13-2
Fire and Emergency Services**

Responding Vehicle	Station	Years 2014 and 2015 Target Response Time	Years 2014 and 2015 Average Response Time (90th Fractile)	District Area
Battalion 5, Engine 35, Truck 35, Chem Rig 35, Brush 35	Station 35	The goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time.	8.82 minutes	11.3 square miles
Engine 27	Station 27		8.05 minutes	5.8 square miles
Engine 9, Medic 9	Station 9		7.53 minutes	4.7 square miles

Source: SDFRD 2015a, 2015b; Citygate 2011

As stated above, the City's goal response time for years 2014 and 2015 is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time. As shown in the table, the 90th fractile response times for both Station 35 and Station 27 did not meet the City's target average response times for years 2014 and 2015. Fire Station 35's 90th fractile response time was 8.82 minutes, while Fire Station 27's was 8.05 minutes. Fire Station 9 did meet the City's target average response times for years 2014 and 2015 with a response time of 7.53 minutes.

c. Schools

Educational facilities in the UCP Area include public, private, and higher education institutions. The UCP Area is within the San Diego Unified School District. Three public elementary schools service the community as listed below. Torrey Pines Elementary in La Jolla also services the UCP Area population.

- Curie Elementary – 4080 Governor Drive
- Doyle Elementary – 3950 Berino Court
- Spreckels Elementary – 6033 Stadium Street

One public middle school is located in the UCP Area:

- Standley Middle School – 6298 Radcliffe Avenue

There is one public high school in the UCP Area:

- University City Senior High – 6949 Genesee Avenue

A private school, La Jolla Day Country School, serves pre-school through 12th grade, located at 9490 Genesee Avenue.

Higher education is available through ~~UCSD~~ UC San Diego, which plays a major role in the UCP Area as the campus and state-controlled land covers approximately 1,100 acres. The university campus is located within the mid-western portion of the community planning area. ~~UCSD~~ UC San Diego had approximately 31,500 students enrolled in fall 2014. ~~UCSD~~ UC San Diego is recognized as a top research university and offers more than 100 undergraduate majors (~~UCSD~~ UC San Diego 2016).

d. Libraries

The UCP Area is served by two public libraries. The University Community Branch Library is located at 4155 Governor Drive, approximately 0.2 mile east of the Governor Drive/Genesee Avenue intersection. The North University Community Branch Library is located at 8820 Judicial Drive.

e. Parks and Recreational Facilities

A wide variety of parks and recreational facilities are located throughout the UCP Area, including regional open space resources to smaller neighborhood parks. UCP Area open spaces and parks include natural resources ranging from panoramic ocean views to vegetated canyon bottoms. Other recreational facilities and open spaces are associated with ~~UCSD~~ UC San Diego, private residential projects, urban plazas, and community centers such as the Lawrence Family Jewish Community Center. Population-based parks are usually located in proximity to residential development or school facilities and are categorized as neighborhood parks and community parks depending on their size and the area they serve. Additionally, some school facilities in the UCP Area are joint-use parks shared with the community. Information regarding parks and open space is cited from the UCP (2014) and the City Parks and Recreation website (City of San Diego 2016d).

Open Space Parks

Marian Bear Memorial Park

Marian Bear Memorial Park is a regional park located in San Clemente Canyon. The park provides a natural setting with over 467 acres of dedicated natural parkland including finger canyons and mesas on the south side with a rich and diverse history. The park provides 3 miles of mostly flat trails along the length of the canyon with more challenging hiking available on the trails leading up to the mesa tops. Biking is permitted on the maintenance roads in the canyon. Major entries to the park are off Genesee Avenue and Regents Road where parking and picnic

areas with restroom facilities are available. A Park Ranger assigned to the park area provides interpretive programs, public assistance, guidance, enforcement, and protection.

Rose Canyon Open Space Park

Rose Canyon Open Space Park is a regional open space park that provides a natural trail experience that traverses from I-5 to I-805 through a wide variety of native San Diego habitats and along Rose Creek. The natural setting is enjoyed by hikers and bicyclists and boasts many wildlife species. There are four main trailheads that provide access to the trail system, including two off of Genesee Avenue and one off of Regents Road. Park Rangers offer interpretive walks and programs. Rose Canyon separates and defines the neighborhoods to the north and south.

Torrey Pines State Natural Reserve

Torrey Pines State Natural Reserve is a 1,750-acre reserve dedicated to preserving the Torrey Pine tree and other indigenous wildlife in its native environment. The park consists of coastal wilderness with pine forests and sandstone canyons. The park provides a trail network of over 8 miles, including coastal trails along the cliffs that provide views of the Pacific Ocean. The park includes a Visitors Center and guided tours of the park are available.

Torrey Pines City Park

Torrey Pines City Park is a resource-based park located along the bluff tops and coastal beach and includes approximately 144 acres. The park is contiguous with the Torrey Pines State Natural Reserve and the Torrey Pines Municipal Golf Course. The park includes a trail system that has ocean views and scenic overlooks. Also within the park is the San Diego Gliderport. The park area has cultural significance to native tribes of the San Diego area and contains many cultural resources that are preserved throughout the park.

Torrey Pines Golf Course

Torrey Pines Golf Course has long been recognized as one of the nation's premier municipal golf courses with views of the Pacific Ocean and a panoramic setting that hosts yearly PGA tournaments. Torrey Pines is open to both San Diego residents and nonresidents, owned and maintained by the City of San Diego. The facility offers two 18-hole championship courses, the north and south courses. Facilities include a driving range, practice putting greens, pro shop, and restaurant at the adjacent Lodge.

Population-Based Parks

Standley Community Park

Standley Park and Recreation Center is an approximately 21-acre park located at 3585 Governor Drive and includes outdoor park facilities, an aquatic center and a recreation center. The recreation center provides indoor gymnasium and sport courts, game room, racquetball courts, and meeting rooms. Youth and adult programming is offered through the center. The outdoor park features include playgrounds, picnic areas and shelters, horseshoe pits, basketball courts, tennis courts, lighted softball fields, and soccer fields.

Doyle Community Park

Doyle Park and Recreation Center is an approximately 26-acre park located at 8175 Regents Road. Facilities include a recreation center with a gymnasium, weight room, game room, and meeting rooms. Youth and adult programming is offered through the center. Outdoor facilities include basketball courts, sand volleyball courts, tot lots, softball fields, and barbeque/picnic areas.

Nobel Athletic Area

The Nobel Athletic Fields and Recreation Center is an approximately 32-acre park located at 8810 Judicial Drive. The recreation center offers a gymnasium/athletic courts and community meeting rooms. Outdoor amenities include children's play areas, off-leash dog park, two softball fields, two soccer fields, a multipurpose field, shaded picnic tables, barbeque pits, an exercise circuit, outdoor basketball, and a comfort station. The site is also home to the North University Branch Library.

Marcy Neighborhood Park

Marcy Neighborhood Park is an approximately 11-acre park located at 5504 Stresemann Street. The park offers a large grassy lawn area, playground, picnic tables and benches, and a loop path around the perimeter of the park.

University Village Neighborhood Park

University Village Neighborhood Park an approximately 4-acre park located at 7100 Florey Street. The park has open grassy lawn space and provides access to local hiking trails through the adjacent open space areas.

University Gardens Park

University Gardens Park is an approximately 13-acre park located at 4850 Governor Drive. The park features a softball field and grassy lawn area and also provides a playground and picnic tables.

Villa La Jolla Neighborhood Park

Villa La Jolla Neighborhood Park is an approximately 6-acre park located at 8321 Via Mallorca. The park features a large open grassy area and is popular for dog walking. There is a children's play area and sidewalks that loop through the park.

Mandell-Weiss Community Park

Mandell-Weiss Community Park (also known as Eastgate Park) is an approximately 10-acre joint-use park located at 4274 Eastgate Mall. The park includes a playground, grassy lawn areas, barbeque pits and picnic tables, softball field, tennis courts, and walking paths.

Doyle Elementary Joint-Use Park

Doyle Elementary Joint Use Park is an approximately 4-acre joint-use park located at Doyle Elementary School at 3950 Berino Court. This joint-use facility includes a grassy lawn field, playgrounds and sports courts.

Spreckels Elementary Joint-Use Park

Spreckels Elementary Joint Use Park is an approximately 2-acre joint-use park located at Spreckels Elementary School at 6033 Stadium Street. This joint-use facility includes a softball field.

Standley Middle School Joint-Use Park

Standley Middle School Joint-Use Park is an approximately 13-acre joint-use park located at Standley Middle School at 6298 Radcliffe Drive. This joint-use facility includes a softball fields, soccer fields and sports courts.

4.13.1.2 Genesee Avenue Corridor

a. Police Protection Services

As described in Section 4.13.1.1, the Northern Division of the SDPD provides police services for Beat 115 along the Genesee Avenue Corridor. The Northern Division headquarters is located off of Eastgate Mall, to the southeast of the intersection of Genesee Avenue and Eastgate Mall. Genesee Avenue serves as a main access to Eastgate Mall and multiple entry points to the police facility are located directly off of Genesee Avenue. Genesee Avenue serves as a main north-south access route for police dispatch.

b. Fire and Emergency Services

Fire Station 35 is located adjacent to the SDPD Northern Division headquarters on Eastgate Mall and services the Genesee Avenue Corridor. The station is located to the southeast of the intersection of Genesee Avenue/Eastgate Mall and there are multiple entry points to the fire station located directly off of Genesee Avenue. Genesee Avenue serves as a main north-south access route for fire and emergency services dispatch.

c. Schools

School facilities are located throughout the UCP Area, as described in Section 4.13.1.1. Specific to the Genesee Avenue Corridor, the entrance to University City Senior High School is accessed directly from Genesee Avenue. Curie Elementary School is located at the northeast corner of the intersection of Genesee Avenue and Governor Drive. Standley Middle School is located to the southwest of the Genesee Avenue and Governor Drive intersection.

d. Libraries

Neither library in the UCP Area is accessed from Genesee Avenue. Library facilities would be the same as described for the UCP Area.

e. Parks and Recreational Facilities

Parks and open space recreation facilities are located throughout the UCP Area, as described in Section 4.13.1.1. Specific to the Genesee Avenue Corridor, there is some trail access for the Rose Canyon Open Space Park off of Genesee Avenue on the south side of the canyon. Genesee Avenue also provides primary access into a parking lot and trailheads for Marian Bear Memorial Park in San Clemente Canyon, immediately south of SR 52.

4.13.1.3 Regents Road Corridor

a. Police Protection Services

The Northern Division of the SDPD provides police services for Beat 115 along the Regents Road Corridor. The Northern Division headquarters is located off of Eastgate Mall, to the southwest of the intersection of Regents Road and Eastgate Mall. Regents Road serves as a main access to Eastgate Mall.

b. Fire and Emergency Services

Fire Station 35 is located adjacent to the SDPD Northern Division headquarters on Eastgate Mall and services the Regents Road Corridor. The station is located to the southwest of the intersection of Regents Road and Eastgate Mall. Regents Road serves as a main north-south access route for fire and emergency services dispatch.

c. School

No school facilities are located immediately off of Regents Road. Spreckels Elementary School is located approximately 0.2 mile east of the Regents Road/Governor Drive intersection.

d. Libraries

Neither library in the UCP Area is accessed from Regents Road. Library facilities would be the same as described for the UCP Area.

e. Parks and Recreational Facilities

Parks and open space recreation facilities are located throughout the UCP Area, as described in Section 4.13.1.1. Specific to the Regents Road Corridor, there is trail access into Rose Canyon Open Space Park at the dead ends of Regents Road on both the north and south sides of the canyon. Regents Road also provides primary access into parking lots and trailheads for Marian Bear Memorial Park in San Clemente Canyon, immediately south of SR 52. Additionally, Doyle Community Park and the associated parking lots are accessed from Regents Road.

4.13.2 Regulatory Framework

Applicable regulations and the associated agencies with regulatory authority and oversight are described below.

4.13.2.1 State

California Mutual Aid Plan

The California Mutual Aid Plan establishes policies, procedures, and responsibilities for requesting and providing inter- and intra-agency assistance in emergencies. The plan directs local agencies to develop automatic or mutual aid agreements, or to enter into agreements for assistance by hire (e.g., Schedule A contracts) where local needs are not met by the framework established by the Mutual Aid Plan.

Assembly Bill 16

AB 16 was passed in 2002 and created the Critically Overcrowded School Facilities program to supplement the construction provisions within the School Facilities Program (SFP). The SFP provides state funding assistance for new construction and modernization of facilities. The Critically Overcrowded School Facilities program allows school districts that have been determined by the California Department of Education (CDE) to have critically overcrowded facilities to apply for new construction projects without meeting all SFP program requirements (CDE 2015). Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply (Chapter 33, Statutes of 2002).

Senate Bill 50

SB 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is also collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered “full and complete mitigation” of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any school impacts (Chapter 407, Statutes of 1998).

Quimby Act and Assembly Bill 1359

Cities and counties have been authorized since the passage of the 1975 Quimby Act (Government Code Section 66477) to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through

the Quimby Act cannot be used for the operation and maintenance of park facilities. The dedicated land or fees may only be used for the development or rehabilitation of neighborhood or community parks or recreational facilities in the subdivision they were provided for, according to AB 1359 (Chapter 412, Statutes of 2013), unless certain requirements are met and an exception is made. The goal of the Quimby Act is to require developers to help mitigate the impacts of property improvements. The act gives authority for passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The fees must be paid and land conveyed directly to the local public agencies that provide park and recreation services community-wide.

4.13.2.2 Local

City of San Diego General Plan

The General Plan contains a Public Facilities, Services, and Safety Element (City of San Diego 2008a, most recently updated in 2015) to address publicly managed and provided facilities and services. This element provides policies for financing, prioritization, developer, and City funding responsibilities for public facilities in San Diego. The Public Facilities, Services, and Safety Element addresses police, fire and rescue, schools, and libraries, among other public services. The following policies are relevant to the Project.

**Table 4.13-3
City of San Diego General Plan, Public Facilities, Services, and Safety Element**

Relevant Polices – Police Services
PF-E.1 Provide a sufficient level of police services to all areas of the City by enforcing the law, investigating crimes, and working with the community to prevent crime.
PF-E.2 Maintain average response time goals as development and population growth occurs. Averse response time guidelines are as follows: <ul style="list-style-type: none"> • Priority 1 Calls (serious crimes in progress) within 12 minutes. • Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes. • Priority 3 Calls (minor crimes/request that are not urgent) within 90 minutes. • Priority 4 Calls (minor requests for police service) within 90 minutes.
PF-E.6. Monitor how development affects average police response time goals and facility’s needs.
PF-E.7. Maintain service levels to meet demands of continued growth and development, tourism, and other events requiring police services. <ol style="list-style-type: none"> a) Analyze the need for additional resources and related capital improvements when total annual police force out-of-service time incrementally increases by 125,000 hours over the baseline of 740,000 in a given year. Out-of-service time is defined as the time it takes a police unit to resolve a call for service after it has been dispatched to an officer.

Relevant Polices – Fire-Rescue Services
<p>PF-D.1. Locate, staff, and equip fire stations to meet established response times as follows:</p> <ul style="list-style-type: none"> a) To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minutes drive time in the most populated areas. b) To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time. <ul style="list-style-type: none"> • This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once. • This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.
<p>PF-D.2. Deploy to advanced life support emergency responses EMS personnel including a minimum of two members trained at the emergency medical technician-paramedic level and two members trained at the emergency medical technician-basic level arriving on scene within the established response time as follows:</p> <ul style="list-style-type: none"> • Total response time for deployment and arrival of EMS first responder with Automatic External Defibrillator (AED) should be within four minutes to 90 percent of the incidents; and • Total response time for deployment and arrival of EMS for providing advanced life support should be within eight minutes to 90 percent of the incidents.
<p>PF-D.3. Adopt, monitor, and maintain service delivery objectives based on time standards for all fire, rescue, emergency response, and lifeguard services.</p>
<p>PF-D.5. Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.</p> <ul style="list-style-type: none"> a) Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or nonemergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities.
<p>PF-D.6. Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.</p>
<p>PF-D.7. Evaluate fire-rescue infrastructure for adherence to public safety standards and sustainable development policies (see also Conservation Element, Section A)</p>

The General Plan also contains a Recreation Element that provides goals, guidelines, and policies for the City’s three use categories of parks and recreation: population-based, resource-based, and open space.

University Community Plan

Community plans are designed in conjunction with the General Plan to provide location-based policies and recommendations specific to the City’s individual community planning areas. Community plans are written to refine the General Plan’s citywide policies, designate land uses and housing densities and include additional site-specific recommendations as needed.

The UCP (City of San Diego 2014b) contains a public facilities element that addresses the provision of schools and libraries as well as police and fire protection. The Open Space and Recreation Element of the UCP provide goals and proposals for existing and future parks, open space, and recreation facilities in the community.

4.13.3 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a potential significant impact to public services and facilities would occur if implementation of the Project would:

Have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, and maintenance of public facilities, including roads.

4.13.4 Impact Analysis

Issue 1: Would the Project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, and maintenance of public facilities, including roads?

4.13.4.1 Impact Analysis

a. Police Protection

The Northern Division of the SDPD provides police services for Beat 115. Table 4.13-1 provides average response times for police service in 2015 for both the Northern Division and Beat 115. As shown in the table, the Northern Division average response times, as well as Beat 115 response times, exceed the City's target average response times for all priority type calls for year 2015.

As discussed in Section 4.2, Transportation/Circulation, there would be significant traffic impacts to roadway segments and intersections in the future year with implementation of the Project. Future Year is the scenario used for transportation modeling purposes. While some transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Project proposes transportation improvements as Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3. Development Impact Fees provide partial funding for proposed mitigation measure

improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. These would make alterations to the existing roadway network in an effort to improve areas of poor operation. Even with implementation of these transportation mitigation measures, significant traffic impacts would still result and would present increased difficulty in police accessing areas within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.

b. Fire and Emergency Services

The SDFRD provides fire protection and emergency services to the UCP Area. As discussed, the City of San Diego conducted a study to evaluate fire services deployment. The study recommended a 90 percent arrival near the 7th minute of total response, or the 90th fractile response times (Citygate 2011). Table 4.13-2 provides the 90th fractile response time for years 2014 and 2015. The City's goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time. As shown in the table, the 90th fractile response times for both Station 35 and Station 27 did not meet the City's target average response times for years 2014 and 2015. Fire Station 35's 90th fractile response time was 8.82 minutes, while Fire Station 27 was 8.05 minutes. Fire Station 9 did meet the City's target average response times for years 2014 and 2015 with a response time of 7.53 minutes.

Table 4.13-4 provides the average response times for years 2014 and 2015, and projected average response times for Future Year with Adopted UCP (which includes the construction of the widening of Genesee Avenue and Regents Road Bridge) and Future Year with Project. Because actual response times for future years are unknown, fractile analysis of response times could not be utilized. Instead, the projected average response times for Future Year with Project were compared to Future Year with Adopted UCP. The Future Year with Adopted UCP condition assumes the implementation of the Adopted UCP and all the transportation improvements associated with the current plan including the planned Genesee Avenue Widening and Regents Road Bridge.

There would be significant traffic impacts to roadway segments and intersections in the future year with implementation of the Project. As discussed in Section 4.2, Transportation/Circulation, –Future Year with Adopted UCP, a total of 21 roadway segments would operate at an unacceptable LOS (Table 4.2-9) and 29 intersections (Table 4.2-10) operating at an unacceptable LOS. Twenty-eight of these 29 intersections exceed significance thresholds.

**Table 4.13-4
Fire and Emergency Services in Future Year**

Station	Years 2014 and 2015 Target Response Time	Years 2014 and 2015 90th Fractile Response Time	Future Year Average Response Time – with Adopted UCP	Future Year Average Response Time – with Project
Station 35	The goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time.	8.82 minutes	8.88 minutes	9.38 minutes
Station 27		8.05 minutes	8.71 minutes	8.76 minutes
Station 9		7.53 minutes	11.38 minutes	11.75 minutes

Source: SDFRD 2016a, 2016b, Kimley-Horn 2016

Future Year with Project conditions would result in a total of ~~21~~20 roadway segments within the traffic study area to degrade to unacceptable operating conditions in exceedance of the significance thresholds. With implementation of the Project, ~~30~~28 intersections would operate at unacceptable LOS operating conditions which exceed the significance thresholds by future year. Under the Project in the future year, the following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. Some of those intersections currently operate at LOS E or F, but would continue to experience significantly worsened conditions with implementation of the Project. Some of these intersections would have significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue /Governor Drive (PM)
- ~~Genesee Avenue/SR 52 WB Ramps (AM)~~
- Genesee Avenue/SR 52 EB Ramps (AM and PM)
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~
- Gilman Drive/I-5 SB Ramps (PM)

While some transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by the removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Future Year with Adopted UCP scenario and the Future Year with Project scenario, as provided in Table 4.13-4, show a

substantial exceedance from the City's target average response time of 7.5 minutes. Under the Future Year with Adopted UCP, Station 35 is projected to result in a 1.38-minute increase (8.88 minutes) from the City's average response time of 7.5 minutes, while Station 27 would result in a 1.21-minute increase (8.71 minutes). Under the Future Year with Adopted UCP, Station 9 is projected to result in a 3.88-minute increase (11.38 minutes) from the City's average response time of 7.5 minutes, Future Year with Project shows even more deterioration in response times. When compared to the City's target response time of 7.5 minutes, Fire Station 35's average response time results in a 1.88-minute increase (9.38 minutes), while Fire Station 27 results in a 1.26-minute increase (8.76 minutes). Fire Station 9's average response time results in a 4.25-minute increase (11.75 minutes) under Future Year with Project. The Project proposes transportation improvements as Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. These would make alterations to the existing roadway network in an effort to improve areas of poor operation. Even with implementation of Mitigation Measures TRA-1 and TRA-2, significant impacts on fire and emergency services would still result and would present increased difficulty in accessing areas within the community due to poor traffic conditions, including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays.

c. Schools, Libraries, and Parks and Recreational Facilities

There are no residential components included with the Project that could directly increase population and result in an increase in student enrollment levels. The Project would not cause the enrollment of the schools to increase and would, therefore, not have an impact on existing school facilities in the area and would not require construction of new facilities. In addition, there would be no increased wear on the existing libraries in the UCP Area, as the Project would not directly increase populations residing in the area. The Project would not create the need for new public parks or facilities, as it is not introducing new housing or population to the community. As such, public services such as schools, libraries, parks, and recreational facilities would not experience an increase in demand or need for services, as the Project would not generate population growth or other community changes that might increase demand or availability of those public services or create the need for new or expanded facilities.

4.13.4.2 Significance of Impacts

a. Police Protection

The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police service response times would be significant.

b. Fire and Emergency Services

The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on fire and emergency service response times would be significant.

c. Schools, Libraries, and Parks and Recreational Facilities

The Project would not result in any significant impacts to schools, libraries, parks, and recreational facilities.

4.13.4.3 Mitigation Framework

a. Police Protection Services

If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area that are associated with the Project and will be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project-level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented.

b. Fire and Emergency Services

See Mitigation Measures TRA-1 and TRA-2 described in Section 4.2, Transportation/Circulation.

c. Schools, Libraries, and Parks and Recreational Facilities

There would be no significant impacts. No mitigation is required.

4.13.4.4 Significance After Mitigation

The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police and fire and emergency service response times would be significant. While Mitigation Measures TRA-1 and TRA-2 would result in improvements to intersection and road segment operations, the traffic conditions would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. ~~Further, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.~~ Therefore, impacts to emergency service providers associated with the Project would remain significant and unmitigated at the program level.

There are no residential components included with the Project that could directly increase population and result in an increase in student enrollment levels. The Project would not have an impact on existing school facilities in the area and would not require construction of new facilities. In addition, there would be no increased wear on the existing libraries in the UCP Area, as the Project would not directly increase populations residing in the area. The Project would not create the need for new public parks or recreation facilities, as it is not introducing new housing or population to the community. As such, the Project would not result in any significant impacts to schools, libraries, parks, and recreational facilities.

4.14 PUBLIC UTILITIES

This section presents an overview of the public utility systems for the Project that includes water, wastewater/sewer, natural gas, communication systems, and solid waste management.

4.14.1 Existing Conditions

Water, Wastewater/Sewer, Natural Gas, Communication Systems, and Solid Waste Management

Metropolitan Water District of Southern California

Metropolitan Water District of Southern California (MWD) is a regional wholesaler that delivers water to 26 member public agencies – 14 cities, 11 municipal water districts, and one county water authority. In turn, water is provided to more than 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego and Ventura Counties. MWD currently delivers an average of 1.7 billion gallons of water per day within a 5,200-square-mile service area (MWD 2015a). MWD imports water from Northern California via the State Water Project (SWP) and from the Colorado River via the Colorado River Aqueduct (CRA). About 45 percent of Southern California’s water supply comes from these two sources (MWD 2015b). The CRA is composed of two reservoirs, five pumping stations, 63 miles of open canals, 92 miles of tunnels, 55 miles of concrete pipe, and 28 miles of pressurized siphons, with a delivery capacity of over 1.2 million acre-feet a year (MAF) (MWD 2015c).

About 30 percent of Southern California’s water comes from the SWP, the largest state-built water and power system in the nation. The SWP serves a population of nearly 25 million Californians from the Bay Area to San Diego. The SWP is operated and maintained by the DWR and includes 34 storage facilities, reservoirs, and lakes; 20 pumping plants; four pumping-generating plants; five hydroelectric power plants; and about 700 miles of open canals and pipelines (MWD 2015c). MWF is the largest contractor on the SWP system, receiving about 50 percent of the SWP’s supplies, roughly 1.2 MAF in an average year. Water from the SWP is delivered through the California Aqueduct, a 444-mile-long canal beginning at the south Delta and ending at Lake Perris in Riverside County. It varies in width from 50 to 110 feet and 19 to 32 feet in depth.

The California Aqueduct conveys SWP water into northern San Diego County via two aqueducts encompassing five large-diameter pipelines. SDCWA takes ownership of these facilities just south of the County line, and conveys SWP water farther south for distribution to member agencies.

Through its 2015 Integrated Resources Plan (IRP) Draft Update, MWD identified a mix of imported and local resources to provide long-term water supplies, including a planning buffer intended to address potential future supply and demand fluctuations. The 2015 Update addresses Southern California's unprecedented drought conditions which have impacted local supplies and groundwater basins (MWD 2016). The 2015 IRP Update develops approaches for how MWD will advance conservation and local resources development and maximize its storage reserves in the future.

San Diego County Water Authority

SDCWA was formed in 1944 and became a member of MWD in 1946 to obtain Colorado River water for the San Diego region. SDCWA supplies water to the western third of San Diego County, including the Project site. SDCWA has 24 member agencies: six cities, five water districts, three irrigation districts, eight municipal water districts, one public utility district, and one federal agency (military base) (SDCWA 2016). Its service area includes about 951,000 acres and approximately 3.1 million people. As indicated in the SDCWA 2010 Urban Water Management Plan (UWMP), demand for water in SDCWA's service area falls into two categories, Municipal and Industrial (includes residential, commercial, industrial, and institutional purposes) and Agricultural, with municipal and industrial uses making up about 80 to 85 percent of water usage.

The 2010 UWMP estimates that, by 2035, total normal water demands are expected to be 785,685 acre-feet (AF) when adjusted for water conservation, an increase from 566,433 AF in 2010. In fiscal year 2007, water demand in the SDCWA service area was 741,893 AF. This dropped to 566,443 AF by 2010 due to supply allocations, mild weather, and water use restrictions (SDCWA 2011). The 2010 UWMP projects water demands through 2035 using an econometric model to develop long-range demand forecasts. SDCWA's model is known as CWA-MAIN, and it relates historic water demand patterns to variables including household incomes, price of water, and weather. The model also incorporates demographic and economic projections from SANDAG's 2050 Regional Growth Forecast. Based on the CWA-MAIN model, projected normal water demands are forecasted. The total regional baseline demand forecast for 2015 (excluding conservation) is 654,022 AF; for 2020 is 722,040 AF; for 2025 is 790,229 AF; for 2030 is 850,899 AF; and for 2035 is 903,213 AF.

As part of its Capital Improvement Program, SDCWA implemented the Emergency and Carryover Storage Projects to increase storage capacity, enhance supply reliability, and more efficiently manage water supplies during catastrophic events and periods of drought. SDCWA also implements a demand management (or water conservation) program to reduce imported water consumption and enhance supply reliability through efforts such as public education;

residential water use surveys; and financial incentives for low-flow plumbing retrofits (toilets and showerheads), high-efficiency appliances, and low-water use landscaping.

City of San Diego

The City is the largest of SDCWA's 24 member agencies, serving 210,726 acres and approximately 1.3 million people. Water storage, treatment, and delivery services are managed by the City Public Utilities Department, which provides water, wastewater, and recycled water services to 1.3 million water customers and 2.5 million wastewater customers in the San Diego region. The City purchases about 85 to 90 percent of its water from SDCWA. The City water system includes 3,300 miles of distribution pipeline, nine reservoirs with a capacity of 415,000 AF, three water treatment plants, 29 distribution reservoirs and standpipes, and an average of 200 million gallons of water delivered to customers daily (City of San Diego 2015c).

The Public Utilities Department also manages the recycled water system, which includes three pump stations and over 80 miles of purple pipe delivering an annual average of over 10 million of gallons per day (mgd) for irrigation, manufacturing, and other non-potable uses. The wastewater system consists of the Municipal (Muni) System and Metropolitan (Metro) System. The Muni System consists of approximately 3,000 miles of pipelines and 79 sewer pump stations including East Mission Gorge Pump Station, Sewage Pump Station No. 64, Sewage Pump Station No. 65, and Peñasquitos Pump Station, and is primarily used to collect and convey wastewater from residences and businesses in the City of San Diego. The Metro System consists of three wastewater treatment plants, one biosolids processing facility, four large pump stations, and two outfalls, and provides treatment and disposal services for the City and 15 other agencies and districts within a 450-square-mile area stretching from Del Mar to the north, Alpine and Lakeside to the east, and San Ysidro to the south (City of San Diego 2013c).

Wastewater

Wastewater collection and treatment services are provided by the Wastewater Branch of the City Public Utilities Department, which collects, treats, and disposes of approximately 180 million gallons of sewage everyday (City of San Diego 2015d). The City wastewater system consists of two components:

- The Metropolitan Sewerage Sub-System treats the wastewater from the City and 15 other cities and districts from a 450-square-mile area with a population of over 2.2 million. An average of 180 mgd of wastewater is treated.

- The Municipal Wastewater Collection Sub-System is responsible for the collection and conveyance of wastewater from residences and businesses in the City, serving a 330 square mile area with a population of 1.2 million people.

The Wastewater Branch treats the wastewater generated in a 450-square-mile area stretching from Del Mar and Poway to the north, Alpine and Lakeside to the east, and the Mexican border to the south. In addition, wastewater collection services are provided to the City of San Diego (City of San Diego 2015c). The City's wastewater facilities include the Point Loma Wastewater Treatment Plant, the North City Water Reclamation Plant, the South Bay Water Reclamation Plant, and the Metro Biosolids Center.

Natural Gas Infrastructure

Existing energy use is discussed in Section 4.6, Energy.

Communications

Communication facilities are provided to the area by utility providers such as Time Warner, AT&T, and Cox Communications, among other independent cable companies. Communication infrastructure is located above and below ground within private easements. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas.

Solid Waste Management

Solid waste management is the responsibility of the City of San Diego Environmental Services Department (ESD). Solid waste management involves collection, disposal, and diversion from disposal. The County must demonstrate adequate capacity for long-term solid waste. The City is required to demonstrate adequate capacity for long-term solid waste disposal (15 years), pursuant to applicable requirements under the California Integrated Waste Management Act (AB 939, as described in Section 4.14.2.1). Specifically, the assessment is based on landfill capacity and related data provided in the Countywide Siting Element, which is prepared by the San Diego County Department of Public Works. Based on data from the most current Siting Element Review Report and other applicable sources, the following summary information is provided regarding existing landfill locations and capacities.

Miramar Landfill is the nearest active solid waste facility to the project site. The Miramar Landfill is permitted to receive 8,000 tons per day, and on average it receives less than 1,000,000 tons per year. As of June 30, 2014, Miramar Landfill had a remaining capacity of 15.5 million

cy, with a maximum permitted capacity of 87.8 million cy and a projected closing date of August 31, 2025 (CalRecycle 2014).

Additional active solid waste landfills within San Diego County include Borrego Springs Landfill, Otay Landfill, Sycamore Landfill, San Onofre Landfill, and Las Pulgas Landfill. Of these, the two closest facilities are Sycamore Landfill and Otay Landfill (CalRecycle 2015).

Otay Landfill is on unincorporated County jurisdiction is located approximately 25 miles from the project site, with a remaining capacity of approximately 24.5 million cy as of March 31, 2012. This landfill is permitted to receive a maximum of 5,830 tons per day with a maximum permitted capacity of 61.1 million cy (CalRecycle 2015). The projected closing date is February 28, 2028.

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (AB 939), which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. Since 2004, the City has diverted more than 50 percent of its generated waste stream from disposal. The City adopted the Recycling Ordinance in November 2007. The State of California enacted AB 341 in 2011, which established a policy goal for California that not less than 75 percent of solid waste generated be source-reduced, recycled, or composted by 2020. In July 2012, the City updated the Recycling Ordinance (City of San Diego 2012b) to lower the exemption threshold for required recycling, thereby requiring all privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating 4 or more cubic yards of trash per week to recycle. On July 13, 2015, the City approved the Zero Waste Plan, which is described in Section 4.14.2.2.

4.14.2 Regulatory Framework

4.14.2.1 State

Assembly Bill 939

In 1989, California AB 939, known as the Integrated Waste Management Act, was passed to address the increasing trend in waste generation and the corresponding decrease in landfill capacity. AB 939 mandates reductions of waste disposal, with jurisdictions required to meet diversion goals of 25 percent by 1995 and 50 percent by 2000. “Diversion” means diversion from disposal in landfills. “Diversion” includes source reduction, or not generating waste in the first place, recycling, composting, and, to a limited degree, transformation. Pursuant to AB 939, the amount of waste “generated” is the sum of the amount disposed plus the amount diverted.

AB 939 established a California Integrated Waste Management Board (CIWMB) to oversee the disposal reporting system and facilities. The CIWMB has been replaced by a department entitled CalRecycle. In 2011, AB 341 established a policy goal for California that not less than 75 percent of solid waste generated should be source-reduced, recycled, or composted by 2020.

Assembly Bill 1826

In October 2014 Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (please note, however, that multifamily dwellings are not required to have a food waste diversion program). Organic waste (also referred to as organics throughout this resource) means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time, while also offering an exemption process for rural counties. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

California Senate Bill 610

Sections 10910 through 10915 of the California Water Code were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912(a)) subject to CEQA. For the purposes of SB 610, “project” means any of the following:

1. A proposed residential development of more than 500 dwelling units.
2. A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
3. A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.

4. A proposed hotel or motel, or both, having more than 500 rooms.
5. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
6. A mixed-use project that includes one or more of the projects specified in this subdivision.
7. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

California Urban Water Management Planning Act

UWMPs are prepared by California's urban water suppliers to support resource planning and ensure adequate water supplies are available to meet existing and future water demands. Every urban water supplier that either provides over 3,000 AF of water annually or serves more than 3,000 or more connections is required to assess the reliability of its water sources over a 20-year planning horizon considering normal, single-dry, and multiple-dry years. This assessment is to be included in its UWMPs, which are to be prepared every 5 years and submitted to DWR. DWR then reviews submitted plans to ensure they have completed the requirements identified in the Urban Water Management Planning Act (Division 6 Part 2.6 of the Water Code Section 10610–10656).

California Executive Order B-29-15

California Executive Order B-29-15 orders the SWRCB to impose restrictions to achieve a 25 percent reduction statewide in potable urban water usage through February 28, 2016. It further requires water suppliers, such as the City, to reduce usage as compared to the amount used in 2013. The executive order updates the State Model Water Efficient Landscape Ordinance to increase water efficiency standards for new and existing landscapes through more efficient irrigation systems, greywater usage, on-site storm water capture, and limiting the portion on landscapes that can be covered in turf.

4.14.2.2 Local

City of San Diego General Plan

General Plan policies that pertain to public utilities include are provided in Table 4.14-1.

Table 4.14-1
City of San Diego General Plan Relevant Elements and Policies

Relevant Elements and Policies
<i>Urban Design Element</i>
UD-A.16. Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm. <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar services to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventors, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fence-like elements. c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements.
<i>Public Facilities, Services and Safety Element</i>
PF-F.1. Meet or exceed federal and state regulatory mandates cost effectively.
PF-F.3. Minimize sewer spills by best practice infrastructure asset management practices.
PF-F.4. Maintain conveyance and treatment capacity.
PF-F.5. Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies.
PF-F.6. Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.
PF-G.1. Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards.
PF-G.2. Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.
PF-G.3. Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.
PF-H.2. Require the provision and maintenance of essential water storage, treatment, supply facilities and infrastructure to serve existing and future development.
PF-H.3. Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development.
PF-I.2. Maximize waste reduction and diversion.
PF-I.4. Promote litter prevention efforts and practices.
PF-I.5. Plan for sufficient waste handling and disposal capacity to meet existing and future needs. Evaluate existing waste disposal facilities for potential expansion of sites for new disposal facilities.
PF-L.3. Provide infrastructure to ensure seamless communications and universally available access to data for all internal and external groups.
PF-L.5. Work with private telecommunication services providers to develop and maintain an integrated information infrastructure system.

Relevant Elements and Policies
PF-L.13. Ensure proper reuse, recycling and waste diversion efforts of communications equipment and other technologies upon expiration of use.
PF-M.1. Ensure that public utilities are provided, maintained, and operated in a cost-effective manner that protects residents and enhances the environment.
PF-M.3. Integrate the design and siting of safe and efficient public utilities and associated facilities into early stages of the long range planning and development process, especially in redevelopment/urban areas where land constraints exist.

University Community Plan

The amended 2014 UCP Public Facilities Element has adopted the following policies for public utilities:

1. Electrical Utilities

Where it is economically feasible, overhead utility lines should be replaced by underground facilities. Undergrounding is not practical for transmission lines; however, new development should provide for the undergrounding of distribution service utility lines. If additional distribution lines are proposed in the community, they should be carefully reviewed for environmental, land use and aesthetic impacts.

2. Sewer and Water Facilities

Private development should finance its public utility needs and provide improvements both off-site and on-site in accordance with present Council policy.

City of San Diego Zero Waste Plan

On July 13, 2015, the City Council approved a Zero Waste Plan. The Zero Waste Plan is a framework of potential sustainable diversion strategies for future action that would be implemented in incremental steps to achieve 75 percent diversion by 2020, 90 percent diversion by 2035, and Zero Waste by 2040 (City of San Diego 2015f).

City of San Diego Climate Action Plan

The City of San Diego adopted a CAP in December 2015 (City of San Diego 2015a). The CAP quantifies GHG emissions, establishes citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives that the City can use to

reduce GHG emissions. The CAP includes strategies and actions that encourage (1) water and energy efficiency buildings, (2) clean and renewable energy, (3) bicycling, walking, transit and land use, (4) zero waste, and (5) climate resiliency.

City of San Diego Ordinance 0-17327 (Mandatory Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that “recycled water shall be used within the City where feasible and consistent with the legal requirements; preservation of public health, safety, and welfare; and the environment.” Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc., based on the project’s location within an existing or proposed recycled water service area.

City of San Diego Municipal Code

In compliance with AB 939, the City is currently at a waste diversion rate of 67 percent. The City has adopted programs and policies requiring individual developments to incorporate recycling and waste reduction measures, and waste reduction and recycling programs have been implemented to assist the City in reducing waste in compliance with state law.

The following sections of the City’s Municipal Code target waste reduction:

- **Construction and Demolition Debris Ordinance.** Chapter 6, Article 6, Division 6. This section (and related ordinances) requires project applicants to submit a Waste Management Form and deposit with the building permit or demolition/removal permit, to provide a general estimate of total project waste generation, including how much will be recycled. In order to obtain a refund on the deposit, the code requires the demonstration of a minimum diversion rate of 50 percent for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance. A minimum diversion rate of 75 percent is required for building permits or demolition/removal permits issued more than 180 calendar days after the effective date of the ordinance, provided that a certified recycling facility that accepts mixed construction and demolition debris operates within 25 miles of the City Administrative Building, located at 202 C Street, San Diego (City of San Diego 2014e).
- **Chapter 6, Article 6, Division 7 (Recycling Ordinance).** This section requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in approved recycling containers.
- **Chapter 14, Article 2, Division 8 (Refuse and Recyclable Material Storage Regulations).** This section is intended to encourage recycling through requirements to provide permanent,

adequate, and convenient space for the storage and collection of refuse and recyclable material. Specific requirements for new nonresidential development include the provision of at least one exterior refuse and recyclable material storage area per building, with related storage area capacity based on the gross floor area of associated buildings.

City of San Diego Drought Restrictions

Effective July 1, 2015, the City implemented mandatory watering restrictions limiting the watering of outdoor landscaping to a maximum of two days per week, five minutes per day, if using a standard sprinkler system to achieve the state mandated 16 percent reduction in water usage. Other restrictions (City of San Diego 2015g) include:

- Stop operation of ornamental fountains, except to the extent needed for maintenance purposes.
- Use a hand-held hose equipped with a positive shut-off nozzle or timed sprinkler system to water landscaped areas.
- Irrigation is not permitted during a rain event or for at least 48 hours following a rain event.
- The washing of automobiles, trucks, trailers, airplanes and other types of transportation equipment is only allowed between 6 p.m. and 10 a.m., and water shall not enter the storm drain.
 - NOTE: Mobile equipment washings are exempt from these regulations where the health, safety, and welfare of the public are contingent upon frequent vehicle cleanings, such as garbage trucks and vehicles to transport food products, livestock and perishables. Washing is permitted at any time at a commercial car wash.
- Boats and boat engines are permitted to be washed down after use.
- Use recycled or non-potable water for construction purposes when available.
- Use of water from fire hydrants will be limited to firefighting, as well as meter installation by the Public Utilities Department as part of its Fire Hydrant Meter Program, and related activities necessary to maintain the health, safety and welfare of the citizens of San Diego.
- Construction operations receiving water from a fire hydrant or water truck will not use water beyond normal activities.
- Irrigation is permitted any day at any time as follows:
 1. As required by a landscape permit.
 2. For erosion control.

3. For establishment, repair or renovation of public use fields for schools and parks.
4. For landscape establishment following a disaster.

4.14.3 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact to public utilities would occur if the Project would:

1. Result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: natural gas, water, sewer, communication systems, and solid waste management; or
2. Result in the use of excessive amounts of water.

4.14.4 Impact Analysis

Issue 1: Would the project result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: natural gas, water, sewer, communication systems, and solid waste management?

4.14.4.1 Impact Analysis

Removal of Genesee Avenue Widening

Water

The UCP Area is served by the City of San Diego's Public Utilities Department. The City receives the majority of its water from SDCWA, who is a member of the MWD. The UCP Area has been included in SDCWA water demand projections and is accounted for by the Public Utilities Department when purchasing water supplies.

The removal of the planned Genesee Avenue Widening from the UCP does not meet any of the thresholds set by SB 610; therefore, preparation of a Water Supply Assessment is not required. Genesee Avenue would remain in its existing condition. The removal of the planned Genesee Avenue Widening from the UCP would not create a demand for water above that which already exists under current conditions.

Wastewater/Sewer

Wastewater treatment service for the UCP Area is provided by the City of San Diego Public Utilities Department. The removal of the planned Genesee Avenue Widening from the UCP would not increase the amount of wastewater generated in the UCP Area and would not require the construction of new wastewater or sewer facilities.

Natural Gas

The removal of the planned Genesee Avenue Widening would not lead to the use of natural gas above existing conditions for the area. Genesee Avenue would not be widened; therefore, no natural gas or energy would be used since no construction activities would occur. Genesee Avenue would continue to operate as it does currently.

Communication Systems

Communications facilities are provided through private utility companies that have the capacity to serve the UCP Area. The removal of the planned Genesee Avenue Widening project would not impair the ability of these companies to provide services to the constituents of the UCP Area, and would not lead to the need to expand or create new communications facilities.

Solid Waste Management

There would be no construction or demolition involved in the removal of the planned Genesee Avenue Widening project. Therefore, no additional solid waste would be generated by this portion of the Project. No new facilities would need to be constructed or services provided as a result of the removal of the planned Genesee Avenue Widening from the UCP.

Removal of Regents Road Bridge

Water

The UCP Area is served by the City of San Diego's Public Utilities Department. The City receives the majority of its water from SDCWA, who is a member of MWD. The UCP Area has been included in SDCWA water demand projections and is accounted for by the Public Utilities Department when purchasing water supplies.

It has been determined that the removal of the planned Regents Road Bridge from the UCP does not meet any of the thresholds set by SB 610; therefore, preparation of a Water Supply Assessment is not required. Regents Road would remain in its existing condition. The removal of

the planned Regents Road Bridge from the UCP would not create a demand for water above that which already exists under current conditions.

Wastewater/Sewer

Wastewater treatment service for the UCP Area is provided by the City of San Diego Public Utilities Department. The removal of the planned Regents Road Bridge from the UCP would not increase the amount of wastewater generated in the UCP Area and would not require the construction of new facilities.

Natural Gas

The removal of the planned Regents Road Bridge would not lead to the use of natural gas above existing conditions for the UCP Area. The planned Regents Road Bridge would not be constructed, therefore, no natural gas or energy would be used since no construction activities would occur, and Regents Road would continue to operate as it does currently.

Communication Systems

Communications facilities are provided through private utility companies that have the capacity to serve the UCP Area. The removal of the planned Regents Road Bridge from the UCP would not impair the ability of these companies to provide services to the constituents of the UCP Area and would not require the construction of expanded or new communications facilities.

Solid Waste Management

There would be no construction or demolition involved in the removal of the planned Regents Road Bridge. Therefore, no additional solid waste would be generated by the removal of the planned Regents Road Bridge from the UCP. No new facilities would need to be constructed or services provided as a result of the removal of the planned Regents Road Bridge from the UCP.

4.14.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

Water

There would be no increase in water demand as a result of not widening Genesee Avenue. Therefore, no new water facilities would need to be constructed, and no significant impacts would occur.

Wastewater/Sewer

The removal of the planned Genesee Avenue Widening would not generate any wastewater above existing conditions. Therefore, no new wastewater or sewer facilities would need to be constructed, and no significant impact would occur.

Natural Gas

The removal of the planned Genesee Avenue Widening would not result in the use of excessive fuel. No significant impact would occur.

Communication Systems

There would be no significant impacts to cable and telephone services, as these are available through private utility companies that have the capacity to serve the UCP Area.

Solid Waste Management

As there are no construction or demolition activities associated with the removal of the Genesee Avenue Widening, there would be no generation of additional solid waste. Therefore, the Project would not require the construction of new facilities, there would be no requirement for new services, and no significant impact would occur.

Removal of Regents Road Bridge*Water*

No new water facilities would need to be constructed as a result of this Project. There would be no increase in demand above that of existing conditions due to the removal of the planned Regents Road Bridge from the UCP. Therefore, no significant impact would occur.

Wastewater/Sewer

No additional wastewater would be generated above existing conditions as a result of the removal of the planned Regents Road Bridge construction from the UCP. No new facilities would need to be constructed; therefore, no significant impact would occur.

Natural Gas

No excessive use of fuel or natural gas would result from the removal of the planned Regents Road Bridge from the UCP. Therefore, no significant impact would occur.

Communication Systems

There would be no significant impacts to cable and telephone services, as these are available through private utility companies that have the capacity to serve the UCP Area.

Solid Waste Management

The removal of the planned Regents Road Bridge from the UCP would not result in any solid waste generation above existing conditions, as there are no construction or demolition activities associated with this portion of the Project. Therefore, no new facilities would need to be constructed, no new services needed, and there would be no significant impact.

4.14.4.3 Mitigation Framework

The Project would not require new water, wastewater/sewer, natural gas, communication systems, or solid waste disposal facilities to be built. No significant impact is anticipated as a result of the Project.

4.14.5 Impact Analysis

Issue 2: Would the project result in the use of excessive amounts of water?

4.14.5.1 Impact Analysis

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not result in the use of an excessive amount of water. There would be no construction or demolition activities that would require the use of water. Conditions at the project site would remain the same as they are under existing conditions.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not result in the use of an excessive amount of water. There would be no construction or roadway surfacing activities that would require the use of water. Conditions, including landscaping, at the project site would remain the same as they are under existing conditions.

4.14.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

There would not be an excessive use of water as a result of the removal of the Genesee Avenue Widening. Therefore, no significant impacts would occur.

Removal of Regents Road Bridge

There would not be an excessive use of water as a result of the removal of the planned Regents Road Bridge construction. Therefore, no significant impacts would occur.

4.14.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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4.15 HEALTH AND SAFETY

This section includes a description of pedestrian safety, existing known contamination sites or hazardous materials/toxic substances within the Project area, emergency access routes, the potential for wildland fires in the Project area, and AIAs within the Project area. Additionally, this section includes a summary of applicable regulations, and analyses of potential short-term and long-term impacts of the Project.

4.15.1 Existing Conditions

4.15.1.1 UCP Area

Pedestrian Safety

As discussed in Section 4.2, Transportation/Circulation, pedestrian facilities in the UCP Area include sidewalks, curb ramps, and other amenities such as street trees for shading. Figure 4.2-5 shows existing sidewalks, as well as pedestrian barriers. The UCP Area consists of many wide roadways carrying six or more travel lanes, which limit pedestrian crossing locations to signalized locations only. Pedestrian bridges are currently built at the following locations to minimize the need for pedestrians to cross wide, busy streets: (1) Genesee Avenue near Executive Square; (2) La Jolla Village Drive east of Genesee Avenue; and (3) Genesee Avenue between La Jolla Village Drive and Esplanade Court.

Hazardous Materials

Hazardous materials pass through the City of San Diego via the freeway, rail, and surface street systems. I-5, I-805, I-8, and I-15, and SRs 56, 52, 94, 163, and 905 pass through the City of San Diego. Transportation of hazardous materials by truck and rail is regulated by the U.S. Department of Transportation (DOT). The DOT regulations establish criteria for safe handling procedures.

A review of regulatory databases was performed to evaluate past and existing environmental conditions within 1 mile of the UCP Area, including the storage, release, or disposal of hazardous substances. These databases include the Department of Toxic Substances Control's (DTSC) EnviroStor database, which consists of National Priority List (NPL) sites, state response sites, voluntary cleanup sites, and school cleanup sites. GeoTracker® is managed by the SWRCB. The database manages sites that impact groundwater and those that require groundwater cleanup, including leaking underground storage tank (LUST) sites, Cleanup Program sites, Land Disposal Sites, Military Sites, WDR Sites, Irrigated Lands Regulatory

Program, Permitted Underground Storage Tank (UST) sites, oil and gas monitoring, and DTSC Cleanup Sites and Hazardous Waste Permits throughout California.

Department of Toxic Substances Control EnviroStor Database

DTSC maintains the EnviroStor database for identifying sites that have known contamination or sites that may require further investigation. The database includes the following site types: Federal Superfund sites (NPL); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites.

An online search on the DTSC EnviroStor site resulted in 11 listed sites within 1 mile of the UCP Area. Of these, there were three “Active” sites (General Atomics, SDG&E Co. Miramar Waste Management Facility, and Sunflower Properties Inc.) (DTSC 2007). The list of “Active” sites identified under EnviroStor is provided in Table 4.15-1:

**Table 4.15-1
EnviroStor Active Sites within 1 Mile of the UCP Area**

Site Name	EnviroStor ID	Location	Site Type	Cleanup Status	Contaminants of Concern
<i>General Atomics</i>	80001461	3550 General Atomics Ct.	Corrective Action	Active – As of 1/1/2008	Tetrachloroethylene (PCE) Trichloroethylene (TCE) 1,4-Dioxane
<i>SDG&E Co. Miramar Waste Management Facility</i>	80001765	6875 Consolidated Way	Corrective Action	Active – As of 1/1/2008	No Contaminants Found
<i>Sunflower Properties Inc.</i>	37590003	9755 Distribution Ave.	State Response or NPL	Active – As of 7/24/1998	Halogenated Organic Compounds Tetrachloroethylene (PCE) Trichloroethylene (TCE)

Source: DTSC 2007

State Water Resources Control Board GeoTracker Database

The SWRCB maintains the GeoTracker database for environmental data for regulated facilities in California. GeoTracker is the SWRCB’s data management system for managing sites that impact groundwater, especially those that require groundwater cleanup (USTs, Department of Defense, Site Cleanup Program), as well as permitted facilities such as operating USTs and land disposal sites.

An online search on the GeoTracker database resulted in 1,008 listed sites within 1 mile of the UCP Area. Of these, 54 are “Open” sites (SWRCB 2016). These sites are listed below in Table 4.15-2.

Schools

As discussed in Section 4.13, Public Services and Facilities, educational facilities in the UCP Area include public, private, and higher education institutions. The UCP Area is within the San Diego Unified School District.

Emergency Response Plans/Evacuation Routes

Emergency Response Plans/Evacuation Routes are maintained at the federal, state, and local levels for all types of disasters, and include elements to maintain continuity of government, emergency function of government agencies, and the mobilizing and application of resources and information. Local governments have the primary responsibility for preparedness and response activities. The 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (Emergency Plan) is for use by the County and all the cities within the county to respond to major emergencies and disasters, including earthquake, flooding, drought, dam failure, nuclear-related incidents, water, gas, energy shortage, terrorism, tsunami, wildland fires, urban fires, transportation accidents, hazardous materials incidents, and landslides.

Response to major emergencies and disasters would be coordinated by the Operational Area (OA), defined as a county and its political jurisdictions, Emergency Operations Center (EOC). If evacuation is required, local jurisdictions work with the OA EOC, law enforcement officials, Caltrans, the California Highway Patrol, County Public Works, and other applicable agencies/departments to identify evacuation points and transportation routes. The following interstates and state highways within the UCP Area are identified in the Emergency Plan as the primary transportation routes for an evacuation effort in the region: I-5, I-805, and SR 52. Other identified evacuation routes within San Diego County include I-8; I-15; and SRs 54, 67, 75, 76, 78, 94, 125, 163, and 905 (OES 2014).

**Table 4.15-2
GeoTracker Active Sites within 1 Mile of the UCP Area**

Site Name	Global ID	Location	Cleanup Status	Contaminants of Concern
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 1a</i>	T10000001033	Miramar Rd.	Open – Assessment & Interim Remedial Action	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 1b</i>	T10000001034	Miramar Way	Open – Assessment & Interim Remedial Action	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 1d</i>	T10000001035	Panther Rd.	Open – Assessment & Interim Remedial Action	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 1f</i>	T10000001036	Altair Ave.	Open – Assessment & Interim Remedial Action	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 5 – San Clemente Canyon Disposal Area</i>	DOD100322200	Johnson Rd.	Open – Assessment & Interim Remedial Action	None Specified
<i>Kelly Park</i>	L10009058884	Kelly St.	Open – Closed/With Monitoring	Copper, Lead, Polynuclear Aromatic Hydrocarbons (PAHs)
<i>North Miramar Landfill</i>	L10006986192	5180 Convoy St.	Open – Closed/With Monitoring	Lead, Nitrate, Other Chlorinated Hydrocarbons, Other Solvent or Non-Petroleum Hydrocarbon, Other Inorganic / Salt
<i>South Miramar Landfill</i>	L10003830787	Kearny Mesa–Sections 25/26	Open – Closed/With Monitoring	Other Chlorinated Hydrocarbons, Other Inorganic/ Salt, Trichloroethylene (TCE)
<i>AT&T Data Center</i>	T10000002687	5732 Pacific Center Blvd.	Open – Eligible for Closure	Gasoline
<i>Chevron #94339</i>	T0607301543	3860 Governor Dr.	Open – Eligible for Closure	Gasoline
<i>Texaco Refining & Marketing</i>	T0607357151	7785 Clairemont Mesa Blvd.	Open – Eligible for Closure	Gasoline
<i>C & R Transfer</i>	T06019782658	5803 Kearny Villa Rd.	Open – Inactive	Dichloroethene (DCE), Other Chlorinated Hydrocarbons, Trichloroethylene (TCE), Vinyl Chloride
<i>Moore Printed Circuits</i>	SLT19715245	6740 Nancy Ridge Dr.	Open – Inactive	None Specified
<i>West Miramar Sanitary Landfill</i>	L10004030235	5180 Convoy	Open – Operating	Other Chlorinated Hydrocarbons, Other Inorganic / Salt
<i>AM/PM/Arco #1986</i>	T0607301828	6130 Balboa Ave.	Open – Remediation	Gasoline

Site Name	Global ID	Location	Cleanup Status	Contaminants of Concern
<i>Chevron Environmental Management Company (Former Texaco 21-1364)</i>	T0607301421	4409 Mission Bay Dr.	Open – Remediation	Gasoline
<i>Kyocera America Inc.</i>	T0608130389	11620 Sorrento Valley Rd.	Open – Remediation	Chlorinated Hydrocarbons
<i>Marine Corps Air Station, Miramar (MCAS) – MMRP Site 5 – Skeet Range 1980 – IR Site 19</i>	T10000004367	PO Box 452022	Open – Remediation	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – Outfall 126</i>	T06019741848	MCAS Miramar	Open – Remediation	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – Tank 936</i>	T0607301031	Tank 936	Open – Remediation	None Specified
<i>Mic Gastation, Inc.</i>	T0607303171	4592 Clairemont Dr.	Open – Remediation	Waste Oil / Motor / Hydraulic / Lubricating
<i>Prestige Stations Inc. #9750</i>	T0607302349	2505 Morena Blvd.	Open – Remediation	Gasoline
<i>Ryder Truck Rental Inc.</i>	T0607300284	5345 Overland Ave.	Open – Remediation	Diesel, Gasoline, Waste Oil / Motor / Hydraulic / Lubricating
<i>Sunflower Property</i>	SL0607363006	9755 Distribution Ave.	Open – Remediation	Tetrachloroethylene (PCE)
<i>801 Pearl Street</i>	T10000005198	801 Pearl St.	Open – Site Assessment	None Specified
<i>AM/PM Mini Market #5214 PSI714</i>	T06019784972	1875 Grand Ave.	Open – Site Assessment	Gasoline
<i>Bay View Plaza</i>	T10000006020	2565 Clairemont Drive	Open – Site Assessment	None Specified
<i>Chevron USA Inc. SS #94038</i>	T0607301085	3063 Carmel Valley Rd.	Open – Site Assessment	Gasoline
<i>County Operation Center</i>	T10000003367	5555 Overland Dr.	Open – Site Assessment	None Specified
<i>Epoch Corp–Linda Vista #166</i>	T0607302693	7611 Linda Vista Rd.	Open – Site Assessment	Benzene, Gasoline, MTBE / TBA / Other Fuel Oxygenates, Toluene, Xylene
<i>Fairfield Kearny Mesa, LLC</i>	SL0607341984	3540 Aero Court Dr.	Open – Site Assessment	Other Solvent or Non-Petroleum Hydrocarbon
<i>Frame Marital Trust</i>	T10000003014	8655 Commerce Ave.	Open – Site Assessment	Tetrachloroethylene (PCE)
<i>Genesee Shell</i>	T0607302627	4303 Genesee Ave.	Open – Site Assessment	Waste Oil / Motor / Hydraulic / Lubricating
<i>Governor Drive Exxon</i>	T0607300146	3918 Governor Dr.	Open – Site Assessment	Gasoline
<i>Health Center Texaco</i>	T0607361960	2777 Health Center Dr.	Open – Site Assessment	Gasoline

4.15 Health and Safety

Site Name	Global ID	Location	Cleanup Status	Contaminants of Concern
<i>John Sandoval – Meth Case</i>	T10000002479	3337 McGraw	Open – Site Assessment	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – Bldg. 8483</i>	T10000005610	Bldg. 8483	Open – Site Assessment	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 16– K212 Boiler Plant Mercury Spill</i>	DOD100302800	Building K-212 Mitscher Way	Open – Site Assessment	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 1c – Future Fuel Facility Operations Area</i>	DOD100320500	Miramar Way	Open – Site Assessment	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 2 – Rose Canyon</i>	DOD100320600	Po Box 452001 Bldg. 6317	Open – Site Assessment	None Specified
<i>Marine Corps Air Station, Miramar (MCAS) – San Clemente Canyon Disposal Area, Installation Restoration Site 20</i>	T10000008410	Johnson Rd.	Open – Site Assessment	None Specified
<i>Meadowood 2 Property</i>	T10000008492	13855 Rancho Santa Fe Farms Rd.	Open – Site Assessment	None Specified
<i>Miramar Shell</i>	T06019732802	9840 Miramar Rd.	Open – Site Assessment	Gasoline
<i>Mission Bay Property</i>	T10000007241	4606 Mission Bay Drive	Open – Site Assessment	None Specified
<i>Mobil 18-EPY</i>	T0607391724	8380 Clairemont Mesa Blvd.	Open – Site Assessment	Diesel, Gasoline
<i>Pacific Beach – Guy Hill Cadillac Site</i>	T10000007656	12250 El Camino Real, Suite 380	Open – Site Assessment	None Specified
<i>Pacific Beach Spirit</i>	T10000006503	1885 Garnet Ave.	Open – Site Assessment	Ethylbenzene, Napthalene, Tetrachloroethylene (PCE), Total Petroleum Hydrocarbons (TPH)
<i>Precision Engine Controls Corp.</i>	T10000000445	11661 Sorrento Valley Rd.	Open – Site Assessment	None Specified
<i>Propel Biofuels 76</i>	T10000004590	3860 Kearny Mesa Rd.	Open – Site Assessment	Diesel, Gasoline
<i>Science Park Facility</i>	T10000003746	3013 Science Park Rd.	Open – Site Assessment	Other Chlorinated Hydrocarbons, Other Solvent or Non-Petroleum Hydrocarbon, Tetrachloroethylene (PCE)

Site Name	Global ID	Location	Cleanup Status	Contaminants of Concern
<i>Shell</i>	T0607378338	7647 Balboa Ave.	Open – Site Assessment	Gasoline
<i>UCSD UC San Diego Camp Matthews (J09ca1110) – UCSD UC San Diego Camp Matthews – HTRW-13 (Ex-UST Soil Remediation)</i>	T10000004407	Gilman Dr.	Open – Site Assessment	Munitions Debris (MD), Other Petroleum
<i>Bob Bond Gas</i>	T0607302008	3377 Sandrock Rd.	Open – Verification Monitoring	Gasoline
<i>Marine Corps Air Station, Miramar (MCAS) – IR Site 18 (Bldg. K-214)</i>	T0607301833	Intersection of Miramar Court and Maxam Way	Open – Verification Monitoring	None Specified

Source: SWRCB 2016

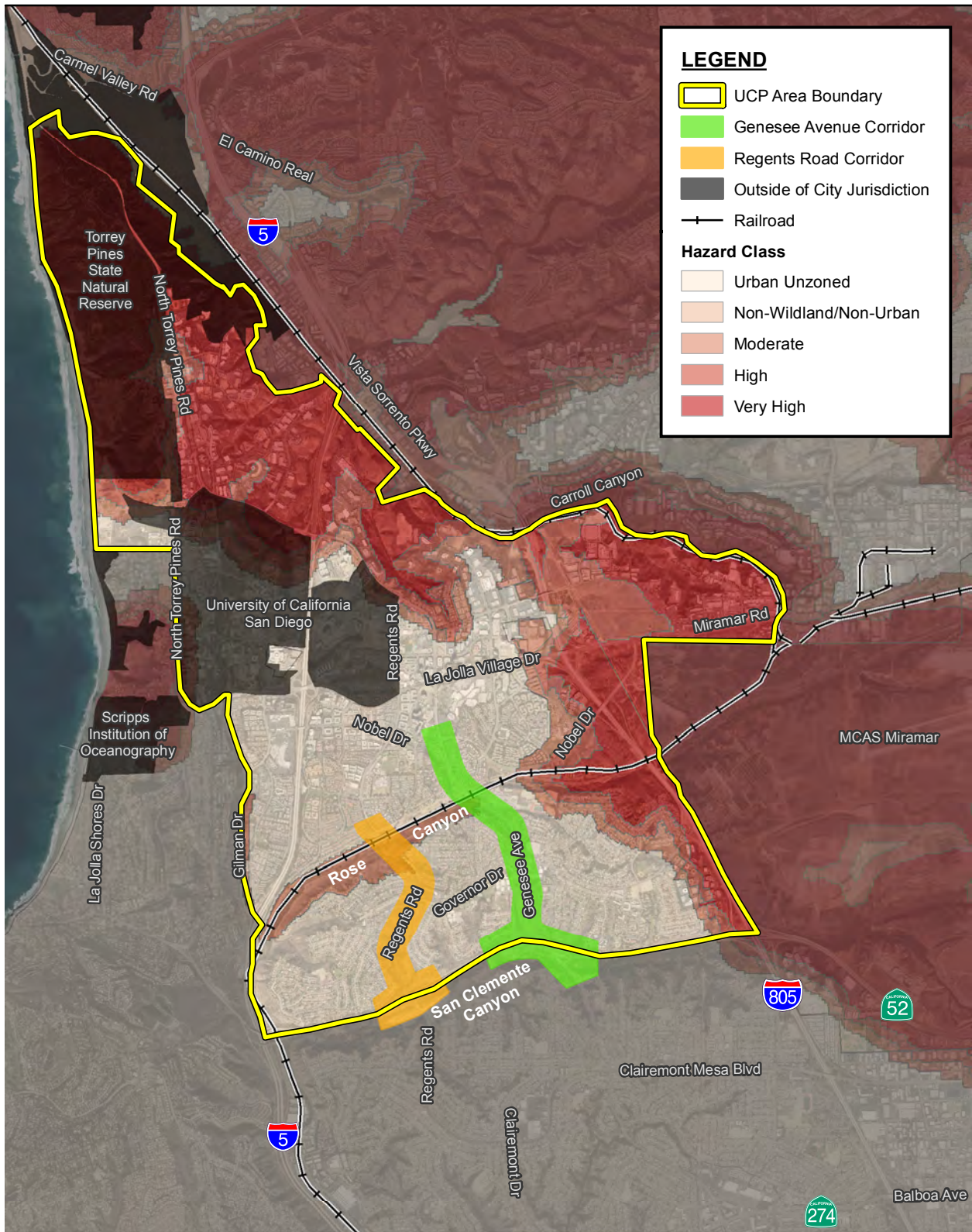
Wildland Fires

Several factors influence the likelihood of wildland fires, such as climate, precipitation levels, topography, and native vegetation. The extended droughts in Southern California can result in large areas of dry vegetation that provide fuel for wildland fires. Wildfires can occur in both undeveloped, rural areas and urbanized areas of the San Diego region. While urban areas are highly developed with buildings, streets, and hardscape, to the north and south of the UCP Area are canyons and other areas of native vegetation that could be susceptible to wildland fires.

Wildland fire protection in California is the responsibility of the state, local government, or the federal government. The California Department of Forestry and Fire Protection (CAL FIRE) adopted Fire Hazard Severity Zone maps for State Responsibility Areas in 2007, as well as recommended maps for Very High Fire Hazard Severity Zones in Local Responsibility Areas. Local Responsibility Areas include incorporated cities, cultivated agriculture lands, and portions of the desert. The CAL FIRE recommendations are not the same as actual zones, which do not go into effect unless adopted by local agencies (CAL FIRE 2012). In San Diego County, CAL FIRE has made recommendations on 13 cities, including the City of San Diego. The County of San Diego Wildland Hazard Map tool provides local designations based on CAL FIRE's recommendations (SDFRD 2009). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as "No Designation," "Moderate," "High," or "Very High." The northern portion of the UCP Area is designated "Very High." In addition, the eastern portions of the UCP contain areas designated as "High" to "Very High" (Figure 4.15-1). Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as "Very High." Areas designated as "Very High" aid in proper vegetation management and implementation of building standards to minimize the loss of life, resources, and property (SDFRD 2009).

Airports

SDCRAA serves as the ALUC, which creates and updates ALUCPs for the San Diego region airports. The San Diego region has 14 adopted ALUCPs for local public use and military airports. The basic function of ALUCPs is to promote compatibility between airports and the land uses that surround them "to the extent that these areas are not already devoted to incompatible uses" (Pub. Util. Code Section 21674(a)). With limited exception, California law requires preparation of ALUCPs for each public-use and military airport in the state. The UCP Area is in proximity to two airports with ALUCPs: MCAS Miramar and Montgomery Field.



Source: SanGIS 2015; SANDAG 2014; Esri.

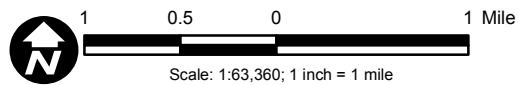


Figure 4.15-1
Fire Hazard Severity Zones

The MCAS Miramar is located approximately one mile to the east of the UCP Area. Portions of the UCP are within both Review Areas 1 and 2 of the AIA for MCAS Miramar. Review Area 1 encompasses locations exposed to noise levels of CNEL 60 dB or greater, the safety zones, air space protection, and overflight. Review Area 2 encompasses the portions of the overflight and airspace protection factors/layers not encompassed within Review Area 1. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate. The MCAS Miramar ALUCP designates APZs, which are sets of safety-related zones beyond the ends of military airport runways. The UCP Area is not located within an APZ (Figure 4.1-4, Airport Safety Zones). The MCAS Miramar ALUCP also identifies the FAA Height Notification Boundary and Federal Aviation Regulation Part 77 Airspace Surfaces (Part 77 Surfaces). The Project is located within the FAA Height Notification Boundary and the Part 77 Surfaces for MCAS Miramar.

The 2010 Montgomery Field ALUCP addresses four types of airport land use compatibility factors, including noise, safety, airspace protection, and overflight. Each factor represents a separate “layer” for the purpose of assessing the compatibility of proposed land use actions, and the combination of the four layers determines the boundaries of the AIA. The southeastern corner of the UCP Area is within the Montgomery Field AIA (ALUC 2010).

4.15.1.2 Genesee Avenue Corridor

Pedestrian Safety

Within the Genesee Avenue Corridor, Genesee Avenue is classified as a Four-Lane Prime Arterial. On both outside edges of Genesee Avenue for the length of the corridor, there is a 10-foot-wide parkway that includes 5.5 feet of curb, gutter, and sidewalk, and 4.5 feet of landscaping. The sidewalk, which is utilized by pedestrians, is located between the curb and the landscaping. The parkway landscaping occurs on the outside edge of the street right-of-way and does not provide a buffer between the sidewalk and the road. However, the sidewalk is separated from automobile traffic by the curb and gutter and a 6-foot-wide bike lane. The speed limit along Genesee Avenue is 45 mph and is reduced to 25 mph near University City High School.

Hazardous Materials

A review of regulatory databases was performed to evaluate past and existing environmental conditions within 1 mile of the Genesee Avenue Corridor, including the storage, release, or disposal of hazardous substances. The following summarizes the results of the review of regulatory databases.

Department of Toxic Substances Control EnviroStor Database

An online search on the DTSC EnviroStor site shows no cleanup sites on or adjacent to the Genesee Avenue Corridor (DTSC 2007). The nearest listed site is approximately 1 mile south of the southern end of the Genesee Avenue Corridor in the Clairemont Town Square at 4180 Clairemont Mesa Boulevard. The site is the former location of Regan Recyclers Site, and is categorized as an “Evaluation” site. The site was a former service station, which was demolished in the 1980s and became Regan Recyclers. During geotechnical work to build a Krispy Kreme doughnut shop on the site, petroleum odors were detected. Soil samples were analyzed, and it was concluded that there was no risk to human health or the environment and no further action was required (County of San Diego 2001).

State Water Resources Control Board GeoTracker Database

An online search of the Genesee Avenue Corridor displays seven LUST sites, five of which are closed sites (SWRCB 2016). Chevron #94339 (Global ID T0607301543) and Governor Drive Exxon (Global ID T0607300146) are open cases. The LUST sites are described in Table 4.15-3:

**Table 4.15-3
GeoTracker Sites within 1 Mile of the Genesee Avenue Corridor**

Site Name	Global ID	Location	Category	Cleanup Status	Contaminants of Concern
<i>Chevron #94339</i>	T0607301543	3860 Governor Drive	LUST Cleanup Site	Open - Site Assessment as of 6/11/2015	Gasoline
<i>Governor Drive Exxon</i>	T0607300146	3918 Governor Drive	LUST Cleanup Site	Open – Site assessment as of 6/1/09 ¹	Gasoline
<i>Mobil 18-F8W</i>	T0607301663	3861 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Unocal SVC STA #5858-31002</i>	T0607303170; T0607302437	3901 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Distinctive Cleaners</i>	T06019778726	4049 Governor Drive	Cleanup Program Site	Case Closed	Chlorinated Hydrocarbons
<i>Marine Aviation Mishap Site</i>	T10000000795	4406 Cather Avenue	Cleanup Program Site	Case Closed	None Specified
<i>University City Arco</i>	T0607300731; T0608117316	3179 Governor Drive	LUST Cleanup Site; also a Cleanup Site	Case Closed	Gasoline
<i>Wally’s Mobile Service</i>	T0607301516; T0607301151; T0608187985	3209 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Costa Verde Car Wash and Chevron</i>	T0608198901	8505 Costa Verde Boulevard	LUST Cleanup Site; also a Permitted UST	Case Closed	Gasoline
<i>Northcoast Cleaners</i>	T0608136642	8915 Towne Center Drive	Cleanup Program Site	Case Closed	Chlorinated Hydrocarbons

Site Name	Global ID	Location	Category	Cleanup Status	Contaminants of Concern
AAA Able Inc.	none	3861 Governor Drive	Permitted UST	n/a	n/a
Unocal Service Station #5853-31002	none	3901 Governor Drive	Permitted UST	n/a	n/a

n/a = not applicable

¹ Site characterization, investigation, risk evaluation, and/or site conceptual model development are occurring at the site. Examples of site assessment activities include, but are not limited to, the following: (1) identification of the contaminants and the investigation of their potential impacts; (2) determination of the threats/impacts to water quality; (3) evaluation of the risk to humans and ecology; (4) delineation of the nature and extent of contamination; (5) delineation of the contaminant plume(s); and (6) development of the Site Conceptual Model.

Source: SWRCB 2016

The GeoTracker database also identified three Cleanup Program sites in the Genesee Avenue Corridor. Distinctive Cleaners (Global ID T06019778726), located at 4049 Governor Drive, included the leaking of chlorinated hydrocarbons into the soil below a dry cleaning machine. Potential risks were eliminated and the case was closed in 2005 (County of San Diego 2005). Northcoast Cleaners (Global ID T0608136642), located at 8915 Towne Center Drive, was reported to leak chlorinated hydrocarbons into the soil. The case was closed as of 1999. The Marine Aviation Mishap Site (Global ID T10000000795), located at 4406 Cather Avenue, is also listed as a Cleanup Program site. This case was closed in 2009 (SWRCB 2016).

Four Permitted UST facilities exist on the northeast side of Genesee Avenue and Governor Drive. The four UST sites include AAA Able Inc. (3861 Governor Drive), Chevron #94339 (3860 Governor Drive), Governor Drive Exxon (3918 Governor Drive), and Unocal Service Station #5853-31002 (3901 Governor Drive). All four facilities are permitted by the County of San Diego (SWRCB 2016).

Schools

Areas within the Genesee Avenue Corridor that are subject to a higher risk of hazardous materials incidents include schools near roadways that are frequently used for transporting hazardous materials. University High School is located directly on the Genesee Avenue Corridor, on the northeast side of Genesee Avenue at 6949 Genesee Avenue. Marie Curie Elementary School is also adjacent to the eastern side of the Genesee Avenue Corridor, located at 4080 Governor Drive. Standley Middle School is on the western side of the Genesee Avenue Corridor, approximately 500 feet from Genesee Avenue at 6298 Radcliffe Drive. Spreckels Elementary School is located outside of the Genesee Avenue Corridor boundaries, approximately 0.5 mile to the west of the Genesee Avenue Corridor at 6033 Stadium Street.

Emergency Response Plans/Evacuation Routes

I-805 and SR 52 are the closest primary transportation routes to the east and southern ends of the Genesee Avenue Corridor, respectively.

Wildland Fires

The majority of the Genesee Avenue Corridor area is located in a Fire Hazard Severity Zone with “No Designation.” However, the portions of the Genesee Avenue Corridor that interface with Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as “Very High” (SDFRD 2009).

Airports

The Genesee Avenue Corridor is in proximity to two airports with ALUCPs. MCAS Miramar is located approximately 1 mile northeast of the Genesee Avenue Corridor. The Genesee Avenue Corridor is located within the FAA Height Notification Boundary and Federal Aviation Regulation Part 77 Airspace Surfaces. Within the boundary, Part 77 requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (slope of 100:1) from the runway. Outside the boundary, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA. In addition, the Genesee Avenue Corridor is within the AIA in Review Area 2. Based on the ALUCP for MCAS Miramar, the Genesee Avenue Corridor area is not located within an APZ.

According to the maps in the Montgomery Field ALUCP, the southeastern corner of the UCP Area is within the Montgomery Field AIA (ALUC 2010).

4.15.1.3 Regents Road Corridor

Pedestrian Safety

At its south terminus, Regents Road is a two-lane roadway with a posted speed limit of 25 mph. It has a sidewalk on the east side of the street for pedestrian use. At the north terminus, Regents Road is classified as a Four-Lane Prime Arterial, which includes a sidewalk on both sides. The speed limit near the north terminus of Regents Road Corridor ranges from 25 to 40 mph.

Hazardous Materials

A review of regulatory databases was performed to evaluate past and existing environmental conditions within 1 mile of the Regents Road Corridor, including the storage, release, or disposal of hazardous substances. The following summarizes the results of the review of regulatory databases.

Department of Toxic Substances Control EnviroStor Database

An online search on the DTSC EnviroStor site shows no cleanup sites on or adjacent to the Regents Road Corridor (DTSC 2007). The nearest listed site is approximately 1.5 miles south of the southern end of the Regents Road Corridor in the Clairemont Town Square at 4180 Clairemont Mesa Boulevard. As described above, the site is the former location of Regan Recyclers Site, and is categorized as an “Evaluation” site.

State Water Resources Control Board GeoTracker Database

A GeoTracker database search of the Regents Road Corridor displays seven LUST sites, five of which are closed sites (SWRCB 2016). Chevron #94339 (Global ID T0607301543) and Governor Drive Exxon (Global ID T0607300146) are open cases. The LUST sites are described in Table 4.15-4.

The GeoTracker database also identified two Cleanup Program sites in the Regents Road Corridor. Distinctive Cleaners (Global ID T06019778726), located at 4049 Governor Drive, included the leaking of chlorinated hydrocarbons into the soil below a dry cleaning machine. Potential risks were eliminated and the case was closed in 2005 (County of San Diego 2005). Northcoast Cleaners (Global ID T0608136642), located at 8915 Towne Center Drive, was reported to leak chlorinated hydrocarbons into the soil. The case was closed as of 1999 (SWRCB 2016).

Four Permitted UST facilities exist on the northeast side of Genesee Avenue and Governor Drive. The four UST sites are AAA Able Inc. (3861 Governor Drive), Chevron #94339 (3860 Governor Drive), Governor Drive Exxon (3918 Governor Drive), and Unocal Service Station #5853-31002 (3901 Governor Drive). All four facilities are permitted by the County of San Diego (SWRCB 2016).

**Table 4.15-4
GeoTracker Facilities within One Mile of the Regents Road Corridor**

Site Name	Global ID	Location	Category	Cleanup Status	Contaminants of Concern
<i>University City Arco</i>	T0607300731; T0608117316	3179 Governor Drive	LUST Cleanup Site; also a Cleanup Site	Case Closed	Gasoline
<i>Wally's Mobile Service</i>	T0607301516; T0607301151; T0608187985	3209 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Costa Verde Car Wash and Chevron</i>	T0608198901	8505 Costa Verde Boulevard	LUST Cleanup Site; also a Permitted UST	Case Closed	Gasoline
<i>Chevron #94339</i>	T0607301543	3860 Governor Drive	LUST Cleanup Site	Open - Site Assessment as of 6/11/2015	Gasoline
<i>Governor Drive Exxon</i>	T0607300146	3918 Governor Drive	LUST Cleanup Site	Open – Site Assessment as of 6/1/09 ¹	Gasoline
<i>Mobil 18-F8W</i>	T0607301663	3861 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Unocal SVC STA #5858-31002</i>	T0607303170; T0607302437	3901 Governor Drive	LUST Cleanup Site	Case Closed	Gasoline
<i>Distinctive Cleaners</i>	T06019778726	4049 Governor Drive	Cleanup Program Site	Case Closed	Chlorinated Hydrocarbons
<i>Northcoast Cleaners</i>	T0608136642	8915 Towne Center Drive	Cleanup Program Site	Case Closed	Chlorinated Hydrocarbons
<i>AAA Able Inc.</i>	none	3861 Governor Drive	Permitted UST	n/a	n/a
<i>Unocal Service Station #5853-31002</i>	none	3901 Governor Drive	Permitted UST	n/a	n/a

n/a = not applicable

¹Site characterization, investigation, risk evaluation, and/or site conceptual model development are occurring at the site. Examples of site assessment activities include, but are not limited to, the following: (1) identification of the contaminants and the investigation of their potential impacts; (2) determination of the threats/impacts to water quality; (3) evaluation of the risk to humans and ecology; (4) delineation of the nature and extent of contamination; (5) delineation of the contaminant plume(s); and (6) development of the Site Conceptual Model.

Source: SWRCB 2016

Schools

Hazardous materials pass through the City of San Diego via the freeway, rail, and surface street systems. Areas within the Regents Road Corridor that are subject to a higher risk of hazardous materials incidents include schools near roadways that are frequently used for transporting hazardous materials. Doyle Elementary School at 3950 Berino Court and Doyle Park Kidz Kamp at 8175 Regents Road lie directly east of the Regents Road Corridor. Spreckels Elementary

School lies between the two corridors and is located 0.32 mile east of Regents Road at 6033 Stadium Street.

Emergency Response Plans/Evacuation Routes

The 2014 Unified San Diego County Emergency Services Organization and Emergency Plan, as described above, respond to emergency and disaster situations. I-5 and SR 52 are the closest primary transportation routes to the west and southern end of the Regents Road Corridor, respectively.

Wildland Fires

As with the Genesee Avenue Corridor, the Regents Road Corridor is located in a Fire Hazard Severity Zone with “No Designation.” However, the portions of Genesee Avenue Corridor that interface with Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as “Very High” (SDFRD 2009).

Airports

MCAS Miramar is located approximately 3 miles northeast of the Regents Road Corridor. As with the Genesee Avenue Corridor, the Regents Road Corridor is located within the FAA Height Notification Area and is within the AIA in Review Area 2, subject to applicable compatibility policies in the ALUCP.

Montgomery Field is approximately 5 miles southeast of the Regents Road Corridor and, as with the Genesee Avenue Corridor, the Regents Road Corridor is located outside of the AIA for Montgomery Field (ALUC 2010).

4.15.2 Regulatory Framework

Several federal, state, and local plans, policies, and regulations exist to control the storage, use, handling, disposal, and transport of hazardous materials and waste, as well as frame emergency and evacuation procedures.

4.15.2.1 Federal

U.S. Environmental Protection Agency Title 40 USC, Chapter 1, Subchapter I, Parts 260-265 – Solid Waste Disposal Act/ Federal Resource Conservation and Recovery Act of 1976

The Solid Waste Disposal Act, as amended and revised by the Resource Conservation and Recovery Act (RCRA), establishes requirements for the management of solid wastes (including hazardous wastes), landfills, USTs, and certain medical wastes. The statute also addresses

program administration; implementation and delegation to the states; enforcement provisions and responsibilities; and research, training, and grant funding. Provisions are established for the generation, storage, treatment, and disposal of hazardous waste, including requirements addressing generator record keeping, labeling, shipping paper management, placarding, emergency response information, training, and security plans.

Title 40 USC, Chapter 1, Subchapter I, Part 273 – Universal Waste

This regulation governs the collection and management of widely generated waste, including batteries, pesticides, mercury-containing equipment, and bulbs. This regulation streamlines the hazardous waste management standards and ensures that such waste is diverted to the appropriate treatment or recycling facility.

Title 40 USC, Chapter 1, Subchapter D, Part 112 – Oil Pollution Prevention

Oil Pollution Prevention regulations require the preparation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan if oil is stored in excess of 1,320 gallons in aboveground storage (or has a buried capacity of 42,000 gallons). SPCC regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

Title 40 USC, Chapter 1, Subchapter C, Part 61 – National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos

This regulation established National Emission Standards for Hazardous Air Pollutants (NESHAP) and names asbestos containing material (ACM) as one of these materials. ACM use, removal, and disposal are regulated by USEPA under this law.

Title 42 USC, Chapter 116 – Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) provides for public access to information about chemical hazards. The EPCRA and its regulations included in Title 40 USC. Parts 350–372 establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. USEPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Title 15 USC, Chapter 53, Subchapter I, Section 2601 et seq. Toxic Substances Control Act of 1976

The Toxic Substances Control Act (TSCA) of 1976 empowers USEPA to require reporting, record-keeping, and testing, as well as place restrictions on the use and handling of chemical substances and mixtures. This regulation phased out the use of asbestos and ACM in new building materials, and it also sets requirements for the use, handling, and disposal of ACM as well as for lead-based paint (LBP) waste. USEPA has also established NESHAP, which governs the use, removal, and disposal of ACM as a hazardous air pollutant; mandates the removal of friable ACM before a building is demolished; and requires notification before demolition. In addition to asbestos, ACM, and LBP requirements, this regulation also banned the manufacturing of polychlorinated biphenyls (PCBs) and sets standards for the use and disposal of existing PCB-containing equipment or materials.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 USC, Part 1926 et seq. Safety and Health Regulations for Construction. These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. This regulation also requires that an engineering survey is prepared prior to demolition.

Title 29 USC, Part 1910 et seq. Occupational Safety and Health Standards. Under this regulation, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training; inventory safety equipment relevant to potential hazards; have knowledge on safety equipment use; prepare an illness prevention program; provide hazardous substance exposure warnings; and prepare an emergency response plan, and fire prevention plan.

U.S. Department of Transportation

Title 49 USC, Part 172, Subchapter C – Shipping Papers. The DOT established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

Federal Aviation Administration

Title 14 USC, Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace. This regulation establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. For example, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

4.15.2.2 State

California Environmental Protection Agency

California Health and Safety Code (HSC), Division 20, Chapter 6.11, Sections 25404- 25404.9 Sections– Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. Under the California Environmental Protection Agency (CalEPA), the DTSC and Enforcement and Emergency Response Program administer the technical implementation of California’s Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level (CalEPA 2015a). Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards (CalEPA 2015b). This program was established under the amendments to the California HSC made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan and Hazardous Material Inventory Statements
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the City of San Diego is the County of San Diego Department of Environmental Health (DEH), Hazardous Materials Division.

Title 19 CCR, Chapter 2, Subchapter 3, Sections 2729-2734/California HSC Division 20, Chapter 6.95, Sections 25500–25520. This regulation requires the preparation of an HMBP by facility operators. The HMBP identifies the hazards, storage locations, and storage quantities for each hazardous chemical stored on-site. The HMBP is submitted to the CUPA for emergency planning purposes.

California Department of Toxic Substances Control

Title 22 CCR, Division 4.5 – Environmental Health Standards for the Management of Hazardous Waste. These regulations establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and federal RCRA. As with federal requirements, waste generators must determine if their wastes are hazardous according to specified characteristics or lists of wastes. Hazardous waste generators must obtain identification numbers; prepare manifests before transporting waste off-site; and use only permitted treatment, storage, and disposal facilities. Standards also include requirements for record keeping, reporting, packaging, and labeling. Additionally, while not a federal requirement, California requires that hazardous waste be transported by registered hazardous waste transporters. In addition, Chapter 31 – Waste Minimization, Article 1 – Pollution Prevention and the Hazardous Waste Source Reduction and Management Review of these regulations require that generators of 12,000 kilograms/year of typical, operational hazardous waste evaluate their waste streams every 4 years and, as applicable, select and implement viable source reduction alternatives. This does not apply to nontypical hazardous waste, including ACM and PCBs, among others.

Title 22 California HSC, Division 20, Chapter 6.5 – California Hazardous Waste Control Act of 1972. This legislation created the framework under which hazardous wastes must be managed in California. It provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA program. It also provides for the designation of California-only hazardous wastes and development of standards that are equal to or, in some cases, more stringent than, federal requirements. The CUPA is responsible for implementing some elements of the law at the local level.

California Regional Water Quality Control Board, San Diego Region

Title 22 California HSC, Division 20, Chapter 6.67, Sections 25270 to 25270.13 – Aboveground Petroleum Storage Act. This law applies if a facility is subject to SPCC regulations under Title 40 USC Part 112, or if the facility has 10,000 gallons or more of petroleum in any combination of aboveground storage tanks (ASTs) and connecting pipes. If a facility exceeds these criteria, it must prepare a SPCC plan.

California Department of Transportation/California Highway Patrol

Title 13 CCR, Division 2, Chapter 6. California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and Caltrans have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakage and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of CHP. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. Caltrans has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

California Division of Occupational Safety and Health Administration

Title 8 CCR – Safety Orders Under the California Occupational Safety and Health Act of 1973, the California Occupational Safety and Health Administration. The California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the CCR. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that Material Safety Data Sheets be available to employees and that employee information and training programs be documented. In Division 1, Chapter 4, Subchapter 4 – Construction Safety Orders of Title 8, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

California Building Standards Commission

Title 24 of the CCR – California Building Standards Code. The California Building Standards Code is a compilation of three types of building standards from three different sources:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions; and
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

Among other rules, the Code contains requirements regarding the storage and handling of hazardous materials.

California State Board of Forestry and Fire Protection/California Department of Forestry and Fire Protection

Public Resources Code Sections 4114 and 4130. This authorizes the State Board of Forestry to establish a fire plan that establishes the levels of statewide fire protection services for State Responsibility Area (SRA) lands. These levels of service recognize other fire protection resources at the federal and local levels that collectively provide a regional and statewide emergency response capability. In addition, California's integrated mutual aid fire protection system provides fire protection services through automatic and mutual aid agreements for fire incidents across all ownerships. The California Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and to contribute to ecosystem health.

4.15.2.3 Local

San Diego County Airport Land Use Commission

The Project site is located within an ALUCP. The ALUCP safeguards the general welfare of the inhabitants within the vicinity of SDIA and the public in general. The ALUCP provides policies and criteria for the City of San Diego to implement and for the San Diego County ALUC to use when reviewing development proposals that require rezones and/or plan amendments. The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contained in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code).

In San Diego County, the ALUC function rests with the Board of the SDCRAA, in accordance with Section 21670.3 of the California Public Utilities Code. As established by state law (Pub.

Util. Code, Section 21670), the ALUC has the responsibility both “to provide for the orderly development of airports” and “to prevent the creation of new noise and safety problems.” ALUC policies thus have the dual objective of protecting against constraints on airport expansion and operations that can result from encroachment of incompatible land uses and minimizing the public’s exposure to excessive noise and safety hazards. To meet these objectives, the ALUCPs address potential compatibility impacts related to four specific airport-related factors/layers: (1) Noise—Exposure to aircraft noise; (2) Safety—Land use factors that affect safety both for people on the ground and the occupants of aircraft; (3) Airspace Protection—Protection of Airport airspace; and (4) Overflight—Annoyance and other general concerns related to aircraft overflights.

Compatibility policies concerning each of these factors/layers are described in the ALUCP. Each factor/layer is addressed separately. Proposed land use development actions must comply with the compatibility policies and maps for each compatibility factor/layer. The ALUCP has designated AIAs for areas that may be significantly influenced by airport-related activities. The AIA services as the plan boundaries for the ALUCP. To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2, and consists of locations where noise and/or safety concerns may necessitate limitations on the types of land uses. Specifically, Review Area 1 encompasses locations exposed to noise levels of CNEL 60 dB or greater, the safety zones, air space protection, and overflight. Review Area 2 encompasses the portions of the overflight and airspace protection factors/layers not encompassed within Review Area 1. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate.

Montgomery Field ALUCP

The Montgomery Field ALUCP is the fundamental tool used by the SDCRAA, acting in its capacity as the San Diego County ALUC, in fulfilling its purpose of promoting airport land use compatibility. Specifically, this ALUCP (1) provides for the orderly growth of the airport and the area surrounding the airport; and (2) safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general (Pub. Util. Code Section 21675(a)). In essence, this Compatibility Plan serves as a tool for the ALUC to use in fulfilling its duty to review land use plans and development proposals within the AIA at Montgomery Field. The ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

MCAS Miramar ALUCP

The MCAS Miramar is located approximately 1 mile to the east of the UCP Area. The Project is within the ALUCP boundaries for MCAS Miramar. The MCAS Miramar AIA is defined as “the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses (County of San Diego 2011).” Portions of the UCP are within both Review Areas 1 and 2 of the AIA for MCAS Miramar.

The MCAS Miramar ALUCP designates APZs, which are sets of safety-related zones beyond the ends of military airport runways. Typically, three types of zones are established: a clear zone closest to the runway end, then APZ I and APZ II. The potential for aircraft accidents and the corresponding need for land use restrictions are greatest with the clear zone and diminish with increased distance from the runway. The UCP Area is not located within an APZ (Figure 4.1-4, Airport Safety Zones).

The MCAS Miramar ALUCP also identifies the FAA Height Notification Boundary and Federal Aviation Regulation Part 77 Airspace Surfaces. The Project is located within the FAA Height Notification Boundary and the Part 77 Surfaces for MCAS Miramar. Title 14 USC, Chapter 1, Subchapter E, Part 77 – Aeronautics and Space – Safe, Efficient Use, and Preservation of the Navigable Airspace, establishes requirements for notifying the FAA of certain construction activities and alterations to existing structures, in order to ensure there are no obstructions to navigable airspace. The boundary extends 20,000 feet from the runway. Within the boundary, Part 77 requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and 1 foot upward (slope of 100:1) from the runway. Outside the boundary, projects that include construction or alteration exceeding 200 feet in height above ground level are required to notify the FAA.

San Diego County Office of Emergency Services

The County of San Diego Office of Emergency Services (OES) coordinates the overall county response to disasters. OES is responsible for notifying appropriate agencies when a disaster occurs; coordinating all responding agencies; ensuring that resources are available and mobilized; developing plans and procedures for response to and recovery from disasters; and developing and providing preparedness materials for the public.

OES staffs the OA EOC, a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The UDC, established through a joint powers agreement among all 18 incorporated cities and the

County of San Diego, provides for coordination of plans and programs countywide to ensure protection of life and property.

In 2010, the County and 18 local jurisdictions, including the City of San Diego, adopted the Multi-Hazard Mitigation Plan (MHMP). The MHMP is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The plan is a comprehensive document that serves many purposes, including creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing interjurisdictional coordination (County of San Diego 2010).

The City of San Diego's disaster prevention and response activities are conducted in accordance with U.S. Department of Homeland Security Office of Domestic Preparedness requirements and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including being responsible for maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident (City of San Diego 2008a).

2014 Unified San Diego County Emergency Services Organization and Emergency Plan. The Emergency Plan includes a comprehensive emergency management system that provides planned response in disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The Plan also describes tasks and overall responsibilities for protecting life and property and identifies sources of outside support. The Plan is for use by the County and its cities to respond to major emergencies and disasters.

City of San Diego General Plan

2008 City of San Diego General Plan – Public Facilities, Services, and Safety Element. The General Plan includes goals and policies related to the City's disaster preparedness program, which focuses on the prevention of, response to, and recovery from natural, technological, and manmade disasters. The City's disaster preparedness efforts include oversight of the City's EOC, and the City participates in San Diego County's Multi-Jurisdictional Hazard Mitigation Plan, which identifies risks posed by both natural and manmade disasters.

City of San Diego Land Development Code

2015 City of San Diego Land Development Manual, Project Submittal Requirements, Section 3 – Construction Permits – Grading and Public Right-of-Way. This section of the City's Land

Development Manual applies to construction permit applications for grading on private property, as well as to the construction, reconstruction, or repair of improvements within the public right-of-way. City guidelines for obtaining grading permits and public right-of-way permits are incorporated into the Land Development Manual; depending on the characteristics of the Project and Project site, the permittee may be required to provide a grading plan, construction plan, geotechnical study, drainage study, water quality study, traffic control plan, and structural calculations.

City of San Diego Municipal Code

San Diego Municipal Code, Chapter 5: Public Safety, Morals, and Welfare, Article 5: Fire Protection and Prevention. Chapter 5, Article 5 of the City of San Diego Municipal Code (referred to as the “Fire Code”) includes portions of the California Fire Code and International Fire Code (. As of January 1, 2014, the City of San Diego adopted the 2013 California Codes and its referenced standards.

San Diego Municipal Code, Chapter 5: Public Safety, Morals, and Welfare, Article 3: Firearms, Dangerous Weapons, Explosives, and Hazardous Trades, Sections 53.01 and 53.01.1. According to this regulation, blasting is only permissible within the City of San Diego following receipt of an explosives permit from the City of San Diego Fire Chief, which is also required under California HSC, Section 12101.

San Diego Municipal Code Section 142.0412, Brush Management Requirements. The City of San Diego Brush Management Regulations state that any property containing a habitable structure and native or naturalized vegetation is required to provide 100 feet of brush management in two distinct zones, Zone 1 and Zone 2, and special requirements may apply (i.e. pre-1989 development). Brush Management Zone 1 typically extends 35 feet out from the habitable structure toward flammable vegetation, and occurs on the level portion of a property. Zone 1 regulations include:

- Maintenance on a regular basis by thinning and pruning trees and plants, controlling weeds, and maintaining irrigation systems.
- No habitable structures are permitted. New construction (i.e., fences, walls, palapas, play structures, gazebos, and decks) must be non-combustible and/or have a minimum 1-hour fire resistance rating. Previously conforming structures (legally constructed prior to ordinance) may remain unless they constitute a distinct danger to life or property.
- Plants should be primarily low-growing (less than 4 feet in height), low-fuel, and fire-resistant.

- All portions of trees, other than the trunk, which extend within 10 feet of a structure or the outlet of any chimney, must be cut back.
- Trees adjacent to or overhanging any building must be free of dead wood.
- Roof and rain gutters must be free of leaves, needles, or other dead vegetative growth.

Brush Management Zone 2 is the remaining 65 feet that extends beyond Zone 1, typically composed of undisturbed vegetation on a slope subject to sensitive biological resource protections. Zone 2 regulations include:

- Maintenance on a regular basis by controlling weeds and removing invasive species.
- Selective thinning and pruning of native and non-native plants is required to reduce the fuel-load. Native plants, soils, or habitats may not be graded or grubbed. Non-native plants must be pruned before native plants.
- Brush management activity is not allowed March 1 through August 15 in coastal sage scrub, maritime succulent scrub, or coastal sage-chaparral habitats, unless an exception is specifically granted.
- No structures or permanent irrigation are allowed in Zone 2.
- A permit is required to re-vegetate or reconfigure Brush Management Zone 2.

University Community Plan

The following policies contained in the Safety Element of the UCP are applicable to the Project:

- Protect the public health and safety by guiding future development so that land use is compatible with identified geologic risks, including seismic and landslide hazards; and
- Ensure that proposed development does not create or increase geologic hazards either on- or off-site.

4.15.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the Project, a significant health and safety impact would occur if implementation of the Project would:

1. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
2. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;
3. Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment; or
5. Result in a safety hazard for people residing or working in a designated airport influence area.

4.15.4 Impact Analysis

Issue 1: Would the Project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

4.15.4.1 Impact Analysis

Removal of Genesee Avenue Widening

The Genesee Avenue Corridor area is located in a Fire Hazard Severity Zone with “No Designation.” However, the portions of Genesee Avenue Corridor that interface with Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as “Very High” (SDFRD 2009). As such, an urban interface susceptible to wildfire exists in the northern and southern portions of the Genesee Avenue Corridor due to the large expanses of open space, interspersed with single and multi-family residential development. However, the Project would remove the planned Genesee Avenue Widening from the UCP and would not entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition, which could result in a temporary increase in the potential for accidental wildfires. Further, the Project would not introduce new or permanent structures that would be fire prone or would create substantial new fire hazards.

Additionally, the intent of the City of San Diego Brush Management Regulations is to reduce the risk of wildfire hazards, as discussed in Section 4.15.2.3. The City’s Municipal Code Section

142.0412 would enforce Brush Management Regulations in vacant areas in order to reduce the risk of fire-related emergencies. Pursuant to LDC Section 142.0412 et seq., brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires submittal of Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires (City of San Diego 2010b).

Removal of Regents Road Bridge

The analysis presented above for the Genesee Avenue Corridor is applicable to the Regents Road Corridor. As with the Genesee Avenue Corridor, the Regents Road Corridor is located in a Fire Hazard Severity Zone with “No Designation.” As with Genesee Avenue, the portions of the Regents Road Corridor that interface with Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon are designated as “Very High” (SDFRD 2009). As such, an urban interface susceptible to wildfire exists in the northern and southern portions of the Regents Road Corridor due to the large expanses of open space, interspersed with single and multi-family residential development. However, the Project would remove the planned Regents Road Bridge from the UCP and would not entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition, which could result in a temporary increase in the potential for accidental wildfires. Further, the Project would not introduce new or permanent structures that would be fire prone or would create substantial new fire hazards.

4.15.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening would not involve construction or modification of the existing roadway. The removal of the planned Genesee Avenue Widening would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In addition, continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential program-level impacts associated with wildfire hazards. Additionally, development along the Genesee Avenue Corridor would be subject to conditions of approval that require adherence to the City’s Brush Management Regulations and requirements of the California Fire Code. Adherence to brush management requirements would minimize any potential for increased wildfire risk due to development in the area. For the reasons provided above, a less than significant impact would result.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In addition, continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential program-level impacts associated with wildfire hazards. Additionally, development along the Regents Road Corridor would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. Adherence to brush management requirements would minimize any potential for increased wildfire risk due to development in the area. For the reasons provided above, a less than significant impact would result.

4.15.4.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.15.5 Impact Analysis

Issue 2: Would the Project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

4.15.5.1 Impact Analysis

Removal of Genesee Avenue Widening

School facilities are located throughout the UCP Area as described in Section 4.13.1.1. Three schools are within 0.25 mile of the Genesee Avenue Corridor. The entrance to University City Senior High School is accessed directly by Genesee Avenue. Curie Elementary School is located at the northeast corner of the intersection of Genesee Avenue and Governor Drive. Standley Middle School is located to the southwest of the Genesee Avenue and Governor Drive intersection. Genesee Avenue extends for approximately 2 miles and currently has four lanes of traffic (two in each direction). As currently included in the UCP, the planned Genesee Avenue

Widening would have involved adding a travel lane in each direction between SR 52 and Nobel Drive.

A Phase I Environmental Site Assessment (ESA) was conducted in support of the 2006 EIR prepared for the University City North/South Transportation Corridor Study, which analyzed three basic transportation projects within University City (Genesee Avenue Widening, Regents Road Bridge, and Genesee Avenue/Governor Drive Grade Separation). The Phase I ESA identified four gas stations at the intersection of Genesee Avenue and Governor Drive that were associated with the release of hazardous materials through LUSTs. Of the four gas stations, two have remained active (Chevron #94339 and Governor Drive Exxon) since the preparation of the 2006 EIR, as shown in Table 4.15-2. The cases for the other two gas stations are closed (Mobil 18-F8W and Unocal Service Station #5858-31002). In addition, the Costa Verde Car Wash and Chevron (Global ID T0608198901), located 0.03 mile outside the Genesee Avenue Corridor, was identified as a LUST Cleanup Site. However, since the preparation of the 2006 EIR, that case was also closed. Furthermore, groundwater monitoring wells were identified at the Chevron and Mobil gas stations at the Genesee Avenue/Governor Drive intersection as described in the 2006 EIR. One monitoring well was located on Genesee Avenue, approximately 15 feet east of the Regency Villas Apartments property boundary, immediately south of the Mobil gas station. The 2006 EIR determined that widening Genesee Avenue would result in significant impacts due to the proximity of the gas stations and one LUST site and the removal or relocation of groundwater monitoring wells during construction. Mitigation measures provided reduced the impacts to a level below significance.

The Project would remove the planned Genesee Avenue Widening from the UCP and would not entail construction activities in the vicinity of school sites. As such, the removal of the planned Genesee Avenue Widening would not result in transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of existing groundwater monitoring wells. Any transport of hazardous material would be in compliance with regulatory requirements. Therefore, the Project would not result in hazardous emissions or the handling of hazardous emissions or substances within 0.25 mile of a school.

Removal of Regents Road Bridge

No school facilities are located immediately off of Regents Road. Spreckels Elementary School is located approximately 0.2 mile east of the Regents Road/Governor Drive intersection. The Regents Road Corridor extends for approximately 1.6 miles and currently has four lanes of traffic (two in each direction), except over Rose Canyon where there is no roadway. The Regents Road Corridor generally traverses through an urbanized setting composed of single- and multi-family residential development.

As currently included in the UCP, the planned Regents Road Bridge design consists of two separate, parallel two-lane bridge structures to be constructed across Rose Canyon, connecting the south and north ends of Regents Road that currently terminate near Lahitte Court on the south and Caminito Cassis on the north. This bridge design would have accommodated two travel lanes in each direction, a 6-foot-wide striped bike lane and 10-foot-wide parkway along each edge, and a 14-foot-wide center median. The Phase I ESA conducted in the 2006 EIR determined that potential sources of hazardous materials were located at the intersection of Regents Road and Governor Drive. The 2006 EIR determined that the planned Regents Road Bridge would result in significant impacts. Mitigation measures provided would have reduced the impacts to a level below significance.

The Project would remove the planned Regents Road Bridge from the UCP and would not entail construction activities in the vicinity of school sites. As such, the removal of the planned Regents Road Bridge would not result in transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of existing groundwater monitoring wells. Any transport of hazardous material would be in compliance with regulatory requirements. Therefore, the Project would not result in hazardous emissions or the handling of hazardous emissions or substances within 0.25 mile of a school.

4.15.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not involve construction or modification of the existing roadway that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impacts would occur.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impacts would occur.

4.15.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.15.6 Impact Analysis

Issue 3: Would the Project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

4.15.6.1 Impact Analysis

The Project would not interfere with or impair the implementation of an adopted emergency response or evacuation plan. The Emergency Plan describes a comprehensive emergency management system that provides for the planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. The Emergency Plan identifies a broad range of potential hazards and a response plan. Primary evacuation routes identified in the Emergency Plan nearest to the Project site include I-5, I-805, and SR 52; however, as noted in the Emergency Plan, specific evacuation routes will be determined based on the location and extent of the incident and will include as many predesignated transportation routes as possible (UDC 2014). The Project would not impede or impair these evacuation routes.

4.15.6.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. Impacts would be less than significant.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. Impacts would be less than significant.

4.15.6.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.15.7 Impact Analysis

Issue 4: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

4.15.7.1 Impact Analysis

Government Code Section 65962.5 (commonly referred to as the “Cortese List” after its legislator) requires reporting to the Secretary of Environmental Protection by the DTSC and SWRCB, as follows:

- The DTSC must compile lists of the hazardous waste facilities subject to corrective action, all land designated as a hazardous waste property, all information received pursuant to Section 25242 of the HSC on hazardous waste disposals on public land, all sites listed pursuant to Section 25356 of the HSC, and all sites included in the Abandoned Site Assessment Program.
- The SWRCB must compile lists of all USTs for which an unauthorized release report is filed pursuant to Section 25295 of the HSC, all solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the DTSC, all cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986 that concern the discharge of wastes that are hazardous materials.

DTSC listings can be found in the EnviroStor database, which lists the hazardous waste and substances sites throughout California. The SWRCB listings can be found in the GeoTracker® database.

Removal of Genesee Avenue Widening

Genesee Avenue extends for approximately two miles and currently has four lanes of traffic (two in each direction). The Genesee Avenue Corridor generally traverses through a highly urbanized setting. As currently included in the UCP, the widening of Genesee Avenue would entail adding an additional 26 feet of width that would allow a 13-foot-wide travel lane to be added in each direction. Construction activities associated with the widening of Genesee Avenue would have involved transporting of standard construction materials, which may contain lubricants, solvents, and similar items, along Project haul routes in which the aforementioned schools are located. As

discussed in Section 4.15.4.1, a Phase I ESA conducted in support of the 2006 EIR identified four gas stations at the intersection of Genesee Avenue and Governor Drive that were associated with the release of hazardous materials through LUSTs. In addition, the Phase I ESA identified the Costa Verde Car Wash and Chevron (Global ID T0608198901), located outside the Genesee Avenue Corridor as a LUST Cleanup Site. As previously discussed, only two of the four gas stations have remained active (Chevron #94339 and Governor Drive Exxon). The Costa Verde Car Wash and Chevron (Global ID T0608198901) case was also closed. The Phase I ESA also identified groundwater monitoring wells at the Chevron and Mobil gas stations at the Genesee Avenue/Governor Drive intersection. The 2006 EIR determined that widening Genesee Avenue would result in significant impacts due to the proximity of the gas stations and one LUST site and the removal or relocation of groundwater monitoring wells during construction. Mitigation measures provided reduced the impacts to a level below significance.

The removal of the planned Genesee Avenue Widening from the UCP would not result in construction activities that would entail transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of groundwater monitoring wells. Therefore, the removal of the planned Genesee Avenue Widening would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment. Genesee Avenue would be maintained in its existing condition.

Removal of Regents Road Bridge

As discussed in Section 4.15.4.1, the Phase I ESA conducted in the 2006 EIR determined that potential sources of hazardous materials were located at the intersection of Regents Road and Governor Drive. The 2006 EIR determined that the planned Regents Road Bridge would result in significant impacts. Mitigation measures provided would have reduced the impacts to a level below significance.

The removal of the planned Regents Road Bridge from the UCP would not result in construction activities that would entail transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of groundwater monitoring wells. Therefore, the removal of the planned Regents Road Bridge would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment. Regents Road would be maintained in its existing condition.

4.15.7.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening would not result in significant impacts associated with the location of known contamination sites. Adherence to applicable federal, state, and local regulations would ensure impacts are less than significant.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge would not result in significant impacts associated with the location of known contamination sites. Adherence to applicable federal, state, and local regulations would ensure impacts are less than significant.

4.15.7.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

4.15.8 Impact Analysis

Issue 5: Would the Project result in a safety hazard for people residing or working in a designated airport influence area?

4.15.8.1 Impact Analysis

Removal of Genesee Avenue Widening

As previously discussed in Section 4.15.1.1, the Genesee Avenue Corridor is in proximity to two airports with ALUCPs. MCAS Miramar is located approximately 1 mile northeast of the Genesee Avenue Corridor. The Genesee Avenue Corridor is located within the FAA Height Notification Boundary and Part 77 Surfaces. In addition, the Genesee Avenue Corridor is within the AIA in Review Area 2. According to the maps in the Montgomery Field ALUCP, the Genesee Avenue Corridor is located outside of the AIA for Montgomery Field (ALUC 2010).

The removal of the planned Genesee Avenue Widening from the UCP would not result in structures that would impair heliport or private airstrip operations. Any helicopter operations would be undertaken in accordance with FAA safety and flight regulations.

Removal of Regents Road Bridge

MCAS Miramar is located approximately three miles northeast of the Regents Road Corridor. As with the Genesee Avenue Corridor, the Regents Road Corridor is located within the FAA Height Notification Area and is within the AIA in Review Area 2, subject to applicable compatibility policies in the ALUCP. Montgomery Field is approximately five miles southeast of the Regents Road Corridor and, as with the Genesee Avenue Corridor, the Regents Road Corridor is located outside of the AIA for Montgomery Field (ALUC 2010).

The removal of the planned Regents Road Bridge from the UCP would not result in structures that would impair heliport or private airstrip operations. Any helicopter operations would be undertaken in accordance with FAA safety and flight regulations.

4.15.8.2 Significance of Impacts

Removal of Genesee Avenue Widening

The removal of the planned Genesee Avenue Widening from the UCP would have no impact on people residing or working within 2 miles of a private airstrip or heliport facility. There would be no structures that would impair heliport or private airstrip operations and all helicopter operations would be undertaken in accordance with FAA regulations. Impacts would be less than significant.

Removal of Regents Road Bridge

The removal of the planned Regents Road Bridge from the UCP would have no impact on people residing or working within 2 miles of a private airstrip or heliport facility. There would be no structures that would impair heliport or private airstrip operations and all helicopter operations would be undertaken in accordance with FAA regulations. Impacts would be less than significant.

4.15.8.3 Mitigation Framework

Impacts would be less than significant. Therefore, no mitigation is required.

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4.16 POPULATION AND HOUSING

This section evaluates the population and housing impacts of the Project.

4.16.1 Existing Conditions

Existing population and housing in the San Diego region are largely concentrated in the western third of the region, which includes lands in the coastal zone. Many incorporated cities, both large and small in size and population, are located along the coast and tend to have fairly high density relative to other portions of the region. Historically, development has centered along the coastal areas due to desirability of the location, access to infrastructure and transportation options, and access to employment and commercial centers, among other factors.

On October 15, 2013, the Series 13: 2050 Regional Growth Forecast was accepted by the SANDAG Board of Directors for planning purposes. The forecast serves as the foundation planning documents across the region.

4.16.1.1 Existing Population, Housing Units, and Jobs

The existing (2012) population for the City of San Diego is 1,321,315 people. There are 518,137 existing housing units, and 742,718 existing jobs (SANDAG 2014b). The City has the largest population in the San Diego region at 42 percent of the regional total, as well as being home to 66 percent of the region’s existing housing units and 55 percent of regional jobs. Table 4.16-1 summarizes the City of San Diego’s population, housing, and employment forecasts from 2010 through 2050.

**Table 4.16-1
Regional Forecast: Population, Housing, and Employment 2010-2050**

	2010 (Actual)	2020 (Projections)	2035 (Projections)	2050 (Projections)
Total Population	1,301,617	1,454,150	1,664,684	1,766,700
Total Housing Units	515,426	559,197	540,194	591,629
Total Jobs	1,450,913	1,624,124	1,769,938	1,911,405

Source: SANDAG 2014b

University Community Plan Area

SANDAG demographic and socioeconomic estimates for the UCP Area in 2015 show that the total population of the UCP Area is 71,093 people with an average of 2.19 persons per household. The area has 26,412 existing housing units (SANDAG 2015b). The UCP Area was

forecasted to have 89,637 total jobs in 2012 (SANDAG 2013). Table 4.16-2 summarizes population, housing, and employment forecasts for the UCP Area from 2012 through 2050.

**Table 4.16-2
UCP Forecast: Population, Housing, and Employment 2012-2050**

	2012 (Actual)	2020 (Projections)	2035 (Projections)	2050 (Projections)
Total Population	68,092	74,186	75,842	75,926
Total Housing Units	26,412	28,495	28,855	29,053
Total Jobs	89,637	98,165	105,636	116,117

Source: SANDAG 2013

4.16.2 Regulatory Framework

4.16.2.1 Federal

Federal Uniform Act

The Uniform Act (42 USC Sections 4601 et seq.) is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displacement of persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. FHWA regulations implementing the Uniform Act are found at 49 CFR Part 24.

4.16.2.2 State

State Housing Element Law

State law requires that each city and county prepare and adopt a general plan for its jurisdiction that contains certain mandatory elements, including a housing element. The housing element is a comprehensive assessment of current and forecasted housing needs for all economic segments of the community. Among other things, housing elements (Government Code Sections 65580 et seq.) must assess the jurisdiction's existing and forecasted housing needed, including the jurisdiction's fair share of regional housing needs identified in the Regional Housing Needs Assessment (RHNA). Housing elements also must identify adequate sites to meet the needs of households at all income levels.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375)

The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Chapter 728, Statutes of 2008) requires, in part, the preparation of an SCS as part of an RTP. Among other things, the SCS must identify areas within the region sufficient to house all the population of the region, including all economic segments of the population over the course of the planning period of the RTP, taking into account net migration into the region, population growth, household formation, and employment growth (Government Code Section 65080).

4.16.2.3 Local

University Community Plan

The UCP was approved in December 1986 and has had various amendments through 2014. The UCP Area encompasses approximately 8,500 acres and contains two state-controlled properties – ~~UCSD~~ UC San Diego and Torrey Pines State Natural Reserve. Overall Community Goals listed in the UCP include development of the UCP Area as a self-sufficient community offering a balance of housing, employment, business, cultural, educational, and recreational opportunities (City of San Diego 2014b). Housing Goals included in the plan include the following:

1. Provide a broad range of housing types and costs to accommodate various age groups, household sizes and compositions, tenure patterns (renter/owner-occupied), and income levels.
2. Encourage housing for students and employees of the University and life-sciences research facilities.
3. Locate higher density housing nearest the University, the Towne Centre core and La Jolla Village Square.
4. Provide affordable housing for low- and moderate-income households by encouraging the following efforts of the City of San Diego:
 - a. Utilization of selected City-owned properties for housing development;
 - b. Utilization of federal rental subsidy programs and state mortgage assistance programs; and
 - c. Stimulation of greater use of modular and other innovative cost-saving building techniques.

5. Encourage religious and other nonprofit organizations to develop and operate rental and cooperative housing for low- and moderate-income households.
6. Encourage a mixture of residential, commercial, and professional office uses.
7. Encourage the provision of non-structured recreation areas such as open grassed playing fields.

In accordance with the Housing Element of the City of San Diego General Plan, proposals in the UCP call for the development of affordable housing within the community and recommend the use of City-owned properties for this purpose. The General Plan also identifies density bonuses as a means of encouraging developers to provide moderate-income housing (City of San Diego 2008a).

The Housing/Residential Element of the UCP indicates the appropriate locations and density of residential development within the community and addresses social and economic concerns associated with housing, consistent with the policies of the City of San Diego General Plan. Additionally, the UCP includes Employment Goals, which include promoting job opportunities within the community and encouraging the development of life-sciences research facilities which maximize the resources of ~~UCSD~~ UC San Diego (City of San Diego 2014b).

Housing Elements of General Plan

Each local jurisdiction in the San Diego region has developed and must periodically update a Housing Element as part of its general plan per requirements of the state Housing Element Law. It sets forth local housing policies and programs to implement those policies. The Housing Element was last updated March 2013.

Land Use Elements of General Plan

Each local jurisdiction in the San Diego region has developed a Land Use Element as part of its general plan per requirements of State Planning and Zoning Law (Government Code Sections 65000 et seq.). The land use element designates the general location and intensity of housing, business, industry, open space, education, public buildings and grounds, waste disposal facilities, and other land uses. The Land Use Element was last updated June 2015.

North City Local Coastal Program

Local jurisdictions within the coastal zone may prepare an LCP for approval by the Coastal Commission. LCPs implement the goals, policies, and requirements of the Coastal Act, including those pertaining to housing, within a local jurisdiction. The coastal zone portions of the UCP Area have been incorporated into the North City LCP segment. The area within the coastal zone and subject to the LCP is the northern portion of the plan area, which does not include the Genesee Avenue Corridor or the Regents Road Corridor. The coastal zone boundary bifurcates ~~UCSD~~ UC San Diego and generally includes the area north of Gilman Drive, east of I-5, and extends to the northern boundary of the community plan. The North City LCP also encompasses portions of the community plan areas for Torrey Pines, North City West, Mira Mesa, Sorrento Hills, La Jolla, and the adjacent open space and urban reserve areas identified in the General Plan.

4.16.3 Significance Determination Thresholds

As the City's Significance Determination Thresholds do not establish specific significance thresholds for population and housing, the following analysis relies on Appendix F of the CEQA Guidelines, which call for an evaluation of whether the Project would:

1. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere; or
2. Induce substantial population growth in the area, either directly or indirectly.

4.16.4 Impact Analysis

Issue 1: Would the Project displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

4.16.4.1 Impact Analysis

Removal of Genesee Avenue Widening

The Project includes the removal of the planned Genesee Avenue Widening from the UCP and would not include the construction of retaining walls or addition of travel lanes as originally planned, and current parking spaces would remain intact. The absence of construction and demolition activities would not displace existing housing or people within the UCP Area, and replacement housing would not need to be constructed elsewhere.

Removal of Regents Road Bridge

Construction of new roadway, expansion and resurfacing of existing roadway, construction of a small parking lot, and displacement of an existing trailhead would not occur with the implementation of the Project within the Regents Road Corridor. The lack of construction activities associated with the Project would not displace existing housing or people. Replacement housing would not need to be constructed. The Regents Road Corridor would continue to exist as it does under current conditions.

4.16.4.2 Significance of Impacts

Removal of Genesee Avenue Widening

Removal of the planned Genesee Avenue Widening would not displace people or existing housing, nor would it require the construction of replacement housing. Therefore, no significant impacts would occur.

Removal of Regents Road Bridge

Removal of the planned Regents Road Bridge construction would not displace existing housing or people. There would be no need for replacement housing. Therefore, no significant impact would occur.

4.16.4.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

4.16.5 Impact Analysis

Issue 2: Would implementation of the Project induce substantial population growth in the area, either directly or indirectly?

4.16.5.1 Impact Analysis

Removal of Genesee Avenue Widening

The proposed removal of the planned Genesee Avenue Widening from the UCP would not induce population growth in the UCP Area beyond what is projected in the Adopted UCP. The

Project does not propose any new homes, businesses, or facilities. Removal of the planned Genesee Avenue Widening would not induce growth in the UCP Area.

Removal of Regents Road Bridge

The Project would remove the construction of planned Regents Road Bridge and associated construction activities from the UCP. This would not induce population growth in the Regents Road Corridor, UCP Area, or surrounding areas. No new housing, businesses, or facilities are proposed to be built, and land use density/intensity would not exceed what is envisioned in the Adopted UCP.

4.16.5.2 Significance of Impacts

Removal of Genesee Avenue Widening

The proposed removal of the planned Genesee Avenue Widening would not induce substantial population growth, either directly or indirectly, and therefore no significant impacts would occur.

Removal of Regents Road Bridge

The proposed removal of the planned Regents Road Bridge construction would not induce substantial population growth, either directly or indirectly, and therefore no significant impacts would occur.

4.16.5.3 Mitigation Framework

There would be no significant impacts. No mitigation is required.

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CHAPTER 5.0 CUMULATIVE IMPACTS

CEQA Guidelines require a discussion of cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable” (CEQA Guidelines, Section 15130). As defined by Section 15065 (a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines, Section 15065 (a)(3)). These cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines Section 15355).

According to Section 15130(b) of the State CEQA Guidelines, the discussion of cumulative effects “...need not provide as great a detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness....” The evaluation of cumulative impacts is to be based on either (A) “a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency,” or (B) “a summary of projections contained in an adopted local, regional, or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect...Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency” (CEQA Guidelines Section 15130(b)(1)).

Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, which may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans, and the lead agency determines that the regional or area-wide cumulative impacts of the Project have already been adequately addressed in a certified EIR for that plan. In addition, Section 15130(e) states that “if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact as provided in Section 15183(j).”

This cumulative impacts analysis relies primarily on the cumulative impact analysis of the City of San Diego General Plan PEIR, which concluded that implementation of the General Plan would result in significant and unmitigated cumulative impacts to the following environmental issue areas:

agricultural resources, air quality, biological resources, geological conditions, health and safety, historical resources, hydrologic resources, land use, mineral resources, noise, paleontological resources, population and housing, public facilities, public services and utilities, transportation/traffic/circulation/parking, visual effects and community character, water quality and global warming.

5.1 CUMULATIVE ANALYSIS SETTING AND METHODOLOGY

A broad examination of cumulative impacts involves considering the Project together with growth of the City and the region. Development pursuant to the General Plan would occur in accordance with the land use designations and development intensities identified in the Land Use and Community Planning Element. The land uses and the associated potential development designated in the General Plan correlate to regional growth estimates made by SANDAG. SANDAG estimates anticipated growth for the 18 cities and the unincorporated areas within San Diego County for the purpose of allocating growth to specific areas and identifying regional transportation infrastructure needed to support regional growth.

Section 5 of the PEIR for the City's General Plan discusses the cumulative impacts that result from its implementation and is, therefore, incorporated by reference. The analysis in the General Plan PEIR relied on the regional growth projections provided by the SANDAG *2030 Regional Growth Forecast Update* (Regional Growth Forecast) estimates for employment, population, and housing for the period between 2004 and 2030. Cumulative impacts were analyzed in light of the significance thresholds presented in Sections 3.1 through 3.17 of the General Plan PEIR.

The General Plan strategy anticipated the cumulative effects of growth and planned for it in a manner that would be balanced in its approach. The focused growth strategy addresses future growth as a whole, and includes policies to avoid or reduce impacts on a cumulative basis.

5.1.1 Plans and Programs Evaluated for Cumulative Impacts

The City of San Diego General Plan; the City of San Diego MSCP Subarea Plan; the City of San Diego LDC, the City of San Diego CAP, and the San Diego Forward: The Regional Plan were used to evaluate cumulative impacts and are briefly described below. These documents are on file at the City of San Diego Development Services Department, 1222 First Avenue, San Diego, California 92101. A summary of for the status of these plans is included in Table 5-1.

**Table 5-1
Planning Documents Used for Cumulative Analysis**

Planning Documents	Location	Status
City of San Diego General Plan	City of San Diego	Final EIR certified and plan adopted in March 2008.
City of San Diego MSCP Subarea Plan	City of San Diego	Final EIR certified and plan adopted in March 1997.
City of San Diego Land Development Code	San Diego Region	Final EIR certified and plan adopted in 1999.
City of San Diego Climate Action Plan	City of San Diego	Approved on December 15, 2015.
San Diego Forward: The Regional Plan	City of San Diego	Final EIR adopted by the SANDAG Board of Directors on October 9, 2015.

City of San Diego General Plan

The City's General Plan (City of San Diego 2008a) sets forth a comprehensive, long-term plan that prescribes overall goals and policies for development within the City of San Diego. According to the General Plan, the UCP Area, which includes the Genesee Avenue and Regents Road Corridors, is located within the Urbanized Lands designation. Urbanized Lands are characterized by older, recently developed, and developing communities at urban and suburban levels of density and intensity.

The City of Villages strategy focuses growth into mixed-use activity centers designed to be pedestrian-friendly districts linked to an improved regional transit system. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area

The City of San Diego adopted an MSCP Subarea plan in 1997. The goal of the City of San Diego's MSCP was to create a habitat preserve system known as the MHPA in order to coordinate conservation efforts on a regional scale while allowing development projects to occur.

The City of San Diego's MSCP Subarea Plan (City of San Diego 1997) was prepared pursuant to the general outline for NCCP/ HCP documents developed by USFWS and CDFW to meet the requirements of the California NHP Act and the FESA. The City's NCCP/HCP fulfilled the requirements for issuance of incidental take authorization under Section 2835 of the NCCP Act and an incidental take permit under Section 10 of the FESA. The MSCP identifies certain species as "covered," that are adequately conserved, within the MHPA. The Subarea plan specifies

conditions of coverage for each covered species that must be applied when those species occur in a project area.

In addition, through the City's Biology Guidelines (City of San Diego 2012a), the City regulates development activities in ESLs according to project location, within or outside of the MHPA. The City's Municipal Code established ESL regulations to ensure protection of resources consistent with CEQA and the City of San Diego's MSCP. ESLs include lands within the MHPA, wetlands, sensitive vegetation communities, habitat for listed species, lands supporting narrow endemics, and steep slopes. The regulations encourage avoidance and minimization of impacts to ESLs. The City's Biology Guidelines define the survey and impact assessment methodologies and mitigation requirements for unavoidable impacts (City of San Diego 2012a).

Sensitive biological resources are defined by the City's Municipal Code (City of San Diego 2012a) as:

- Lands that have been included in the MHPA as identified in the City of San Diego's MSCP Subarea Plan;
- Wetlands (as defined by the Municipal Code, Section 113.0103);
- Lands outside of the MHPA that contain Tier I habitats, Tier II habitats, Tier IIIA habitats, or Tier IIIB habitats as identified in the Biology Guidelines;
- Lands supporting species or subspecies listed as rare, endangered, or threatened;
- Lands containing habitats with narrow endemic species as listed in the Biology Guidelines; and
- Lands containing habitats of covered species as listed in the Biology Guidelines.

Upon compliance with the MSCP Subarea Plan and the Biology Guidelines, the City is able to issue "take" authorization for covered species. Prior to the adoption of the MSCP, this "take" authorization would have required project-by-project review with the regulatory agencies. Thus, the MSCP provides for the preservation of a network of habitat and open space, protecting biodiversity, and enhancing the region's quality of life. The plan is designed to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. By identifying priority areas for conservation and other areas for future development, the MSCP streamlined permit procedures for development projects that impact habitat. It also provides an economic benefit by reducing constraints on future development and decreasing the costs of compliance with federal and state laws that protect biological resources.

Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones and the planned district ordinances that specify permitted land use; development standards, such as density, FAR, and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements.

City of San Diego Climate Action Plan

The City of San Diego CAP includes a quantitative inventory of GHG emissions for the baseline year of 2010 and a projection of emissions for 2020 and 2035. The most recent GHG inventory for the year 2010 estimated the total emissions at 13.0 MMT CO₂e per year (City of San Diego 2015a). Transportation is the largest emissions sector, accounting for approximately 55 percent of total emissions. Energy consumption is the next largest source of emissions, at 40 percent of the total. Accounting for future population and economic growth, the City estimates that GHG emissions will increase to approximately 14.1 MMT CO₂e in 2020 and 16.7 MMT CO₂e in 2035.

The CAP includes City-specific targets to reduce GHGs by 2020 and 2035, helping to achieve statewide 2020 and 2030 targets, and putting the City on the trajectory of meeting its share of the 2050 statewide target. The City's reduction targets are 11.0 MMT CO₂e in 2020, 7.8 MMT of CO₂e in 2030, and 6.5 MMT of CO₂e in 2035.

San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan is an update of the Regional Comprehensive Plan for the RCP and the 2050 RTP/SCS, combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. In addition to the 2050 RTP, the Regional Plan includes an SCS, in compliance with SB 375. The SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The purpose of the SCS is to help the region meet the GHG emissions reductions set by ARB. The Regional Plan has a horizon year of 2050 and projects regional growth and the construction of transportation projects over this time period. The Regional Plan was adopted by the SANDAG Board on October 9, 2015.

5.2 CUMULATIVE EFFECTS ANALYSIS

5.2.1 Geographic Scope for Cumulative Impact Analysis

The geographic scope for the analysis of cumulative impacts is dependent on the nature of the issue and the project and varies depending upon the environmental issue being analyzed. Often, cumulative impacts are not limited by jurisdictional boundaries. For example, the project's contribution to localized impacts, such as those associated with traffic or noise, would affect the local neighborhood and traffic study area. Other topic areas, such as biological resources, historical resources, or water quality, could extend to areas beyond the local vicinity to include geographic areas that share similar conditions and the potential for similar adverse effects to these resources. Further, the impacts associated with regional topics, such as air quality and GHG emissions, could extend throughout the entire air basin.

5.2.2 Cumulative Impacts Found to be Significant

As required by CEQA, the discussion below identifies the potential for significant cumulative impacts and discusses the project's contribution on these impacts. In the discussion below, "Project" is used to refer to the project analyzed in this PEIR, to differentiate between cumulative projects. Based on the analyses contained in Chapter 4.0 of this PEIR and through the analysis presented here, the Project's contribution to cumulative impacts associated with transportation/circulation, air quality, GHGs, noise, and public services and facilities would be cumulatively considerable.

5.2.2.1 Transportation/Circulation

The geographic scope of consideration for the cumulative traffic analysis is considered the same as the study area defined for the traffic analysis prepared for the Project. The study area encompasses the roadways, intersections, and freeway segments and ramps that could be affected by the Project traffic and could have the potential to combine with other local traffic to create degraded traffic conditions. As described in Section 4.2, the primary study area encompasses the UCP Area and up to one segment and key intersection beyond. A total of 68 roadway segments were included within the traffic study area. The roadway segments selected for analysis are shown in Figure 4.2-1. Three freeways, I-5, I-805, and SR 52, provide regional access to the UCP Area and access is provided to these freeways by local arterial roadways. There were 80 intersections selected for inclusion in the traffic study. Figure 4.2-2 shows intersections selected for analysis in the traffic study.

5.2.2.1.1 Impact Analysis

Because the UCP would not result directly in the development of new or expanded uses, the analysis of potential impacts to transportation/circulation detailed within Section 4.2 is conducted at a program level and reflects potential cumulative (i.e., future year) impacts. The traffic analysis is based on the inclusion of San Diego Forward: The Regional Plan, which identified improvements to the regional transportation system including regional projects such as the Mid-Coast Corridor Transit Project, the Caltrans North Coast Corridor Project, and ~~UCSD~~ UC San Diego Circulation Improvements (i.e., SuperLoop). Additionally, the PEIR analysis is based on the amendments to the North University City PFFP (City of San Diego 2014a).

Traffic thresholds for the Project are presented in Section 4.2. If the Project exceeds these thresholds, then the Project would be considered to have a significant cumulative impact. A significant cumulative impact would also occur if the Project would cause LOS to degrade from D to E, even if the allowable increases are not exceeded.

Roadway Segments

With implementation of the Project, a total of ~~24~~20 roadway segments within the traffic study area would degrade to unacceptable operating conditions which exceed the significance thresholds. Under Future Year with Project, the ~~four~~three roadway segments listed below would be characterized by LOS E or F. These unacceptable operating conditions would not occur with implementation of the Adopted UCP transportation improvements. Thus, the impacts at these segments can be specifically attributed to the Project.

- Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E)
- Genesee Avenue: Nobel Drive to Centurion Square (LOS F)
- Genesee Avenue: Centurion Square to Governor Drive (LOS F)
- ~~La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E)~~

As shown in Table 4.2-9, ~~14~~13 of the segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the Adopted UCP. These ~~14~~13 segments are considered to have a significant decrease in operation due to an exceedance of the V/C ratio thresholds (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Implementation of the Project would eliminate two significant impacts associated with the Adopted UCP that would occur in the future year along two segments of Regents Road:

- SR 52 WB Ramps to SR 52 EB Ramps

- SR 52 EB Ramps to Luna Avenue

Intersections

With implementation of the Project, ~~31~~30 intersections would degrade to unacceptable LOS operating conditions by future year. ~~Thirty~~Twenty-eight of the ~~31~~30 intersections exceed the significance thresholds. Some of those intersections currently operate at LOS E or F, but would continue to experience significantly worsened conditions. Some of the intersections would be characterized by significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods. Under Future Year with Project, the ~~nine~~seven following intersections would be characterized by unacceptable operating conditions of LOS E or F during the peak period indicated. However, in Future Year with Adopted UCP, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue/Governor Drive (PM)
- ~~Genesee Avenue/SR 52 WB Ramps (AM)~~
- Genesee Avenue/SR 52 EB Ramps (~~AM and~~ PM)
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~
- Gilman Drive/I-5 SB Ramps (PM)

As shown in Table 4.2-10, ~~24~~19 of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These ~~24~~19 intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Implementation of the Project would eliminate significant impacts associated with Future Year with Adopted UCP that would occur in the future year at three intersections along Regents Road:

- Regents Road/Arriba Street (AM and PM)
- Regents Road/Governor Drive (AM and PM)
- Regents Road/Luna Avenue (AM)

Freeway Segments

As detailed in Table 4.2-16, eight of the 16 freeway segments included in the analysis would be characterized by significant impacts in the future year (the same eight segments identified for Future Year with Adopted UCP). These impacts are a result of operating conditions worsening to unacceptable levels and also the continued deterioration in speed within segments already experiencing poor operating conditions. The eight freeway segments are the following:

- I-5: SR 52 to Gilman Drive
- I-805: SR 52 to Governor Drive
- I-805: Governor Drive to Nobel Drive
- I-805: Nobel Drive to La Jolla Village Drive
- I-805: La Jolla Village Drive to Mira Mesa Boulevard
- SR 52: I-5 to Regents Road
- SR 52: Regents Road to Genesee Ave
- SR 52: Genesee Avenue to I-805

Freeway Ramp Metering

As shown in Table 4.2-17, eight freeway ramps would experience significant increases in delay in the future year (same as those identified for Future Year with Adopted UCP). The table provides the excess demand at the ramps and the resulting delay in minutes. As indicated in the table, all impacts would occur in the PM peak hour with the longest delay extending almost 2.5 hours. The eight freeway ramps are the following:

- I-5 SB and Gilman Drive
- I-5 SB and Nobel Drive
- I-5 NB and La Jolla Village Drive WB to NB
- I-5 NB and La Jolla Village Drive EB to NB
- I-5 NB and La Jolla Village Drive WB to SB
- I-5 NB and La Jolla Village Drive EB to SB
- I-5 NB and Genesee Avenue
- I-805 SB and Nobel Drive

5.2.2.1.2 Significance of Impacts

Roadway Segments

Deteriorated traffic conditions would result in significant impacts at ~~24~~20 roadway segments with implementation of the Project in the future year. Of the ~~24~~20 roadway segments within the traffic study area that would degrade to unacceptable operating conditions, nine segments have feasible measures available to reduce impacts (Table 4.12-11). ~~Eight~~Six of the nine segments would be improved to operate better than existing conditions and the impact would be mitigated to less than significant (Table 4.12-13). The remaining segment would be improved by the improvement measures; however, while the measures would improve the segment operations, the LOS would not be improved to operations better than existing. Two segments operating at unacceptable conditions would not trigger an impact. Thus, impacts along ~~13~~14 roadway segments would remain significant.

Intersections

With implementation of the Project, ~~34~~30 intersections would degrade to unacceptable LOS operating conditions by future year during one or both of the peak periods. ~~Thirty~~Twenty-eight of these ~~34~~30 intersections exceed the significance thresholds. ~~Twenty-one~~Nineteen of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These ~~24~~19 intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP. Of these ~~30~~28 intersections that exceed the significance thresholds, 18 intersections ~~operating at LOS E or F in the future year~~ do not have feasible measures available to reduce impacts (Table 4.2-14). Two intersections, Genesee Avenue/Decoro Street and La Jolla Village Drive/Villa La Jolla Drive, have mitigation measures proposed. However, while the proposed mitigation measures would improve the intersection operations, the delay time would not be reduced to below a level of significance. The impacts at the remaining ~~4~~10 intersections would be improved to operate at an LOS D or better and the significant impact would be mitigated in both the AM and PM peak hours. Table 4.2-12 summarizes the level of significance for intersections after implementation of mitigation measures. The impacts at the ~~20~~18 study area intersections would remain significant and unmitigated even after incorporation of Mitigation Measures TRA-1 and TRA-2 specified in Section 4.2.4.3. Thus, the Project would result in an increase in projected traffic congestion that is substantial in relation to the existing traffic load and capacity of the street system and the impact would be significant.

Freeway Segments

Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments in the future year. Thus, impacts at the eight aforementioned freeway segments would remain significant and unmitigated. These would be considered significant cumulative impacts.

Freeway Ramp Metering

Feasible mitigation is not available to reduce the significant impacts that would occur at freeway ramps in the future year. Thus, impacts at the eight aforementioned freeway ramps would remain significant and unmitigated. These would be considered significant cumulative impacts.

5.2.2.1.3 Mitigation Framework

Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area that are associated with the Project, if implemented, and will be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element.

5.2.2.1.4 Significance After Mitigation

~~Discretionary p~~Projects with the potential to substantially deteriorate traffic conditions would result in significant impacts. ~~Discretionary p~~Projects, including implementation of the proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. As discussed, Mitigation Measures TRA-1 and TRA-2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). However, program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level. As such, the Project's contribution to the aforementioned impacts when considered in conjunction with past, present, and future projects would be cumulatively considerable.

5.2.2.2 Air Quality

The geographic scope for the analysis of cumulative air quality impacts is considered SDAB. It is appropriate to consider the entire air basin as air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. While some air quality emissions can be localized, such as a CO₂ hot spot or odor, the overall consideration of cumulative air quality is typically more regional. By its very nature, air pollution is largely a cumulative impact.

5.2.2.2.1 Impact Analysis

Air quality in the SDAB has generally improved over recent decades due to auto emissions and other emissions restrictions and improved technologies. The SDAB currently meets NAAQS for all criteria air pollutants except ozone (8-hour), and meets the CAAQS for all criteria air pollutants except ozone, PM₁₀, and PM_{2.5}. The SDAB currently falls under a federal maintenance plan for 8-hour ozone. The SDAB is currently classified as a state nonattainment area for ozone, PM₁₀, and PM_{2.5}.

The cumulative assessment of air quality impacts to the SDAB relies on assessment of the Project's consistency with the adopted RAQS and SIP. The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum buildout of land uses as allowed in the adopted community and general plans. Potential cumulative air quality impacts would thus be reduced through achievement of emission levels and reduction strategies identified in the RAQS. As discussed in Section 4.4, Air Quality, the Project would remove the planned widening of Genesee Avenue and construction of the Regents Road Bridge from the UCP. Therefore, construction-related emissions associated with those activities would not occur.

The Project does not include the construction of new residential or commercial buildings; therefore, it would not directly increase population or regional employment that would cause a net increase in regional VMT. The CO concentrations resulting from the Project would not violate the CAAQS for either the 1-hour period (20 ppm) or the 8-hour period (9.0 ppm). The Project would not exceed 100 pounds per day of PM dust. The Project would not create objectionable odors affecting a substantial number of people. These impacts would be less than significant. However, the transportation network changes as a result of the Project have not been included in the regional emissions analysis of the RAQS. The Project requires an amendment to the General Plan and as determined in this analysis (see Issue 2 and in Section 4.2, Transportation/Circulation), would increase the total regional VMT compared to the Adopted UCP. SANDAG is currently developing an update to the RAQS and an ozone attainment plan for the 8-hour ozone NAAQS. Any changes to the transportation network and the General Plan as a

result of the Project would be incorporated in the updates to future air quality attainment plans. However, the increase in VMT and change in the roadway network as a result of the Project have not been accounted for in the current RAQS. Because the Project would result in a significant increase in criteria pollutant and precursor emissions compared to the current assumptions in the RAQS, the Project would conflict with or obstruct implementation of the applicable air quality plan and could violate an ambient air quality standard or contribute substantially to an existing violation. In addition, the net increase in emissions of for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area) for the total Project area VMT would exceed the applicable annual thresholds established by the City of San Diego.

5.2.2.2.2 Significance of Impacts

Impacts related to criteria pollutant and precursor emissions compared to the current assumptions in the RAQS would conflict with or obstruct implementation of the applicable air quality plan and would be significant and unmitigated at the program-level. Operational emissions resulting from the Project would, therefore, result in a significant cumulative air quality impact.

5.2.2.2.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provide a regulatory framework for developing project-level air quality mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant impacts related to air quality are subject to site-specific review in accordance with the City's General Plan; the UCP; the City's Municipal Code; and the City's CEQA Significance Determination Thresholds, through the discretionary process. In general, implementation of these policies would preclude or reduce air quality impacts. Compliance with all applicable local, state, and federal standards are required of all projects and is not considered mitigation. However, it is possible that, for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, these improvements to the transportation network would also affect criteria air pollutant emissions. No additional feasible mitigation is available to reduce impacts associated with the Project.

5.2.2.2.4 Significance After Mitigation

The Project's impact on air quality emissions would be significant and unmitigated at the program level. As such, the Project's contribution to the aforementioned impacts when considered in conjunction with past, present, and future projects would be cumulatively considerable.

5.2.2.3 Greenhouse Gas Emissions

The geographic scope of consideration for GHG emissions is on a global scale as such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By nature, GHG evaluations are a cumulative study. The cumulative analysis considers both global and regional projections of GHG emissions as well as local projects that may contribute to GHG emission impacts. The Project's impacts when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable as a result of a substantial increase in the emission of GHGs from construction activities, generation of vehicle traffic, energy use, and fuel consumption associated with on-road motor vehicles.

5.2.2.3.1 Impact Analysis

The removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not involve construction or modification of the existing roadway. Therefore, construction-related GHG emissions associated with those activities would not occur. Projects, including implementation of the proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review to evaluate construction-related GHG emissions.

As discussed in Section 4.5, Greenhouse Gas Emissions, the changes in VMT and average speed associated with the Project result in a net increase of 4,466 MT CO₂e per year on freeways and a net decrease of approximately 1,874 MT CO₂e per year on arterials. The decrease in arterial-related GHG emissions is primarily associated with changes to Regents Road (i.e., deletion of the bridge and associated roadway segment). Although the Project would reduce GHG emissions on Regents Road without the Regents Road Bridge, other affected arterials and freeway segments would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments. Overall, the Project results in a net increase of 2,593 MT CO₂e per year. Based on the analysis of the change in VMT and speeds on freeway and arterial segments in the Project area, the Project would not improve overall traffic operations and would result in a net increase in overall GHG emissions in the Project area.

5.2.2.3.2 Significance of Impacts

The total GHG emissions for the Project would increase compared to the Adopted UCP. In addition, the analysis does not include all vehicle travel and operations in the area as a result of the Project, and additional vehicle travel and congestion, similar to the overall trend identified in this analysis, could further increase the Project's estimated change in GHG emissions. These changes would be analyzed during the next update to the 2015 RTP/SCS for consistency with the long-term GHG reduction goals in AB 32 and SB 375. There are no additional measures that could reduce emissions in the Project area. Since the Project increases emissions compared to the Adopted UCP and the regional GHG impacts have not yet been analyzed in the 2015 RTP/SCS, the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

5.2.2.3.3 Mitigation Framework

There are no mitigation measures available that could reduce this impact at the program level.

5.2.2.3.4 Significance After Mitigation

~~Discretionary~~ Projects implemented in accordance with the UPC shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Project's impact on GHG emissions would be significant and unmitigated at the program level. As such, the Project's contribution to the aforementioned impacts when considered in conjunction with past, present, and future projects would be cumulatively considerable.

5.2.2.4 Noise

The geographic scope for the consideration of cumulative noise impacts is the areas immediately surrounding the Project site. Generally, noise impacts are limited to the area directly surrounding the noise generator as noise attenuates with distance and only has the potential to combine with other noise sources in the immediate vicinity. The Project's impacts when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable if ambient noise increases above the City's CEQA Significance Determination Thresholds.

5.2.2.4.1 Impact Analysis

Construction

The Project would remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge from the UCP. As such, construction activities would not occur in

proximity to nearby residences. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would not result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in the Project vicinity. As such, the Project would not contribute to a cumulative noise impact associated with construction activities.

Operation

The removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). As discussed in Section 4.7.1.6, noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4. As shown in Table 4.7-4, With Project compared to With Adopted UCP, the distances of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City's residential exterior CNEL noise standards with the Project. The distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor to the residences along the Genesee Avenue Corridor increases under the Project. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Noise impacts would be significant with the removal of the widening of Genesee Avenue from the UCP. As such, the Project may contribute to a cumulative noise impact during operations.

5.2.2.4.2 Significance of Impacts

The removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008s). This is a potentially significant impact. As such, Mitigation Measure NOI-1 is provided in order to address the significant impacts related to operational noise along the Genesee Avenue Corridor. As such, the Project may contribute to a cumulative operational noise impact when considered together with other past, present, and future projects.

The removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Operational noise impacts would be less than significant. Therefore, no cumulative operational noise impacts associated with the removal of the planned Regents Road Bridge would result when considered together with other past, present, and future projects.

5.2.2.4.3 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level noise mitigation measures for ~~discretionary~~ projects. All ~~discretionary~~ projects with the potential to result in significant noise impacts are subject to site-specific review in accordance with the City's General Plan, Noise Element, including the City's 2015 General Plan Amendments; the UCP, Noise Element; the City's Municipal Code, Noise Ordinance; and the City's CEQA Significance Determination Thresholds (City of San Diego 2011), through the discretionary process. The Mitigation Framework (Mitigation Measure NOI-1) shall be required of all ~~discretionary~~ projects with the potential to result in significant noise impacts.

5.2.2.4.4 Significance After Mitigation

~~Discretionary p~~Projects with the potential to conflict with adopted policies, plans, or programs relating to noise would result in significant impacts. ~~Discretionary p~~Projects, including implementation of the proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. In addition, ~~discretionary~~ projects implemented in accordance with the UCP would be required to implement the Mitigation Framework specified in Section 4.7.6.3. However, even with implementation of Mitigation Measure NOI-1, the noise impacts associated with the Project, in conjunction with other past, present, or future projects, would result in a significant cumulative impact during operational activities. The Project's contribution to the aforementioned impacts would be cumulatively considerable.

5.2.2.5 Public Services and Facilities

The geographic scope for the public services and facilities cumulative analysis is the UCP Area within the City of San Diego. The provision of public services and facilities is often specific to jurisdictional providers or confined by set service boundaries. Public services and facilities generally serve residents on a community-wide basis. Typically, changes in development influence the demand for public services and facilities to be provided within a local City, county, or service district. The Project's impacts on public services and facilities when viewed together

with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable.

5.2.2.5.1 Impact Analysis

The anticipated population growth within the UCP Area would increase the demand for fire protection, police protection, schools, parks and recreation, and libraries. This demand, together with the demand from other development in the surrounding area, would result in a need for new or modified facilities. As stated in Section 4.13, Public Services and Facilities, there are no residential components included with the Project that could directly increase population and result in an increase in student enrollment levels. The Project would not have an impact on existing school facilities in the area and would not require construction of new facilities. In addition, there would be no increased wear on the existing libraries in the UCP Area as the Project would not directly increase populations residing in the area. The Project would not create the need for new public parks or facilities as it is not introducing new housing or population to the community. However, the Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police and fire and emergency service response times would be significant.

5.2.2.5.2 Significance of Impacts

With implementation of the Project, traffic conditions would degrade to unacceptable LOS operating conditions by future year. The impact on emergency service response times would be significant.

The Project would not result in any significant impacts to schools, libraries, parks, and recreational facilities.

5.2.2.5.3 Mitigation Framework

Under the Project, the traffic conditions would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP; impacts to emergency service providers would remain significant and unmitigated at the program level.

5.2.2.5.4 Significance After Mitigation

As discussed, the traffic conditions under the Project would deteriorate significantly with removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP; impacts to emergency service providers would remain significant and unmitigated at the program

level. As such, the Project's contribution to the aforementioned impacts when considered in conjunction with past, present, and future projects would be cumulatively considerable.

5.2.3 Cumulative Impacts Found Not to be Significant

Based on the analyses contained in Chapter 4.0, Environmental Analysis, of this PEIR, the Project's contribution to cumulative land use, visual effects and neighborhood character, energy, historical resources, biological resources, geological conditions, paleontological resources, hydrology/water quality, public utilities, health and safety, and population and housing would not be cumulatively considerable, as analyzed below.

5.2.3.1 Land Use

The geographic scope for land use cumulative analysis includes the UCP Area and immediately surrounding lands. Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions, but can have implications on surrounding areas. The Project's impacts when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable if continuous development changes existing land use patterns and intensity. Cumulative incompatible uses can also be seen as a significant impact but are typically mitigated on a project-by-project basis.

As stated in Section 4.1, Land Use, the Project would not conflict with any goals, objectives, and recommendations of the City of San Diego General Plan, the North City LCP, or any coastal regulations. The Project would result in a community plan amendment, as such; the Project would no longer be inconsistent with the UCP and UCP Transportation Element. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to land use would occur.

5.2.3.2 Visual Effects and Neighborhood

The geographic scope of consideration for the visual analysis is the UCP Area. Throughout the UCP Area, long east-west views are available, while short north-south views are also available. The Project's impacts when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable with the alteration of visual character of the area resulting in a change to public views, as well as increased nighttime light and daytime glare levels.

The Project would not create any impacts to visual resources. The removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not change the UCP Area from existing conditions, as no new structures would be constructed. Therefore, when

viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to visual resources would occur.

5.2.3.3 Energy

The geographic scope of consideration for the cumulative analysis of energy is the UCP Area within the City of San Diego. The provision of power and energy is often specific to jurisdictional providers or confined by set service boundaries. Energy utilities generally serve residents on a community-wide basis. Typically, changes in development influence the demand for power and energy to be provided within a local city, county, or service district.

As stated in Section 4.6, Energy, the removal of planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would cause no increased demand for energy or power. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to energy would occur.

5.2.3.4 Historical Resources

The geographic scope of consideration for the cumulative analysis of historical resources includes the UCP Area. The UCP Area presents a unique prehistoric and historic context within the region. The removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not have an impact on historical resources. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to historical resources would occur.

5.2.3.5 Biological Resources

The cumulative analysis geographic scope for biological resources is the UCP Area. Biological resources can have commonalities across a large regional area, while also having very unique and specific characteristics in certain locations. In the UCP Area, the dense urbanized setting creates limited habitat opportunities, and biological resources tend to be fairly isolated with areas of connectivity restricted to a few linear features such as Rose Canyon and Marian Bear Memorial Park in San Clemente Canyon.

The removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would have no impact on biological resources. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to biological resources would occur.

5.2.3.6 Geological Conditions

The geographic scope for cumulative impacts for geological resources is the UCP Area and immediately surrounding lands. Geology and soil features can be very specific to certain locations and sites, but can also have broad reaching elements, such as faults and underlying bedrock formations. However, potential geologic or soil hazards resulting from development are generally localized to the site and immediate surrounding lands rather than a broad reaching area. In this way, potential cumulative impacts resulting from seismic and geologic hazards would be minimized on a site-by-site basis to the extent that modern construction methods and code requirements provide. Throughout the UCP Area, cumulative projects would also be susceptible to similar geologic hazards caused by unstable geologic conditions or soils, including seismic activity, liquefaction, settlement, and land sliding. The specific geologic conditions of each individual project site, soil type, and project excavation requirements would dictate the severity of the potential geologic risks. Cumulative projects would be subject to the same regulations and engineering requirements as the Project, such as the City's grading ordinance, a SWPPP and associated BMPs, and building codes.

As discussed in Section 4.10, Geologic Conditions, removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not result in construction activities or changes to the Project area from existing conditions. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to geological conditions would occur.

5.2.3.7 Paleontological Resources

The general geographic scope for cumulative impacts to paleontological resources includes the overall Southern California region as interrelated paleontological resources are known to occur throughout the region in various locations and a variety of rock formations. However, the specific locations known to produce paleontological resources are typically quite limited based upon the sensitivity of the underlying bedrock formations. The Project's impacts related to paleontological resources when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable if ongoing development results in the loss and/or degradation of paleontological resources.

As discussed in Section 4.11, Paleontological Resources, the removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not result in any ground disturbance, and would have no impact on paleontological resources. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to paleontological resources would occur.

5.2.3.8 Hydrology and Water Quality

The cumulative analysis geographic scope includes the San Diego River hydrologic unit as water bodies within the watershed area are part of an interrelated hydrologic system that can span community and jurisdictional boundaries. Modifications to a portion of a watershed area or water pollution produced by development in one location may result in hydrology and water quality impacts that affect other water bodies or the entire region. The Project's impacts when viewed together with the environmental impacts from past, present, and probable future projects may be viewed as cumulatively considerable if the impacts contribute to the cumulative effects of degradation of water quality, changes to runoff patterns, and the potential for increased flooding.

As discussed in Section 4.12, Hydrology and Water Quality, the removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not lead to new development and no construction or change in existing conditions to those areas. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to hydrology and water quality would occur.

5.2.3.9 Public Utilities

The geographic scope for the public utilities cumulative analysis is the UCP Area within the City of San Diego. The provision of public utilities is often specific to jurisdictional providers or confined by set service boundaries. Public utilities generally serve residents on a community-wide basis. Typically, changes in development influence the demand for public utilities to be provided within a local city, county, or service district. The Project's impacts on public utilities when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable.

Water

The UCP Area is served by the City of San Diego's Public Utilities Department. The City receives the majority of its water from the SDCWA, who is a member of the MWD. The Project would not directly or indirectly contribute to population growth. Removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not require additional use of water above existing conditions, and would not cause a need for new or expanded water facilities. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to water would occur.

Wastewater/Sewer

Wastewater collection and treatment services for the UCP Area are provided by the Wastewater Branch of the City of San Diego Public Utilities Department. Removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not generate wastewater above existing conditions, as no construction would occur at, and no changes would be made to, the UCP Area under those project components. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to wastewater/sewer would occur.

Natural Gas

As discussed in Section 4.6, Energy, removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not increase demand or consumption of natural gas. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to natural gas would occur.

Communication Systems

Communications facilities are provided through private utility companies that have the capacity to serve the UCP Area. The Project would not impair the ability of these companies to provide services to the constituents of the UCP Area and would not require the construction of new communications facilities. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to communication systems would occur.

Solid Waste Disposal

Solid waste disposal is provided by the City of San Diego ESD and private collectors such as Allied Waste/Republic Services. As discussed in Section 4.14, several active solid waste facilities in the San Diego area could receive waste from the project site. Many of these landfills are projected to reach capacity and close between 2025 and 2050. The ESD developed the Source Reduction and Recycling program and the Recycling Ordinance in order to comply with state law. Removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP would not cause an increase in solid waste generation. Therefore, no additional solid waste would be generated by the Project and no additional strain would be placed on landfills that serve the UCP Area. No new facilities would need to be constructed as a result of the Project from the UCP. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to solid waste disposal would occur.

5.2.3.10 Health and Safety

For cumulative analysis, the geographic scope for health and safety, which includes wildland fires, hazardous materials, and safety, is the City of San Diego because these issues cover a much broader scope that does not follow the boundaries of the UCP Area. The Project's impacts when viewed together with the environmental impacts from past, present, and future projects may be viewed as cumulatively considerable if the Project, along with other development in the Project area, creates an ongoing risk to public health.

As discussed in Section 4.15, Health and Safety, the two Project components are located in a Fire Hazard Severity Zone with "No Designation." However, the portions of the Project that interface with Rose Canyon and Marian bear Memorial Park in San Clemente Canyon are designated as "Very High." However, the removal of the planned Genesee Avenue Widening and the Regents Road Bridge from the UCP would not involve construction modification of the existing roadway. This would not expose people or structures to a significant risk of loss, injury, or death involving fire. The Project would not result in the transportation of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of existing groundwater monitoring wells. The Project would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. The Project would not result in construction activities that would entail transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of groundwater monitoring wells. The Project would have no impact on people residing or working within two miles of a private airstrip or heliport facility. There would be no structures that would impair heliport or private airstrip operations and all helicopter operations would be undertaken in accordance with FAA regulations. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to health and safety would occur.

5.2.3.11 Population and Housing

The geographical scope considered for the population and housing cumulative impact analysis is defined as the region. The Project would not lead to the construction of new housing, or induce population growth, either directly or indirectly. The Project would not displace any housing units or hinder the future construction of additional housing units in the UCP Area. Therefore, when viewed together with the environmental impacts from past, present, and probable future projects, no cumulative impacts to population and housing would occur.

CHAPTER 6.0

GROWTH INDUCEMENT

As required by CEQA Guidelines, Section 15126.2(d), an EIR must include analysis of ways in which a project could foster economic or population growth, either directly or indirectly, in the surrounding area. Growth should not be assumed beneficial, detrimental, or of little consequence of the environment (CEQA Guidelines Section 15126.2(d)). The analysis includes the ways in which a project could foster the construction of housing, either directly or indirectly, in the surrounding environment, as well as the potential for a project to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. This includes the potential for a project to induce further growth or remove obstacles to growth by the expansion or extension of existing services, utilities, or infrastructure.

Short-Term Growth Inducement

The Project proposes to remove the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Project would not entail construction that would require a temporary or permanent increase in the need for labor and materials. Therefore, there would not be an increase in demand for local temporary or permanent housing for workers. Additionally, there would not be a demand for goods, services, products, and materials associated with construction projects that would require new supply services. No associated substantial short-term growth-inducing effects would result.

Long-Term Growth Inducement

The Project includes the removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. The Project is not expected to increase traffic capacity above and beyond the needs of the future planned population and their needs. The Project does not involve residential or commercial development. No residences within the study area would be permanently impacted by the Project. The Project would not induce substantial population growth in an area. Project implementation would not foster additional development that would lead to population growth, either directly or indirectly. Therefore, long-term activities associated with the Project would not be considered growth inducing.

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CHAPTER 7.0

EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires an EIR to contain a statement briefly indicating the reasons that various possible significant impacts of a project were determined not to be significant and therefore were not discussed in detail in this PEIR. Pursuant to Section 15128 of the CEQA Guidelines, the following issue areas were determined by the City of San Diego, as the lead agency, not to have the potential to cause adverse impacts, and therefore have not been addressed in detail in this PEIR.

7.1 AGRICULTURAL AND FORESTRY RESOURCES

The City's CEQA Significance Determination Thresholds (2011a) state that a significant impact on agricultural resources may result if the Project would:

- Result in conversion of a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or Williamson Act contract; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

There are no City CEQA Significance Determination Thresholds related to forestry resources. However, CEQA Guidelines Appendix G states that a significant impact on forestry resources may result if the Project would:

- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
- Result in the loss of forest land or conversion of forest land to non-forest use; or
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

The Project site is located in an urbanized area and does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designed by the California Department of Conservation. The site is not subject to, nor is it near, a Williamson Act contract site pursuant to Sections 51200–51207 of the California Government Code. The Project site is urban and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No agricultural lands are located on or adjacent to the Project site. The site is designated as developed land and is not designated as farmland under the Farmland Mapping and Monitoring Program of the California Department of Conservation or the City of San Diego’s Progress Guide and General Plan. The Project is not located on land that would be in conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). Because the Project is located in an urbanized area, it would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, there would be no impacts to agricultural and forestry resources due to implementation of the Project.

7.2 MINERAL RESOURCES

The City’s CEQA Significance Determination Thresholds (2011a) state that a significant impact on mineral resources may result if the Project would result in:

- The loss of availability of a significant mineral resource (e.g., sand or gravel) as identified by the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey (located in the EAS library).

The Department of Conservation – California Department of Geological Survey and City of San Diego General Plan, Conservation Element designate Mineral Resource Zones (MRZs), which are the established zones based on the presence or absence of significant sand and gravel deposits and crushed rock resource areas. There zones are described below:

- MRZ-1. Areas where adequate information indicates that no significant mineral deposits are present or where it is judged that there is little likelihood for their presence.
- MRZ-2. Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence.
- MRZ-3. Areas containing mineral deposits, the significance of which cannot be evaluated from available data.

- MRZ-4. Areas where available information is inadequate for assignment to any other MRZ.

The UCP Area is primarily designated as MRZ-3. Areas designated as MRZ-1 were identified along the eastern and northern portions of the UCP Area. There are also areas designated as MRZ-4 located in the northern portion of the UCP Area. The Torrey Pines Subarea, forming the western border of the UCP Area, consists of parks and recreation areas. Torrey Pines State Natural Reserve occupies most of the land north of Genesee Avenue and west of North Torrey Pines Road. The Miramar Subarea, located in the eastern portion of the UCP Area, is primarily industrial uses, including warehouses, distribution centers, storage facilities, and automotive-related commercial uses in a typical strip commercial pattern. MCAS Miramar lies east of the UCP Area. Both the Central Subarea and South University Subarea are defined as urbanized areas in the General Plan. General land uses within these subareas consist of research parks, business parks, office, visitor commercial, and residential development (both single-family and multi-family development). The Project does not involve an operating mine, sampling, or availability of a known mineral resource that would be of value to the region and the residents of California per the City of San Diego's General Plan. Therefore, no impacts to mineral resources would occur due to implementation of the Project.

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CHAPTER 8.0 MANDATORY DISCUSSION AREAS

8.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in an EIR. Based upon the environmental analyses within this PEIR, the City has determined that the Project would result in significant and unmitigated impacts associated with the following issue areas:

- **Transportation/Circulation:**
 - Increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system
 - Result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp
 - Result in a substantial impact upon existing or planned transportation systems
 - Result in substantial alterations to present circulation movements, including effects on existing public access areas to beaches, parks, or other open space areas
 - Conflict with adopted policies, plans, or programs supporting alternative transportation modes

- **Air Quality:**
 - Conflict with or obstruct implementation of the applicable air quality plan
 - Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation

- **Greenhouse Gas Emissions:**
 - Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment
 - Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG

- **Noise:**
 - Expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan

- Public Services and Facilities:
 - Result in an impact to police service and fire and emergency service response times

Transportation/Circulation

Increase in Projected Traffic Which Is Substantial in Relation to the Existing Traffic Load and Capacity of the Street System

As discussed in Section 4.2, Transportation/Circulation, deteriorated traffic conditions would result in significant impacts at ~~24~~20 roadway segments under Future Year with Project. Four of these significantly impacted roadway segments under the Project would continue to operate at acceptable LOS with implementation of the Adopted UCP. Also, 13 of the roadway segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the Adopted UCP.

As discussed in Section 4.2, Transportation/Circulation, with implementation of the Project, ~~30~~28 intersections would degrade to unacceptable LOS operating conditions which exceed the significance thresholds during one or both of the peak periods by future year. Eight of these significantly impacted intersections under the Project would operate at acceptable LOS with implementation of the Adopted UCP. Also, ~~24~~19 of the intersections operating at unacceptable LOS in Future Year with Project would be significantly worse during one or both of the peak hours with implementation of the Project as compared to the Adopted UCP. Thus, the Project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system. The impact would be significant.

All ~~discretionary~~ projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, ~~Transportation~~ Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. ~~If implemented,~~ Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Result in the Addition of a Substantial Amount of Traffic to a Congested Freeway Segment, Interchange, or Ramp

As discussed in Section 4.2, Transportation/Circulation, deteriorated traffic conditions would result in significant impacts at eight freeway segments by future year with implementation of the Project, and all of these impacts would also be anticipated to occur by future year under the Adopted UCP. However, five of the freeway segments that would be operating at unacceptable LOS by future year would be significantly worse during at least one of the peak periods with implementation of the Project as compared to the Adopted UCP. As shown in Table 4.2-13 (which is presented for informational purposes), eight freeway ramps would experience significant increases in delay in the future year (same as those identified for future year with Adopted UCP). However, six of the freeway ramps that would be operating at unacceptable LOS by future year would be significantly worse with implementation of the Project as compared to the Adopted UCP.

~~Discretionary p~~Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, ~~Transportation~~ Mobility Element (City of San Diego 2008); the UCP; and the City's CEQA Significance Determination Thresholds (City of San Diego 2011), through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Result in a Substantial Impact upon Existing or Planned Transportation Systems

As discussed in Section 4.2, Transportation/Circulation, implementation of the Project, including the amendment to the UCP, would not result in the construction of a roadway that is inconsistent with the General Plan and/or the UCP or that would misalign with existing or planned roadways. However, the Project would result in significant traffic impacts to roadway segments, intersections, freeway ramps, and freeway segments by future year. Thus, the Project would result in a substantial impact upon existing or planned transportation systems. The impact would be significant.

~~Discretionary p~~Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, ~~Transportation~~ Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Result in Substantial Alterations to Present Circulation Movements, Including Effects on Existing Public Access Areas

As discussed in Section 4.2, Transportation/Circulation, implementation of the Project, including the amendment to the UCP, would not modify the existing transportation network in a way that would include substantial alterations to present circulation movements. However, the Project would result in significant traffic impacts to roadway segments, intersections, freeway ramps, and freeway segments by future year, which would present increased difficulty in accessing areas within the community and traveling through the local area during peak periods. Thus, the Project would result in a substantial impact to present circulation movements, including effects on existing public access areas. The impact would be significant.

~~Discretionary p~~Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, ~~Transportation~~ Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be

~~fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.~~ Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Conflict with Adopted Policies, Plans, or Programs Supporting Alternative Transportation Modes

As discussed in Section 4.2, Transportation/Circulation, the removal of the planned Regents Road Bridge from the UCP would eliminate the planned crossing of Rose Canyon that would have been designed to accommodate pedestrians and bicyclists. This connection was identified in the Bicycle Master Plan. Because this future linkage would no longer occur with implementation of the Project, the loss of this multimodal connection would conflict with adopted policies, plans, or programs supporting alternative transportation modes. The impact would be significant.

~~Discretionary p~~Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation Mobility Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Air Quality

Result in a Conflict with or Obstruct Implementation of the Applicable Air Quality Plan

The Project requires an amendment to the General Plan and, as determined in this analysis (see Issue 2 and Section 4.2, Transportation/Circulation), would increase the total regional VMT compared to the Adopted UCP. SANDAG is currently developing an update to the RAQS and an ozone attainment plan for the 8-hour ozone NAAQS. Any changes to the transportation network

and the General Plan as a result of the Project would be incorporated in the updates to future air quality attainment plans. However, the increase in VMT and change in the roadway network as a result of the Project would not have been accounted for in the current RAQS. Because the Project would be not consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS, the Project could conflict with or obstruct implementation of the applicable air quality plan. No additional feasible mitigation is available to reduce impacts associated with the Project. The impact would be significant and unmitigated at the program level.

Cause a Violation of Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation

The net increase in emissions of ROG, PM₁₀, and PM_{2.5} would not exceed applicable daily or annual thresholds established by the City of San Diego (Table 4.4-6.). However, the net increase in emissions of (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area) for the total Project area VMT would exceed the applicable annual thresholds established by the City of San Diego. Considering that the Project's long-term operations would exceed annual thresholds of significance for NO_x and CO, operation of the Project could violate an ambient air quality standard or contribute substantially to an existing violation. ~~Discretionary~~ Projects with the potential to result in significant impacts related to air quality are subject to site-specific review in accordance with the City's General Plan; the UCP; the City's Municipal Code; and the City's CEQA Significance Determination Thresholds, through the discretionary process. Further, Mitigation Measures TRA-1 through TRA-2 provided in Section 4.2.4.3 would reduce significant traffic impacts to roadway segments and intersections. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

Greenhouse Gas Emissions

Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

As discussed in Section 4.5, Greenhouse Gas Emissions, the total GHG emissions for the Project would increase compared to the Adopted UCP. In addition, the analysis does not include all vehicle travel and operations in the area as a result of the Project, and additional vehicle travel and congestion, similar to the overall trend identified in this analysis, could further increase the Project's estimated change in GHG emissions. These changes would be analyzed during the next update to the SANDAG Regional Plan for consistency with the long-term GHG reduction goals in AB 32 and SB 375. There are no additional measures that could reduce emissions in the Project area. Since the Project increases emissions compared to the Adopted UCP and the regional GHG impacts have not yet been analyzed in the Regional Plan, the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHG

Given the increase in VMT and GHG emissions from mobile sources, the Project would not be consistent with the goals of the 2015 RTP/SCS, Climate Action Strategy, and City of San Diego CAP. Therefore, the Project could conflict with the applicable plan, policy, or regulation for the purpose of reducing GHG emissions. There are no mitigation measures available that could reduce this impact. The impact would be significant and unmitigated.

Noise

Expose People to Current or Future Transportation Noise Levels That Exceed Standards Established in the Noise Element of the General Plan

As discussed in Section 4.7, Noise, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (i.e., exterior standard of 65 dBA CNEL residential; interior standard of 45 dBA CNEL residential) (City of San Diego 2008a). This is a potentially significant impact.

All ~~discretionary~~ projects with the potential to result in significant noise impacts are subject to site-specific review in accordance with the City's General Plan, Noise, including the City's 2015 General Plan Amendments; the UCP, Noise Element; the City's Municipal Code, Noise Ordinance; and the City's CEQA Significance Determination Thresholds, through the discretionary process. The Mitigation Framework (Mitigation Measure NOI-1) provided in Section 4.7.6.3 shall be required of all ~~discretionary~~ projects with the potential to result in significant noise impacts. Noise impacts would be significant with the removal of the widening

of Genesee Avenue. Mitigation Measure NOI-1 would address the significant impacts related to operational noise along the Genesee Avenue Corridor and reduce impacts to a level below significance. However, even with implementation of Mitigation Measure NOI-1, where effective noise measures cannot be implemented, operational noise impacts would be significant and unmitigated at the program level.

Public Services and Facilities

Result in an Impact to Police Service and Fire and Emergency Service Response Times

With implementation of the Project, traffic conditions would degrade to unacceptable LOS operating conditions by the future year, which is substantial in relation to the existing traffic load and capacity of the street system. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, significant traffic impacts would still result at the program level. Development Impact Fees provide partial funding for proposed mitigation measure improvements (TRA-1 and TRA-2). An amendment to the North University City PFFP would be adopted with the community plan amendment to allow for implementation of the UCP (City of San Diego 2014a, City of San Diego 2014b). Program-level improvements cannot be fully mitigated even with implementation of mitigation measures TRA-1 and TRA-2. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, impacts to emergency service providers associated with the Project would remain significant and unmitigated at the program level.

8.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA and the CEQA Guidelines require that an EIR address “significant irreversible environmental changes which would be involved in the project, should it be implemented [Section 158126(c)].” Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes, which would occur should the Project be implemented.

Irreversible changes typically fall into three categories:

- Primary impacts such as the use of nonrenewable resources (i.e.’ biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);

- Primary and secondary impacts, such as highway improvements, that provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with the Project.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to ensure that current consumption of such resources is justified.

Nonrenewable Resources

The Project would not involve the use of nonrenewable resources, as it does not include any construction. Therefore, the Project would not have a significant irreversible commitment to biological resources.

The Project site is urban and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No agricultural lands are located on or adjacent to the Project site. The site is designated as developed land and is not designated as farmland under the Farmland Mapping and Monitoring Program of the California Department of Conservation or the City of San Diego's Progress Guide and General Plan. Therefore, the Project would not have a significant irreversible commitment to agricultural resources.

The Project does not involve an operating mine, sampling, or availability of a known mineral resource that would be of value to the region and the residents of California per the City of San Diego's General Plan. Therefore, there would be no impacts associated with mineral resources due to implementation of the Project.

The Project would not represent a long-term commitment to a more intensive land use. Therefore, implementation of the Project would not involve an irreversible commitment to the use of nonrenewable resources in the form of water.

The Project would not involve significant consumption of energy or petroleum-based fuels that deplete supplies of nonrenewable resources. The Project would not consume energy and water; therefore, the Project would not represent a significant irreversible use of resources.

Removal of the planned Genesee Avenue Widening or the construction of the Regents Road Bridge from the UCP would not result in the alteration and/or the destruction of a prehistoric or historic building, including an architecturally significant building or site. Therefore, the Project would not have a significant irreversible commitment to cultural resources.

Primary and Secondary Impacts

Implementation of the Project would remove the planned widening of Genesee Avenue and the construction of the Regents Road Bridge from the UCP. With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of the Mitigation Measures TRA-1 and TRA-2 provided in Section 4.2.4.3, significant traffic impacts would result and present increased difficulty in accessing areas due to poor traffic conditions including long queue lengths, crowded maneuvering conditions, slow speeds, and other traffic-related delays. ~~Further, Mitigation Measures TRA-1 and TRA-2 are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time.~~ The Project would not provide access to areas that were previously inaccessible. Therefore, the Project would not have primary and secondary impacts related to access to previously inaccessible areas.

Potential Environmental Accidents

The Project would not result in construction activities that would entail transporting of hazardous construction materials, contact with contaminated soil and/or groundwater, or disturbance of groundwater monitoring wells. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment.

Within the UCP Area, the risk for wildfires is highest in areas of natural, unmaintained open space, and as development occurs adjacent to these areas the risk increases. The Project would not entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition, which could result in a temporary increase in the potential for accidental wildfires. Further, the Project would not introduce new or permanent structures that would be fire prone or would create substantial new fire hazards.

The Project would not result in structures that would impair heliport or private airstrip operations. Any helicopter operations would be undertaken in accordance with FAA safety and flight regulations.

Based on the analysis provided in Section 4.15, Health and Safety, although conditions exist within the Project site associated with hazardous materials, risk of wildfires, and aircraft operations, the Project would not have the potential for environmental accidents.

CHAPTER 9.0 ALTERNATIVES ANALYSIS

9.1 RATIONALE FOR ALTERNATIVE SELECTION

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

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

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

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

The alternatives identified in this analysis are intended to further reduce or avoid significant environmental impacts associated with the Project. In accordance with Section 15126.6(c) of the CEQA Guidelines, the following analysis of alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In developing the alternatives to be addressed in this chapter, consideration was given to each alternative’s ability to meet the basic objectives of the Project and to eliminate or reduce potentially significant environmental impacts. ~~In addition, this PEIR also provides a discussion on alternatives that were considered but rejected.~~

9.1.1 Significant Impacts of the Project

As discussed throughout the document and summarized in Chapter 8.0, Mandatory Discussion Areas, of this document, the significant and unmitigated impacts of the Project include:

- Transportation/Circulation
- Air Quality
- Greenhouse Gas Emissions
- Noise
- Public Services and Facilities

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

9.1.2 Project Objectives

The following specific objectives support the underlying purpose of the Project, assist the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. Per CEQA, the Project has been developed to meet the following primary objectives:

- Evaluate the environmental impacts of the removal of the planned Genesee Avenue Widening and the Regents Road Bridge projects.
- Minimize impacts to biological resources at Rose Canyon.
- Identify transportation improvements and accommodations for multiple modes of travel (i.e., transit, bicycle, pedestrian, and vehicle), as part of a balanced transportation network.
- Consider the effects of the Project on the General Plan City of Villages strategies related to emergency access and multi-modal transportation.

9.1.3 Feasibility of Alternatives

CEQA, the CEQA Guidelines, and case law have found that feasibility can include a wide range of factors and influences. The Guidelines advise that such factors can include (but are not necessarily limited to) the following: (1) suitability of an alternate site; (2) economic viability; (3) availability of infrastructure; (4) consistency with a general plan; (5) consistency with other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project proponent can “reasonably acquire, control, or otherwise have access to the alternative site.” (Section 15126.6(f)(1))

9.2 ALTERNATIVES CONSIDERED

Alternatives to the Project are considered and discussed in this section. These include the “No Project” alternative that is mandated by CEQA and other alternatives that were developed in the course of project planning and environmental review for the Project. Relative to the requirement to address a “No Project” alternative, CEQA Guidelines Section 15126.6(e) states that:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy, or operation into the future.

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.

Specifically, the following project alternatives are addressed in this PEIR:

- ***No Project Alternative – Construction of Regents Road Bridge and Widening of Genesee Avenue.*** CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as “circumstances under which the project does not proceed.”

The No Project Alternative would result in the planned widening of Genesee Avenue and the construction of the Regents Road Bridge. Genesee Avenue is currently a four-lane road. The No Project Alternative would widen Genesee Avenue from four to six lanes between SR 52 and Nobel Drive. This would involve adding a travel lane in each direction between SR 52 and Nobel Drive in an effort to increase the capacity of this roadway to carry anticipated traffic volumes. The No Project Alternative would involve widening of the bridge crossing Rose Canyon, construction of retaining walls and temporary construction easements, which may result in property acquisition. This alternative would also include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.

The No Project Alternative would involve construction of two separate parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road termini on either side of the canyon. The bridge/roadway would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned),

and through a small ridge adjacent to Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long.

The No Project Alternative would include construction of surface-level improvements at the intersection of Genesee Avenue and Governor Drive. These improvements would be the addition of a northbound and a southbound through lane, maintaining exclusive right-turn lanes in each direction. This requires some modifications to the existing curb to accommodate the right-turn pockets.

- ***Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.*** The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would involve construction of two separate parallel two-lane bridge structures across Rose Canyon as described in the No Project Alternative. This alternative would not result in the widening of Genesee Avenue. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would include repurposing the existing footprint of Genesee Avenue to have three through lanes in each direction by reducing median width, adjusting lane utilizations at intersections, and narrowing lanes. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would construct surface-level improvements at the intersection of Genesee Avenue and Governor Drive. These improvements would be the addition of a northbound and a southbound through lane, maintaining exclusive right-turn lanes in each direction. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would require modifications to the existing curb to accommodate the right-turn pockets. This alternative would include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.
- ***No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative.*** The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not involve construction of the bridge structures spanning Regents Road. This alternative would result in the ~~widening~~ reconfiguration of Genesee Avenue, which would consist of restriping the existing four-lane roadway to a six-lane roadway within the existing right-of-way. This alternative would not involve improvements outside of the existing Genesee Avenue right-of-way. It would potentially involve modification of the existing median. The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive, removing northbound and southbound through-movements at the existing intersection and replacing them with two northbound and southbound through-lanes in an undercrossing along Genesee Avenue. The topography of Genesee Avenue approaching this intersection allows

for the intersection to remain at its current elevation and an undercrossing to be constructed beneath it. Separating the through traffic on Genesee Avenue would significantly increase flow between the north and south areas of the UCP Area. All proposed roadway improvements would be within the existing right-of-way. Under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, businesses at the intersection would still have access and provide services to the adjacent community, but would experience less traffic on their adjacent roads. This alternative would include a new traffic signal at the Genesee Avenue intersection with SR 52 westbound ramps.

- ***Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.*** The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would involve construction of a single bridge structure across Rose Canyon to connect the present north and south termini on either side of Regents Road. The pedestrian bike bridge with emergency access would extend north from the present end of Regents Road on the south side of Rose Canyon just north of Lahitte Court, over a tributary drainage to Rose Canyon (which would be filled, not spanned), and through a small ridge adjacent to Rose Canyon. The bridge portion spanning Rose Canyon would be approximately 870 feet long. The bridge structure would provide emergency access that would improve access times for emergency service providers. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in the widening of Genesee Avenue and would include all the features as described in the No Project Alternative. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would also construct a grade-separated intersection at Genesee Avenue and Governor Drive as described in the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.
- ***Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.*** The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would involve construction of the single-lane bridge structure spanning Regents Road as described in the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. The bridge structure would provide emergency access that would improve access times for emergency service providers. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would include repurposing the existing footprint of Genesee Avenue to have three through lanes in each direction by reducing median width, adjusting lane utilizations at intersections, and narrowing lanes, as described in the Construction of Regents Road Bridge and No Widening of Genesee

Avenue Alternative. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive as described in the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

The environmental analysis of the alternatives presented above is summarized in Table 9-1, which compares the project elements and level of environmental impact within each environmental issue area for each alternative, including the Project. Simulations are provided to graphically display the Alternatives discussed above. Figure 9-1 displays the existing conditions at Rose Canyon, Figure 9-2 displays the Pedestrian Bike Bridge with Emergency Access Alternative, and Figure 9-3 displays the Regents Road Bridge. The analysis presented in this discussion is addressed qualitatively in this PEIR as this is a program-level document.

Section 15126.6(e)(2) of the CEQA Guidelines requires that an EIR identify an environmentally superior alternative. In instances when a No Project Alternative represents the environmentally superior alternative, the above-referenced section of the CEQA Guidelines requires that the PEIR also identify an environmentally superior alternative from among the other alternatives considered. Based on the evaluation presented below, it was determined that the Project No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is the environmentally superior “build” alternative among the alternatives considered. ~~The No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative was determined to be the environmentally superior “build” alternative.~~

9.2.1 No Project Alternative – Construction of Regents Road Bridge and Widening of Genesee Avenue

9.2.1.1 Land Use

Based on the program-level analysis, the No Project Alternative would result in greater impacts related to land use policies when compared to the Project. The proposed ~~Rose Canyon~~ Regents Road Bridge under the No Project Alternative would result in a loss of habitat. In addition, the widening of Genesee Avenue over Rose Canyon would result in impacts to vegetation communities as well as fringes of habitat that occur along the existing Genesee Avenue alignment. As a result, the No Project Alternative would have greater MHPA impacts when compared to the Project. However, the No Project Alternative would connect the present north and south termini on either side of Regents Road with a bridge across Rose Canyon, and, therefore, open up an area previously inaccessible. In this regard, the No Project Alternative would provide a greater community benefit by improving access within the UCP Area when compared to the Project. However, because of the greater MHPA impacts, the No Project Alternative would have significant but mitigable impacts when compared to the Project.

**Table 9-1
Comparison of Project Alternatives – Proposed Elements**

Environmental Issue Area	Project	No Project Alternative – Construction of Regents Road Bridge and Widening of Genesee Avenue	Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative	No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative	Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative	Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative
Land Use	Less than Significant (LS)	Greater than Project- <u>Significant but mitigable (SM)</u>	Greater than Project- <u>SM</u>	Greater than Project- <u>LS</u>	Greater than Project- <u>SM</u>	Greater than Project- <u>SM</u>
Transportation/ Circulation	Significant and Unmitigated (SU)	Less than Project (roadways segments, intersections, freeway segments, and freeway ramp metering); <u>SU (roadway segments, intersections, freeway segments, and freeway ramp metering - reduced significant impacts compared to Project)</u>	Less than Project (intersections, freeway segments, and freeway ramp metering); <u>SU (roadway segments – similar significant impacts compared to Project; intersections, freeway segments, and freeway ramp metering – reduced significant impacts compared to Project)</u>	Less than Project (roadways segments, intersections, freeway segments, and freeway ramp metering); <u>SU (roadway segments, freeway segments, and freeway ramp metering - reduced significant impacts compared to Project; intersections – more significant impacts than Project)</u>	Less than Project (roadways segments, intersections, freeway segments, and freeway ramp metering); <u>SU (roadway segments, intersections, freeway segments, and freeway ramp metering – slightly reduced significant impacts compared to Project)</u>	Less than Project (intersections); <u>SU (roadway segments, freeway segments, and freeway ramp metering - similar significant impacts compared to Project; intersections - slightly reduced significant impacts compared to Project)</u>
Visual Effects and Neighborhood Character	LS	Greater than Project- <u>SM</u>	Greater than Project- <u>SM</u>	Greater than Project- <u>SM</u>	Greater than Project- <u>SM</u>	Greater than Project- <u>SM</u>
Air Quality	No Significant Impacts (NS) (construction) SU (Air Quality Plans, Criteria Pollutants)	Greater construction impacts to Project. Less than Project (air quality plans and criteria pollutants); <u>SM (construction)</u> <u>LS (air quality plans, criteria pollutants)</u>	Greater construction impacts to Project. Similar to Project (air quality plans), but slightly reduced (criteria pollutants); <u>SM (construction)</u> <u>SU (air quality plans)</u> <u>SU (criteria pollutants slightly reduced compared to Project)</u>	Greater construction impacts to Project. Similar to Project (air quality plans), but reduced (criteria pollutants would not exceed thresholds); <u>SM (construction)</u> <u>SU (air quality plans)</u> <u>LS (criteria pollutants would not exceed thresholds)</u>	Greater construction impacts to Project. Similar to Project (air quality plans), but slightly reduced (criteria pollutants); <u>SM (construction)</u> <u>SU (air quality plans)</u> <u>LS (criteria pollutants would not exceed thresholds)</u>	Greater construction impacts to Project. Similar to Project (air quality plans), but less than significant impacts (criteria pollutants); <u>SM (construction)</u> <u>SU (air quality plans)</u> <u>LS (criteria pollutants would not exceed thresholds)</u>
Greenhouse Gas Emissions	SU (Plan Consistency; GHG Emissions)	Less than Project. <u>SU, but slightly reduced GHG emissions than Project</u>	Less than Project. <u>SU, but slightly reduced GHG emissions than Project</u>	Less than Project. <u>SU, but slightly reduced GHG emissions than Project</u>	Less than Project. <u>SU, but slightly reduced GHG emissions than Project</u>	Less than Project. <u>SU, but slightly reduced GHG emissions than Project</u>
Energy	No Significant Impacts (NS)	Greater than Project- <u>LS</u>	Greater than Project- <u>LS</u>	Greater than Project- <u>LS</u>	Greater than Project- <u>LS</u>	Greater than Project- <u>LS</u>
Noise	<u>SU (Established Standards) NS (construction)</u> <u>SU (Established Standards/operation – removal of Genesee Avenue Widening)</u> <u>LS (Established Standards/operation – removal of Regents Road Bridge)</u>	Greater construction impacts to Project. Greater than Project with construction of Regents Road Bridge. <u>SM (construction)</u> <u>LS (Established Standards/operation – construction of Genesee Avenue Widening)</u> <u>SM (Established Standards/operation - construction of Regents Road Bridge)</u>	Greater construction impacts to Project. Greater than Project with Regents Road Bridge and removal of Genesee Avenue Widening. <u>SM (construction)</u> <u>SU (Established Standards/operation - removal of Genesee Avenue Widening)</u> <u>SM (Established Standards/operation – construction of Regents Road Bridge)</u>	Greater construction impacts to Project. Less than Project with construction of Genesee Avenue Widening. <u>SM (construction)</u> <u>LS (Established Standards/operation – removal of Regents Road Bridge and construction of Genesee Avenue Reconfiguration)</u>	Greater construction impacts to Project. Less than Project with construction of Genesee Avenue Widening. <u>SM (construction)</u> <u>LS (Established Standards/operation – construction of Genesee Avenue Widening)</u> <u>SM (Established Standards/operation – construction of pedestrian bike bridge)</u>	Greater construction impacts to Project. Greater than Project with removal of Genesee Avenue Widening. <u>SM (construction)</u> <u>SU (Established Standards/operation – removal of Genesee Avenue Widening)</u> <u>SM (Established Standards/operation – construction of pedestrian bike bridge)</u>

Environmental Issue Area	Project	No Project Alternative – Construction of Regents Road Bridge and Widening of Genesee Avenue	Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative	No Construction of Regents Road Bridge and Widening <u>Reconfiguration</u> of Genesee Avenue Alternative	Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative	Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative
<i>Historical Resources</i>	NS	Greater than Project- SM	Greater than Project- SM	Greater than Project- LS	Greater than Project- SM	Greater than Project- SM
<i>Biological Resources</i>	NS	Greater than Project- SM	Greater than Project- SM	Greater than Project- LS	Greater than Project- SM	Greater than Project- SM
<i>Geological Conditions</i>	NS	Greater than Project- SM	Greater than Project- SM	Greater than Project- NS	Greater than Project- SM	Greater than Project- SM
<i>Paleontological Resources</i>	NS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS
<i>Hydrology and Water Quality</i>	NS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS	Greater than Project- LS
<i>Public Services and Facilities</i>	SU (Emergency Service Response Times) NS (schools, libraries, parks, recreational facilities)	Less than Project, but SU (Emergency Service Response Times) SU (Emergency Service Response Times - but less significant impacts compared to Project) NS (schools, libraries, parks, recreational facilities)	Less than Project, but SU (Emergency Service Response Times) SU (Emergency Service Response Times - but less significant impacts compared to Project) NS (schools, libraries, parks, recreational facilities)	Similar to Project- SU (Emergency Service Response Times) NS (schools, libraries, parks, recreational facilities)	Similar to Project- SU (Emergency Service Response Times) NS (schools, libraries, parks, recreational facilities)	Similar to Project- SU (Emergency Service Response Times) NS (schools, libraries, parks, recreational facilities)
<i>Public Utilities</i>	NS	Greater than Project- SM	Greater than Project- SM	Greater than Project- SM	Greater than Project- SM	Greater than Project- SM
<i>Health and Safety</i>	LS	Greater than Project- LS (wildland fires, emergency plans, AIAs) SM (hazardous materials)	Greater than Project- LS (wildland fires, emergency plans, AIAs) SM (hazardous materials)	Greater than Project- LS (wildland fires, emergency plans, AIAs) SM (hazardous materials)	Greater than Project- LS (wildland fires, emergency plans, AIAs) SM (hazardous materials)	Greater than Project- LS (wildland fires, emergency plans, AIAs) SM (hazardous materials)
<i>Population and Housing</i>	NS	Similar to Project- NS	Similar to Project- NS	Similar to Project- NS	Similar to Project- NS	Similar to Project- NS

LS = less than significant; NS = No Significant Impacts; SU = significant and unmitigated; SM = Significant but mitigable;



Figure 9-1
Rose Canyon (Existing)



Figure 9-2
Simulation of Pedestrian Bridge with Emergency Access



Figure 9-3
Simulation of Regents Road Bridge

9.2.1.2 Transportation/Circulation

Impacts associated with the No Project Alternative are addressed in the Transportation Impact Study provided as Appendix C. Implementation of the No Project Alternative would have potentially reduced impacts to roadway segments and intersections compared to those of the Project. Under the No Project Alternative in future year, there would be a total of 19 roadway segments operating at an unacceptable LOS in exceedance of the significance thresholds. With implementation of the Project, a total of ~~21~~20 roadway segments within the traffic study area would degrade to unacceptable operating conditions in exceedance of the significance thresholds. Under the Project, ~~14~~13 of the segments that would be operating at unacceptable LOS in future year would be significantly worse as compared to the No Project Alternative. In addition, under the Project in future year, the ~~four~~three following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur with implementation of the No Project Alternative. Thus, the impact at these segments can be specifically attributed to the Project.

- Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E)
- Genesee Avenue: Nobel Drive to Centurion Square (LOS F)
- Genesee Avenue: Centurion Square to Governor Drive (LOS F)
- ~~La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E)~~

The No Project Alternative would result in reduced traffic impacts related to intersections when compared to the Project. Under the No Project Alternative in future year, there would be 28 significantly impacted intersections operating at an unacceptable LOS E or F during at least one of the peak hours. With implementation of the Project, ~~30~~28 intersections would degrade to unacceptable LOS operating conditions in exceedance of the significance thresholds. Under the Project, ~~21~~19 of the intersections operating at unacceptable LOS in future year would be significantly worse during one or both of the peak hours as compared to the No Project Alternative. These ~~21~~19 intersections are considered to have a significant decrease in operations due to an exceedance of the delay time thresholds for LOS E and F when comparing the Project to the No Project Alternative in future year. In addition, under the Project in future year, the ~~nineteen~~ following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, in future year with implementation of the No Project Alternative, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)

- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue /Governor Drive (PM)
- ~~Genesee Avenue/SR 52 WB Ramps (AM)~~
- Genesee Avenue/SR 52 EB Ramps (AM and PM)
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~
- Gilman Drive/I-5 SB Ramps (PM)

The No Project Alternative would result in reduced traffic/circulation impacts related to freeway segments when compared to the Project. Table 4.2-16 outlines the significant impacts anticipated along study area freeway segments that would occur in the future year. Under the No Project Alternative in the future year, there would be a total of eight freeway segments operating at an unacceptable LOS E or F, which is similar to the Project. However, under the Project, five of the freeway segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the No Project Alternative during at least one of the peak periods. Under the Project and the No Project Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments in the future year. Thus, impacts to freeway segments would remain significant and unmitigated at the program level under both the Project and the No Project Alternative.

The No Project Alternative would result in reduced traffic/circulation impacts related to freeway ramp metering when compared to the Project. Table 4.2-17 outlines the significant impacts anticipated at study area freeway ramps that would occur in the future year. Deteriorated operating conditions would result in significant impacts at eight freeway ramps with implementation of the Project in the future year. All of these impacts would also be anticipated to occur in the future year under the No Project Alternative. However, six of the freeway ramps that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to the No Project Alternative. Under the Project and the No Project Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway ramps in the future year. Thus, impacts to freeway ramps would remain significant and unmitigated at the program level under the Project and the No Project Alternative.

The Transportation Impact Study (see Appendix C) identifies mitigation measures for the No Project Alternative. Despite the operational improvements on roadway segments and intersections, the traffic/circulation impacts would remain significant and unmitigated at the program level under the No Project Alternative similar to the Project.

9.2.1.3 Visual Effects and Neighborhood Character

Based on the program-level analysis, the No Project Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing when compared to the Project. The widening of Genesee Avenue would introduce a new structure that would dominate previously unobstructed views. The primary structural/architectural features created by the planned Genesee Avenue Widening would be the retaining walls and crib walls that would be constructed along both sides of the widened roadway. Due to the height and length of the retaining walls and the extreme contrast to the existing neighborhood character, impacts would be considered significant. The construction of the planned Regents Road Bridge would also result in significant aesthetic impacts (Figure 9-3). In the short term, construction would result in significant grading and the exposed fill would look unnatural. However, in the long term, vegetation would mature and blend in with the canyon vegetation. In the immediate vicinity of the planned Regents Road Bridge, Rose Canyon is uninterrupted by structures with the exception of the railroad tracks. The introduction of a bridge spanning the canyon would significantly impact the aesthetic character of this portion of Rose Canyon by introducing a structure that would dominate the aesthetic character. The aesthetic impact would be related to persons walking, hiking, or riding through this portion of the canyon. Therefore, the No Project Alternative impacts related to alteration of public views and visual character would be significant but mitigable when compared to the Project.

9.2.1.4 Air Quality

Based on the program-level analysis, the No Project Alternative would result in greater construction emissions compared to the Project. The No Project Alternative would widen Genesee Avenue and construct of the Regents Road Bridge. As such, a substantial number of trips associated with construction activities would result. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. Therefore, the No Project Alternative impacts related to construction would be significant and mitigable when compared to the Project.

Operational impacts for the No Project Alternative would result in reduced air quality impacts related to air quality plans when compared to the Project. The construction of Regents Road Bridge and the widening of Genesee Avenue in the No Project Alternative are in the UCP Transportation Element and are, therefore, included in the 2050 RTP/SCS. The No Project Alternative impacts related to air quality plans and criteria pollutants are less than significant when compared to the Project.

9.2.1.5 Greenhouse Gas Emissions

Based on the program-level analysis, the No Project Alternative would result in slightly reduced GHG emissions compared to the Project. As discussed in Section 4.5, Greenhouse Gas Emissions, the total GHG emissions for the Project would increase compared to the No Project Alternative. The No Project Alternative would experience increased GHG emissions specifically along Regents Road with the construction of the bridge. Although the Project would reduce GHG emissions on Regents Road without the planned Regents Road Bridge, other affected arterials and freeway segments would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments when compared to the No Project Alternative. Despite the slight reduction in GHG emissions when compared to the Project, both the No Project Alternative and the Project would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unmitigated at the program level.

9.2.1.6 Energy

Based on the program-level analysis, the No Project Alternative would result in greater energy demand than the Project. The No Project Alternative would consume energy through the use of construction equipment and the operation of the new transportation facilities. Electricity would be used for temporary structures, lighting, and electricity-driven equipment, such as pumps and other tools. While the construction activities associated with the No Project Alternative would require the use of electrical power, this use would be temporary, and would not be excessive, wasteful, or require the unnecessary consumption of resources. Usage is not anticipated to cause the need for new electrical systems, or require substantial alterations to existing energy systems. Specific impacts associated with the use of electrical power would be analyzed at the project level. Therefore, it is anticipated that the construction phase would not result in wasteful, inefficient, and unnecessary consumption of energy.

Operational impacts of the No Project Alternative would result in greater energy demand as the Project as the No Project Alternative would modify or construct new transportation facilities. The No Project Alternative is anticipated to reduce VMT and reliance on fossil fuels. The No Project Alternative would require additional electrical power to accommodate traffic signal modifications and street lighting. The No Project Alternative would have less than significant impacts.

9.2.1.7 Noise

Based on the program-level analysis, the No Project Alternative would result in greater noise impacts related to construction when compared to the Project. The No Project Alternative could

potentially result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors during construction activities (i.e., earth moving and pile driving). Unlike the Project, the No Project Alternative would also result in construction noise impacts to sensitive biological resources habitat. Therefore, the No Project Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Based on the program-level analysis, the widening of Genesee Avenue in the No Project Alternative would result in reduced operational noise impacts when compared to the Project. As discussed in Section 4.7.1.6, noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4. As shown in Table 4.7-4, With Project compared to Without Project, the distances of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City's residential exterior CNEL noise standards with the Project. Under the Project, the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases within the residences. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Unlike the No Project Alternative, this is a potentially significant impact under the Project. ~~Discretionary p~~Projects implemented in accordance with the Project with the potential to result in significant operational noise impacts shall be required to implement the Mitigation Framework (Mitigation Measure NOI-1). However, impacts to operational noise would remain significant and unmitigated at the program level under the Project. The construction of Genesee Avenue Widening in the No Project Alternative would have less than significant impacts related to established standards/operation when compared to the Project.

Based on the program-level analysis, the construction of the planned Regents Road Bridge in the No Project Alternative would result in greater operational noise impacts when compared to the Project. As shown in Table 4.7-2 in Section 4.7, Noise, Future Year with Project in comparison to Future Year with Adopted UCP, ADT and peak hour traffic volumes along the Regents Road Corridor would substantially decrease by more than half. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases by 43 to 69 feet to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current

or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Impacts under the Project would be less than significant. However, impacts under the No Project Alternative are anticipated to expose people to noise levels that exceed City standards. As such, the No Project Alternative would require mitigation measures to be determined at the project level. The No Project Alternative would have significant but mitigable impacts related to established standards/operation with the construction of Regents Road Bridge when compared to the Project.

9.2.1.8 Historical Resources

Based on the program-level analysis, the extent of impacts to historical resources resulting from implementation of the No Project Alternative would be greater than those identified for the Project. Historical and prehistoric resources are known to exist within the UCP Area, specifically within the Genesee Avenue and Regents Road Corridors. Therefore, the No Project Alternative has the potential to result in significant direct and/or indirect impacts to cultural resources. The Project would not result in construction or excavation activities that would result in the alteration and/or the destruction of a prehistoric or historic building, including an architecturally significant building or site. Therefore, no impacts to prehistoric or historic buildings or sites would result from the Project in contrast to the No Project Alternative. The No Project Alternative would have significant but mitigable impacts related to historical resources when compared to the Project.

9.2.1.9 Biological Resources

Based on the program-level analysis, the extent of impacts to biological resources resulting from implementation of the No Project Alternative would be greater than those identified for the Project because less land would be preserved in open space under this alternative. Genesee Avenue and Regents Road would remain as they are today under the Project. The No Project Alternative would result in greater MHPA compatibility impacts when compared to the Project. The proposed changes at Rose Canyon under the No Project Alternative would result in a loss of habitat. The planned widening of Genesee Avenue and the construction of Regents Road Bridge in the No Project Alternative would result in greater impacts related to Tier I, II, IIIA, and IIIB habitats when compared to the Project. The No Project Alternative would result in greater impacts related to aquatic resources, including vernal pools and wetlands. Both the planned Genesee Avenue Widening and the Regents Road Bridge construction projects are expected to involve removal of vegetation (clearing, brushing, and trimming) and grading (filling, backfilling, compacting, leveling, etc.). The widening of Genesee Avenue over Rose Canyon would result in significant permanent and temporary impacts to jurisdictional habitats. As such, the No Project Alternative would have significant but mitigable impacts related to biological resources when compared to the Project.

9.2.1.10 Geologic Conditions

Based on the program-level analysis, the extent of impacts to geological conditions resulting from implementation of the No Project Alternative would be greater than those identified for the Project. Implementation of the No Project Alternative has the potential to result in significant impacts related to geologic hazards. The UCP Area contains geologic conditions that would pose significant risks for discretionary development if not properly addressed at the project level. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils represent a potentially significant impact for discretionary development. Construction of the planned Regents Road Bridge and the Genesee Avenue Widening would be exposed to geological hazards associated with unstable conditions related to compressible soils, landslides, seismicity (faults), and expansive soils. The construction of the planned Genesee Avenue Widening and Regents Road Bridge would expose people or structures to additional geologic hazards beyond existing conditions; therefore, significant but mitigable impacts would occur under the No Project Alternative when compared to the Project.

9.2.1.11 Paleontological Resources

In the UCP Area, the most abundant geologic formations containing fossils include the Scripps Formation and Ardath Shale. The Scripps Formation includes marine sediments and has a “medium” resource potential. The Ardath Shale contains some important marine invertebrate fossils and the resource potential is considered “medium to high.” Based on the program-level analysis, the extent of impacts to paleontological resources resulting from implementation of the No Project Alternative would be greater than those identified for the Project. Construction and grading activities would occur under the No Project Alternative, which would not occur under the Project. As such, the No Project Alternative may result in adverse impacts to paleontological resources. However, even though these geologic units have a recognized resource potential, no specific areas within the UCP Area are known to have produced significant paleontological resources. The planning area has been almost entirely developed; thus the potential for finding new resources is limited under the No Project Alternative. The No Project Alternative would have less than significant impacts related to paleontological resources when compared to the Project.

9.2.1.12 Hydrology and Water Quality

Based on the program-level analysis, the extent of impacts to hydrology and water quality resulting from implementation of the No Project Alternative would be greater than those identified for the Project. The No Project Alternative would increase impervious surfaces resulting from the construction of the planned Regents Road Bridge and the widening of Genesee

Avenue Widening. Runoff during storm events and non-storm water flows (such as over irrigation) would transport these pollutants via storm drain systems and would negatively affect surface water quality if not properly managed. Any increases in pollutant concentrations from new development would impact the water quality of aquatic ecosystems, particularly for impaired waterbodies listed under CWA Section 303(d) (i.e., Rose Canyon Creek, Mission Bay). The No Project Alternative would be developed in compliance with applicable regulations, including the Municipal Permit (Order R9-2013-0001), Construction General Permit (2009-0009-DWQ), the City Storm Water Standards, and the Model BMP Design Manual (County of San Diego 2015). The No Project Alternative would be required to maintain predevelopment hydrology and incorporate LID site design and/or treatment control BMPs. As such, hydrology and water quality impacts would be greater under the No Project Alternative when compared to the Project; however, overall impacts under the No Project Alternative would be less than significant when compared to the Project.

9.2.1.13 Public Services and Facilities

Impacts associated with the No Project Alternative are addressed in the Transportation Impact Study provided in Appendix C. Based on the program-level analysis, the extent of impacts to emergency service providers resulting from implementation of the No Project Alternative would be less than that identified for the Project. The No Project Alternative would improve operational capacity with the construction of the planned Regents Road Bridge and the Genesee Avenue Widening. Subsequently, emergency service response times under the No Project Alternative are anticipated to improve when compared to the Project. Table 9-2 provides the target response times for years 2014 and 2015 and the projected response times for the No Project Alternative compared to the Project during the future year. As shown in the table, the response times for all stations under the No Project Alternative were improved compared to the Project in the future year. Fire Station 35's average response times in the future year under the No Project Alternative results in a 0.5-minute decrease compared to the Project in the future year. Fire Station 27's average response times in the future year under the No Project Alternative results in a 0.05-minute decrease compared to the Project in the future year. Fire Station 9's average response times in the future year under the No Project Alternative results in a 0.37-minute decrease compared to the Project in the future year. Based on the program-level analysis, impacts associated with emergency service providers under the No Project Alternative would experience a slight improvement compared to the Project.

**Table 9-2
No Project Alternative Fire and Emergency Service Response Times in Future Year**

Responding Vehicle	Years 2014 and 2015 Target Response Time (90th Fractile)	Station	Project Future Year Average Response Time	No Project Alternative Future Year Average Response Time
Battalion 5, Engine 35, Truck 35, Chem Rig 35, Brush 35	The goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time.	Station 35	9.38 minutes	8.88 minutes
Engine 27		Station 27	8.76 minutes	8.71 minutes
Engine 9, Medic 9		Station 9	11.75 minutes	11.38 minutes

Source: SDFRD 2016a, 2016b, Kimley-Horn 2016

Despite a slight improvement in emergency response times when compared to the Project, the No Project Alternative would result in an operational deterioration as shown in Table 9-2 when compared to the City's target average response times of 7.5 minutes (Citygate 2011). As shown in Table 9-2, the response times for both Station 35 and Station 27 would be greater than the City's target average response times in the future year. Under the No Project Alternative, Fire Station 35's average response times in the future year results in a 1.38-minute increase from years 2014 and 2015 average response times. Fire Station 27's average response times in the future year With Project results in a 1.21-minute increase from years 2014 and 2015 average response times. Fire Station 9's average response times in the future year With Project results in a 3.88-minute increase from years 2014 and 2015 average response times.

Impacts to emergency services under the No Project Alternative would be slightly improved when compared to the Project in the future year. However, as with the Project, the No Project Alternative would result in operational deterioration as shown in Table 9-2 when compared to the City's target average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the No Project Alternative would remain significant and unmitigated at the program level.

As with the Project, the demand for police services, fire protection, educational services, libraries, and parks resulting from implementation of the No Project Alternative would be similar to those identified for the Project. Both the Project and the No Project Alternative would not include residential components that could directly increase population and result in an increase in new facilities. Impacts related to construction of new facilities under the No Project Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.1.14 Public Utilities

Based on the program-level analysis, the extent of impacts to public utilities resulting from implementation of the No Project Alternative would be greater than those identified for the

Project. Implementation of the No Project Alternative would require public utilities (water, sewer, storm drain, electric, gas, communications, and solid waste management) installation, extension, and some relocation of onsite utilities, which would not be required under the Project. Overall impacts to public utilities under the No Project Alternative would be significant but mitigable when compared to the Project.

9.2.1.15 Health and Safety

Based on the program-level analysis, the extent of impacts related to exposure to wildland fires from implementation of the No Project Alternative would be greater than those identified for the Project. The No Project Alternative would entail construction activities in the vicinity of dry brush and other dense vegetation vulnerable to ignition, which could result in a temporary increase in the potential for accidental wildfires. Implementation of the No Project Alternative would be required to adhere to brush management regulations, specifically the City's Fire Prevention Bureau Policy B-08-1, Clarification of Brush Management Regulations and Landscape Standards and required preparation of a Brush Management Plan and Program in order to obtain discretionary, grading, and/or building permits (City of San Diego 2010b). The No Project Alternative would have less than significant impacts related to wildland fires similar to the Project.

Based on the program-level analysis, the extent of impacts related to exposure of hazardous materials under the No Project Alternative would be greater than those identified for the Project. Implementation of the No Project Alternative would result in the exposure of hazards that could be encountered during grading and/or construction-related activities. Construction activities under the No Project Alternative are short term and would be subject to federal, state, and local health and safety requirements. The No Project Alternative would have significant but mitigable impacts related to hazardous materials when compared to the Project.

Based on the program-level analysis, the extent of impacts related to impairment of an adopted emergency response plan under the No Project Alternative would be similar to those identified for the Project. Both the Project and the No Project Alternative would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. The No Project Alternative would have less than significant impacts related to emergency response plans similar to the Project.

Based on the program-level analysis, the extent of impacts related to exposure of people to AIAs would be similar to those identified for the Project. MCAS Miramar is approximately 1 mile to the east of the UCP Area. Montgomery Field is approximately 5 miles southeast of Regents Road. Implementation of both the Project and the No Project Alternative would not result in

structures that would impair heliport or private airstrip operations. Any helicopter operations would be undertaken in accordance with FAA safety and flight regulations. As with the Project, the No Project Alternative would also require adherence to applicable regulations imposed by federal, state, and local agencies. The No Project Alternative would have less than significant impacts related to AIAs similar to the Project.

9.2.1.16 Population and Housing

Based on the program-level analysis, the extent of impacts related to population and housing from implementation of the No Project Alternative would be similar to those identified for the Project. As with the Project, the No Project Alternative does not include residential components that could directly increase population. No existing housing or people would be displaced as a result of the Project and the No Project Alternative. Impacts related to population and housing under the No Project Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.2 Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative

9.2.2.1 Land Use

Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater impacts related to land use policies when compared to the Project. The proposed construction of planned Regents Road Bridge would result in a loss of habitat that would result in impacts to MHPA lands. However, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would connect the present north and south termini on either side of Regents Road with a bridge across Rose Canyon, and, therefore, open up an area previously inaccessible. In this regard, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would provide a greater community benefit by improving access within the UCP Area when compared to the Project. However, because of the greater MHPA impacts, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.

9.2.2.2 Transportation/Circulation

Impacts associated with the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative are addressed in the Transportation Impact Study provided in Appendix C. As provided in Appendix C, traffic/circulation impacts associated with implementation of the

Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in similar traffic impacts related to roadway segments when compared to the Project. There would be a total of 21 roadway segments operating at an unacceptable LOS with a significant impact under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. With implementation of the Project, a total of ~~24~~20 roadway segments within the traffic study area would degrade to unacceptable operating conditions in exceedance of the significance thresholds

The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in reduced traffic impacts related to intersections when compared to the Project. There would be a total of 29 intersections operating at an unacceptable LOS with significant impact under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. With implementation of the Project, ~~30~~28 intersections would degrade to unacceptable LOS operating conditions in exceedance of the significance thresholds. Under the Project, 20 of the intersections operating at unacceptable LOS in future year would be significantly worse during one or both of the peak hours as compared to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. These ~~24~~20 intersections are considered to have a significant decrease in operations due to an exceedance of the delay time thresholds for LOS E and F when comparing the Project to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative in future year. In addition, under the Project in future year, the three following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, in future year with implementation of the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, these intersections would continue to operate at an acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- ~~Genesee Avenue/SR 52 EB Ramps (AM and PM)~~
- ~~La Jolla Village Drive/I-5 SB Off Ramp (PM)~~

The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in reduced traffic/circulation impacts related to freeway segments when compared to the Project. Table 4.2-16 outlines the significant impacts anticipated along study area freeway segments that would occur in the future year. Under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative in the future year, there would be a total eight freeway segments operating at an unacceptable LOS E or F, which is similar to the Project. However, five of the freeway segments that would be operating at unacceptable LOS in future

year would be significantly worse with implementation of the Project as compared to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative during at least one of the peak periods. Under the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments in the future year. Thus, impacts to freeway segments would remain significant and unmitigated at the program level under the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in reduced traffic/circulation impacts related to freeway ramp metering when compared to the Project. Table 4.2-17 outlines the significant impacts anticipated at study area freeway ramps that would occur in the future year. Deteriorated operating conditions would result in significant impacts at eight freeway ramps with implementation of the Project in the future year and all of these impacts would also be anticipated to occur in the future year under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. However, six of the freeway ramps that would be operating at unacceptable LOS future year would be significantly worse with implementation of the Project as compared to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. Under the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway ramps in the future year. Thus, impacts to freeway ramps would remain significant and unmitigated at the program level under the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

The Transportation Impact Study (see Appendix C) identifies mitigation measures for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. Despite the operational improvements on roadway segments and intersections, the traffic/circulation impacts would remain significant and unmitigated at the program level under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative similar to the Project.

9.2.2.3 Visual Effects and Neighborhood Character

Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing when compared to the Project. Unlike the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, the Project would remove construction elements from the UCP, which would not result in any visual impacts. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would

introduce a new structure that would dominate previously unobstructed views. The construction of the Regents Road Bridge would result in significant aesthetic impacts. In the short term, construction would result in significant grading and the exposed fill would look unnatural. However, in the long term, vegetation would mature and blend in with the canyon vegetation. In the immediate vicinity of the Regents Road Bridge, Rose Canyon is uninterrupted by structures with the exception of the railroad tracks. The introduction of a bridge spanning the canyon would significantly impact the aesthetic character of this portion of Rose Canyon by introducing a structure that would dominate the aesthetic character. The aesthetic impact would be related to persons walking, hiking, or riding through this portion of the canyon. Therefore, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative impacts related to alteration of public views and visual character would be greater than the Project. Overall, the aesthetic impacts related to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.

9.2.2.4 Air Quality

Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater construction emissions compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would construct the planned Regents Road Bridge, but not widen Genesee Avenue. As such, a substantial number of trips associated with construction activities would result. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts would not occur under the Project. Therefore, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Operational impacts for the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in similar air quality impacts related to air quality plans when compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be partially consistent with the adopted community plan land use designations upon which the RAQS and SIP were based. The construction of the planned Regents Road Bridge is included in the 2050 RTP/SCS, and there would be no significant regional air quality impacts associated with its implementation. However, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would not widen Genesee Avenue, similar to the Project. As such, the Project and the Construction of Regents

Road Bridge and No Widening of Genesee Avenue Alternative would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS. As such, both could conflict with or obstruct implementation of the applicable air quality plan. The Project's and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative's impact to air quality plans would be significant and unmitigated.

The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result similar criteria pollutant emissions when compared to the Project, but slightly reduced. The construction of planned Regents Road Bridge is anticipated to result in VMT and speed change that would result in a reduction in operational emissions, however, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative is anticipated to exceed criteria pollutant emissions thresholds similar to the Project. Long-term operations associated with the Project would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area). Despite the reduction in air quality emission under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, operational impacts associated with the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative is anticipated to be significant and unmitigated as with the Project.

9.2.2.5 Greenhouse Gas Emissions

Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative is anticipated to result in slightly reduced GHG emissions compared to the Project. However, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would not result in GHG emissions resulting from the widening of Genesee Avenue. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would experience increased GHG emissions specifically along Regents Road with the construction of the bridge. The Project would result in a decrease in arterial-related GHG emissions is primarily associated with changes to Regents Road (i.e., deletion of the bridge and associated roadway segment). Although the Project would reduce GHG emissions on Regents Road without the planned Regents Road Bridge, other affected arterials and freeway segments would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments when compared to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative. Despite the slight reduction in GHG emissions when compared to the Project, both the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative and the Project would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unmitigated at the program level.

9.2.2.6 Energy

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.2.7 Noise

Based on the program-level analysis, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would potentially result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors during construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. Therefore, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Based on the program-level analysis, the construction of the planned Regents Road Bridge would result in greater operational noise impacts when compared to the Project. ADT and peak hour traffic volumes along the Regents Road Corridor are anticipated to increase with construction of the planned Regents Road Bridge. As shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor is anticipated to decrease by 43 to 69 feet to the residences With Project. Therefore, the construction of the planned Regents Road Bridge would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). In addition, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would remove of the widening of Genesee Avenue from the UCP. As discussed in Section 9.2, Noise, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan because the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases to the residences (see Table 4.7-4). The construction of planned Regents Road Bridge and the removal of the widening of Genesee Avenue from the UCP would combine for greater operational noise impacts under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative when compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts related to the construction of the Regents Road Bridge. However, the Construction of Regents Road Bridge and No Widening

of Genesee Avenue Alternative would have significant but unmitigable impacts related to the removal of the widening of Genesee Avenue similar to the Project.

9.2.2.8 Historical Resources

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.2.9 Biological Resources

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.2.10 Geologic Conditions

The analysis provided in the No Project Alternative is applicable to Alternative the Construction of Regents Road Bridge and No Widening of Genesee Avenue.

9.2.2.11 Paleontological Resources

The analysis provided in the No Project Alternative is applicable to Alternative the Construction of Regents Road Bridge and No Widening of Genesee Avenue.

9.2.2.12 Hydrology and Water Quality

The analysis provided in the No Project Alternative is applicable to Alternative the Construction of Regents Road Bridge and No Widening of Genesee Avenue.

9.2.2.13 Public Services and Facilities

Based on the program-level analysis, the extent of impacts to emergency service providers resulting from implementation of the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be less than those compared to the Project. The Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would improve operational capacity with the construction of the planned Regents Road Bridge. Subsequently, emergency service response times under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative are anticipated to improve when compared to the Project. Table 9-3 provides the target response times for years 2014 and 2015 and the projected response times for the Construction of Regents Road Bridge and No Widening of Genesee

Avenue Alternative compared to the Project in the future year. As shown in the table, the response times for both Station 35 and Station 27 under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative were improved compared to the Project in the future year. Fire Station 35's average response times in the future year under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative results in a 0.49-minute decrease compared to the Project in the future year. Fire Station 27's average response times in the future year under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative results in a 0.01-minute decrease compared to the Project in the future year. However, the response times for Station 9 slightly worsened under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative when compared to the Project in the future year, resulting in a 0.04-minute increase. Based on the program-level analysis, Station 35 and Station 27 under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would experience a slight improvement when compared to the Project.

Table 9-3
Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative
Fire and Emergency Service Response Times in Future Year

Responding Vehicle	Years 2014 and 2015 Target Response Time (90th Fractile)	Station	Project Future Year Average Response Time	Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative Future Year Average Response Time
Battalion 5, Engine 35, Truck 35, Chem Rig 35, Brush 35	The goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time.	Station 35	9.38 minutes	8.89 minutes
Engine 27		Station 27	8.76 minutes	8.75 minutes
Engine 9, Medic 9		Station 9	11.75 minutes	11.79 minutes

Source: SDFRD 2016a, 2016b, Kimley-Horn 2016

Planned Genesee Avenue Widening Despite a slight improvement in emergency response times when compared to the Project, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in an operational deterioration as shown in Table 9-3 when compared to the City's target average response times of 7.5 minutes (Citygate 2011). As shown in Table 9-3, the response times for both Station 35 and Station 27 would be greater than the City's target average response times in the future year. Under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative, Fire Station 35's average response times in the future year results in a 1.39-minute increase from years 2014 and 2015 average response times. Fire Station 27's average response times in the future year With Project results in a 1.25-minute increase from years 2014 and 2015 average response times. Fire Station

9's average response times in the future year With Project results in a 4.29-minute increase from years 2014 and 2015 average response times.

Impacts to emergency services under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be slightly improved when compared to the Project in the future year. However, as with the Project, the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would result in reduced operational deterioration as shown in Table 9-3 when compared to the City's target average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would remain significant and unmitigated at the program level.

As with the Project, the demand for police services, fire protection, educational services, libraries, and parks resulting from implementation of the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would be similar to those identified for the Project. Both the Project and the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would not include residential components that could directly increase population and result in an increase in new facilities. Impacts related to construction of new facilities under the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.2.14 Public Utilities

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.2.15 Health and Safety

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.2.16 Population and Housing

The analysis provided in the No Project Alternative is applicable to the Construction of Regents Road Bridge and No Widening of Genesee Avenue Alternative.

9.2.3 No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative

9.2.3.1 Land Use

Based on the program-level analysis, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in ~~greater~~ similar impacts related to land use policies when compared to the Project. This alternative would result in the reconfiguration of Genesee Avenue which would consist of restriping the existing four-lane roadway to a six-lane roadway. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way, therefore impacts to vegetation communities in Rose Canyon and fringe habitat that occur along the existing Genesee Avenue alignment would not result. As a result, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would have ~~greater~~ similar MHPA impacts ~~when compared~~ to the Project. As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts as with the Project.

9.2.3.2 Transportation/Circulation

Impacts associated with the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative are addressed in the Transportation Impact Study provided in Appendix C. As provided in Appendix C, traffic/circulation impacts associated with implementation of No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would have the potential to reduce impacts to roadway segments and intersections compared to those of the Project. Under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, the number of roadway segments locations that would operate at poor LOS (E or F) is a total of 22 roadway segments, 20 of which are a significant impact. Under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, the number of intersection locations that would operate at poor LOS (E or F) during at least one peak period are ~~3129~~ 2927 intersections, ~~2927~~ of which are a significant impact.

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in reduced traffic/circulation impacts related to freeway segments when compared to the Project. As outlined in Table 4.2-16, deteriorated traffic conditions would result in significant impacts at eight freeway segments with implementation of the Project in future year and all of these impacts would be anticipated to occur in future year

under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. However, five of the freeway segments that would be operating at unacceptable LOS in future year would be significantly worse with implementation of the Project as compared to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative during at least one of the peak periods. Under the Project and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments in the future year. Thus, impacts to freeway segments would remain significant and unmitigated at the program level under the Project and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in reduced traffic/circulation impacts related to freeway ramp metering when compared to the Project. Table 4.2-17 outlines the significant impacts anticipated at study area freeway ramps that would occur in future year under the Project. Deteriorated operating conditions would result in significant impacts at eight freeway ramp segments with implementation of the Project in future year and all of these impacts would also be anticipated to occur in future year under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. However, two of the freeway ramp segments that would be operating at unacceptable LOS future year would be significantly worse with implementation of the Project as compared to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. Under the Project and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway ramps in the future year. Thus, impacts to freeway ramps would remain significant and unmitigated at the program level under the Project and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

The Transportation Impact Study (see Appendix C) identifies mitigation measures for the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. Despite the operational improvements on roadway segments and intersections, the traffic/circulation impacts would remain significant and unmitigated at the program level under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative similar to the Project.

9.2.3.3 Visual Effects and Neighborhood Character

Based on the program-level analysis, No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing when compared to the Project. Unlike the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, the Project would remove construction elements from the UCP, which would not result in any visual impacts. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would introduce a new structure that would dominate previously unobstructed views. ~~The primary structural/architectural features created by the planned Genesee Avenue Widening would be the retaining walls and crib walls that would be constructed along both sides of the widened roadway. Due to~~ The height and length of the grade-separated intersection retaining walls and the extreme ~~would be in~~ contrast to the existing neighborhood character; impacts would be considered significant. Therefore, the impacts of the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative ~~impacts~~ related to alteration of public views and visual character would be greater than the Project. Overall, the aesthetic impacts related to the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.

9.2.3.4 Air Quality

Based on the program-level analysis, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in greater construction emissions compared to the Project. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would widen Genesee Avenue. As such, a substantial number of trips associated with construction activities would result. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts would not occur under the Project. Therefore, impacts related to construction would be significant but mitigable when compared to the Project.

Operational impacts for the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in similar air quality impacts related to air quality plans when compared to the Project. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be partially consistent with the adopted community plan land use designations upon which the RAQS and

SIP were based. ~~The widening of~~ Reconfiguring Genesee Avenue from an existing four-lane roadway to a six-lane roadway is included in the 2050 RTP/SCS, and there would be no significant regional air quality impacts associated with its implementation. However, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not construct Regents Road Bridge, similar to the Project. As such, the Project and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS. As such, both could conflict with or obstruct implementation of the applicable air quality plan. The Project's and the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative's impact to air quality plans would be significant and unmitigated.

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in reduced criteria pollutant emissions when compared to the Project and is not anticipated to exceed the thresholds. The ~~widening reconfiguring~~ of Genesee Avenue is anticipated to result in VMT and speed change that would result in a reduction in overall operational emissions. Long-term operations associated with the Project would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area). Air quality emission under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not exceed criteria pollutant emissions thresholds and would result in less than significant impacts, in contrast to the Project.

9.2.3.5 Greenhouse Gas Emissions

Based on the program-level analysis, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative is anticipated to result in slightly reduced GHG emissions compared to the Project. As with the Project, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not result in GHG emissions resulting from the Regents Road Bridge. Under the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, the ~~widening reconfiguring~~ of Genesee Avenue is anticipated to result in a decrease in GHG emissions to Genesee Avenue and other affected arterials and freeway segments. In contrast, the changes in VMT and average speed associated with the Project results in a net increase of CO₂e per year on freeways. Despite the slight reduction in GHG emissions when compared to the Project, both the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative and the Project would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unmitigated at the program level.

9.2.3.6 Energy

The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

9.2.3.7 Noise

Based on the program-level analysis, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. Therefore, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Based on the program-level analysis, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in reduced operational noise impacts when compared to the Project. The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would not result in noise impacts related to the construction of Regents Road Bridge. In addition, the ~~widening~~ reconfiguration of Genesee Avenue would further reduce noise impacts. As discussed in Section 4.7.1.6, noise measurements conducted were used to determine the site-specific distances between the TNM-predicted hourly noise level and the 24-hour CNEL level. TNM was utilized to develop conceptual distances (in feet, from the center of the roadway centerline) of various CNEL threshold contours (i.e., 60, 65, and 70 dBA CNEL) along the Genesee Avenue and Regents Road Corridors, and SR 52, with and without the Project, and their net change, as shown in Table 4.7-4. As shown in Table 4.7-4, With Project compared to Without Project, the distances of the CNEL contours increase away from the centerline of the Genesee Avenue Corridor, decrease along the Regents Road Corridor, and essentially remain unchanged along the SR 52 corridor. The changes in CNEL distances identify where potential noise impacts would occur with respect to exceeding the City's residential exterior CNEL noise standards with the Project. Under the Project, the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases within the residences under the Project. Therefore, the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General

Plan (City of San Diego 2008a). Unlike the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, this is a potentially significant impact under the Project. Under the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative, operational noise impacts would be less than significant when compared to the Project.

9.2.3.8 Historical Resources

~~The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative.~~ No impacts to prehistoric sites, historic buildings, religious or sacred sites, or disturbance to human remains would result from the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative because all proposed roadway improvements would be within the existing right-of-way. As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts.

9.2.3.9 Biological Resources

~~The analysis provided in Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative.~~ The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in similar impacts related to land use policies when compared to the Project. All proposed roadway improvements would be within the existing right-of-way, therefore impacts to vegetation communities in Rose Canyon and fringe habitat that occur along the existing Genesee Avenue alignment would not result. As a result, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have similar MHPA impacts to the Project. As such, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant impacts.

9.2.3.10 Geologic Conditions

~~The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative.~~ The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have no significant impact related to geologic conditions as with the Project.

9.2.3.11 Paleontological Resources

~~The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening of Genesee Avenue Alternative.~~ The No Construction of

Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would have less than significant related to paleontological resources.

9.2.3.12 Hydrology and Water Quality

The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative.

9.2.3.13 Public Services and Facilities

Based on the program-level analysis, the extent of impacts to emergency service providers resulting from implementation of the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be similar to the Project. The No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would improve operational capacity with the widening reconfiguring of Genesee Avenue; however, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would not construct Regents Road Bridge. Subsequently, emergency service response times under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be similar to the Project for Station 35 and Station 27. Table 9-4 provides the target response times for years 2014 and 2015 and the projected response times for the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative compared to the Project during the future year. As shown in the table, the response times for both Station 35 and Station 27 under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative were unchanged from the Project in the future year. However, response times for Station 9 showed a slight improvement for the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative compared to the Project during future year.

As with the Project, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in similar operational deteriorations as shown in Table 9-4 when compared to the City's target average response times of 7.5 minutes (Citygate 2011). As shown in Table 9-4, the response times for all stations would be greater than the City's target average response times in the future year. Under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative, Fire Station 35's average response times in the future year results in a 1.88-minute increase from years 2014 and 2015 average response times. Fire Station 27's average response times in the future year With Project results in a 1.26-minute increase from years 2014 and 2015 average response times. Fire Station 9's average response times in the future year With Project results in a 3.88-minute increase from years 2014 and 2015 average response times.

**Table 9-4
No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative Fire and Emergency Service Response Times in Future Year**

Responding Vehicle	Years 2014 and 2015 Target Response Time (90th Fractile)	Station	Project Future Year Average Response Time	No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative Future Year Average Response Time
Battalion 5, Engine 35, Truck 35, Chem Rig 35, Brush 35	The goal response time is 7.5 minutes, which includes 2.5 minutes of turn-out time and 5 minutes of drive time.	Station 35	9.38 minutes	9.38 minutes
Engine 27		Station 27	8.76 minutes	8.76 minutes
Engine 9, Medic 9		Station 9	11.75 minutes	11.38 minutes

Source: SDFRD 2016a, 2016b, Kimley-Horn 2016

Impacts to emergency services under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be similar when compared to the Project in the future year. As with the Project, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would result in similar operational deterioration as shown in Table 9-4 when compared to the City’s target average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would remain significant and unmitigated at the program level under the Project.

As with the Project, the demand for police services, fire protection, educational services, libraries, and parks resulting from implementation of the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be similar to those identified for the Project. Both the Project and the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would not include residential components that could directly increase population and result in an increase in new facilities. Impacts related to construction of new facilities under the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.3.14 Public Utilities

The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative.

9.2.3.15 Health and Safety

The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

9.2.3.16 Population and Housing

The analysis provided in the No Project Alternative is applicable to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative.

9.2.4 Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative

9.2.4.1 Land Use

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in greater impacts related to land use policies when compared to the Project. The proposed pedestrian bike bridge with emergency access under the No Project Alternative would result in a loss of habitat. In addition, the widening of Genesee Avenue over Rose Canyon would result in impacts to vegetation communities as well as fringes of habitat that occur along the existing Genesee Avenue alignment. As a result, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have greater MHPA impacts when compared to the Project. However, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would connect the present north and south termini on either side of Regents Road with a bridge across Rose Canyon, and, therefore, opening up an area previously inaccessible. In this regard, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would provide a greater community benefit by improving access within the UCP Area when compared to the Project. However, because of the greater MHPA impacts, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.

9.2.4.2 Transportation/Circulation

With implementation of the Project, the total number of affected roadway segments, intersections, freeway segments, and freeway ramp meterings that would experience operational degradation is expected to exceed those of the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. The Pedestrian Bike Bridge with Emergency

Access and the Widening of Genesee Avenue Alternative would construct a single-lane pedestrian bike bridge with emergency access structure over Rose Canyon, which would facilitate alternative transportation modes. Therefore, traffic/circulation impacts would be slightly greater than under the Project when compared to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. Impacts associated with the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative related to roadway segments, intersections, freeway segments, and freeway ramp metering would be significant and unmitigated; however, these impacts would be reduced when compared to the Project.

9.2.4.3 Visual Effects and Neighborhood Character

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing compared to the Project. Unlike the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative, the Project would remove construction elements from the UCP, which would not result in any visual impacts. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would introduce a new structure that would dominate previously unobstructed views. The primary structural/architectural features created by the planned Genesee Avenue Widening would be the retaining walls and crib walls that would be constructed along both sides of the widened roadway. Due to the height and length of the retaining walls and the extreme contrast to the existing neighborhood character, impacts would be considered significant.

The implementation of the pedestrian bike bridge with emergency access would result in short-term construction impacts that would result in significant grading and exposed fill that would look unnatural. In the long-term, the introduction of a pedestrian bike bridge with emergency access spanning the canyon would significantly impact the aesthetic character of this portion of Rose Canyon by introducing a structure that would visually dominate the canyon. Therefore, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative impacts related to alteration of public views and visual character would be greater than the Project. Overall, the aesthetic impacts related to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.

9.2.4.4 Air Quality

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in greater construction emissions

compared to the Project. Construction activities under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in a substantial number of trips. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts would not occur under the Project. Therefore, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Operational impacts for the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in similar air quality impacts related to air quality plans when compared to the Project. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would be partially consistent with the adopted community plan land use designations upon which the RAQS and SIP were based. The widening of Genesee Avenue is included in the 2050 RTP/SCS, and there would be no significant regional air quality impacts associated with its implementation. However, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would not construct Regents Road Bridge, similar to the Project. This alternative would, instead, construct a pedestrian bike bridge with emergency access. As such, the Project and the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS. As such, both could conflict with or obstruct implementation of the applicable air quality plan. The Project's and the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative's impact to air quality plans would be significant and unmitigated.

The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in reduced criteria pollutant emissions when compared to the Project and is not anticipated to exceed the thresholds. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative is anticipated to result in VMT and speed change that would result in a reduction in overall operational emissions. Neither of the major components of the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative is anticipated to generate CO hot spots or cause significant operational air quality impacts. Long-term operations associated with the Project would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area). Air quality emission under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would not exceed criteria pollutant emissions thresholds and would result in less than significant impacts, in contrast to the Project.

9.2.4.5 Greenhouse Gas Emissions

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative is anticipated to result in slightly reduced GHG emissions compared to the Project. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would improve operational capacity with the construction of a pedestrian bike bridge with emergency access and the widening of Genesee Avenue. In addition, a grade-separated intersection would be constructed at the intersection of Genesee Avenue and Governor Drive. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would experience increased GHG emissions specifically along Regents Road with the construction of the bridge. The Project would reduce GHG emissions on Regents Road without the Regents Road Bridge. However, other affected arterials and freeway segments under the Project would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments when compared to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. Despite the slight reduction in GHG emissions when compared to the Project, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unmitigated at the program level.

9.2.4.6 Energy

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.7 Noise

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in greater noise impacts related to construction when compared to the Project. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. Unlike the Project, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would also result in construction noise impacts to sensitive biological resources habitat. Therefore, the impacts under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative related to construction would be significant but mitigable when compared to the Project.

The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would widen Genesee Avenue. Under the Project, it was determined that the removal of the planned Genesee Avenue Widening from the UCP would expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a), as shown in Table 4.7-4 where the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor increases to the residences. This is a potentially significant impact under the Project in contrast to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative. Therefore, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have reduced operational noise impacts than the Project. The Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would have less than significant impacts related to established standards/operation with the construction of Genesee Avenue Widening, but would have significant but mitigable impacts related to established standards/operation with the construction of the pedestrian bike bridge.

9.2.4.8 Historical Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.9 Biological Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.10 Geological Conditions

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.11 Paleontological Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.12 Hydrology and Water Quality

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.13 Public Services and Facilities

Impacts to emergency service response times under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative are anticipated to be similar to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. As such, emergency service response times were calculated only for the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. As such, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would improve operational capacity with the construction of a pedestrian bike bridge with emergency access and the widening of Genesee Avenue when compared to the Project. In addition, a grade-separated intersection would be constructed at the intersection of Genesee Avenue and Governor Drive, which is anticipated to improve operations.

Despite the slight improvement in emergency response times when compared to the Project, the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative is anticipated to experience operational deterioration when compared to the City's target average response times of 7.5 minutes. Response times for all fire stations under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative are anticipated to increase from years 2014 and 2015 average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would remain significant and unmitigated at the program level under the Project.

As with the Project, the demand for police services, fire protection, educational services, libraries, and parks resulting from implementation of the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would be similar to those identified for the Project. Both the Project and the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would not include residential components that could directly increase population and result in an increase in new facilities. Impacts related to construction of new facilities under the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.4.14 Public Utilities

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.15 Health and Safety

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.4.16 Population and Housing

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and the Widening of Genesee Avenue Alternative.

9.2.5 Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative

9.2.5.1 Land Use

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in greater impacts related to land use policies when compared to the Project. The proposed pedestrian bridge with emergency access would result in a loss of habitat that would result in impacts to MHPA lands. However, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would connect the present north and south termini on either side of Regents Road with a bridge across Rose Canyon, and, therefore, opening up an area previously inaccessible. In this regard, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would provide a greater community benefit by improving access within the UCP Area when compared to the Project. However, because of the greater MHPA impacts, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would have significant but mitigable impacts when compared to the Project.

9.2.5.2 Transportation/Circulation

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in similar traffic impacts related to roadways when compared to the Project. Similar to the Project, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would not experience any

impacts and traffic benefits associated with the widening of Genesee Avenue. With implementation of the Project, the total number of affected roadway segments that would experience operational degradation is expected to be similar to the number of roadway segments under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in reduced traffic impacts related to intersections when compared to the Project. With implementation of the Project, the total number of affected intersections that would experience operational degradation is expected to be similar to the number of affected intersections under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in similar traffic impacts related to freeway segments and freeway ramp metering when compared to the Project.

Overall, impacts associated with the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative related to roadway segments, freeway segments, and freeway ramp metering would be significant and unmitigated; these impacts would be similar to the Project. Impacts to intersections under this alternative are anticipated to be significant and unmitigated, but slightly reduced impacts when compared to the Project.

9.2.5.3 Visual Effects and Neighborhood Character

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in greater visual impacts related to obstruction of a vista or scenic view from public viewing compared to the Project. Unlike the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative, the Project would remove construction elements from the UCP, which would not result in any visual impacts. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would introduce a new structure that would dominate previously unobstructed views. The implementation of the pedestrian bike bridge with emergency access would result in short-term construction impacts that would result in significant grading and exposed fill that would look unnatural. In the long-term, the introduction of a pedestrian bridge with emergency access spanning the canyon would significantly impact the aesthetic character of this portion of Rose Canyon by introducing a structure that would visually dominate the canyon. Therefore, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative impacts related to alteration of public views and visual

character would be greater than the Project. Overall, the aesthetic impacts related to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would be significant but mitigable when compared to the Project.

9.2.5.4 Air Quality

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in greater construction emissions compared to the Project. Construction activities under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in a substantial number of trips. Operation of construction equipment would also generate air pollutants from the combustion of diesel fuel or gasoline. Emissions from earthwork associated with soil import/export and grading would occur. The major potential impact would be from settling dust, which could be a temporary nuisance to local residents near any of the construction zones. These impacts would not occur under the Project. Therefore, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative impacts related to construction would be significant but mitigable when compared to the Project.

Operational impacts for the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in similar air quality impacts when compared to the Project. Both the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative and the Project would include elements not included in the 2050 RTP/SCS. As such, the Project and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would not be consistent with the assumptions for roadway design and VMT in the General Plan and the RAQS. As such, both could conflict with or obstruct implementation of the applicable air quality plan. The Project's and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative's impact to air quality plans would be significant and unmitigated.

The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in reduced criteria pollutant emissions when compared to the Project and is not anticipated to exceed the thresholds. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative is anticipated to result in VMT and speed change that would result in a reduction in overall operational emissions. Neither of the major components of the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative is anticipated to generate CO hot spots or cause significant operational air quality impacts. Long-term operations associated with the Project would exceed annual thresholds of significance for NO_x (i.e., ozone precursor in an ozone nonattainment area) and CO (i.e., CO maintenance area). Air quality emission under the Pedestrian Bike Bridge with

Emergency Access and No Widening of Genesee Avenue Alternative would not exceed criteria pollutant emissions thresholds and would result in less than significant impacts, in contrast to the Project.

9.2.5.5 Greenhouse Gas Emissions

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative is anticipated to result in slightly reduced GHG emissions compared to the Project. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would improve operational capacity with the construction of a pedestrian bike bridge with emergency access. In addition, a grade-separated intersection would be constructed at the intersection of Genesee Avenue and Governor Drive. However, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would not result in GHG emissions resulting from the widening of Genesee Avenue. The Project would reduce GHG emissions on Regents Road without the planned Regents Road Bridge. However, other affected arterials and freeway segments under the Project would experience increases in GHG emissions as a result of rerouted vehicle trips and increased volumes on those segments when compared to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative. Despite the slight reduction in GHG emissions when compared to the Project, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unmitigated at the program level.

9.2.5.6 Energy

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.7 Noise

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in similar noise impacts related to construction when compared to the Project. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in a substantial temporary or periodic increase in existing ambient noise levels at noise-sensitive receptors in proximity to the grade separation construction activities (i.e., earth moving and pile driving) at Genesee Avenue and Governor Drive. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative may result in construction noise impacts to sensitive biological

resources habitat. Therefore, the impacts under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative related to construction would be significant and mitigable when compared to the Project.

Based on the program-level analysis, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would result in greater operational noise impacts when compared to the Project with the construction of the pedestrian bike bridge with emergency access. ADT and peak hour traffic volumes along the Regents Road Corridor are anticipated to increase with the construction of the pedestrian bike bridge with emergency access. Under the Project and as shown in Table 4.7-4, the distance of the 65 dBA CNEL contour from the centerline of the Regents Road Corridor decreases by 43 to 69 feet to the residences With Project compared to With Adopted UCP. Therefore, the removal of the planned Regents Road Bridge from the UCP would not expose people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Impacts under the Project would be less than significant. However, impacts under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative are anticipated to expose people to noise levels that exceed City standards. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would have significant and unmitigated impacts related to established standards/operation with the construction of Genesee Avenue Widening, but would have significant but mitigable impacts related to established standards/operation with the construction of the pedestrian bike bridge.

9.2.5.8 Historical Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.9 Biological Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.10 Geological Conditions

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.11 Paleontological Resources

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.12 Hydrology and Water Quality

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.13 Public Services and Facilities

Given that impacts to emergency service response times under the Pedestrian Bike Bridge with Emergency Access and ~~the~~ No Widening of Genesee Avenue Alternative are anticipated to be similar to the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative, emergency service response times were calculated only for the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative. The Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would improve operational capacity with the construction of a pedestrian bike bridge with emergency access. In addition, a grade-separated intersection would be constructed at the intersection of Genesee Avenue and Governor Drive, which is anticipated to improve operations.

Despite the slight improvement in emergency response times when compared to the Project, the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative is anticipated to experience operational deterioration when compared to the City's target average response times of 7.5 minutes. Response times for all fire stations under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative are anticipated to increase from years 2014 and 2015 average response times. Based on the program-level analysis, impacts associated with emergency service response times under the Project and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would remain significant and unmitigated at the program-level under the Project.

As with the Project, the demand for police services, fire protection, educational services, libraries, and parks resulting from implementation of the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would be similar to those identified for the Project. Both the Project and the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would not include residential

components that could directly increase population and result in an increase in new facilities. Impacts related to construction of new facilities under the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative would not result in a significant impact at the program level, similar to the Project.

9.2.5.14 Public Utilities

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.15 Health and Safety

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.2.5.16 Population and Housing

The analysis provided in the No Project Alternative is applicable to the Pedestrian Bike Bridge with Emergency Access and No Widening of Genesee Avenue Alternative.

9.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative among other alternatives considered. If the No Project Alternative is the environmentally superior alternative, the PEIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 9.0 of the PEIR, the No Construction of Regents Road Bridge and Widening Reconfiguration of Genesee Avenue Alternative would be considered environmentally superior because it would reduce impacts compared to the other proposed alternatives that preserve more open space as it would not construct a bridge structure. This alternative would not involve widening of Genesee Avenue. Instead, the alternative would restripe the existing four-lane roadway to a six-lane roadway. The No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would construct a grade-separated intersection at Genesee Avenue and Governor Drive. All proposed roadway improvements would be within the existing right-of-way. As such, therefore, resulting this alternative would result in fewer impacts to transportation/circulation (roadway segments, freeway segments, and ramps), air quality (operation criteria pollutants), and GHGs, and noise (operation). Implementation of the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would eliminate one of the significant impacts associated with the Project. The No Construction

of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would not result in a significant impact related to noise (Issue 3).

Further, in contrast to other alternatives the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative would result in reduced impacts to land use, historical resources, biological resources, and geological conditions.

However, as with the other alternatives, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would result in greater impacts to ~~land use~~, visual effects and neighborhood character, air quality (construction), ~~energy~~, noise (construction), ~~historical resources, biological resources, geological conditions~~, paleontological resources, hydrology and water quality, public utilities, and health and safety, when compared to the Project.

The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would have similar impacts to the Project in terms of impacts to public services and facilities and population and housing.

Additionally, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative would fulfill three Project Objectives. The No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative evaluates the impacts of the removal of the Regents Road Bridge project from the UCP and would minimize impacts to biological resources at Rose Canyon when compared to the other alternatives because this alternative would not construct a new structure over Rose Canyon, would not widen Genesee Avenue, and would perform all proposed roadway improvements within the existing right-of-way. Lastly, the No Construction of Regents Road Bridge and ~~Widening~~ Reconfiguration of Genesee Avenue Alternative seeks to provide transportation improvements that would result in a reduction in traffic impacts related to roadways, intersections, freeways, and freeway ramp metering due to greater capacity when compared to the Project. Further, the other proposed alternatives, which would result in the construction of either Regents Road Bridge or a Pedestrian Bike Bridge with Emergency Access, would preserve less open space and result in greater impacts to biological resources. Based on the discussion provided above, the No Construction of Regents Road Bridge and Reconfiguration of Genesee Avenue Alternative is selected as the environmentally superior alternative.

CHAPTER 10.0

MITIGATION MONITORING AND REPORTING PROGRAM

~~Section 21081.6 of the CEQA Guidelines requires that a mitigation monitoring and reporting program be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.~~

~~The UCP PEIR, incorporated herein as referenced, focused on issues determined to be potentially significant by the City. The issues addressed in the PEIR include land use; transportation/circulation; visual effects and neighborhood character; air quality; greenhouse gas emissions; energy; noise; historical resources; biological resources; geologic conditions; paleontological resources; hydrology and water quality; public services and facilities; public utilities; health and safety; and population and housing.~~

~~PRC Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for transportation/circulation; air quality; greenhouse gas emissions; noise; and public services and facilities.~~

~~The environmental analysis resulted in the identification of a mitigation framework that would reduce potentially significant impacts. In some cases, the mitigation measures would reduce impacts to below a level of significance. For some of the environmental issue areas noted above, the mitigation measures would reduce the impact, but not to below a level of significance. Specifically, mitigation measures for significant impacts related to transportation/circulation, air quality; greenhouse gas emissions; noise, and public services and facilities were identified, but impacts remain significant and unmitigated, even with adherence to the mitigation framework. No feasible mitigation is available for greenhouse gas emissions; therefore, no mitigation measures are included for this issue area.~~

~~The mitigation monitoring and reporting program for the UCP PEIR is under the jurisdiction of the City and other agencies as specified below. The mitigation monitoring and reporting program addresses only the issue areas identified above as significant. The following is an overview of the mitigation monitoring and reporting program to be completed as part of the UCP PEIR.~~

10.1 TRANSPORTATION/CIRCULATION

10.1.1 Roadway and Intersection Capacity

Impact

Roadways

~~With implementation of the Project, a total of 2120 roadway segments within the traffic study area would degrade to unacceptable operating conditions which exceed the significance thresholds.~~

~~Under the Future Year with Project, the four following roadway segments would result in LOS E or F and these unacceptable operating conditions would not occur under Future Year with Adopted UCP. Thus, the impact at these segments can be specifically attributed to the Project.~~

- ~~● Genesee Avenue: La Jolla Village Drive to Esplanade Court (LOS E)~~
- ~~● Genesee Avenue: Nobel Drive to Centurion Square (LOS F)~~
- ~~● Genesee Avenue: Centurion Square to Governor Drive (LOS F)~~
- ~~● La Jolla Village Drive: Revelle College Drive to Villa La Jolla (LOS E)~~

~~As shown in Table 4.2-9, 14 of the segments that would be operating at unacceptable LOS in the future year would be significantly worse with implementation of the Project as compared to Future Year with Adopted UCP. These 14 segments are considered to have a significant decrease in operation due to an exceedance of the V/C ratio thresholds (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.~~

~~Implementation of the Project would eliminate two significant impacts along two segments of Regents Road:~~

- ~~● SR 52 WB Ramps to SR 52 EB Ramps~~
- ~~● SR 52 EB Ramps to Luna Avenue~~

Intersections

~~With implementation of the Project, 30 intersections would operate at unacceptable LOS operating conditions which exceed the significance thresholds by future year. Some of those intersections currently operate at LOS E or F, but would continue to experience significantly~~

worsened conditions. Some of the intersections would have significant impacts during both the AM and PM peak hours, while others would experience a significant impact during only one of the peak periods.

Under the Future Year with Project, the following intersections would result in unacceptable operating conditions of LOS E or F during the peak period indicated. However, under Future Year with Adopted UCP, these intersections would operate at acceptable LOS. Thus, the impact at these intersections can be specifically attributed to the Project.

- Genesee Avenue/La Jolla Village Drive (PM)
- Genesee Avenue/Nobel Drive (AM)
- Genesee Avenue/Decoro Street (AM)
- Genesee Avenue/Centurion Square (AM and PM)
- Genesee Avenue/Governor Drive (PM)
- Genesee Avenue/SR 52 WB Ramps (AM)
- Genesee Avenue/SR 52 EB Ramps (AM and PM)
- La Jolla Village Drive/I 5 SB Off Ramp (PM)
- Gilman Drive/I 5 SB Ramps (PM)

As shown in Table 4.2-10, 21 of the intersections operating at unacceptable LOS in the future year would be significantly worse during one or both of the peak hours with implementation of the Project as compared to Future Year with Adopted UCP. These 21 intersections are considered to have a significant decrease in operation due to an exceedance of the delay time thresholds for LOS E and F (Table 4.2-8) when comparing the Project to Future Year with Adopted UCP.

Implementation of the Project would eliminate significant impacts that would occur under Future Year with Adopted UCP at three intersections along Regents Road:

- Regents Road/Arriba Street (AM and PM)
- Regents Road/Governor Drive (AM and PM)
- Regents Road/Luna Avenue (AM)

Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project level traffic mitigation measures for discretionary projects. Discretionary Projects with the potential to result in significant traffic impacts are subject to site specific review in accordance with the City's General Plan,

Transportation Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented. However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

~~**MITIGATION MEASURE TRA-1:** Roadway segments shall be enhanced with the following:~~

- ~~● **TRA-1.1: Regents Road from Executive Drive to Genesee Avenue:** Widen the roadway to a four lane Major Arterial with bicycle lanes, including relocation of the Genesee Avenue and Regents Road intersection to the east.~~
- ~~● **TRA-1.2: Miramar Road from I-805 Ramps to 300 feet east of Eastgate Mall:** Widen the roadway to an eight lane Prime Arterial.~~
- ~~● **TRA-1.3: Eastgate Mall from Judicial Drive to Eastgate Drive:** Widen roadway to a four lane Collector with a continuous left turn lane and additional right of way to accommodate bicycle facilities, excluding widening the bridge over I-805.~~
- ~~● **TRA-1.4: Eastgate Mall from Eastgate Drive to Miramar Road:** Widen roadway to a four lane Collector with a continuous left turn lane and additional right of way to accommodate protected bicycle facilities.~~
- ~~● **TRA-1.5: Genesee Avenue from La Jolla Village Drive to Esplanade Court:** Repurpose the right of way to provide for a six lane Prime Arterial with Class II bike facility with buffers.~~
- ~~● **TRA-1.6: Genesee Avenue from Nobel Drive to SR 52 WB Ramps:** Repurpose the right of way to provide for a modified six lane Major Arterial from Nobel Drive to Decoro Street, modified six lane Prime Arterial from Decoro Street to Centurion Square, and modified six lane Major Arterial from Centurion Square to SR 52 WB Ramps with bicycle facilities that include a shared pedestrian bicycle facility~~

accommodated on widened sidewalks or Class II bike facility with buffers as right-of-way permits.

- ~~**TRA-1.7: La Jolla Village Drive from I-5 Northbound Ramps to Towne Centre Drive:** Repurpose the right of way to a 6 lane Prime Arterial. This entails removal of on-street parking and provides acceleration and deceleration lanes at existing driveways.~~
- ~~**TRA-1.8: Genesee Avenue between SR 52 and North Torrey Pines Road:** Implement adaptive traffic control and transit signal priority measures.~~
- ~~**TRA-1.9: La Jolla Village Drive between Torrey Pines Road and I-805:** Implement adaptive traffic control and transit signal priority measures.~~
- ~~**TRA-1.10: Nobel Drive between La Jolla Village Square and Miramar Road:** Implement adaptive traffic control and transit signal priority measures.~~

MITIGATION MEASURE TRA-2: Intersections shall be enhanced with the following:

- ~~**TRA-2.1: Genesee Avenue and John Hopkins Drive (Intersection 2):** Repurpose one of the five westbound through lanes on Genesee Avenue to become a second right-turn lane.~~
- ~~**TRA-2.2: Genesee Avenue and Decoro Street (Intersection 15):** Stripe eastbound and westbound right turn lanes on Decoro Street. On-street parking would need to be removed to add the right-turn pockets.~~
- ~~**TRA-2.3: Genesee Avenue and Governor Drive (Intersection 17):** Construct of a grade separated intersection (removing northbound and southbound through-movements), and construct two northbound and southbound through lanes in the undercrossing.~~
- ~~**TRA-2.4: Genesee Avenue and SR 52 Westbound Ramps (Intersection 18):** Signalize the intersection and square up ramps, adding a protected phase for northbound left turns from Genesee Avenue to the SR 52 ramp, and add a second right-turn lane on the exit ramp.~~

- ~~TRA 2.5: La Jolla Village Drive and Torrey Pines Road (Intersection 21):~~ Relocate the pedestrian crossing from the east leg to the west leg of the intersection and implement signal phasing modification to improve operation.
- ~~TRA 2.6: La Jolla Village Drive Eastbound Ramps and Gilman Drive (Intersection 23b):~~ Signalize the intersection, install a protected southbound left turn phase, and restripe eastbound ramp approach to have a shared left right lane and an exclusive right turn lane.
- ~~TRA 2.7: La Jolla Village Drive and Villa La Jolla Drive (Intersection 24):~~ Construct a second westbound right turn lane from La Jolla Village Drive to Villa La Jolla Drive.
- ~~TRA 2.8: Miramar Road and Eastgate Mall (Intersection 34):~~ Modify the southbound Eastgate Mall approach to have two left turn lanes and one right turn lane.
- ~~TRA 2.9: Gilman Drive and I-5 Southbound Ramps (Intersection 69):~~ Convert one of the westbound through lanes to a second left turn lane.
- ~~TRA 2.10: Towne Center Drive and Eastgate Mall (Intersection 73):~~ Construct a second westbound left turn lane from Eastgate Mall to Towne Centre Drive.
- ~~TRA 2.11: Executive Way and Executive Drive (Intersection 76):~~ Traffic signal modification for eastbound and westbound left turns to be “protected permissive” instead of “permissive.”
- ~~TRA 2.12: Judicial Drive and Eastgate Mall (Intersection 77):~~ Traffic signal modification for northbound and southbound approach of Judicial Drive to be “split-phased” in the traffic signal, and restripe the northbound approach to have a left turn lane, shared left through right lane, and right turn lane.
- ~~TRA 2.13: Governor Drive and I-805 Northbound Ramps (Intersection 79):~~ Install roundabout control at this roadway intersection.

Mitigation Funding, Timing, and Responsibility

The overall responsibility for mitigation monitoring, enforcement, and reporting would be with the City of San Diego. As discussed in Section 4.2 of the PEIR and the Findings, Mitigation Measures TRA 1 and TRA 2 would reduce impacts to the local roadways and intersections of

~~the UCP Area that are associated with the Project. Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments and freeway ramps in the future year. Projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. The proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee; therefore, full funding for the construction of improvements cannot be assured at the time the improvement is needed. Second, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in the CIP; therefore, they have neither been designated as priority projects nor have funding sources been identified. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.~~

10.1.2 Freeway Capacity

Impact

Freeway Segments

~~Deteriorated traffic conditions would result in significant impacts at eight freeway segments with implementation of the Project in the future year and all of these impacts would also be anticipated to occur in the future year under the Adopted UCP.~~

- ~~● I 5: SR 52 to Gilman Drive~~
- ~~● I 805: SR 52 to Governor Drive~~
- ~~● I 805: Governor Drive to Nobel Drive~~
- ~~● I 805: Nobel Drive to La Jolla Village Drive~~
- ~~● I 805: La Jolla Village Drive to Mira Mesa Boulevard~~
- ~~● SR 52: I 5 to Regents Road~~
- ~~● SR 52: Regents Road to Genesee Ave~~
- ~~● SR 52: Genesee Avenue to I-805~~

Freeway Ramps

~~Deteriorated operating conditions would result in significant impacts eight freeway ramps with implementation of the Project in the future year and all of these impacts would also be anticipated to occur in the future year under the Adopted UCP.~~

- ~~● I 5 SB and Gilman Drive~~
- ~~● I 5 SB and Nobel Drive~~
- ~~● I 5 NB and La Jolla Village Drive WB to NB~~

- ~~I 5 NB and La Jolla Village Drive EB to NB~~
- ~~I 5 NB and La Jolla Village Drive WB to SB~~
- ~~I 5 NB and La Jolla Village Drive EB to SB~~
- ~~I 5 NB and Genesee Avenue~~
- ~~I 805 SB and Nobel Drive~~

Thus, the Project would result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp and the impact would be significant.

Mitigation Framework

Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments and freeway ramps in the future year. Thus, impacts at eight freeway segments and eight freeway ramps would remain significant and unmitigated at the program level.

Mitigation Funding, Timing, and Responsibility

Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments and freeway ramps in the future year.

10.1.3 Existing or Planned Transportation System

Impact

There would be significant traffic impacts to roadway segments, intersections, freeway ramps, and freeway segments by future year with implementation of the Project. As described in the analysis above, some transportation impacts would occur regardless of implementation of the Project, and some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP. Even with implementation of Mitigation Measures TRA-1 and TRA-2, significant traffic impacts would still result.

Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation Element; the UCP; and the City's CEQA Significance Determination Thresholds,

through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA-1 and TRA-2) would reduce impacts to and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented. However, the proposed mitigation measure improvements (TRA-1 and TRA-2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.

10.1.4 Circulation Movements

Impact

With implementation of the Project, future traffic conditions would worsen on certain roadway segments, intersections, freeway ramps, and freeway segments by the future year. While some significant transportation impacts would occur regardless of implementation of the Project, some operational deterioration would be worsened by removal of the planned Genesee Avenue Widening and Regents Road Bridge from the UCP.

The Project proposes Mitigation Measures TRA-1 and TRA-2, described in Section 4.2.4.3, that would make alterations to the existing roadway network in an effort to improve areas of poor operation. None of the mitigation measures would substantially change the existing roadway network or circulation movements, but would make adjustments to the existing roadways to improve traffic operations. Even with implementation of the mitigation measures, significant traffic impacts would still result and would present increased difficulty in accessing areas due to poor traffic conditions, including long queues, crowded maneuvering conditions, slow speeds, and other traffic-related delays. While these traffic-related delays would be significant, all public or private locations would still be accessible via the transportation network with implementation of the Project.

Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level traffic mitigation measures for discretionary projects. Discretionary Projects with the potential to result in significant traffic impacts are subject to site-specific review in accordance with the City's General Plan, Transportation Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures

~~TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented. However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.~~

10.1.5 Alternative Transportation

Impact

~~The removal of the planned Regents Road Bridge from the UCP would eliminate the planned crossing of Rose Canyon that would have been designed to accommodate pedestrians and bicyclists. This connection was identified in the Bicycle Master Plan. Because this future linkage would no longer occur with implementation of the Project, the loss of this planned pedestrian and bicycle modes of transit would conflict with adopted policies, plans, or programs supporting alternative transportation modes and the impact would be significant.~~

Mitigation Framework

~~The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project level traffic mitigation measures for discretionary projects. Discretionary projects with the potential to result in significant traffic impacts are subject to site specific review in accordance with the City's General Plan, Transportation Element; the UCP; and the City's CEQA Significance Determination Thresholds, through the discretionary process. If implemented, Mitigation Framework (Mitigation Measures TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented. However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. Therefore, traffic impacts associated with the Project would remain significant and unmitigated at the program level.~~

10.2 AIR QUALITY

10.2.1 ~~Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation~~

Impact

~~The Project would remove planned changes to the physical roadway network that would affect future vehicle circulation on local roadways and freeways. As on road vehicles would need to reroute their trips without the planned Regents Road Bridge, it is anticipated that the Project would affect the ADT volumes on various local roadway segments. Rerouted trips would cause changes to ADT volumes on roadways that would affect the V/C ratios, LOS, and ultimately average vehicle speeds on those roadway segments in the Project area. As shown in Table 4.4-6, the net increase in emissions of ROG, PM₁₀, and PM_{2.5} would not exceed applicable daily or annual thresholds established by the City of San Diego. However, the net increase in emissions of NO_x and CO for the total Project area VMT would exceed the applicable annual thresholds established by the City of San Diego. The impact would be significant.~~

Mitigation Framework

~~Mitigation Measures TRA 1 and TRA 2 provided would reduce impacts to the circulation network of the UCP Area that are associated with the Project. However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. If implemented, Mitigation Framework (Mitigation Measures TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. However, these improvements to the transportation network would also affect criteria air pollutant emissions. Project level analysis of the potential impacts of the proposed mitigation measures will be completed at such a time the improvements are implemented. No additional feasible mitigation is available to reduce impacts associated with the Project. Air quality impacts associated with the Project would remain significant and unmitigated at the program level.~~

10.3 NOISE

10.3.1 Transportation Noise

Impact

The removal of the planned Regents Road Bridge and the Genesee Avenue Widening from the UCP would increase the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor to the residences along the Genesee Avenue Corridor and therefore would expose people along the Genesee Avenue Corridor to future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). This is a potentially significant impact. Therefore, mitigation is required.

Mitigation Framework

The removal of the planned Regents Road Bridge and the Genesee Avenue Widening from the UCP, would increase the distance of the 65 dBA CNEL contour from the centerline of the Genesee Avenue Corridor to the residences along the Genesee Avenue Corridor and, therefore, would expose people along the Genesee Avenue Corridor to future transportation noise levels that exceed standards established in the Noise Element of the General Plan (City of San Diego 2008a). Mitigation Measure NOI-1 shall be implemented in order to reduce the operational noise impacts to a level below significance. However, where effective noise measures cannot be implemented, operational noise impacts would be significant and unmitigated at the program level.

NOI-1 — Implement Noise Control Measures: Prior to the issuance of construction permits, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings; placing HVAC in noise-reducing enclosures; or designing buildings so that no windows face freeways or major roadways may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Prior to the issuance of construction permits, site-specific exterior noise analyses that demonstrate that the Project would not place future residential receptors in

locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Mitigation Funding, Timing, and Responsibility

Development implemented in accordance with the Project that would potentially result in significant noise impacts are provided Mitigation Measure NOI 1, which addresses the significant impacts related to operational noise along the Genesee Avenue Corridor.

10.4 PUBLIC SERVICES AND FACILITIES

10.4.1 Police Protection and Fire/Emergency Services

Impact

The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. The impact on police service response times and fire and emergency response times would be significant.

Mitigation Framework

The Project would result in an increase in projected traffic in the future year, which is substantial in relation to the existing traffic load and capacity of the street system. If implemented, Mitigation Framework (Mitigation Measures TRA 1 and TRA 2) would reduce impacts to the circulation network of the UCP Area and would be referred to the City Council for consideration during review and approval of the Project as part of the amendment to the Transportation Element. Project level analysis of the potential impacts of the proposed mitigation measures would be completed at such a time the improvements are implemented. However, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee or CIP, and, thus, cannot be guaranteed at this time. No additional feasible mitigation is available to reduce impacts associated with the Project. Thus, impacts to emergency service providers would remain significant and unmitigated at the program level.

Mitigation Funding, Timing, and Responsibility

The overall responsibility for mitigation monitoring, enforcement, and reporting would be with the City of San Diego. As discussed in Section 4.13 of the PEIR and the Findings, Mitigation Measures TRA 1 and TRA 2 would reduce impacts to the local roadways and intersections of the UCP Area that are associated with the Project. Feasible mitigation is not available to reduce the significant impacts that would occur along study area freeway segments and freeway ramps in the future year. Projects, including implementation of proposed mitigation measures, tiering off this PEIR would be subject to subsequent environmental review. The proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in any impact fee; therefore, full funding for the construction of improvements cannot be assured at the time the improvement is needed. Second, the proposed mitigation measure improvements (TRA 1 and TRA 2) are not currently included in CIP; therefore, they have neither been designated as priority projects nor have funding sources been identified.

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