

Grantville Focused Plan Amendment  
Final Programmatic Environmental Impact Report

Exhibit B Candidate Findings  
Regarding Final Environmental Impact Report for the  
Grantville Focused Plan Amendment

---

Project Number 346289

SCH NO. 2013111017

May 2015

# I INTRODUCTION

The following Candidate Findings are made for the Grantville Focused Plan Amendment (hereinafter referred to as the "Project"). The environmental effects of the Project are addressed in the Final Environmental Impact Report ("FEIR") dated May 2015 (State Clearinghouse No. **2013111017**), which is incorporated by reference herein.

The California Environmental Quality Act (CEQA) (Pub. Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs. §§ 15000, *et seq.*) promulgated thereunder, require that the environmental impacts of a proposed project be examined before a project is approved. In addition, once significant impacts have been identified, CEQA and the CEQA Guidelines require that certain findings be made before project approval. It is the exclusive discretion of the decision maker certifying the EIR to determine the adequacy of the proposed candidate findings. Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
  - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  - 3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
- (b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

These requirements also exist in Section 21081 of the CEQA statute. The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

Should significant and unavoidable impacts remain after changes or alterations are applied to the project, a Statement of Overriding Considerations must be prepared. The statement provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental effects. Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region- wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed and considered the Final Environmental Impact Report for the Grantville Focused Plan Amendment Project, State Clearinghouse No. **2013111017** (FEIR), as well as all other information in the record of proceedings on this matter, the following Findings of Fact (Findings) are made by the City of San Diego (City) in its capacity as the CEQA Lead Agency. These Findings set forth the environmental basis for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the project.

## **II PROJECT SUMMARY**

### **II.I Project Location**

The proposed Grantville Focused Plan Amendment (FPA) area is located within the Navajo Community Plan area in the City of San Diego and in the County of San Diego. The proposed FPA incorporates an approximately 280-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue, and including several parcels north of Zion Avenue.

### **II.II Project Background**

The City of San Diego has adopted community plans that provide land use development guidelines for property within each community. The proposed FPA area is located within the Navajo Community Planning Area which was adopted in 1982 with subsequent amendments. The Navajo Community Plan is approximately 8,000 acres located in the easterly portion of the City of San Diego. It includes the community areas of Allied Gardens, Del Cerro, Grantville and San Carlos. It is bounded on the north by Mission Gorge, on the east by the cities of El Cajon and La Mesa, on the south by Highway 8 and on the west by the San Diego River channel. The proposed elements of the amendment are discussed below, future development activities within the

proposed FPA would be required to comply with the Navajo Community Plan, Community Plan Amendment, and the City's Land Development Code.

### **II.III Project Description and Purpose**

The proposed FPA consists of four components: (1) a Community Plan Amendment (CPA) to the Navajo Community Plan; (2) including an amendment to the Community Plan Implementation Overlay Zone (CPIOZ) in the Navajo Community Plan; (3) the processing of rezones to implement the plan amendment; and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo planning area. The proposed FPA and rezones would introduce mixed-use residential and commercial development to the Grantville neighborhood, which is currently comprised of predominately industrial and commercial uses. The proposed FPA will set out the long-range vision and comprehensive policy framework for how Grantville could develop over the next 20 to 30 years. The proposed FPA will provide policy direction for future development and has been guided by the citywide policy direction contained in the City of San Diego General Plan (2008).

The following primary objectives support the purpose of the project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in the EIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

- Promote planning, redesign, and development of areas which are underutilized;
- Promote Transit Oriented Development within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles;
- Promote a multi-modal transportation strategy including walkable and bicycle-friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout the community;
- Provide more market-rate and affordable housing opportunities consistent with a land use pattern that promotes infill development and socioeconomic equity;
- Provide an incentive for development within the Grantville Community Plan Implementation Overlay Zone (CPIOZ) by streamlining the permit processing requirements in order to ensure a less costly and time-intensive process;
- Allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions;
- Conserve resource lands and open space; and,
- Facilitate implementation of the San Diego River Park Master Plan.

## III SUMMARY OF IMPACTS

As described in Section 3.0 of the FEIR, the proposed FPA is an amendment to the current adopted 1982 Navajo Community Plan. The proposed FPA is also a component of the City's General Plan as it expresses the General Plan policies in the proposed FPA area through the provision of more site-specific recommendations that implement goals and policies contained within the 10 elements of the General Plan. As such, the proposed FPA sets forth procedures for implementation and provides goals and policies for future development within the portion of the proposed FPA area under the City's jurisdiction.

Controls on development and use of public and private property including zoning, design controls, and implementation of transportation improvements are included as part of the plan implementation program.

The FEIR concludes that the proposed FPA will have **no potentially significant impacts** and require no mitigation measures with respect to the following issues:

- Land Use
  - General Plan Land Use Consistency (except Noise)
  - Navajo Community Plan Consistency
  - Land Development Code
  - Environmental Plan Consistency (MSCP Specific Management Directives for Grantville)
  - San Diego River Park Master Plan
- Transportation/Circulation
  - Traffic Hazards
  - Alternative Transportation
- Air Quality
  - Regional Air Quality Strategy Consistency
  - Sensitive Receptors
  - Odors
- Greenhouse Gas Emissions
  - Consistency with Adopted Plans, Policies, and Regulations
  - Cumulative GHG Emissions
- Hydrology
  - Drainage Patterns

- Visual/Aesthetics
  - Public Views
  - Aesthetic Appearance
  - Bulk and Scale
  - Neighborhood Character
  - Light and Glare
  
- Geology and Soils
  - Geologic Hazards
  - Erosion
  
- Health and Safety
  - Emergency Response and Evacuation Plans
  
- Paleontological Resources
  
- Public Services and Facilities
  - Fire, police services, schools, parkland, and libraries
  
- Public Utilities
  - Energy and Water Usage
  - Landscape Elements
  
- Agricultural and Mineral Resources
  - Conversion of Agricultural Land
  - City and Regional Consequences of Agricultural Land Conversion
  - Mineral Resources

Potentially **significant impacts of the proposed FPA will be mitigated** to below a level of significance with respect to the following issues:

- Land Use
  - MHPA / Land Use Adjacency Guidelines
  - Environmentally Sensitive Lands Regulations
- Transportation/Circulation
  - Traffic generation
- Air Quality
  - Air Quality Standards
- Biological Resources
  - Sensitive Flora and Fauna
  - Sensitive Habitats
  - Wildlife Corridors/Migratory Wildlife
  - Habitat Conservation Plans/MHPA Land Use Adjacency Guidelines
  - Invasive Species
  - Discharging into receiving waters with Environmentally Sensitive Lands or water bodies.
- Hydrology
  - Runoff
- Water Quality
  - Pollutant Discharge
- Historical Resources
  - Prehistoric/Historical Sites
  - Religious or Sacred Uses and Human Remains
  - Archaeological Resources
- Geology and Soils
  - Geologic Stability
- Health and Safety
  - Wildland Fire Hazards
  - Hazardous Waste Exposure to Schools
  - Government Lists of Hazardous Materials Sites
  - Toxic Substances Exposure
- Public Utilities
  - Utilities Systems



**No feasible mitigation measures** are available to reduce impacts to **below a level of significance** for the following issues:

- Land Use
  - General Plan Land Use Consistency: Noise Element
  - Noise Compatibility
- Transportation/Circulation
  - Traffic Load and Capacity
  - Freeway Segments/Ramps
- Air Quality
  - Cumulative Air Pollutant Emissions
  - Particulate Matter
- Noise
  - Exposure of Noise-Sensitive Land Uses
  - Ambient Noise Level Increase

## **IV FINDINGS REGARDING SIGNIFICANT IMPACTS**

### **IV.1 Findings Regarding Impacts That Will be Mitigated to Below a Level of Significance (CEQA §21081(a)(1) and CEQA Guidelines §15091(a)(1))**

The City, having independently reviewed and considered the information contained in the FEIR and the public record for the project, finds, pursuant to Public Resource Code §21081(a)(1) and State CEQA Guidelines §15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project which would mitigate or avoid the significant effects on the environment related to:

- Land Use (Issues 3 and 4)
- Transportation (Issue 2)
- Air Quality (Issue 2)
- Biological Resources (Issues 1-7)
- Hydrology (Issue 1)
- Water Quality (Issue 1)
- Historical Resources (Issues 1-3)
- Geology and Soils (Issue 3)
- Health and Safety Hazards (Issues 1, 2, 4, and 5)
- Public Utilities (Issue 1)

#### **IV.1.1 Land Use (MHPA / Land Use Adjacency Guidelines - Edge Effects)**

##### **IV.1.1.1 Significant Effect**

Implementation of the FPA would introduce land uses adjacent to the MHPA, which would potentially result in a significant impact at the program-level.

##### **IV.1.1.2 Facts in Support of Finding**

The potentially significant impact would be mitigated to below a level of significance by compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations and the implementation of the mitigation measures LU-1 identified in Section 5.1.7 of the FEIR. Implementation of this mitigation framework would require that all subsequent development projects implemented in accordance with the FPA which are adjacent to the MHPA shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts related to compliance with the Land Use Adjacency Guidelines of the MSCP Subarea Plan (SAP). Prior to approval of any subsequent development project in an area adjacent to the MHPA, the City of San Diego shall identify specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA.

##### **IV.1.1.3 Rationale and Conclusion**

The Mitigation framework assures that future projects adjacent to the MHPA comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. This mitigation framework would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.II Land Use (Regulation Consistency – Conflict with Plans for Biological Resources)**

### **IV.I.II.I Significant Effect**

A potentially significant impact could result from a conflict with the purpose and intent of the City's MSCP Subarea Plan, and the Biology Guidelines/Environmentally Sensitive Lands (ESL) regulations. Given the presence of biological resources within and adjacent to the FPA area, implementation of the FPA has the potential to result in significant impacts to biological resources.

### **IV.I.II.II Facts in Support of Finding**

Future development located within or adjacent to MHPA lands would be required to comply with the applicable provisions of the City's MSCP Subarea Plan. For parcels partially constrained by the MHPA, biological impacts would require mitigation at the ratios set forth in Table 5.1-7 in the FEIR. In addition, implementation of the Mitigation Framework as detailed in Mitigation Measures LU-1 in Section 5.1.7 of the FEIR would ensure that any potential impacts to the City's MSCP plan area that may result from future development projects would be reduced to a less than significant level.

### **IV.I.II.III Rationale and Conclusion**

Mitigation framework LU-1 assures that future development project types that are consistent with the FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-1. This mitigation framework would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.III Transportation (Traffic Generation)**

### **IV.I.III.I Significant Effect**

Implementation of the FPA has the potential to generate additional traffic such that traffic levels would exceed specific community plan allocations.

**IV.I.III.II Facts in Support of Finding**

The proposed FPA would be a mixed use transit oriented development (TOD) project that aims to reduce vehicle trips and promote all which is achieved with the support of the existing Grantville Trolley Station. The proposed FPA transportation improvements identified in this study are consistent with the current Navajo Community Plan and the Navajo Public Financing Plan (2013).

As discussed in 5.2.3.1 of the FPA, as based on the calculated trip generation in accordance to the City of San Diego Trip Generation Manual (May 2003), the proposed FPA is calculated to generate approximately 27,360 new ADT with the reduction of 400 inbound trips and the addition of 2,573 outbound trips during the AM peak hour and the addition of 2,201 inbound trips and the reduction of 53 outbound trips during the PM peak hour. Implementation of the proposed FPA would increase density and ultimately result in a significant increase in traffic within the proposed FPA area.

Mitigation measures T-23 through T-26 are included to ensure future development adheres to the proposed FPA's goals. Therefore, with the approval of the amendment to the Navajo Community Plan, and the implementation of Mitigation Measure T-23 through T-26, traffic generation impacts related to the implementation of the proposed FPA would be reduced to a level less than significant.

**IV.I.III.III Rationale and Conclusion**

Development projects that comply with the supplemental regulations for CPIOZ-Type A and the regulations of the underlying zone, and can provide documentation from a California Registered Traffic Engineer stating that the proposed project's traffic volumes are based on the City's trip generation rates and meet one of the criteria found in SDR 1, can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations and do not meet one of the criteria found in SDR 1 shall be subject to discretionary review in accordance with CPIOZ-Type B and the Mitigation Framework as detailed in T-23 through T-26.

T-23 through T-26 would require that Pedestrian Circulation Improvements, Bicycle Circulation Improvements Transit and Transportation Demand Management improvements be implemented in accordance with future development within the FPA area. This mitigation framework would reduce potentially significant impacts for additional traffic generation to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.IV Air Quality (Air Quality Standards)**

##### **IV.I.IV.I Significant Effect**

Future demolition, grading, and construction activities of future development projects allowed under the proposed FPA would generate temporary air pollutant emissions. These emissions could result in a violation of air quality standards or contribute substantially to an existing or projected air quality violation. Potential impacts to air quality standards associated with construction of projects implemented in accordance with the FPA would be significant.

##### **IV.I.IV.II Facts in Support of Finding**

Per the Mitigation Framework for Air Quality Impacts, future development projects within the proposed FPA area would be required to demonstrate compliance with SDAPCD regulations and associated BMPs related to potential construction emissions. In addition, compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors. With adherence to the Mitigation Framework as detailed in Mitigation Measure AQ-1, in Section 5.3.4.3 of the FEIR, the implementation of the FPA would not result in the exceedance of air quality standards. Therefore the impact to air quality standards would be less than significant.

##### **IV.I.IV.III Rationale and Conclusion**

The Mitigation framework assures that future projects adhere to the SDAPCD regulations and comply with the SDMC and implementation of AQ-1. This mitigation framework would reduce potentially significant air quality standards impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.V Biological Resources (Sensitive Flora or Fauna)**

##### **IV.I.V.I Significant Effect**

Implementation of the FPA has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA.

##### **IV.I.V.II Facts in Support of Finding**

All impacts to sensitive biological resources shall be avoided to the maximum extent practicable and minimized when avoidance is not possible. For future development projects that are consistent with the FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that no biological resources are

present, the project can be processed ministerially and would not be subject to further environmental review under CEQA.

Future development which does not comply with CPIOZ Type A shall be subject to review in accordance with CPIOZ Type B and shall implement the biological resources mitigation framework detailed in Section 5.6 of the FEIR and discussed further below. Where impacts are not avoidable or cannot be minimized through project design, site-specific mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures typically employed include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat, or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank.

Mitigation framework BR-1 and BR-2 for impacts to sensitive plants and animals would require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012), and mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012a).

Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo, and the cactus wren are further detailed in mitigation framework BR-1 and BR-2, detailed in Section 5.6.9.1 of the FEIR.

Potentially significant impacts to wetlands would be mitigated through implementation of the Mitigation Framework found in BR-4, detailed in Section 5.4.9.1 of the FEIR.

Potentially significant impacts to sensitive plants and animals would be mitigated to below a level of significance with implementation of the mitigation frameworks in BR-1 to BR-4 and LU-1 identified in Sections 5.1 and 5.6 of the FEIR. Mitigation measures for sensitive biological resources would be determined and implemented at the project-level. Adherence to the recommendations in mitigation framework BR-1 to BR-4 and LU-1 would reduce impacts to sensitive biological resources.

#### **IV.I.V.III Rationale and Conclusion**

Mitigation frameworks BR-1 – BR-4 and LU-1 together would assure that future development implemented in accordance with the FPA would be able to mitigate impacts to sensitive plant and animal species. This mitigation framework would reduce potentially significant impacts to biological resources to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.VI Biological Resources (Migratory Wildlife)**

### **IV.I.VI.I Significant Effect**

Future development, including construction or extension of FPA roadways, utility lines, and/or temporary construction activities, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss and/or fragmentation. Direct or indirect impacts to migratory wildlife nesting, foraging, and movement would be significant.

### **IV.I.VI.II Facts in Support of Finding**

The potentially significant impact would be mitigated to below a level of significance with implementation of the mitigation framework BR-5 under Section 5.6.9.1 of the FEIR. Implementation of mitigation framework BR-5 would require identification of site-specific mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the FPA area, prepared in accordance with City of San Diego Biology Guidelines as further detailed in BR-2 during the discretionary review process.

### **IV.I.VI.III Rationale and Conclusion**

Mitigation Framework BR-5 would assure that future development implemented in accordance with the FPA would be able to mitigate impacts to migratory wildlife. This mitigation framework would reduce potentially significant impacts to biological resources (migratory wildlife) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.VII Biological Resources (Sensitive Habitats)**

### **IV.I.VII.I Significant Effect**

Impacts to Tier I, II, IIIA, and IIIB habitats through implementation of the FPA would be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, and riparian scrub.

### **IV.I.VII.II Facts in Support of Finding**

All impacts to sensitive biological habitats shall be avoided to the maximum extent practicable and minimized when avoidance is not possible. For future projects that are consistent with the FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A, and can demonstrate that no biological resources are present; the

project can be processed ministerially and would not be subject to further environmental review under CEQA.

Future development that does not comply with CPIOZ Type A shall be subject to review in accordance with CPIOZ Type B and shall implement the biological resources mitigation framework detailed in Section 5.6 of the FEIR. Where impacts are not avoidable or cannot be minimized through project design, site-specific mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat, or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank.

The potentially significant impact to sensitive habitat would be mitigated to below a level of significance with implementation of the measures detailed in Mitigation Framework BR-2 under Section 5.6.9.1 of the FEIR. Implementation of mitigation framework BR -2 would require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012), and mitigation implemented for impacts to sensitive upland habitats in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines (City of San Diego 2012a) for all subsequent projects implemented in accordance with the FPA.

#### **IV.I.VII.III Rationale and Conclusion**

Mitigation framework BR-2 would assure that future development implemented in accordance with the FPA would mitigate impacts to sensitive habitat. This mitigation framework would reduce potentially significant impacts to biological resources (sensitive habitat) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.VIII Biological Resources (Wetlands and Discharge into Jurisdictional Waters)**

##### **IV.I.VIII.I Significant Effect**

Impacts to wetlands and other jurisdictional water resources resulting from subsequent development projects implemented in accordance with the FPA would be significant. These sensitive habitats include but are not limited to riparian habitat and the San Diego River.

##### **IV.I.VIII.II Facts in Support of Finding**

All impacts to wetlands and other jurisdictional water resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future



projects that are consistent with the FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A, and can demonstrate that no biological resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.

Future development, which does not comply with CPIOZ Type A, shall be subject to review in accordance with CPIOZ Type B and shall implement the biological resources mitigation framework detailed in Section 5.6 of the FEIR. Where impacts are not avoidable or cannot be minimized through project design, site-specific mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures include resource avoidance, restoration, or creation of habitat; dedication, or acquisition of habitat; or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank.

The potentially significant impact to sensitive habitat would be mitigated to below a level of significance with implementation of the mitigation framework BR-4 under Section 5.4.9.1 of the FEIR. Implementation of mitigation framework would require site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012), and mitigation implemented for impacts to wetlands, vernal pools and other jurisdictional water resources in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines (City of San Diego 2012a) for all subsequent projects implemented in accordance with the FPA.

#### **IV.I.VIII.III Rationale and Conclusion**

Mitigation framework BR-4 would assure that future development implemented in accordance with the FPA would mitigate impacts to wetlands and other jurisdictional water resources. This mitigation framework would reduce potentially significant impacts to biological resources (wetlands, vernal pools and other jurisdictional water resources) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.IX Biological Resources (MSCP)**

##### **IV.I.IX.I Significant Effect**

Implementation of the FPA would introduce land uses adjacent to the MHPA; this is a potentially significant impact at the program-level.

##### **IV.I.IX.II Facts in Support of Finding**

The potentially significant impact would be mitigated to below a level of significance with implementation of mitigation framework outlined in LU-1, detailed in Section 5.1.7

of the FEIR. Implementation of mitigation framework outlined in LU-1 would require that MHPA adjacency impacts be addressed at the project-level, as discussed above under Land Use (MHPA / Land Use Adjacency Guidelines).

#### **IV.I.IX.III Rationale and Conclusion**

Mitigation framework outlined in LU-1 assures that future projects located adjacent to the MHPA would comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. This mitigation framework would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.X Biological Resources (Invasive Plants)**

##### **IV.I.X.I Significant Effect**

The proposed FPA has the potential to indirectly impact vegetation communities through the introduction of invasive plant species into a natural open space area. Permanent indirect impacts could occur from an increase in the amount of edge habitat, which has the potential to increase opportunities for invasive plant species to spread and colonize areas in the MHPA. If uncontrolled, invasive species could significantly impact the integrity of the MHPA in the FPA area.

##### **IV.I.X.II Facts in Support of Finding**

All future projects would be required to implement the MHPA Land Use Adjacency Guidelines and mitigation framework LU-1, detailed in Section 5.1.7 of the FEIR, which require that a development project's landscape plan would not contain any exotic plant/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA.

##### **IV.I.X.III Rationale and Conclusion**

Mitigation framework LU-1 assures that future projects located adjacent to the MHPA would comply with the Land Use Adjacency Guidelines of the MSCP in terms of invasive plant species. This mitigation framework would reduce potentially significant Biological Resources (Invasive Plants) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.XI Hydrology (Runoff)**

### **IV.I.XI.I Significant Effect**

Buildout in accordance with the FPA would have the potential to change surface runoff characteristics including volume of runoff, rate of runoff, and drainage patterns, and could result in alterations to on- and off-site drainage. Therefore, implementation of the FPA has the potential to result in significant direct and indirect impacts associated with runoff and alterations to on-and off-site drainage patterns.

### **IV.I.XI.II Facts in Support of Finding**

Potentially significant impacts associated with increased runoff would be mitigated to below a level of significance with implementation of mitigation framework HYD-1 identified in Section 5.7.3.3 of the FEIR.

HYD-1 would require, prior to approval of future projects implemented under the FPA, the applicant to demonstrate to the satisfaction of the City Engineer that the future project is sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations. Future design of projects shall incorporate all practicable measures in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations, and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

### **IV.I.XI.III Rationale and Conclusion**

The individual actions making up mitigation framework HYD-1 assure that future projects implemented in accordance with the FPA are subject to the requirements of the Storm Water Standards Manual, which includes design of new or improved systems to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the mitigation framework, which requires regulatory compliance as noted above, along with GP and FPA policy compliance for reducing storm water runoff, would ensure that potential impacts to downstream resources would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through regulatory compliance.

## **IV.I.XII Water Quality**

### **IV.I.XII.I Significant Effect**

Future projects constructed during buildout of the FPA could result in impacts to water quality, including discharges to surface or groundwater. Development per the FPA, and

associated runoff, could impact water quality. Grading and exposed soil could result in sedimentation.

#### **IV.I.XII.II Facts in Support of Finding**

The potentially significant impact would be mitigated to below a level of significance with implementation of mitigation framework HYD-1 identified in Section 5.7.3.3 of the FEIR. Implementation of this mitigation framework would require that future projects be sited and designed to minimize impacts on receiving waters, in particular, the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall ensure that any impacts on receiving waters be precluded and, if necessary, mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual. Future projects shall incorporate storm water improvements and water quality protection measures as determined by project-specific water quality reports

#### **IV.I.XII.III Rationale and Conclusion**

These individual actions making up mitigation framework HYD-1 reiterate that future development implemented in accordance with the FPA would be subject to the requirements of the Storm Water Standards, which includes design of new or improved systems to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the mitigation framework detailed in HYD -1, which also requires regulatory compliance, would ensure that potential impacts related to discharges into surface or ground water, alterations to surface or groundwater, increases in pollutant discharges (erosion) and downstream sedimentation would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP and regulatory compliance.

### **IV.I.XIII Historical Resources (Prehistoric/Historic Resources)**

#### **IV.I.XIII.I Significant Effect**

The proposed FPA area includes a recommendation for future evaluation as the FPA area contains resources that are potentially eligible for the City Register and/or the California Register of Historic Resources (CRHR). Future buildout of the proposed FPA area would facilitate future development that has the potential to impact these potentially eligible historic resources. The demolition or substantial alteration of a

resource listed on, or formally determined eligible for, the City Register and/or the CRHR would represent a significant direct impact to historical resources.

#### **IV.I.XIII.II Facts in Support of Finding**

For future development project types that are consistent with the FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A, and can demonstrate that there are no archaeological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA.

Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and shall implement the mitigation framework for Historical Resources, HR-1, detailed in Section 5.9.2.3 of the FEIR.

Mitigation Framework HR-1 would require that the City determine whether the affected building/structure is historically significant as outlined in the Historical Resources Guidelines prior to issuance of any permit for a future development project that would directly or indirectly affect a building/structure in excess of 45 years of age.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. These measures would be detailed in a site-specific report prepared at the project-level.

#### **IV.I.XIII.III Rationale and Conclusion**

HR-1 would require that, for future development within the FPA area that would directly or indirectly affect a building/structure in excess of 45 years, site-specific surveys be conducted to identify any significant on-site historic resources, and if such resources are found, that appropriate measures are taken in accordance with CEQA and the City's Historical Resources Regulations . This mitigation framework would reduce potentially significant impacts to historical resources (prehistoric/historic sites) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

### **IV.I.XIV Historical Resources (Religious/Sacred Uses and Human Remains)**

#### **IV.I.XIV.I Significant Effect**

Impacts to religious or sacred uses in association with construction of future projects implemented in accordance with the FPA would be significant. Future construction or

grading could also expose buried human remains. Potential impacts to human remains associated with construction of projects implemented in accordance with the FPA would be significant

#### **IV.I.XIV.II Facts in Support of Finding**

The mitigation framework for impacts to religious or sacred uses shall implement mitigation framework HR-2, described in detail in Section 5.9.4.3 of the FEIR.

#### **IV.I.XIV.III Rationale and Conclusion**

HR-2 would require that, prior to issuance of any permit that could directly affect an archaeological resources or resources associated with prehistoric Native American activities, site-specific surveys be conducted to identify any significant on-site cultural resources, and if such resources, including sacred sites, are found, that appropriate measures are taken in accordance with CEQA and the City's Historical Resources Regulations. This mitigation framework would reduce potentially significant impacts to historical resources (religious or sacred sites) to below a level of significance. As discussed in HR-2 if human remains are found the appropriate measures would be taken, with the implementation of the mitigation framework the potentially significant impacts of the finding of human remains would be less than significant.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

### **IV.I.XV Historical Resources (Archaeological Resources)**

#### **IV.I.XV.I Significant Effect**

Future grading associated with development per the FPA could also expose buried historical (archaeological) resources and features. Potential impacts to archaeological resources associated with construction of future projects implemented in accordance with the FPA would be significant.

#### **IV.I.XV.II Facts in Support of Finding**

Prior to issuance of any permit for a future development project in the FPA area that could directly affect an archaeological resource, implementation of mitigation framework HR-2 would require , (1) the preparation of a site-specific study to determine the presence of archaeological resources and (2), the appropriate mitigation for any significant resources which may be impacted by a development activity.

#### **IV.I.XV.III Rationale and Conclusion**

HR-2 requires that future development projects implemented in accordance with the FPA conduct site-specific surveys to identify any significant or potentially significant

cultural resources and identify appropriate measures to be undertaken to address potential impacts in accordance with CEQA and the City's Historical Resources Regulation and Guidelines. This mitigation framework would reduce potentially significant impacts to historical resources (archaeological resources) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

#### **IV.I.XVI Geology and Soils (Geologic Stability)**

##### **IV.I.XVI.I Significant Effect**

The FPA area contains geologic conditions, which would pose significant risks for future development if not properly addressed at the project-level. These impacts are associated with geologic instability related to seismically induced landslides, liquefaction, and seismically induced settlement. Unstable geologic conditions represent a potentially significant impact.

##### **IV.I.XVI.II Facts in Support of Finding**

Within the FPA area there are moderate to high geotechnical risk areas. Although no landslides have been mapped in the proposed FPA area, some portions of the proposed FPA area are mapped as having a low to moderate risk for landsliding. In addition, according to the State of California, some portions of the proposed FPA area are classified by the State as being generally susceptible or most susceptible to landsliding. While not mapped, parcels in close proximity to the San Diego River and Alvarado Creek may have a moderate to high potential for liquefaction. The proposed FPA area is underlain by fill (both documented and undocumented), young alluvium, young colluvium, old alluvium, and formational soils of the Mission Valley Formation, Stadium Conglomerate, and Friars Formation. Fill, young alluvium, and young colluvium are not considered suitable in their current state for support of development. The condition of these fills, young alluvium, and young colluvium soils is not known and they may be subject to settlement under foundation loads.

The potentially significant impact would be mitigated to below a level of significance with implementation of the mitigation framework GC-1 identified in Section 5.11.5.3 of the FEIR. Implementation of this mitigation framework generally would require that future projects adhere to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report, prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code (CBC).

**IV.I.XVI.III Rationale and Conclusion**

The individual actions making up mitigation framework GC-1 assure that future development implemented in accordance with the FPA is required to: comply with the recommendations included in a geotechnical report prepared in accordance with City Geotechnical Report Guidelines, the CBC, and the LDC; and would be designed satisfactory to the City Engineer. Implementation of the GP and FPA policies, compliance with established development and engineering standards, as well as strict adherence to the mitigation framework detailed in GC-1, which requires regulatory compliance, ensures that impacts related to geological hazards would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP and regulatory compliance.

**IV.I.XVII Health and Safety Hazards (Wildfire Hazards)****IV.I.XVII.I Significant Effect**

Due to the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. Potential impacts associated with wildfires would be significant.

**IV.I.XVII.II Facts in Support of Finding**

The potentially significant impact would be mitigated to below a level of significance with implementation of mitigation framework HS-1 identified in Section 5.13.2.3 of the FEIR. Implementation of this mitigation framework would require that future projects that are implemented in accordance with the FPA incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations and Landscape Standards pursuant to GP and FPA policies intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 of the LDC, and Chapter 7 of the California Building Code.

**IV.I.XVII.III Rationale and Conclusion**

These individual actions making up mitigation framework HS-1 assure that future projects implemented in accordance with the FPA are required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to GP and FPA policies intended to reduce the risk of wildfires. This mitigation framework would reduce potentially significant impacts associated with wildfire hazards to below a level of significance.



Implementation of this mitigation framework would be assured through regulatory compliance.

## **IV.I.XVIII Health and Safety Hazards (Hazardous Waste Exposure to Schools)**

### **IV.I.XVIII.I Significant Effect**

Several existing schools and/or day care/educational centers are located within the proposed FPA area, and other proposed and/or existing schools may be located within a quarter-mile of the proposed FPA area. The presence of sites compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the FPA area.

### **IV.I.XVIII.II Facts in Support of Finding**

Potentially significant impacts associated with hazardous sites would be mitigated to below a level of significance with the incorporation of the Mitigation Framework as detailed in HS-2 through HS-12, further detailed in Section 5.13.7 of FEIR. Mitigation framework HS-2 through HS-12 generally requires that: 1) a Phase I Site Assessment shall be completed in accordance with federal, state, and local regulations for any property identified on a list compiled pursuant to Government Code Section 65962.5; 2) the project applicant shall retain a qualified environmental engineer to develop a soil and groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater); 3) the applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by the local regulatory agencies (RWQCB/DTSC/DEH); 4) the applicant shall obtain written authorization from the regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation; and 5) all cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction.

### **IV.I.XVIII.III Rationale and Conclusion**

The individual actions that make up mitigation framework HS-2 through HS-12 assure that any potentially significant impacts from future projects would reduce impacts associated with hazardous waste exposure to schools to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP.

## **IV.I.XIX Health and Safety Hazards (Hazardous Sites Government Lists of Hazardous Materials Sites)**

### **IV.I.XIX.I Significant Effect**

The presence of sites on a list compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the FPA area.

### **IV.I.XIX.II Facts in Support of Finding**

Potentially significant impacts associated with hazardous sites would be mitigated to below a level of significance with the incorporation of the Mitigation Framework as detailed in HS-2 through HS-12, which are listed in Section 5.13.7 of FEIR. Mitigation framework HS-2 through HS-12 generally requires that: 1) a Phase I Site Assessment shall be completed in accordance with federal, state, and local regulations for any property identified on a list compiled pursuant to Government Code Section 65962.5; 2) the project applicant shall retain a qualified environmental engineer to develop a soil and groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater); 3) the applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by the local regulatory agencies (RWQCB/DTSC/DEH); 4) the applicant shall obtain written authorization from the regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation; and 5) all cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction.

### **IV.I.XIX.III Rationale and Conclusion**

The individual actions that make up mitigation framework HS-2 through HS-12 assure that all subsequent development projects implemented in accordance with the FPA would ultimately ensure that all existing on-site contamination has been avoided or remediated in compliance with federal, state and local regulations. This mitigation framework would reduce potentially significant impacts associated with hazardous sites to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP and regulatory compliance.

## **IV.I.XX Health and Safety Hazards (Toxic Substances Exposure)**

### **IV.I.XX.I Significant Effect**

Previous agricultural land usage can result in concentrations of constituents of concern (e.g., pesticides, herbicides) in soil and/or groundwater. Agricultural land usage in the proposed FPA area was noted during review of historical aerial photographs. This, along with former industrial sites, would have potentially significant impacts on future development and land uses within the FPA area.

### **IV.I.XX.II Facts in Support of Finding**

Based on the historical urban development of the proposed FPA area, and the length of time since agricultural uses were present within the proposed FPA area, it is not likely that residual agricultural contaminants, if any, would result in a significant impact to future development projects. However, the implementation of Mitigation Framework as detailed in HS-2 through HS-12 would ensure that future development projects would not expose people to toxic substances and a less than significant impact is identified for this issue area.

### **IV.I.XX.III Rationale and Conclusion**

The individual actions that make up mitigation framework HS-2 through HS-12 assure that all subsequent development projects implemented in accordance with the FPA would ultimately ensure that all existing on-site contamination has been avoided or remediated in compliance with federal, state and local regulations. This mitigation framework would reduce potentially significant impacts associated with hazardous sites to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP and regulatory compliance.

## **IV.I.XXI Public Utilities (Utilities Systems)**

### **IV.I.XXI.I Significant Effect**

The buildout of the FPA would include construction, demolition, and /or renovation projects that would potentially have a cumulatively significant impact to solid waste utility systems.

### **IV.I.XXI.II Facts in Support of Finding**

Potentially significant impacts to solid wastes systems would be mitigated to below a level of significance with implementation of the mitigation framework PU-1, identified in Section 5.15.3.3 of the FEIR. Mitigation framework PU-1 generally requires any development that, during demolition, construction, or operation, would generate 60

tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the Environmental Services Department and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable.

#### **IV.I.XXI.III Rationale and Conclusion**

Mitigation framework PU-1 would assure that all subsequent development projects implemented in accordance with the FPA would be required to prepare a Waste Management Plan and ultimately ensure that all solid waste generated does not impact the solid waste utility systems. This mitigation framework would reduce potentially significant impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the FPA's MMRP and regulatory compliance.

### **IV.II B. Findings Regarding Mitigation Measures Which are the Responsibility of Another Agency (CEQA §21081(a)(2)) and CEQA Guidelines §15091(a)(2))**

The City, having reviewed and considered the information contained in the Final EIR and the Record of Proceedings, finds pursuant to CEQA §21081(a)(2) and CEQA Guidelines §15091(a)(2) that there are changes or alterations which could reduce significant impacts that are within the responsibility and jurisdiction of another public agency.

#### **IV.II.I Traffic/Circulation (Capacity)**

##### **IV.II.I.I Significant Impact**

##### **IV.II.I.I.I Freeway Segments**

With implementation of the proposed FPA, four freeway segments would function at LOS E or F, which is a significant impact. The impacted segments are on the following:

- Interstate 15
  - Aero Drive to Friars Road
  - Friars Road to I-8
- Interstate 8:
  - I-15 to Fairmount Avenue

- Fairmount Avenue to Waring Road

#### **IV.II.I.I.II Freeway Interchanges (Ramps and Intersections):**

Implementation of the proposed FPA would result in a significant impact at the following two freeway interchange intersections:

- Friars Road / I-15 NB and Friars Road / I-15 SB Intersection
- Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N. Intersection

#### **IV.II.I.II Facts in Support of Findings**

##### **IV.II.I.I.I.I Freeway Segments**

At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of fair share contribution or transportation demand management (TDM) measures that encourage carpooling and other alternate means of transportation. Fair share contributions could be provided toward the construction of 2 managed lanes along I-15 (between I-8 and SR-163) and proposed I-8 operational improvement (between I-15 and SR-125). Both are projects currently included in the San Diego Association of Governments (SANDAG) Revenue Constrained Regional Transportation Plan (RTP).

##### **IV.II.I.I.I.II Freeway Interchanges (Ramps and Intersections):**

Mitigation that would reduce freeway interchange impacts at I-15/ Friars Road and I-8/ Fairmount Avenue consists of interchange reconfiguration, adding auxiliary lanes, implementation of TDM measures that encourage carpooling, fair share contribution, and other alternate means of transportation.

#### **IV.II.I.I.III Rationale and Conclusion**

##### **IV.II.I.I.I.I.I Freeway Segments**

I-15 NB & SB: Aero Drive to I-8:

The FPA would have a significant impact to I-15 NB and SB from Aero Drive to I-8. The San Diego Association of Governments (SANDAG) 2050 Revenue Constrained Regional Transportation Plan (RTP) proposes the construction of 2 managed lanes along I-15 between I-8 and SR-163. The mitigation framework T-27 through T-30 provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane. However, there is some uncertainty related to the actual development and associated traffic impacts that would materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project level impacts and provide the mechanism to mitigate them through fair share contribution in

addition to the forecast funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. As a result, the FPA significant traffic impact to this freeway segment would remain significant.

I-8 EB & WB: I-15 to Waring Road:

The SANDAG 2050 Revenue Constrained RTP includes operational improvements along I-8 between I-15 and SR-125. The project is expected to be built by 2040. The mitigation framework T-31 through T-34 provides partial mitigation since it improves freeway operation in the vicinity of the project. However, there is some uncertainty related to the actual development and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project level impacts and provide the mechanism to mitigate them through fair share contribution in addition to the forecast funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. As a result, the FPA significant traffic impact to this freeway segment would remain significant.

#### **IV.II.I.III.II Freeway Interchanges (Ramps and Intersections):**

I-15/Friars Road Interchange

Friars Road to Northbound I-15 Ramp

Mitigation measures that would potentially reduce vehicular queuing and freeway ramp metering impacts at this location consists of adding freeway lanes or auxiliary lanes, adding a lane to the freeway on-ramp, implementation of TDM measures that encourage carpooling, and other alternate means of transportation or a combination of these measures. Additional roadway improvements would also be necessary along Friars Road; however, this is infeasible at the program level due to the uncertainty related to the actual development and associated traffic impacts of the FPA that will materialize over time. Future development projects' transportation studies would be able to more accurately identify potential transportation impacts and provide the mechanism to mitigate them through project-specific mitigation including, but not limited to physical improvements, fair share contribution, transportation demand management measures which may be more cost effective than alternative infrastructure improvements, or a combination of these measures. It should be noted that this location is located within the Mission Valley Community Plan, which will be evaluated in more detail in the upcoming Mission Valley Community Plan update. As a result, the FPA significant traffic impact to this roadway segment would remain significant.

Friars Road / I-15 SB Ramps Intersection:

The percentage increase in vehicular trips at this intersection is mainly due to the increase in traffic associated with local and regional growth in the San Diego region. Caltrans is in the process of developing preliminary improvement plans at I-15 and Friars Road for this location. It should also be noted that this location is located within the Mission Valley Community Planning area where it will be evaluated in more detail in the upcoming Mission Valley Community Plan Update. Additionally, there is some uncertainty related to the actual development and associated traffic impacts of the FPA that will materialize over time. Future development projects' transportation studies would be able to more accurately identify potential transportation impacts and provide the mechanism to mitigate them through project-specific mitigation including, but not limited to, fair share contribution, transportation demand management measures, or a combination of these measures. As a result, the FPA's significant traffic impact to this intersection would remain significant.

#### I-8/Fairmount Avenue Interchange

Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N. Intersection:

The I-8/Fairmount Avenue interchange improvement project has been coordinated with Caltrans and divided into three improvement phases. These phases are identified and included in the Navajo PFFP (# T12). Impacts at this location are mainly due to the increase in traffic associated with local and regional growth in the San Diego Region. It is acknowledged that interchange improvements at Fairmount Avenue and I-8 will be needed at this location. However, there is some uncertainty related to the actual development and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify potential transportation impacts and provide the mechanism to mitigate them through Public Facilities Financing Plan (PFFP) and project-specific mitigation – physical improvements, fair share contribution or transportation demand management measures which may be more cost effective than alternative infrastructure improvements, or a combination of these measures. Additionally, SANDAG, in coordination with Caltrans, is currently administering the proposed I-8 Corridor project. This project will assess a set of identified operational improvements between the Sunset Cliffs/Nimitz Boulevard area to the west and the College Avenue/SDSU area to the east including, but not limited to, interchange and ramp modifications that are key components of the future improvement strategy of I-8 Corridor. As part of this analysis, alternative mitigation and access improvements may arise at the I-8 and Fairmount Avenue interchange to enhance overall travel efficiencies at that location. As a result, the FPA significant traffic impact to this intersection would remain significant.

### **IV.III C. Findings Regarding Infeasible Mitigation Measures and Alternatives (CEQA §21081(a)(3) and CEQA Guidelines §15091(a)(3))**

This section includes potentially significant impacts that cannot be mitigated to below a level of significance (Public Resource Code §21081(a)(1) and (3)).

The Project would have significant and unmitigable impacts in the following issue areas:

- Land Use
  - General Plan Land Use Consistency: Noise Element (Issue 1)
  - Noise Compatibility (Issue 2)
- Transportation/Circulation
  - Traffic Load and Capacity (Issue 1)
  - Freeway Segments/Ramps (Issue 3)
- Air Quality
  - Cumulative Air Pollutant Emissions (Issue 3)
  - Particulate Matter(Issue 5)
- Noise
  - Exposure of Noise-Sensitive Land Uses (Issue 1)
  - Ambient Noise Level Increase(Issue 2)

Although mitigation measures are identified in the FEIR that could reduce significant impacts resulting from implementation of the proposed FPA, mitigation measures cannot feasibly be implemented at this time, since the degree of future impacts and applicability, feasibility, specific design, and success of future mitigation measures cannot be adequately known for each specific future project at the program level in such a manner as to avoid conflict with the goals and policies and objectives of the FPA, in particular those relating pedestrians, bicycles, and transit oriented development .. This finding is appropriate because there are no feasible mitigation measures available that would reduce the identified impacts to below a level of significance. “Feasible” is defined in Section 15364 of the CEQA Guidelines to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The CEQA statute (Section 21081) and Guidelines (Section 15019(a)(3)) also provide that “other” considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project objectives or on related public policy grounds.

#### **IV.III.I Land Use – Consistency with the Noise Element**



**IV.III.1.1 Significant Effect****IV.III.1.1.1 General Plan Land Use Consistency: Noise Element**

As discussed in EIR Section 5.5 (Noise), build-out under the proposed FPA could potentially result in the exposure of noise-sensitive land uses to predicted future noise levels that exceed those established in the General Plan or the SDMC. With implementation of Mitigation Measures N-1 through N-6, the significance of these impacts would be reduced; however, impacts would not be reduced to a level less than significant. Therefore, noise impacts to sensitive receptors would remain significant and unmitigable.

**IV.III.1.1.2 Noise Compatibility**

With implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 through N-6, the potential significant noise impacts associated with temporary construction noise and/or operational noise associated with future development projects within the proposed FPA would be reduced, however, not to below a level of significance. Therefore, noise impacts to sensitive receptors would remain significant and unmitigable. The FPA has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts.

**IV.III.1.2 Facts in Support of Finding****IV.III.1.2.1 General Plan Land Use Consistency**

As discussed in Section 5.5.3.1 of the FEIR, buildout under the proposed FPA is estimated to result in a significant noise impact relative to increased noise levels along Fairmount Avenue between Vandever Avenue and Twain Avenue. The General Plan policies provide a framework for supporting future development in existing areas where the urban environment already sustains a higher noise level than less developed areas and would avoid major increases in noise in those less developed areas. These policies, along with adherence to federal, state, and local noise regulations (including the Noise Element of the General Plan and Section 59.5.0101 et seq. of the SDMC), and the implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 and N-6 serve to preclude or reduce significant impacts to a degree, but cannot reduce the noise impact along Fairmount Avenue between Vandever Avenue and Twain Avenue to a level less than significant. Therefore, impacts associated with increased ambient noise are significant at the program level and impacts related to ambient noise remain significant and unavoidable.

**IV.III.I.II. II Noise Compatibility**

The City of San Diego requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan. Traffic-related noise impacts are considered significant if project-generated traffic would result in exterior noise levels exceeding 65 dBA or interior levels exceeding 45 dBA for single and multi-family residences. 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. Because noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses, and the increase in future exterior noise levels is expected to be as high as 3 dBA, the increase in noise levels is considered a substantial permanent increase and a significant impact.

**IV.III.I.III Rationale and Conclusion****IV.III.I.III.I General Plan Land Use Consistency**

Future development implemented in accordance with the FPA would be required to comply with the recommendations included in an acoustical report prepared in accordance with City Acoustical Report Guidelines, the GP, and FPA policies. Strict adherence to the mitigation framework detailed in N-1 through N-6 in Section 5.5.3.3 of the FEIR, which requires regulatory compliance as noted above, would ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the mitigation framework, these impacts may not be reduced to below a level of significance, and therefore, the impacts remain significant and unavoidable. It is not feasible at the program level to determine the level of compliance for future projects implemented in accordance with the FPA. Further evaluation would be required at the project level to identify additional mitigation measures at the time future projects are submitted for review in accordance with the FPA.

**IV.III.I.III.II Noise Compatibility**

As discussed in Section 5.5. Noise, the FPA area has locations where the existing exterior noise levels exceed the 65 dBA level. For these areas any increase in noise by 3 dBA would be significant. The buildout of the FPA would result, in some areas, in the exposure of sensitive noise receptors to an increase in future exterior noise levels as high as 3 dBA. This increase in noise levels is considered a substantial permanent increase and a significant impact.

With implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 through N-6, the potential significant operational noise impacts associated with future development projects within the proposed FPA would be reduced, but would still remain significant. Therefore, noise impacts to sensitive receptors would remain significant and unmitigable.

## **IV.III.II Transportation/Circulation (Capacity)**

### **IV.III.II.I Significant Effect**

For this programmatic analysis, the FPA would result in a significant impact if a roadway segment, intersection, freeway segment, or freeway ramp meter would operate unacceptably in the buildout year. Roadway segments, intersections, and freeway segments are considered to operate acceptably from LOS A to LOS D, and unacceptably at LOS E or F. Metered freeway ramps are considered to operate unacceptably if the delay exceeds 15 minutes and the downstream freeway segment operates at an unacceptable LOS E or F.

#### **IV.III.II.I.I Roadway Segments**

With buildout of the proposed FPA, fifteen roadway segments would have significant impacts. The impacted segments are on the following roadways:

- Friars Road:
  - I-15 NB Ramps to Rancho Mission Road
  - Rancho Mission Road to Santo Road
  - Santo Road to Riverdale Street
- Mission Gorge Road:
  - Rainier Avenue to Vandever Avenue
  - Vandever Avenue to Twain Avenue
  - Twain Avenue to Mission Gorge Place
  - Mission Gorge Place to Fairmount Avenue

- Fairmount Avenue:
  - Vandever Avenue to Twain Avenue
  - Mission Gorge Road to Alvarado Canyon Road
  - Alvarado Canyon Road to I-8 WB Ramps
  - I-8 WB Ramps to I-8 EB Ramps
- Vandever Avenue:
  - Riverdale Street to Mission Gorge Road
- Twain Avenue:
  - Fairmount Avenue to Mission Gorge Road
- San Diego Mission Road:
  - Rancho Mission Road to Fairmount Avenue
- Zion Avenue:
  - Mission Gorge Road to Waring Road

#### **IV.III.II.I.II Intersections**

With implementation of the FPA, seven intersections would be expected to operate at unacceptable levels at the buildout year for at least one of the peak hours, if not both. The FPA would have a significant impact at all nine of these intersections, including seven intersections located within the City of San Diego Jurisdiction and two intersections within Caltrans Jurisdiction. This section will address impacts at intersections within City's jurisdiction. The Freeway Interchanges are discussed above, as they are not within the jurisdiction of the City of San Diego.

- Friars Road / Riverdale Street
- Mission Gorge Road / Zion Avenue
- Mission Gorge Road / Princess View Drive
- Waring Road / Princess View Drive
- Waring Road / Zion Avenue
- Fairmount Avenue / Mission Gorge Road
- Alvarado Canyon Road / Mission Gorge Place

#### **IV.III.II.II Facts in Support of Finding**

##### **IV.III.II.II.I Roadway Segments**

At the program-level, impacts to roadway segments shall be reduced through necessary roadway improvements. Roadway improvements are included in the PFFP for Navajo Community Plan and would be implemented in accordance with future development projects, as conditions of approval or through collection of Development Impact Fees (DIF). In addition, the TIA identified additional potential improvements, or mitigation measures, that are not included as part of the Navajo Public Facility Financing Plan (PFFP). The rationale and conclusions are detailed below.

##### **IV.III.II.II.II Intersections**

The TIA identified potential intersection improvement measures that would be included in the PFFP for Navajo Community Plan and implemented in accordance with future development projects, as conditions of approval or through collection of Development Impact Fees (DIF). The TIA identified additional potential improvements, or mitigation measures, that are not included as part of the Navajo Public Facility Financing Plan (PFFP). The rationale and conclusions for why the additional improvements are not feasible and therefore not included in the FPA are detailed below.

#### **IV.III.II.III Rationale and Conclusion**

##### **IV.III.II.III.I Roadway Segments**

The following roadway segments improvements were identified in the TIA. The improvement or mitigation measure and the rationale for why it is infeasible are detailed below for each of the roadway segments that would be significantly impacted by the FPA.

##### **Friars Road**

- I-15 NB Ramps to Rancho Mission Road: level of service "F".
- Rancho Mission Road to Santo Road: level of service "F".

Impacts at these locations are mainly due to the increase in traffic associated with local and regional growth in the San Diego Region. These roadway segments currently function as seven lane primary arterials and are located within the Mission Valley Community Planning Area. Per Mission Valley Community Plan Circulation Element, the ultimate roadway classification of these two segments is eight lane primary arterial. Widening these roadway segments from seven lanes to eight lanes would require additional right-of-way, which would lengthen pedestrian crossing distances and encroach into an existing slope on adjacent residential properties requiring the construction of a significant retaining wall along the south side of Friars Road between I-15 NB Ramps and Santo Road. Classification of these roadway segments will be

revisited and evaluated in more detail in the upcoming Mission Valley Community Plan Update. Because proposed mitigation is deferred until the Mission Valley Community Plan is updated, the FPA's significant traffic impact to these roadway segments would remain significant and unmitigated.

- Santo Road to Riverdale Street: level of service "F".

No mitigation measures have been identified for this location as this roadway segment is currently built to its ultimate classification per Mission Valley and Navajo Community Plans. As a result, the Grantville FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **Mission Gorge Road**

- Rainier Avenue to Vandever Avenue: level of service "E".
- Vandever Avenue to Twain Avenue: level of service "F".
- Twain Avenue to Mission Gorge Place: level of service "E".

These roadway segments currently function as a four lane collector and are located within the Navajo Community Planning Area. Widening these roadway segments to four lane major is identified in the Navajo PFFP (#T19). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to these segments would remain significant and unmitigated.

- Mission Gorge Place to Fairmount Avenue: level of service "E".

This roadway segment currently functions as a four lane major and is located within the Navajo Community Planning Area. Widening this roadway segment to a six lane major is identified in the Navajo PFFP (#T16). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to

achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **Fairmount Avenue**

- Vandever Avenue to Twain Avenue: level of service "F".

The implementation of a continuous two-way left-turn lane along this segment would fully mitigate the significant traffic impact caused by the project. This roadway improvement project is identified in the Navajo PFFP (#T20). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

- Mission Gorge Road to Alvarado Canyon Road: level of service "F".
- Alvarado Canyon Road to I-8 WB Ramps: level of service "F".
- I-8 WB Ramps to I-8 EB Ramps: level of service "F".

These roadway segments currently function as a four lane major and are located within the Navajo Community Planning Area. Widening this roadway segment to a six lane major would partially mitigate the potential significant traffic impact caused by the project. This improvement project is identified in the Navajo PFFP (#T12). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with

public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **Vandever Avenue**

- Riverdale Street to Mission Gorge Road: level of service "E".

The implementation of a continuous two-way left-turn lane along this segment would fully mitigate the significant traffic impact caused by the project. This roadway improvement project is identified in the Navajo PFFP (#T28). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **Twain Avenue**

- Fairmount Avenue to Mission Gorge Road: level of service "F".

The implementation of a continuous two-way left-turn lane along this segment would fully mitigate the significant traffic impact caused by the project. This roadway improvement project is identified in the Navajo PFFP (#T29). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **San Diego Mission Road**

- Rancho Mission Road to Fairmount Avenue: level of service "F".



This roadway segment currently functions as a two lane collector and is located within the Navajo Community Planning area. Widening the roadway to 4-Lane Collector Street would mitigate project's significant impact, but would require bridge widening over the San Diego River. The widening of this roadway would impact the San Diego River, wetlands, biological resources, and would conflict with the San Diego River Park Master Plan, thereby interfering with one of the objectives of the FPA. Therefore, due to the potential impacts to biological resources, widening of the San Diego Mission Road and bridge widening are not recommended and are not included in any Public Facilities Financing Plan. In addition to the bridge widening, right-of-way acquisition would be needed to widen the roadway which would require encroachment into existing slopes of adjacent properties on both sides of the street. Encroaching into these slopes requires the construction of significant retaining walls which would result in additional impacts that would likely require additional mitigation along with additional economic costs. The costs are currently unknown, have not been accounted for, and are not included in any Public Facilities Financing Plan. Therefore, the FPA's significant traffic impact to this roadway segment would remain significant and unmitigated.

### **Zion Avenue**

- Mission Gorge Road to Waring Road: level of service "F".

***IV.III.II.III.II This roadway segment currently functions as a two lane collector. Widening the roadway to a four lane major street, as recommended in the existing Navajo Community Plan, would mitigate the project's significant impact, but would impact surrounding residential properties, community character, and on-street parking that is heavily utilized in this area. Therefore, widening of this roadway segment is not feasible at this time, as it would conflict with the goals and policies of the Grantville FPA, and the FPA's significant traffic impact to this roadway segment would remain significant and unmitigated.*****Intersections**

The following intersection improvements were included in the TIA. Provided below is a summary of mitigation identified at the interchanges and major intersections significantly impacted by the Grantville FPA and the rationale for why mitigation either does not fully mitigate the impact or is infeasible.

### **Friars Road / Riverdale Street:**

Mitigation for this intersection would restripe the northbound and southbound approaches to provide one left-turn lane, one through lane, and one right-turn lane. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T22). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development

land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Mission Gorge Road / Zion Avenue:**

Mitigation for this intersection would restripe the westbound approach to provide two left-turn lanes and a through/right-turn lane, widen the eastbound approach to provide a dedicated right-turn lane, and remove the east-west split phase to provide protected left-turn phases. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T23). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Mission Gorge Road / Princess View Drive:**

Mitigation for this intersection would restripe the southbound approach to provide a dedicated left-turn lane and a shared right-turn/through lane, remove the split phase, and provide protected left-turn phases. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T24). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes

supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Waring Road / Princess View Drive:**

Mitigation for this intersection would restripe the westbound approach to provide a dedicated right-turn lane and prohibit street parking along the westbound approach. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T25). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Waring Road / Zion Avenue:**

Mitigation for this intersection would restripe the southbound approach to provide a dedicated right-turn lane and prohibit street parking along the southbound approach. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T26). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Fairmount Avenue / Mission Gorge Road:**

Mitigation for this intersection would widen the northbound approach to provide an additional (third) through lane; provide a northbound right-turn overlap phase; widen the southbound approach to provide three through lanes and a dedicated right-turn lane; widen the eastbound approach to provide one left-turn lane, one through lane, and two right-turn lanes with overlap phasing; and remove the east-west split phase to provide protected left-turn phases. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. The Alvarado Canyon Road Realignment Project proposed at this location is identified in the Navajo PFFP (#T12). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

**Alvarado Canyon Road / Mission Gorge Place:**

Mitigation for this intersection would install a traffic signal at this intersection. the mitigation also entails widening of the westbound approach to provide an exclusive right-turn lane; and widening of the eastbound approach to provide a dedicated left-turn lane. The FPA's significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T27). However, this mitigation measure is infeasible at the programmatic level because it would conflict with the Grantville FPA goals and policies. The Grantville FPA should promote transit-oriented development land uses and reinforce an interconnection between development projects and the surrounding public transit system through the physical and functional integration of project components, site design, and pedestrian/bicycle infrastructure. The Navajo Community Plan includes supplemental development regulations requiring new development to achieve this goal. Roadway and intersection widening could decrease walkability and integrated design, thus impede the incorporation of transit oriented- development. The measure would be inconsistent with public policy and regulation and, as a result, the FPA's significant traffic impact to this segment would remain significant and unmitigated.

### **IV.III.III Air Quality**

#### **IV.III.III.I Significant Effect**

##### **IV.III.III.I.I Long-Term Cumulative Impacts**

Long-term emissions associated with future development in the proposed FPA area would be those associated with mobile, area, and energy sources. Future development of the proposed FPA area would add 8,275 residential dwelling units and 524,200 square feet of commercial space. The long-term emissions take into account the removal of existing on-site industrial and commercial uses (1,114,500 square feet of industrial space and 162,900 sf of commercial space).

As discussed in the Noise section, the San Diego Air Basin (SDAB) is currently in Federal non-attainment for ozone (1-hour) and State non-attainment for ozone (1- and 8-hour), PM<sub>10</sub>, and PM<sub>2.5</sub>. Ozone is not emitted directly but forms in the atmosphere by a photochemical reaction between nitrogen oxides and reactive organic gases. As such, it is difficult to quantify future ozone emissions. However, estimated emissions of ozone precursors such as nitrogen oxides and reactive organic gases can be used to indicate the potential for ozone formation in the atmosphere. According to the data presented in Table 5.3-8, implementation of the proposed FPA would result in total emissions of 351.7 pounds per day of ROG<sub>s</sub> at buildout, which is a net increase of 219.2 pounds per day when compared to the ROG emissions from existing land uses. The net new long-term ROG emissions that would result from implementation of the proposed FPA would be cumulatively considerable, and potential air quality impacts would be considered significant. In regards to NO<sub>x</sub>, implementation of the proposed FPA would result in total emissions of 204.0 pounds per day of NO<sub>x</sub> at buildout, which is a net decrease of 9.5 pounds per day when compared to the NO<sub>x</sub> emissions from existing land uses.

Furthermore, implementation of the proposed FPA would also result in total emissions 1,758.8 pounds per day of CO, which is a net increase of 799.5 pounds per day when compared to CO emissions from existing land uses. Although the SDAB is currently in federal and state attainment for CO, the net new long-term emissions of CO that would result from implementation of the proposed FPA would be cumulatively considerable, and potential air quality impacts would be considered significant.

##### **IV.III.III.I.II Particulate Matter**

In addition to the pollutants discussed above, the SDAB is in State non-attainment for PM<sub>10</sub> and PM<sub>2.5</sub>. Both PM<sub>10</sub> and PM<sub>2.5</sub> are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. Specifically, the small particulates (PM<sub>10</sub>) generally come

from windblown dust and dust kicked up from mobile sources. The fine particulates (PM<sub>2.5</sub>) are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Implementation of the proposed FPA would result in total emissions of 294.0 pounds per day of PM<sub>10</sub> at buildout, which is a net increase of 176.5 pounds per day when compared to PM<sub>10</sub> emissions from existing land uses. In regards to PM<sub>2.5</sub>, implementation of the proposed FPA would result in total emissions of 85.0 pounds per day of PM<sub>2.5</sub>, which is a net increase of 51.3 pounds per day when compared to PM<sub>2.5</sub> emissions from existing land uses. The net new long-term PM<sub>10</sub> and PM<sub>2.5</sub> emissions that would result from implementation of the proposed FPA would be cumulatively considerable, and potential air quality impacts would be considered significant.

#### **IV.III.III.II Facts in Support of Finding**

##### **IV.III.III.II.1 Long-Term Cumulative Impacts**

The FPA would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions used to develop the SDAPCD RAQS. While it cannot be estimated what the total air emissions would be at buildout, as air emissions from the future individual developments within the FPA area cannot be adequately quantified at this time, cumulative long-term air quality impacts would be significant at the program-level. The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future development projects implemented in accordance with the FPA. The City's process for the evaluation of development projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and FPA. In general, implementation of the policies in the FPA and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be 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 shall be included in an MMRP for future development projects implemented in accordance with the FPA. Mitigation framework AQ-1 through AQ-2 shall be implemented to reduce project-level operational impacts. These measures shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

**IV.III.III.II Particulate Matter**

The development of new projects would result in the generation of particulate matter and would be required to evaluate impacts. The estimated emissions of PM<sub>10</sub> and PM<sub>2.5</sub> at buildout would exceed the threshold established by the City of San Diego. Therefore, at the program-level, impacts would be significant.

**IV.III.III.III Rationale and Conclusion****IV.III.III.III.I Long-Term Cumulative Impacts**

While the mitigation framework provided in the FEIR, along with compliance with FPA policies, would reduce long-term cumulative impacts, future projects may not be able to reduce air emissions below the City's project-level thresholds. It is not feasible at the program level to determine the level of compliance for future projects implemented in accordance with the FPA. Therefore, impacts would remain significant and unavoidable at the program-level.

**IV.III.III.III.II Particulate Matter**

While the mitigation framework identified in Section 5.3.5.4 of the FEIR would reduce the potential impacts associated with generation of particulate matter, estimates show that the total amount of particulate matter generated would exceed the threshold of significance. It is not feasible at the program level to determine the level of compliance for future projects implemented in accordance with the FPA. Therefore, impacts related to exposure to particulate matter would be significant and unavoidable.

**IV.III.IV Noise****IV.III.IV.I Significant Effect****IV.III.IV.I.I Ambient Noise Level Increase**

As discussed in Section 5.5.4.1 of the FEIR, buildout of the proposed FPA could potentially result in a substantial increase in the existing ambient noise levels in excess of 3.0 dBA within the northern segments of the Fairmount Avenue corridor, which already have exterior noise in excess of 65 dBA. Therefore, the increase in noise levels within this area would be considered a substantial permanent increase to ambient noise levels and a significant impact.

**IV.III.IV.II Facts in Support of Finding****IV.III.IV.II.I Ambient Noise Level Increase**

The City's 2011 Significance Determination Thresholds state that a change in the ambient noise level of less than 3 dBA is not perceptible to the general population, and

therefore, would not constitute “a substantial increase.” A noise increase of 3 dB or greater would be substantial and therefore, result in a potentially significant impact.

Anticipated ambient noise levels would be driven primarily by traffic noise sources. Increases in traffic noise gradually degrade the ambient noise environment, especially with respect to sensitive receptors. As discussed in Section 5.5.3.1, traffic would be the primary noise source associated with existing and future development within the proposed FPA area. Traffic volumes and related noise levels throughout the area are projected to increase as a result of implementation of the proposed FPA. Future year noise levels based on projected peak hour traffic volumes would increase somewhere in the range of 0 to 3 dBA throughout the proposed FPA area. The ambient noise level is predicted to exceed 3 dBA along the Fairmount Avenue corridor near the Vandever/Twain Avenue intersections.

Noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses; thus, existing and future residents would be exposed to noise levels that exceed the City of San Diego standards. This would be a significant impact as defined in Appendix G, Section XII, Noise (a) of the CEQA Guidelines. As noted above, when existing noise levels exceed 65 dBA, project-related noise levels would have to increase by 3 dBA or more for the increase to be considered significant. This is projected to occur within the northern segments of the Fairmount Avenue corridor.

Build-out under the proposed FPA would result in a significant impact to ambient noise levels. The General Plan policies provide a framework for supporting future development in existing areas where the urban environment already sustains a higher noise level than less developed areas and would avoid major increases in noise in those less developed areas. These policies, along with adherence to federal, state, and local noise regulations (including the Noise Element of the General Plan and Section 59.5.0101 et seq. of the SDMC), and the implementation of Mitigation Measure N-1 and N-6 described in the FEIR, serve to preclude or reduce significant impacts to a degree, but cannot reduce noise impacts along Fairmount Avenue between Vandever Avenue and Twain Avenue to a level less than significant. Therefore, impacts associated with increased ambient noise are significant at the program level. The impact related to ambient noise remains significant and unavoidable.

#### **IV.III.IV.III Rationale and Conclusion**

##### **IV.III.IV.III.I Ambient Noise Level Increase**

Future development implemented in accordance with the FPA would be required to comply with the recommendations included in an acoustical report prepared in accordance with City Acoustical Report Guidelines, the GP and FPA policies. Strict adherence to the mitigation framework detailed in Mitigation Measure N-1 and N-6 in Section 5.5.3.3 of the FEIR, which requires regulatory compliance as noted above,



would ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the mitigation framework, these impacts may not be reduced to below a level of significance, and therefore, the impacts remain significant and unavoidable.

#### **IV.IV D. Findings Regarding Alternatives (CEQA § 21081(a)(3) and CEQA Guidelines §15091(a)(3))**

Because the proposed project would cause one or more unavoidable significant environmental effects, the City must make findings with respect to the alternatives to the proposed project considered in the FEIR, evaluating whether these alternatives could feasibly avoid or substantially lessen the proposed project's unavoidable significant environmental effects while achieving most of its objectives (listed in Section II.C above and Section 3.2 of the FEIR).

The City, having reviewed and considered the information contained in the FEIR and the Record of Proceedings, and pursuant to Public Resource Code §21081(a)(3) and State CEQA Guidelines §15091(a)(3), makes the following findings with respect to the alternatives identified in the FEIR (Project No. 30330/304032/SCH No. 2004651076):

Specific economic, legal, social, technological, or other considerations, including considerations of the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the FEIR as described below.

"Feasible" is defined in Section 15364 of the CEQA Guidelines to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The CEQA statute (Section 21081) and Guidelines (Section 15019(a)(3)) also provide that "other" considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project objectives or on related public policy grounds.

##### **IV.IV.I Background**

The EIR for the proposed FPA conducted an initial review of four alternatives, one of which was subsequently eliminated from further study. The reasons this alternative was eliminated from detailed evaluation are discussed in the FEIR.

Three alternatives received a detailed analysis in the FEIR:

- No Project (Current Adopted Community Plan);
- Reduced Density (<43 dwelling units [du]/acre); and
- Reduced Density (<73 du/acre).

These three project alternatives are summarized below, along with the findings relevant to each alternative.

#### **IV.IV.II No Project (Adopted Community Plan) Alternative**

The No Project Alternative is the continued implementation of the adopted 1982 Navajo Community Plan, consistent with CEQA Guidelines Section 15126.6(e)(3)(A). The land use plan for the No Project Alternative incorporates several recent “clean-up” items that are not reflected on the land use plan for the adopted 1982 Navajo Community Plan. Those changes, which more accurately depict the current conditions, have been incorporated into the No Project Alternative land use plan analysis.

##### **IV.IV.II.I Potentially Significant Effects**

The No Project Alternative consists of continued implementation of the adopted 1982 Navajo Community Plan, consistent with CEQA Guidelines Section 15126.6(e)(3)(A). Compared to the FPA, the No Project Alternative would not implement the City of Villages concept of the General Plan and Strategic Framework Element to the same extent as the proposed FPA. Specifically, the No Project Alternative would not include a rezone and CPIOZ in Grantville to provide design standards to ensure high-quality development which supports walkability, strengthens connectivity and enhances community identity. Thus, because the No Project Alternative (Adopted Community Plan) would conflict with adopted land use plans, policies, or ordinances, it would not provide the same level of land use benefits as the proposed FPA. In addition, under this alternative, incompatible land uses would continue to be allowed under current zoning, and new incompatibilities would be more likely to result over time. In addition, under this alternative, the additional potential 109 dwelling units per acre would not be permitted and consequently it would result in less intensity of uses. As such, land use impacts under the No Project Alternative (Adopted Community Plan) would be greater than the proposed FPA.

**Health and Safety:** Future development consistent with the No Project Alternative (Adopted Community Plan), as with the proposed FPA, may result in significant impacts if such development allows greater contact between humans and hazards or retains industrial/heavy commercial uses adjacent to more sensitive uses. In either case, potential significant impacts would occur with construction where soil and/or groundwater have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases from USTs, or other sources.

**Hydrology and Water Quality:** Future development projects associated with the implementation of the proposed FPA area would result in a beneficial impact to hydrology and no significant adverse impacts have been identified. The total site discharge would be reduced by decreasing the amount of impervious surfaces from

that of the existing condition. Additionally, existing and proposed flows would be routed to on-site detention basins or bioretention facilities, which increase the time of concentration providing smaller intensities of flow. Adverse impacts to hydrology and water quality under the No Project Alternative (Adopted Community Plan) would be more significant than those from the proposed FPA.

**GHG Emissions:** Future projects implemented under the No Project Alternative (Adopted Community Plan) would not benefit from the additional GHG-reducing features identified in the proposed FPA policies (Section 5.4) beyond the reductions mandated under existing codes and regulations. Under the proposed FPA, project-level GHG reduction design features are available that could reduce business-as-usual (BAU) GHG emissions to 28.3 percent or greater relative to BAU, which would meet the City's GHG reduction goal. In addition, implementation of the No Project Alternative (Adopted Community Plan) would not benefit from the proposed Mobility, Urban Design, and Conservation elements of the proposed FPA, which include specific policies that require dense, compact, and diverse development; encourage highly efficient energy and water conservation design; increase walkability and bicycle and transit accessibility; increase urban forestry practices and community gardens; decrease urban heat islands; and increase climate sensitive community design. These proposed policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in community-wide GHG emissions relative to BAU. Therefore, GHG impacts would be greater under the No Project Alternative (Adopted Community Plan) compared to the proposed FPA.

**Public Utilities:** Under the No Project Alternative (Adopted Community Plan), the provision of public utilities would be implemented as detailed in the current PFFP. However, utility upgrades may be required as growth occurs. The proposed FPA updates the PFFP to address the current and future needs of the community.

**Air Quality:** Air Quality impacts would be similar under the No Project Alternative (Adopted Community Plan) compared to the proposed FPA.

**Noise:** Under this alternative, noise sources, such as transportation and construction noise, would continue to exist. Similar to the proposed FPA, future construction activities related to the existing plan would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Compliance with the City's standards and codes, along with other federal, state, and local regulations, is required of all projects. The Noise Element of the proposed FPA provides goals and policies to ensure location of compatible land uses and includes noise abatement measures for existing and new uses to protect people living and working in the project area from an excessive noise environment. Since the existing land use plan and zoning do not provide measures to the extent that would be provided by the proposed FPA and may not provide the same level of benefit to the community, future projects

subject to discretionary review would need to demonstrate conformance with existing noise regulations, plans, and policies. Therefore, noise impacts under the No Project Alternative (Adopted Community Plan) would be similar the proposed FPA.

**Transportation/Circulation:** Buildout of the FPA area in accordance with the existing Navajo Community Plan would result in reduced transportation impacts compared with the proposed FPA. The existing Community Plan's total number of housing units at buildout would be significantly less due to the lack of the rezone. Although the existing Community Plan's Circulation Element differs from that of the proposed FPA, both of the plans include recommendations and policies to address transportation related issues. Because of the potential reduction in units due to the subtraction of the rezone, impacts for this alternative would be reduced but still significant and unavoidable compared to the proposed FPA. The No Project Alternative (Adopted Community Plan) would not provide the benefits of reduced vehicle miles travelled and GHG emissions reduction that would be achieved by the synergy of mixed use, transit-oriented development around the Grantville Trolley (Transit) Station provided by the proposed FPA.

**Biology:** Future development activities that would be allowed with the existing Community Plan or proposed FPA have the potential to result in direct and indirect impacts to biological resources due the fact that portions of the proposed FPA are either in or adjacent to the MSCP Subarea. However, under the No Project Alternative (Adopted Community Plan), compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations would ensure impacts would be less than significant because the use in the area would not intensify and additional impacts would not occur. Overall, impacts to biological resources would be less compared to the FPA.

**Water Quality:** Similar to the processing of a project under the existing No Project Alternative (Adopted Community Plan), implementation of the proposed FPA is not expected to have a significant impact on water quality. Future development projects within the proposed FPA area would be required to adhere to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of construction and post-construction BMPs; and, compliance with the California BMP Handbook.

**Public Services:** The demand on public services resulting from the No Project Alternative (Adopted Community Plan) would potentially be less than the proposed FPA due to current zoning. However, the increased demand based on the proposed zoning under the proposed FPA would be less than significant. Any impacts related to police protection, fire/life protection, libraries, schools, park and recreational facilities, and roadways would be mitigated by mandated developer impact fees and fair share contributions. Therefore, because the No Project (Adopted Community Plan)

Alternative could result in fewer residents due to current zoning, it can be assumed that the demand for public services would be less, compared to the proposed FPA.

**Utilities:** The need for additional sewer, water, energy and solid waste systems under the existing land use plan would be less as compared to the proposed FPA. However, the increased demand based upon the rezoning per the proposed FPA would be negligible. As noted previously, the Navajo Community Plan does not contain the benefits and polices of the updated 2008 General Plan. The General Plan Conservation Element discusses water resources management and the Public Facilities and Service Element evaluates growth and its effects upon infrastructure. These elements are fundamental to maintaining public utilities in response to the growing community. Therefore, because the existing plan does not have the benefits of an updated PFFP and the recommendations from the updated General Plan Public Facilities and Service Element, impacts to Public Utilities would be greater with the No Project Alternative compared to the proposed FPA.

Compared to the proposed FPA, the No Project Alternative (Adopted Community Plan) would not avoid or substantially reduce the significant effects of the project with respect to land use (noise), transportation/circulation, air quality, and noise. While the No Project Alternative would result in lower population at build-out, land use, greenhouse gas emissions, visual effects/neighborhood character, and public utility impacts would be greater compared to the proposed FPA.

The No Project (Adopted Community Plan) Alternative would not meet a substantial portion of the proposed FPA's objectives. Specifically, it would not accomplish the smart growth principles through the provision of high-density and affordable residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services to the same degree as the proposed FPA. In addition, the No Project (Adopted Community Plan) Alternative would not address the current co-location of incompatible uses associated with heavy industrial uses near sensitive receptors. Selection of the No Project alternative would allow industrial uses throughout the community, but at a cost to the community character and potential health of residents where incompatible uses are allowed to coexist. The No Project (Adopted Community Plan) Alternative would not result in programs or processes that could incentivize development in the TOD area, such as the ministerial review and streamlined permitting. Finally, this alternative would not support a multi-modal transportation strategy in the community or the City as a whole.

#### **IV.IV.II.II Findings and Supporting Facts**

While adoption of the No Project (Adopted Community Plan) Alternative would allow future development to proceed in accordance with the adopted community plan, adoption of this alternative would not achieve important project objectives to:

- Promote a Transit Oriented Development within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles;
- Promote a Multi-Modal Transportation Strategy: Including walkable and bicycle-friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout the community;
- Provide more market-rate and affordable housing opportunities consistent with a land use pattern that promotes infill development and socioeconomic equity;
- Provide an incentive for development within the Grantville Community Plan Implementation Overlay Zone by streamlining the permit processing requirements in order to ensure a less costly and time-intensive process; and,
- Allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions.

Therefore, because this alternative fails to meet multiple project objectives, and failure to meet even a single objective would be sufficient for rejection of the alternative, this alternative is considered infeasible.

#### **IV.IV.III Reduced Density Alternative (<43 du/acre)**

Similar to the proposed FPA, the Reduced Density Alternative (<43 du/acre) would include an amendment to the Navajo Community Plan. Therefore, Alternative (<43 du/acre) would amend the zoning types, in accordance with the proposed FPA, but would call for a maximum of 43 du/acre. Implementation of this alternative would provide 5,237 units, reducing the total number of proposed residential units in the FPA by approximately 37 percent (3,038 units). Fewer residential units would also reduce the number and size of new dwelling units available in the community. The zoning of the Reduced Density Alternative (<43 du/acre) would be similar to the zoning described in the proposed FPA; however, the community commercial zoning would be reduced to just CC-2-5 and CC-3-6, eliminating the CC-3-8, CC-3-9 that would be allowed by the proposed FPA.

The permitted densities under the Reduced Density Alternative (<43 du/acre) are consistent with the City of San Diego's Transit Oriented Development (TOD) Guidelines. Densities under this alternative are assigned based on proximity to future transit (i.e., areas closest to transit would have a density of 25 du/ac, areas slightly further away would have a density of 12 du/ac, and areas well beyond transit service would have a density of 7 du/ac.).

##### **IV.IV.III.I Potentially Significant Effects**

Implementation of the Reduced Density Alternative (<43 du/acre) would not avoid any of the significant and unavoidable impacts of the FPA (i.e., land use [noise], air quality,

traffic/circulation [capacity], and noise [operational]). However, this alternative would generate fewer ADT due to the reduced intensity of residential development within the villages, and thus impacts from traffic congestion (such as, air quality emissions and noise, and greenhouse gas emissions) would be incrementally reduced from the FPA.

The Reduced Density Alternative (<43 du/acre) also lessens the intensity of residential development. Greater density within the village areas, such as that proposed under the FPA, better implements General Plan and FPA goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The Reduced Density alternative would allow for more suburban-type development, which would be more auto-centric, and contribute to, rather than reduce GHG impacts.

Although this alternative would reduce density, the development footprint within the FPA would remain generally the same, and therefore, result in similar areas requiring grading and ground disturbance as with the FPA. Therefore, this alternative would have similar, or, in some cases, fewer impacts to biological resources, historical resources, hydrology/water quality, human health/public safety/hazardous materials, utilities (including solid waste), and paleontological resources depending on the location and development footprint. As with the FPA, with the exceptions noted below, strict adherence to the applicable mitigation framework for each applicable issue area would reduce potential impacts to below a level of significance.

#### **IV.IV.III.II Finding and Supporting Facts**

The Reduced Density Alternative (<43 du/acre) would not result in additional significant impacts beyond those previously disclosed for the proposed FPA. Impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational), would be incrementally less with the reduction in overall density of development, but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar compared to the proposed FPA. However, the Reduced Density Alternative (<43 du/acre) would not meet all of the proposed FPA's objectives. Fewer residential units would also reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year 2020. This alternative would reduce potential housing development in the proposed FPA area by 37%, forcing the city to find other areas to accommodate more housing.

#### **IV.IV.IV Reduced Density Alternative (<73 du/acre)**

The Reduced Density Alternative (<73 du/acre) would reduce the density and intensity of development compared to the proposed FPA by more than 30 percent. The distribution of land uses would otherwise be consistent with the proposed FPA. This

alternative would slightly reduce project impacts associated with the intensity of uses, and any corresponding significant impacts that would result.

Similar to the proposed FPA, this alternative would include the amendment to the Navajo Community Plan. Therefore, this alternative would amend the zoning types, in accordance with the proposed FPA, but would call for a maximum of 73 du/acre. This scale of reduction would likely result in fewer multi-family residential units, as well as less intense commercial and industrial development. Impacts to land use under this alternative would not be consistent with the increased density goals proposed in the FPA and the land use impacts to development goals would be greater than the proposed Navajo Community Plan. Implementation of this alternative would provide 7,356 units, reducing the total number of proposed residential units by approximately 919 units, or approximately 11 percent fewer units. The zoning of the Reduced Density Alternative (<73 du/acre) would be similar to the zoning described in the proposed FPA; however, more types of community commercial zoning (CC-2-5, CC-3-6, CC-3-8, CC-3-9) would be implemented with the proposed FPA, while only CC-2-5, CC-3-6, and CC-3-8 would be implemented with this Alternative.

#### **IV.IV.IV.1 Potentially Significant Effects**

Implementation of the Reduced Density Alternative (<73 du/acre) would not avoid any of the significant and unavoidable impacts of the FPA (i.e., land use [noise], air quality, traffic/circulation, and noise [operational]). However, this alternative would generate fewer ADT due to the reduced intensity of residential development within the villages, and thus impacts from traffic congestion (such as, air quality emissions and noise) would be incrementally reduced from the FPA. Impacts associated with hazardous materials would be slightly less under the Reduced Density Alternative (<73 du/acre).

The Reduced Density Alternative (<73 du/acre) also lessens the intensity of residential development. Greater density, such as that proposed under the FPA, better implements General Plan and FPA goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The Reduced Density Alternative (<73 du/acre) would allow for more suburban-type development, which would be more auto-centric, and contribute to, rather than reduce GHG impacts.

Although this alternative would reduce density, the development footprint within the FPA would remain generally the same, and therefore, result in similar areas requiring grading and ground disturbance as with the FPA. Therefore, this alternative would have similar, or, in some cases, fewer impacts to biological resources, historical resources, hydrology/water quality, human health/public safety/hazardous materials, utilities (including solid waste), and paleontological resources depending on the location and development footprint. As with the FPA, with the exceptions noted below, strict



adherence to the applicable mitigation framework for each applicable issue area would reduce potential impacts to below a level of significance.

#### **IV.IV.IV.II Finding and Supporting Facts**

The Reduced Density Alternative (<73 du/acre) would not result in additional significant impacts beyond those previously disclosed for the proposed FPA. Impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational), would be incrementally less with the reduction in overall density of development, but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar compared to the proposed FPA. However, the Reduced Density Alternative (<73 du/acre) would not meet all of the proposed FPA's objectives. Incrementally fewer residential units would reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year 2020. The Reduced Density (<73 du/acre) Alternative would reduce potential housing development in the proposed FPA area by 11%, forcing the city to find other areas to accommodate more housing.